

*School Performance Review  
Protocols*

**December 2014**

**Legislative Budget Board**

***DISTRICT  
LEADERSHIP,  
ORGANIZATION  
AND  
MANAGEMENT***



# ***1. District Leadership, Organization and Management***

A district's governance structure, staff management and planning process provide the foundation for effective and efficient education of students. The board and superintendent function as a leadership team to meet student needs. The board sets goals, objectives and policies for school district operations and approves the plans and funding needed to achieve the district's goals and objectives. The superintendent manages district operations and recommends the staffing levels and amount of resources necessary to carry out the board goals and directives developed through the planning process. The District Leadership, Organization and Management chapter evaluates the effectiveness and efficiency of the district's organization and leadership in the following areas:

- 1.A. Board Governance
- 1.B. Board Meetings
- 1.C. Board Policies
- 1.D. District Management
- 1.E. Procedures
- 1.F. Legal Services
- 1.G. Campus Administration and Site-Based Decision-Making
- 1.H. Planning, Budgeting and Evaluation
- 1.I. Review and Evaluation of Contracting Process

## **1.A. Board Governance**

School districts in Texas are governed by elected Boards of Trustees. Boards should focus on the decision making process, planning and providing resources for goal achievement. To a great extent, the ability of the board to perform these duties effectively is determined by their knowledge and recognition of the separation of their role from that of the superintendent. The superintendent serves as the administrative leader responsible for policy implementation and day-to-day operations. An effective superintendent supports the board's responsibility as policy maker. It is important that the superintendent work to help board members fulfill their duties by providing training opportunities and instituting procedures that facilitate effective board meetings, open communications and timely transfer of information.

### **Data Needs**

- Name of each board member, any offices held on the board, year elected, term of office, the length of service and the board member's profession and place of business
- Copies of any board ethics policies, codes of conduct or board operating procedures
- Board minutes for the last two years (URL for on-line version or made available while on-site)
- Board policy manuals (URL for on-line versions or made available while on-site)
- List of all board committees, both standing and ad hoc, the charge of the committee and the names and positions of individuals serving on the committees
- Board members' resumes and board members training records for the last three years
- Internal audit reports for prior three years
- Conflict of interest affidavits signed by board members in the last three years
- Attorney's fees for prior three years, by firm and type of services rendered
- Budget information provided to board members
- Minutes or tapes from board committee meetings
- Travel records for Board of Trustees

- Job description for board liaison or support staff

### **People to Interview**

Board members

Superintendent

Cabinet members

Principals

Board liaison or support staff

Representatives of parent teacher associations, teacher organizations, campus improvement committees, district improvement committees, business community, non-profit organizations with child related focus, leaders of minority communities

Attorney(s) for the district

### **Activities to Perform**

- 1.A.1. Prepare a chart showing each board member, any offices held on the board, year elected, term of office, the length of service and the board member's profession and place of business. Note the normal term or office, how officers are selected and any recent changes in the board's makeup, other than through the normal election process (i.e., vacancy filled through appointment).
- 1.A.2. Diagram the organization of the board, including any advisory, ad hoc, or standing committees of the board such as standing and/or ad hoc committees for finance, facility/building, personnel, instruction and/or other special purposes. Delineate the specific purposes of each committee, the makeup and membership of the committees, the process used to ensure fair and equal representation in the selection of committee members and any specific time limits imposed on the life of the committee.
- 1.A.3. Prepare a list of all district provided training for board candidates and board members for the last three years. List the type and number of hours of training attended by each board member. Specifically identify orientation and training for newly elected board members, training on the board's role in budget, personnel matters, etc., seminars and workshops sponsored by regional, state and national organizations and special training based on identified needs of board members in addition to basic state requirements. Compare the results to the state's guidelines and note any discrepancies.
- 1.A.4. Compile a list of board policies and procedures that are designed to ensure that the board operates as a policy-making body and does not become involved in micro-management such as ethics policies, codes of conduct or board operating procedures. Discuss how each is used and compliance is monitored. If breaches of policy or procedure have occurred, note how these situations were self-policed and explain what changes may have occurred to deter recurrences.
- 1.A.5. Prepare a chart showing the dates when affidavits of conflict of interest were submitted by board member, the name of the company involved, the dollar amount of contracts issued to the company in the last three years and note whether the board member abstained from voting on issues dealing with a company in which they or a family member held substantial interest, in compliance with conflict of interest statute.
- 1.A.6. Chart the path of a complaint received by a board member from a parent, district employee or other community member. Note any related board policies and administrative procedures that support the process and through interviews determine if the process is being consistently followed. When breakdowns have occurred, note why the breakdown occurred and if procedures or policies were changed to prevent recurrences.

- 1.A.7. Diagram the communication link between the board and the superintendent showing both normal communication methods and those employed in emergency situations. If special equipment such as fax machines, computers for email access or cell phones are used to improve communication, note this in the diagram and attempt to determine the cost for such services. Examine copies of memos, letters and the like from and to board members to verify that the process is working. If breakdowns in communication have been experienced, attempt to determine the reason for the breakdown.
- 1.A.8. Prepare a list of all travel by board member and examine travel reimbursements and supporting documents. Note if board members have district credit cards or access to district credit cards and any corresponding policies or procedures associated with the use of those credit cards. Compare the reimbursements to board policy and state laws regarding travel and travel reimbursement to determine compliance. Note anomalies and through interviews attempt to determine the reason for the variances.
- 1.A.9. Chart the support services and other resources provided by the district to support board duties. Identify the staff and number of hours worked a week for board or individual members.

### **Questions to Ask**

#### **Board structure**

Are trustee terms set so that a majority of experienced trustees hold office at all times? Are district elections held at locations and set on dates that will result in the greatest voter turnout? How has the board handled mid-term vacancies on the board? How does the board handle the selection of board officers? How does this officer selection process ensure that the board will remain cohesive and focused on its role as policy-makers?

How do committees of the board function? Do committees contribute to an overall sense of open-government in the district? How have committees been used to establish trust among board members? Between the board and the administration? In what situations have committees been misused and why did this happen?

How do board members maintain ties with the business community? With other school districts? Other educational institutions? How have board members encouraged partnerships within the community or with higher education institutions? What steps are taken by board members collectively or individually to promote the district in the business community?

#### **Board training**

How does the district track board training? When was the last time that board training hours were reported publicly? How does the district ensure compliance with laws regarding the public notice of board training hours completed? How does the administration keep board members informed of the training requirements and possible training opportunities? Are budgets sufficient to ensure that board members can attend needed training? How are budgets allocated to ensure that all board members have an opportunity for training?

Are distance learning and Internet based courses used to hold down the time and expense of training? How has the Regional Education Service Center been involved in board training sessions?

Does the district conduct information sessions for candidates running for the board? What type of formal orientation sessions are provided to new board members to define the role and responsibilities of a board member?

### **Board conduct**

What process is used by the board to hold one another accountable for unethical or self-interested behavior?

Do board members understand their roles in the district's governance and exhibit that understanding by allowing the superintendent to manage the district's operations within the constraints set by the board? Does the board interfere in personnel decisions outside of voting on the superintendent's recommendations? How does the board work constructively with the superintendent to resolve issues and concerns?

What board members or board member's families are currently doing business with the district? What procedures are in place to ensure that affidavits are signed prior to voting on contracts with vendors closely associated with board members (substantial interest provisions in law)? When put to a vote, do minutes clearly reflect that the board member in question has abstained from voting? If not, why not? What is the amount of the contracts? How much did the board member or the family member profit from the transaction? How does the community perceive this type transaction? What processes are in place to ensure that the community fully understands conflict of interest policies and procedures?

What processes or procedures are in place to ensure that complaints received directly by board members are sent through the appropriate channels? How does the district work with the board to ensure timely responses to concerns brought to the board by parents, employees and the community? What processes and procedures would prevent a board member from directing the actions of staff in the resolution of a complaint?

### **Board/superintendent communication**

Has the superintendent established an effective communication process with board members? Is there a full or part-time staff person within the administration that supports the needs of the board? How does the superintendent notify board members of serious or newsworthy events between board meetings? Do the superintendent and board members have fax and/or email access so that they can receive information quickly and in a format that is easy to review?

### **Board travel and expense reimbursement**

What policies or procedures are in place to ensure that board travel and related expenses are appropriate in within state law and board policy guidelines? How do current policies and procedures ensure equal access to travel and training for all board members? What instances have occurred where board members asked for reimbursement without proper receipts? How are cash advances for travel reconciled with receipts following travel? What policies or procedures exist to prevent excessive or non-district related expenditures such as those for alcoholic beverages or spousal travel? How do policies and procedures differ for travel in state and out-of-state?

If credit cards are available to board members, what policies and procedures prevent the use of cards for non-district purchases? When personal purchases are made on those cards, how does the board member reimburse the district? What documentation is required to support credit card bills such as copies of receipts? Who is responsible for monitoring these transactions? Who notifies the board members of noncompliance, should this occur?

### **Board support**

How does the district support the board? Does the district provide necessary support for the board to perform its function by:

- Providing staff to record meetings and minutes, schedule appointments and maintain files?

- Assigning appropriate staff to research and respond to information requests from the board?
- Providing budgetary resources for participation in training and professional development seminars including travel and tuition costs?

Which staff person is assigned to interact with the board on a day-to-day basis? Is this a part- or full-time position? What is this person's role and responsibility to the board? Does this arrangement provide the board members the information they need in a timely manner? What specific duties does this person perform?

### **1.B. Board Meetings**

Meetings of the board must be held according to state guidelines, particularly in regard to compliance with open meetings requirements. To be productive, the meetings must be orderly and board members must have adequate information in sufficient time to be fully prepared to make sound decisions. To be productive, board meetings should offer an opportunity for input from the public.

#### **Data Needs**

- Board meeting schedule, posted agendas for past year
- Board minutes for the last two years (URL for on-line version or made available while on-site)
- Numbers and dates of opportunities for public input other than board meetings for prior year
- Audio and videotapes of board meetings, if available for prior year (made available while on-site)
- Board packets for last three months

#### **People to Interview**

Board members  
Superintendent  
Board secretary  
Public information officer

#### **Activities to Perform**

- 1.B.1. Attend one or more board meetings and summarize board conduct, particularly as it deals with the use of Roberts Rules of Order. Compare the posted agenda to the meeting format and make note of any anomalies. Note instances if and when the board conduct deviates from standards and following the board meeting, ask the board president and/or parliamentarian for the reasons for deviation.
- 1.B.2. Examine board policy regarding public input and by provision of the policy evaluate how the policy encourages participation, is fair and equitable to all members of the public wishing to speak, prevents individuals from dominating the meeting. Compare the policy to the practices observed at one or more meetings (either in person or via audio or video tapes of the meetings) and determine, as practical, consistent compliance with district policies and the overall quality and quantity of public input.
- 1.B.3. Prepare a list of all standard items contained in board packets and note any items that are obviously missing from the packet, items that are incomplete or inaccurate and would hinder good decision-making or adequate preparation by board members at the regular meeting. Pay particular attention to financial and budget data to determine if board members could, from



the information provided, identify negative or positive trends and make informed financial decisions.

- 1.B.4. In conjunction with the activity above, list the date, method and time of delivery of the packets to board member and determine if, given the body of information to review, the time frame is sufficient for volunteer board members to become adequately knowledgeable about each issue.
- 1.B.5. Chart the minutes of the last six board meetings and show the date that the minutes were presented to the board for approval, whether the minutes show who voted in favor, against or abstained from certain proposals, whether the minutes provide detail regarding the arguments for and against the actions taken and generally provide the reader a firm understanding of what took place at the meeting for historical reference. Where possible, determine reasons for missing or incomplete information from the secretary to the board or the superintendent.
- 1.B.6. Examine policies, procedures and guidelines concerning public input and compile a list of all opportunities for community input, including but not limited to board meetings, public forums, budget hearings and the like. Determine through interviews and with survey results whether the community feels they have ample opportunity and whether they perceive that the board listens to their concerns.

### **Questions to Ask**

#### **Meeting conduct**

Are board meetings well organized? Are board meetings conducted according to established procedures and Robert's Rules of Order? Are interpreters available in the predominant languages of the members of the community and for individuals with hearing impairments? How is information recorded and distributed for review?

What are the established criteria for placing an item on the agenda (including items requested by the board or citizens)? Who is responsible for ensuring that executive sessions are conducted in accordance with state law?

Are all meetings of the board posted in compliance with state law? How does the district use the local newspaper, a district website and public libraries to keep the community informed of board meetings, agendas, decisions and other district news?

#### **Public comment**

What provisions are in place for public input? A formal agenda item? Other means for citizen comment? What time limits are imposed on public input? How do these time limits encourage or discourage people from speaking out on controversial topics?

If time limits are imposed on public comment, who is responsible for timing the comments? When recently have these rules or procedures been set aside? When and why is it considered fair to set aside these rules?

What other mechanisms are used to solicit public comment on controversial topics? How does the board react to public comment? How and when does the board provide a response to questions asked by citizens in an open board meeting?

How does the board solicit feedback from the public, district campus administrators and teachers when considering issues with significant financial implications? What mechanisms are in place to ensure that board members hear the concerns of the community? How does the board use what it

hears from the community to help shape board policy or establish goals and budgets? How does the board communicate its responses back to the community?

**Board packets**

How and when are board agendas and packets delivered to board members? Do board members have sufficient time to review the materials and adequately prepare for board meetings? Is the material meaningful?

How does the board direct staff regarding the information and materials the board needs to understand and consider issues with significant financial implications? What processes allow board members to review significant financial issues identified in internal audits, external audits, management evaluations and performance reviews? What kind of training does the board receive to improve oversight of district financial resources? What mechanisms are in place to provide the board a better understanding of the long and short-range financial impact of their decisions on the fund balance?

How and when is academic performance data provided to and used by the board in order to determine and direct the appropriate alignment of resources on all campuses? How does the board ensure that the district's resources reflect student learning and academic achievement as the highest priority?

Are board packets and other informational items made available on the Internet to board members or to the public?

**Board minutes**

How are minutes of the board meetings prepared and who is responsible for preparing them? Are minutes prepared in a timely manner? Are minutes complete and do they contain sufficient detail to be useful in documenting the decisions of the board? Does the district record board meetings in audio or video format? Does the district televise board meetings to the community? Does the administration use these tapes to determine follow-up actions needed to carry out board policy? Are tapes used to plan future meetings? Does the public and community have access to these tapes?

**1.C. Board Policies**

Boards set policies that guide the district. Having a clear set of policies that are current and integrated or cross-referenced to current laws, rules and regulations and available to every staff member is important to the overall organizational health of the district. Further, policies help a district to guard against possible lawsuits and penalties that may result if individual employees of that district inadvertently violate laws, rules or regulations.

**Data Needs**

- Copy of board policies (examined while on-site or URL if available on-line)
- List of locations where policy manuals are available in hardcopy or on-line
- Administrative procedure for updating policies and presenting proposed policy changes to the board for consideration, both legal and local

**People to Interview**

Superintendent

Board members

Individuals responsible for the maintenance and dissemination of policies

### **Activities to Perform**

- 1.C.1. Prepare a diagram of the process used by the district to update district policies, submit them to the board for consideration, disseminate approved updates to staff and ultimately translate the policies into administrative procedures. Note if a policy review cycle exists in the district and whether a service such as the Texas Association of School Boards (TASB) is being used; describe the services provided and show the cost of this service. Also show if and how the district monitors staff implementation of newly updated policies.
- 1.C.2. Examine the master board policy manual and document the last update and the policy area(s) of the last 10 updates. Compare a sample of policies with recent law changes and note any discrepancies.
- 1.C.3. Prepare a list of the locations throughout the district where district policy manuals are available. Examine the board policy manual and a representative sample of policy manuals distributed throughout the district. Determine the oldest, latest and median date of updates. Compare a sample of manuals housed on campuses with the master copy of the manual and note any inconsistencies in the versions.

### **Questions to Ask**

#### **Policy creation and updating**

How frequently are policies comprehensively reviewed and updated? What formal policy review cycle is used by the district? Who is responsible in the administration for the policy update process? How are policy changes initiated? How quickly do proposed policy changes move through the system? What causes delays?

What legal staff is used to comment on proposed policy changes? At what point in the process are policies reviewed by legal staff?

If a board policy service is used, what administrative staff reviews the updates prior to submission to the board for review and approval? What information is provided to the board regarding the impact of the proposed policy changes? What information is provided to the board regarding options for approval (i.e., investment strategies)?

Are new or revised policies disseminated in a timely manner to each board member and all other designated staff? How is compliance with policy routinely monitored to ensure staff compliance?

#### **Policy content**

Are policies clear, concise and in compliance with state law? What policies exist that specifically pertain to the roles, responsibilities and actions of board members? Does the district have conflict of interest policies for board members? Are there nepotism policies in place for employees and board members? Are there policies regarding public input at board meetings? How do these policies encourage open communication with the public? Who ensures that the board is in compliance with these policies? How are exceptions handled?

#### **Access to policies**

Where are policies made available at the administration office and campus locations for use by employees and/or the public? Are policies available to staff and community members on-line? How many hard copies of policies exist in the district? How many times are they updated annually? What is the cost for updating manuals in terms of copying expenses? If the policies are not available on-line, what has prevented the district from doing this?

## **1.D. District Management**

While the board sets policy, the superintendent is responsible for carrying out that policy and managing the district in the most cost effective and efficient manner possible. The primary goal of district management is to facilitate and support the instruction of students by ensuring that every possible dollar and resource is directed into the classroom.

### **Data Needs**

- Districtwide organizational charts
- Job descriptions for key administrators
- Administrative staffing reports, by location
- Superintendent's contract, resume and last three evaluations
- District history since its inception
- District directory and district and departmental organizational charts
- District budget broken down by fund, function, object and department for three years
- Campus budgets for current and preceding year including updates
- Central administration job descriptions
- Reimbursement history for prior three years for superintendent and upper management positions
- List of credit cards held by superintendent and upper management positions
- Credit card statements for prior three years for superintendent and upper management positions
- Salary information for central administration
- Contracts of central administration
- Allowance for central administration

### **People to Interview**

Board members  
Superintendent  
Cabinet members – key central office administrators  
Principals

### **Activities to Perform**

- 1.D.1. Create or examine the organization and staffing charts for the district and prepare a chart to job descriptions for key administrators. Interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the district and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the background for changes. Include any contracted individuals or services or committees that oversee cash management in the organization chart and show the reporting relationship and who is responsible for monitoring the contracts. Based upon the district's actual central office organizational structure and staffing, including support staff, prepare a written evaluation demonstrating whether the structure ensures:
- appropriate spans of controls (giving particular attention to supervisory/staff ratios at all levels);
  - clearly defined units and lines of authority that are reflected in both the district's organizational charts and job descriptions;

- minimal management layers that encourage communication and decision-making;
  - direct and accessible support for all campuses and auxiliary programs (including area supervision of feeder patterns of schools within larger districts, as appropriate); and
  - accountability at all levels within the organization.
- 1.D.2. Based upon interviews, historical documents or historical summaries prepared by the district, write a brief history of the district. Note pivotal events in the district's development and discuss how these events have shaped the district's operations today, as applicable.
- 1.D.3. Examine the superintendent's contract and outline the key terms and conditions of the contract including perks that may be given in addition to base salary and a history of renewals. Outline all performance components and terms that might protect the district from the necessity of "buying" out the contract if either the district or the superintendent wants to separate.
- 1.D.4. If a recent superintendent search or hiring process was conducted in the district, outline the process used by the district and evaluate the effectiveness of the process.
- 1.D.5. Diagram the superintendent evaluation process used by the board and examine the last three board evaluations of the superintendent. Assess whether expectations defined clear and measurable goals and objectives and show how the process ensures that the superintendent is given honest and meaningful feedback based upon progress toward expectations.
- 1.D.6. Examine senior management evaluations and create a chart showing the date of the last evaluation, whether the expectations identify specific goals, objectives and performance measures relevant to the job and the methods used to hold key administrators accountable for performance. If evaluations have not been done within the last 18 months, determine whether salaries have been withheld in compliance with the law.
- 1.D.7. Calculate the district's administrative cost ratio for the last three years and compare to the numbers used by the Texas Education Agency (TEA). Determine the reason for any upward or downward trends including but not limited to an evaluation of the number of administrative positions being counted and the salaries and benefits being paid. Evaluate the trend in relation to the student enrollment growth or decline and specifically note any instances where the district has been warned by TEA of excessively high ratios.
- 1.D.8. Compile a chart showing historical administrative spending and staffing levels to peer school districts and state and regional averages. Where anomalies are identified, determine the reason for the variance and evaluate the appropriateness of the difference.
- 1.D.9. Prepare a list of all travel by key administrator and examine travel reimbursements and supporting documents. Note which administrators have district credit cards or access to district credit cards and any corresponding policies or procedures associated with the use of those credit cards. Compare the reimbursements to board policy and state laws regarding travel and travel reimbursement to determine compliance. Note anomalies and through interviews attempt to determine the reason for the variances.
- 1.D.10. Prepare a list of credit cards held by the superintendent, board members and upper management positions. Show who has access to the card, the stated purpose and intent of the card and how much has been charged on the card over the last year. Discuss processes and control procedures for verifying the accuracy of statements, ensuring that no personal expenditures are charged or paid and the process for matching receipts to the invoices prior to payment.

### **Questions to Ask**

#### **Organization structure**

Does the district conduct periodic reviews to minimize administrative layers and processes?

Has the district clearly assigned authority to managers or administrators for the effective and efficient supervision of instruction, instructional support and other assigned responsibilities, including consideration of the needs of campuses throughout the district? How does the central administration support and facilitate the work of teachers and campus administrators?

Is the approach used by the institution basically a centralized or decentralized structure? Why? What are the most likely reasons that have led to the approach being used? Is this the most appropriate, efficient and effective method for this institution?

What authority is assigned to campus administrators for the effective and efficient supervision of instruction, instructional support including consideration of site-based decision-making and other organizational alternatives?

### **History of the district**

What historical events have shaped the current organizational structure of the district? What defining events in the district's history continue to impact the district today? A desegregation order? Fires, floods or other natural disasters? Very strong or very weak leadership from the board or administration? Scandals? What specifically has the district done to protect the district from a repeat of these historical events?

### **Superintendent**

Does the superintendent acknowledge his position as chief executive officer for the district by:

- making recommendations for all personnel actions based on input from campus administrators or other appropriate staff?
- making other recommendations to the board regarding operation of the district including an annual budget?
- attending all meetings of the board?
- recommending policies to the board?
- Implementing adopted board policies?
- establishing a process to communicate regularly with the board to keep them informed of district activities?
- delegating authority when appropriate?
- coordinating the implementation of procedures regarding district operations?
- identifying and sustaining district performance objectives, such as meeting Adequate Yearly Progress or balancing the budget?
- actively participate in local, regional and national school administration associations?

### **Superintendent evaluations**

What is the district's performance evaluation cycle? Is performance measured against pre-established standards? How is the board educated about the standards? How does the board obtain information regarding the superintendent's performance on the standards? If the information is provided by the superintendent, how does the board know that the information is current and accurately portrayed? How does the process allow input from all members of the board? How are conflicts in opinions resolved? Are performance ratings based on hard facts or are they more subjective?

What type of evaluation instrument is used? Is the instrument state approved or internally developed? Is the superintendent evaluated following the cycle prescribed by law? Have the evaluations been done in a timely manner?

### **Administrative evaluations**

What is the district's performance evaluation cycle? What type of system is in place to ensure that administrative evaluations are conducted in a timely manner? What type of evaluation instrument is used? Was it approved by the state or locally developed? How are expectations communicated to the administrators? What mechanisms are in place to ensure that the evaluations are fair and impartial? Are employees allowed any self-assessment input to the evaluation process? Are performance evaluations timely, or not? Is there any notification system by HR for overdue performance evaluations, or not? What are the consequences for non-compliance by supervisors? What is the evaluation hierarchy; what levels conduct which evaluations? What feedback is allowed by the person being evaluated? At what point in the process is the superintendent or board alerted to non-compliance with state law regarding evaluations?

### **Administrative costs**

Is the district taking measures to minimize central office expenditures? Do reductions in central office expenditures reflect actual reductions or reclassifications to other functions? Does the district central office effectively and efficiently support the schools? How does the administration decide what positions add value to classroom instruction? Are surveys or informal discussions held with campus staff to determine what they want and need from the central administration? Is the central office attitude one of controlling campuses or one of facilitating and supporting campuses? What evidence is there to support this position as being the right one?

### **Administrative travel and expense reimbursement**

What policies or procedures are in place to ensure that administrative travel and related expenses are appropriate in within state law and board policy guidelines? How do current policies and procedures ensure equal access to travel and training for all administrators? What instances have occurred where administrators (including the superintendent) have asked for reimbursement without proper receipts? How are cash advances for travel reconciled with receipts following travel? What policies or procedures exist to prevent excessive or non-district related expenditures such as those for alcoholic beverages or spousal travel? How do policies and procedures differ for travel in state and out-of-state?

If credit cards are available to administrators, what policies and procedures prevent the use of cards for non-district purchases? When personal purchases are made on those cards, how does the board member reimburse the district? What documentation is required to support credit card bills such as copies of receipts? Who is responsible for monitoring these transactions? Who notifies the administrators (particularly the superintendent) of noncompliance, should this occur?

## **1.E. Procedures**

Effective school management is built on sound, clearly written and legally valid policies. The Texas State Board of Education mandates that each school board adopt policies governing the operation of its schools and make them accessible to all school district employees and the public. Procedures on the other hand show district employees how to carry out the policies in their various organizational units.

Well-written and organized procedures:

- implement and assure compliance with board policies as well as documenting the intent of those policies;
- protect the institutional knowledge of an organization, so that as experienced employees leave, new employees have the benefit of the others' years of experience;
- provide the basis for training new employees; and

- offer a tool for evaluating employees based on their adherence to procedures.

Administrative procedures should be formally documented, with each administrator held responsible for creating and maintaining understandable, cross-referenced procedures.

### **Data Needs**

- Any administrative procedures manuals for key functions of the district's operations
- Copies of handbooks, memos or other internal documents used by staff in key functional areas to carry out routine processes such as business operations, human resources functions, purchasing and the like

### **People to Interview**

Superintendent  
Cabinet members – key central office administrators  
Internal auditor  
Principals

### **Activities to Perform**

- 1.E.1. Review the administrative procedures or regulations and prepare a chart by functional area showing which functions have procedures that are formally documented, are linked directly to board policy or state laws by reference, are current (show date of last update) and are complete and cover all key processes performed in the department or by the function (note what processes are not included in the procedure). If a formal procedure manual is not available, show by functional area what is used by staff as a reference to ensure that all duties are carried out in compliance with the law and district policy.
- 1.E.2. Diagram the process used by the district to update and monitor district procedures including staff responsible for each step along the way. Include a list of locations where procedure manuals are available.

### **Questions to Ask**

#### **Administrative procedures**

How does management ensure that policies are translated into operating procedures and are adhered to? Do administrators review and update administrative regulations and procedures annually or on some other cycle? Who is responsible for ensuring that each department or operating unit develops procedures? How are documented procedures used to train new staff or cross-train existing staff on the processes?

What formal staff training is provided on district administrative regulations procedures?

Is there a process for procedure revision that is clearly defined and allows for staff input? What evidence exists to show that the system is working as it was intended? What internal or external audit findings have identified internal control weaknesses or violations of laws or policies? How have procedures been modified to ensure that those instances do not recur?

How are revised policies incorporated into operating procedures? How frequently are employee, parent and student handbooks revised to reflect changes in policy or procedure? How are users



informed of changes in policy and consequently procedures (i.e., changes in purchasing procedures could impact campus staff as well as vendors)?

## **1.F. Legal Services**

School districts operate under a wide array of local, state and federal laws, rules and regulations. Administrators and boards must ensure compliance with the Texas Education Code and pertinent sections of Texas statutes including the Family, Government, Insurance, Local Government, Tax, Transportation and Utility Codes and the Texas Constitution. School districts also must comply with federal laws, Attorney General opinions, Education Commissioner decisions and State Board of Education and TEA rules.

Some districts are effectively controlling their legal costs, while costs in some districts have dramatically increased. Because of legal fees associated with issuing bonds and large construction projects, fast growth districts and districts in the midst of building programs experience higher than average legal fees. Mitigating circumstances such as lawsuits brought against a school district can also dramatically impact its ability to control legal costs. However, all districts can and should work to control legal costs.

### **Data Needs**

- Board policy or administrative procedures for handling legal matters
- Law firm contracts or engagement letters, including the contract with the delinquent tax attorney
- A list of any grievances filed with TEA, the Secretary of State, law enforcement agencies or the courts against the district, the board or individual board members in the prior three years
- List of any current litigation and accrued losses, if applicable, associated with the litigation
- Copy of legal liability insurance, error and omissions or other insurance policies that would help a district control legal costs
- Attorney's fees for prior three years, by firm and type of services rendered (copies of invoices may suffice if detailed)
- District policy or internal procedure for contacting the school attorney
- Legal budget for current and prior three years, broken out to show external fees and in-house costs such as insurance or in-house counsel
- List of judgments or settlements for the past three years

### **People to Interview**

Board members  
Superintendent  
Key central office administrators  
In-house legal counsel (if applicable)  
Attorney(s) for the district

### **Activities to Perform**

- 1.F.1. Examine the actual expenditures, current year's budget and invoices for legal services for the last three years, as available and create a chart that shows the name of the in-house attorney or external law firm that represent the district, the nature of the work done by each firm and the amount paid to each firm.

- 1.F.2. Create a list of major lawsuits, judgments or litigation and show the associated costs and current status. Through interviews, determine the root cause of the lawsuit and ask staff to suggest what kinds of policies or procedures could be implemented to avoid this type litigation in the future.
- 1.F.3. Examine all attorney contracts and prepare a chart showing the major terms and conditions of the contract including, but not limited to the effective dates and billing rates. Note major variances and seek to determine the reason for the variance through interviews.
- 1.F.4. Diagram the process used to select the attorneys for the district. Show purchasing method employed, the make up of the evaluation committee, dates when recommendations were made to the board and the manner in which the board made its final selection. Determine to the extent possible if sound evaluation practices were used and whether the district obtained high quality legal services at a reasonable cost to the district. Note whether the district considered hiring in-house counsel at any point in this process and if so, what reasons were given to contract for the services instead.
- 1.F.5. Determine the terms and conditions of any existing legal liability insurance, errors and omissions policies or other insurance coverages that would help a district control legal costs. Through interviews, determine if any claims have been made against the policies and whether the policies paid.

### **Questions to Ask**

#### **Board policies and administrative procedures for controlling legal expenses**

Does the district have a local policy for the use of outside counsel that includes:

- requiring written contracts of all legal counsel be approved by the board in advance of services rendered;
- clarifying the reporting relationship of the attorney with the administration and the board;
- designating individuals within the administration with the express authority to contact the attorney(s) and incur costs;
- stipulating that only requests of the board majority are to be directed to the attorney(s);
- determining how and when an individual board member can seek legal assistance and advice, to be paid from district funds; and
- authorizing Professional/Educators Legal Liability or errors and omissions policies.

Do administrative procedures clarify and institutionalize board policy? How are employees instructed about:

- proper notification procedures to use when informed of a possible lawsuit or served notice of a lawsuit;
- procedures for handling routine legal matters such as contracting, open records requests and open meetings postings;
- training programs on sexual harassment, employee hiring practices, employee appraisal practices and employee grievance procedures; and
- procedures on obtaining advice on potentially litigious issues.

How does the district use cost-efficient legal services to keep abreast of changes in the law, review policy, provide representation in legal actions and reduce the risk of lawsuits? Does the district employ an attorney (either in-house, on a retainer or in a cooperative arrangement with another district) with the primary responsibility of advising the board, reviewing policy and reducing the risk of lawsuits? Is legal counsel available to the board in a timely manner?

### **Selecting a law firm**

Does the district use an organized evaluation process to determine the circumstances under which outside counsel should be used with cost effectiveness as a consideration? Does the district routinely request cost proposals for legal services? In evaluating law firms or attorneys for the district, did the board and administration consider:

- the attorney's commitment to public education?
- attorney's experience and expertise in the major areas of school law and the expertise and experience of other members of the attorney's firm (if any) available to assist the school district as needed?
- the personality and style of the prospective counsel in comparison to that of the board, administration and staff?
- other school districts the attorney represents and the quality of references?
- availability and accessibility, including willingness to attend board meetings or hearings when necessary or desired by the board and to consult with board members or administrators as needed?
- mutually agreeable fee arrangements?
- quality of work product?
- the nature and purpose of professional associations to which the prospective counsel belongs?
- any other clients who might present a conflict of interest in the future?
- the percentage of the prospective counsel's practice devoted to school law?
- whether the specific attorney will perform or supervise the district's legal work and the nature and extent of the role to be played (if any) by other attorneys, law clerks and legal assistants?

During the evaluation, did the district access the State Bar of Texas Web site at <http://www.texasbar.com/> to determine if the attorney is in good standing or has had a history of complaints or license suspensions?

### **Contract or engagement letter**

Does the contract or engagement letter with the attorney(s) contain:

- the effective dates of the contract including a beginning date, an ending date and/or a provision for terminating the contract by either party with some reasonable notice;
- a description of the fee structure, including the amount of any retainer and the activities that will be performed within the parameters of the retainer;
- the attorney's duties and responsibilities;
- the parties (by title rather than name) within the district with whom the attorney is authorized to communicate and receive assignments;
- professional liability insurance requirements;
- billing and payment schedules, including the frequency and level of detail expected on each invoice for monitoring and verification purposes;
- the terms and conditions under which the contract can be terminated by either party; and
- any other agreed to terms or conditions of the relationship not otherwise noted above.

Except in the case of the delinquent tax attorney, has the district ever used attorneys on a contingency fee basis? Why and for what purpose? Was this in the best interest of the district at the time? How has the district used a retainer to control legal fees for routine matters such as:

- reviewing board meeting notices and agendas to determine compliance with the Open Meetings Act;
- attending board meetings to ensure compliance with the Act, provide answers to legal issues and advice and counsel the board and administration regarding proposed actions;
- assisting the district to respond to requests for information under the Public Information Act;

- providing advice regarding alternative means to settle disputes between board members and/or district employees;
- reviewing correspondence, bid documents, contracts and court documents prepared by the district;
- drafting contracts, bidding documents, correspondence or court documents of a routine legal nature;
- investigating facts: interviewing individuals involved in a dispute or other matters to ascertain the facts and public record searches;
- performing legal research and analysis; and
- answering routine legal questions regarding compliance with Texas Education Code requirements, or rules of the State Board of Education or TEA.

How has the district used a monthly “flat fee” or a “not to exceed” monthly fee for these routine services shown above?

If a district uses legal counsel to assist it on federal grant programs, how does the district separate the allowable and unallowable costs for legal services associated with each grant? How are contracts written to comply with the grant’s federal guidelines?

**Monitoring legal costs**

Is the district paying a fair market rate for legal services? Who is responsible for monitoring legal bills using billing rates, number of hours billed, nature of work performed and the individual performing the service?

Has the district established a system to review legal costs to determine whether it is more cost-efficient and practical to have a staff attorney or to contract out for legal services on an as-needed basis?

Does the district use a tracking system that alerts of pending deadlines, produces reports for the board and categorizes types of legal actions?

Does the district know what legal documents must be kept on file and for how long? Which legal documents should be accessible as open records and what must be kept confidential? What paper files are maintained in a fireproof cabinet with other valuable district papers? Are electronic files backed up periodically so that they can be recovered in the event of a disaster?

Who is responsible for monitoring compliance with court orders such as court-ordered desegregation? How are periodic reporting requirements or other major components complied with? Do legal files contain all vital pieces of information regarding the case, not just for monitoring the current plan, but also provide a historical reference for the future? If, for example, a court order requires the district to publish certain information in the local newspaper, who is responsible for insuring that this action takes place? Does the file contain proof that the district completed the action required?

Who is responsible for tracking the type of work performed and the average number of hours spent on each type of litigation or legal service? Is this information used when and if the district decides to change attorneys, renegotiate contracts or bring some portion of the work in-house? How has this information been used to keep the board informed or to show savings or costs resulting from decisions made by the board in relation to legal expenses?

How are trends, such as litigation as a result of similar employment issues, used to modify its employment policies, practices, training and procedures?

How does the district use legal liability or other insurances to protect it from catastrophic litigation costs?

### **1.G. Campus Administration and Site-Based Decision-Making**

Campuses are obviously the core of the educational process in a school district. The campus is where instruction takes place and principals and teachers are the key to an effective instructional system. Over the years, the issues of local control and local decision-making have resulted in more and more of the responsibility being pushed down to the campus level. Principals must effectively and efficiently manage budgets, personnel and instructional programs and are being held more and more accountable for improving student performance in a high stakes testing environment.

Each school district is required to adopt a policy and have administrative procedures to establish a district- and campus-level planning and decision-making process. This process must involve professional staff of the district, parents and community members in establishing and reviewing the district's and campuses' educational plans, goals, performance objectives and major classroom instructional programs. (TEC 11.251 (b, d)).

#### **Data Needs**

- Campus directories
- Campus-level staffing by category of employee, for each campus
- District and campus improvement plans
- Policies, procedures and training documents used for selecting SBDM committee members, SBDM structures and committee operations
- A listing of district and campus based improvement committee members showing each committee's configuration, members addresses and phone numbers

#### **People to Interview**

Board members  
Superintendent  
Cabinet members – key central office administrators  
Principals  
Representatives of teacher organizations  
Site-based decision-making committees  
Parents and leaders of community organizations

#### **Activities to perform**

- 1.G.1. Diagram the campus-level budgeting process and identify components over which the campus administrators and site-based committees have some oversight or control. Note areas of concern or strength in the process.
- 1.G.2. Prepare a chart by campus showing the number of principals, assistant principals, counselors, secretaries, clerks and other campus administrative staff. Compare the staffing levels by campus and grade level with staffing standards, such as those used by the Southern Association of Colleges and Schools (SACS) and districtwide allocation formulas and note discrepancies. Compare the results, making adjustments for state requirements such as

PEIMS reporting (clerks), counselor requirements at the elementary level and the like that may not be included in the SACS formulas. Identify variances and through interviews seek to determine the reason for those differences.

- 1.G.3. Prepare a chart (or obtain a copy of any district documentation) showing the role of the board, superintendent, key administrators, area superintendents or other that work with and between the central office and the schools. Determine whether these administrators exercise authority consistent with the SBDM plan and whether their authority is commensurate with their responsibility.
- 1.G.4. Compile a chart listing the SBDM policies, procedures and handbooks. Show how and if each of these documents complies with state laws pertaining to SBDM, if they are clear and understandable, provide guidance and direction to individuals at all levels of the organization and clear establish accountability parameters for student performance. Through interviews, determine whether these policies procedures and guidelines are being consistently followed and are well understood.

### **Questions to Ask**

#### **Budgets and staff allocations**

How are budgets allocated to individual campuses? How are instructional supplies and materials (other than textbooks) allocated to campuses? Do campuses have an opportunity to give input about their needs? How does the district ensure the equitable distribution of resources per pupil, grade level and subject matter? Do the campuses maintain an inventory of instructional materials and supplies?

Do campuses have flexibility in the use of budgeted funds? How are campus employee salaries budgeted? Centrally? Or at the campus level? How are campus budgets monitored? How are campus administrators held accountable for their budgets? How are SDSM committees used in the campus budget planning process?

How is staff allocated to the campuses including principals, assistant principals, counselors, teachers, librarians, teacher aides and nurses? Does the district have a targeted student teacher and staff-student ratios for the district? For campuses? For each grade-level? Are these ratios based upon a district goal or strategy? Industry (SACS or other) standards? Are staffing ratios equitable between campuses serving similar grade levels? Is there a direct correlation between higher than average staffing levels at specific campuses and higher than average numbers of special need students? Is the staffing equitable from campus to campus? Are inequities explained by the special needs of the student population at those campuses with higher allocations of resources?

#### **Administrative and board support**

What is the board's role in site-based decision-making? What is the superintendent's role? How and where are these roles and responsibilities documented? How does the district ensure that everyone understands their role and responsibility in the process?

How does the board and superintendent strive to decentralize decisions to the campus level and solicit the input of stakeholders in the decision-making process?

Should some decisions be more centralized to support increased efficiency? How does the central office provide support systems to meet the diverse needs of the schools? What central systems are duplicative or unnecessary? How does the central office evaluate its effectiveness in facilitating the needs of campus administrators and teachers?

How do area superintendents or other administrators between the central office and the schools fit into the SBDM plan?

**Site-based decision-making committees**

How does the district ensure that district- and campus-level planning and decision-making committees' membership includes:

- professional staff;
- parents of students enrolled in the district;
- community members; and
- business and industry representatives.

How does the selection process for the district-level and campus-level committees ensure appropriate representation of the community's diversity (TEC 11.251 (e))? What documentation exists to prove that these committees held at least one public meeting per year? Did the meeting(s) take place after the receipt of the annual district performance report from TEA? What evidence exists that these meetings are for the purpose of discussing the performance of the district and the district performance objectives (TEC 11.252 (e), 11.253 (g))?

What district and campus policies and procedures are established to ensure that systematic communications measures are in place to periodically obtain broad-based community, parent and staff input and to provide information to those persons regarding the recommendations of these committees (TEC 11.252 (e), 11.253 (g))? How frequently does the superintendent consult with the district- and campus-level committees in the planning, operation, supervision and evaluation of the district and campus educational programs?

How are the campus- and district-level planning and decision-making committees' involved in:

- planning;
- budgeting;
- curriculum;
- staffing patterns;
- staff development; and
- school organization?

How was the district-level committee involved in establishing the administrative procedure that defines the respective roles and responsibilities related to planning and decision-making at the district and campus levels?

How are the district- and campus-level committees involved in the following:

- developing an appraisal process and performance criteria for teacher appraisals (TEC 21.352 (a) - (b))?
- providing advice on a student code of conduct for the district (TEC 37.001 (a))?
- determining the use of the funds awarded to a school under the Texas Successful School Awards System (TEC 39.094 (b))?
- developing and approving staff development related to achieving campus performance objectives (TEC 21.451 (b))?

How do policies, procedures and practices ensure consistent compliance and commitment to:

- legally established and staffed SBDM committees at each campus and at the district level?
- effective campus and school district planning for the purpose of improved student performance?

- clearly defined roles and responsibilities?
- community and parental involvement in the school improvement process?
- clearly established accountability parameters for student performance?
- improved communication and information flow?
- consensus-based, decision-making?
- pervasive and long-range commitment to implementation?

Is there flexibility at the campus level in the allocation and use of both human and fiscal resources? Has SBDM produced increased staff productivity and satisfaction and less teacher turnover? Does SBDM have the support of both the school board and the superintendent? Does the district provide extensive and continuous training before and during implementation within the school district? What type of training is provided?

How much time is spent changing role definitions, training school district staff, educating the community, establishing objectives, developing and implementing programs and monitoring program success? Do campuses have access to accurate information so that they can establish objectives and develop and implement programs to meet those objectives?

What differences exist between central office and campus perceptions of how decisions are made? Are there instances where too much flexibility in decision-making was a detriment to operating efficiency (e.g., types of computers to buy, bus and lunch schedules)? If so, explain. What instances exist where central office exerted too much control over teaching methods and other operational matters and stifled creativity?

Do principals develop their respective school's site-based decision-making policies and procedures as well as its campus improvement plan (CIP)? How do teachers, parents, students and community representatives provide input for their respective school's SBDM policies and procedures and CIP?

Are goals determined on a campus level from a campus needs assessment and outcome data? Are activities based on goals and are they initiated and directed by the campus staff with measurable outcomes? To what extent is budget development and allocation of resources campus-controlled?

Are staff selection criteria guided by standards developed by a campus within the context of state and district guidelines? Is the campus organization structure arranged functionally to encourage and facilitate shared decision-making and input? Does campus staff verify that site-based decision-making is established and working?

To what extent do the district's policies and procedures support and sustain the capacity of the school site leadership and teachers to focus on academic achievement?

Is there a gap in perceptions about how decisions are made in the school system? How well does the SBDM plan articulate where decisions are made? How is this communicated if not through the plan?

## **1.H. Planning, Budgeting and Evaluation**

Each school district is required to develop a district improvement plan (DIP) and it must be developed, evaluated and revised annually by the superintendent and the district-level committee. The purpose of the DIP is to guide district and campus staff in the improvement of student performance for all student groups and to attain state standards for the state academic excellence indicators. The



DIP must be supportive of the objectives of the CIP and must, at a minimum, support the state goals and objectives for education that are identified in Chapter 4 of the Texas Education Code.

Each school year the principal of each school campus, with the assistance of the campus-level committee, must develop, review and revise the CIP. The purpose of this plan is to improve student performance on the state's academic excellence indicators for all student populations, as well as improve performance on any other performance measures for special needs populations. The CIP must be supportive of the objectives of the district improvement plan and must, at a minimum, support the state goals and objectives for education. At least every two years, each district must evaluate the effectiveness of the district's decision-making and planning policies, procedures and staff development activities related to district- and campus-level decision-making and planning to ensure that they are structured effectively to positively impact student performance (TEC 11.252 (d)).

A district with a strategic plan that has received broad-based input and has well defined goals will be better able to attain state standards in respect to academic excellence indicators. Evaluation of a district's programs allows the board and administrators to gauge the success of each program by determining if key objectives and results were obtained and if the benefits merit the costs. Planned programmatic changes can then be made based on those results.

State law mandates that the superintendent prepare, or cause to be prepared, the budget. Thus, the superintendent is responsible for preparing and presenting the preliminary budget to the board. The board's role in approving the budget is critical, however, because it is through the budget that the priorities of the board are funded. Planning and budgeting must be closely linked if plans are to be implemented and the goals of the district are to be accomplished.

#### **Data Needs**

- District mission, strategic plan and goals
- Description of the strategic planning process
- Copies of all planning documents including DIP, CIPs, Local Educational Agency Plan (LEAP), Facility Plan (FP) including district owned sites and growth projections specific to each attendance area in the district and Technology Plan (TP) as requested under Computers and Information Technology
- Program evaluation schedule
- Copies of all external audits, reviews, reports, surveys and survey results submitted by outside consultants in the past three to five years
- Budget preparation instructions and calendar

#### **People to Interview**

Board members

Superintendent

Cabinet members or central office personnel

Principals

Representatives of parent teacher associations, teacher organizations, campus improvement committees, district improvement committees, business community, child related non-profit organizations

Members of facilities planning committee if one exists

### **Activities to Perform**

- 1.H.1. Using copies of all district planning documents including the DIP and CIP, Local Educational Agency Plans (LEAP), Strategic Plans, Facility Master Plans, Technology Plans and the like determine the nature and scope of each plan, the time frame of the plan, the individual or groups that prepared the plan and the process by which the plan was developed.
- 1.H.2. Using the compiled planning documents, create a chart to show whether each plan contains board approved goals, objectives, implementation strategies, assignments of responsibilities, links to the annual budget, annual monitoring activities and the like. In addition, evaluate how the goals, objectives and strategies of each plan are linked to each other and the budget, the assignment of responsibility for implementation and the process by which the plan's implementation is monitored.
- 1.H.3. Conduct a comparative analysis of campus performance data to the district's allocation of resources in order to determine if academic performance data is being used to determine the appropriate alignment of resources on all campuses? Compare findings to that of comparable districts.
- 1.H.4. Diagram the process used to formally or informally evaluate the effectiveness of strategies, progress toward goals or the implementation of plans. Include in this the results of any external audits and how the board and administration have responded to any findings. Determine what staff perform specific evaluations, whether the evaluations are required by state or federal law, whether evaluation activities are prioritized and if so, by what methodology (e.g., board policy, student needs, etc.) and how the results are used to modify strategies and ultimately achieve district goals.

### **Questions to Ask**

#### **Strategic planning**

Are the goals of peripheral plans compatible with the Strategic Plan? Is the DIP aligned with CIPs? Does the budget reflect Goals, Strategic Plan, Facility Plan, Technology Plan, etc.?

Does the board establish annual goals and undertake a formal planning process? Do the board and superintendent conduct annual goal setting and planning sessions? Is the board involved in adopting annual goals to improve the district's programs and operations?

How are district plans and goals publicized? Is the district reviewing progress of goal achievement regularly, or at least once a year? Is a priority placed on instructional program goals and student achievement goals? Are essential resources dedicated for goal achievement?

Is the board, superintendent and other administrative staff involved in developing a multi-year strategic plan for the district? Does strategic planning include these components: general administration, education (including instruction), evaluation and student services, business operations, personnel operations, communications and parent and community involvement?

Are demographic projections collected from verifiable sources? Do plans include full disclosure of the fiscal impact of policy or programmatic changes? Has the district done a future needs analysis and an evaluation of future capability in each functional area? Is there a documented process for measuring progress toward its goals? Are there direct ties to annual budgets? Does the system of annual reviews and updates keep pace with ever changing needs? Has the district developed a technology plan that realistically meets the projected demographic needs and academic goals of the district within budget constraints and policy guidelines?

Has the district allocated adequate resources to develop and implement a realistic long-range master plan for educational facilities? Will the plan meet the projected needs of the district as anticipated through demographic study? Was a standing committee comprised of a broad base of school district employees and community members involved in the planning process?

Does the district use a system to select and acquire proper school sites in a timely manner using school site selection criteria to ensure schools are located to serve the proposed attendance area economically, with maximum convenience and safety? Is there a system to assess sites that also evaluates fair market value? Is there a process to systematically determine the student capacity and educational adequacy of existing facilities and evaluates alternatives to new construction? Does the district seek donated land from developers?

### **District improvement plans**

How has the district used their Regional Education Service Center to assist in the development of their district or campus improvement plans?

How does the DIP specifically address the following:

- a comprehensive needs assessment on district student performance on the academic excellence indicators and other measures of performance that are desegregated into students groups including ethnicity, socioeconomic status, sex and populations serviced by special programs?
- measurable district performance objectives for all appropriate academic excellence indicators for all student populations, including objectives for special needs populations and any other performance measures used by the district?
- strategies for improving student performance, including:
  - instructional methods?
  - methods for addressing the needs of students for special programs (e.g., suicide prevention, conflict resolution, violence prevention, dyslexia treatment programs)?
  - drop out reduction?
  - integration of technology into instruction and administrative programs?
  - discipline management?
  - staff development?
  - career education for students?
  - accelerated education?
- Resources needed to implement identified strategies, including:
  - supplemental personnel attributed to state compensatory education and accelerated instruction?
  - supplemental direct costs attributed to state compensatory education?
- Staff responsible for ensuring the accomplishment of each strategy?
- Timelines for ongoing monitoring of the implementation of each improvement strategy?
- Formative evaluation criteria for determining periodically whether strategies are resulting in intended improvements in student performance?

### **Campus improvement plans**

How does each CIP specifically address the following:

- assess the academic achievement for each special population student in the school using the Academic Excellence Indicator System (AEIS) and other assessment instruments?
- set campus performance objectives based on AEIS and other assessment instruments, including objectives for special needs populations?
- identify how the campus goals will be met for each student?

- resources needed to implement identified strategies, including:
  - supplemental personnel attributed to state compensatory education and accelerated instruction?
  - supplemental direct costs attributed to state compensatory education?
- identify staff needed to implement the plan?
- timelines for monitoring strategies?
- set timelines for reaching the goals?
- establish measurable performance objectives and measure progress toward the performance objectives periodically to ensure that the plan is resulting in academic improvement?
- formative and summative evaluation criteria?

How was the campus-level committee involved in developing and approving the portions of the campus plan that address campus staff development needs?

Does each school have a CIP? If not, why not (small districts with only one campus may not be required to have a campus and a district improvement plan)? How is the state compensatory education program described in the campus improvement plan, if the program is implemented at the campus level? How is the program described in the district improvement plan, if the state compensatory education program is implemented districtwide?

How effective is the district/campus improvement plan in providing the primary record supporting expenditures attributed to the state compensatory education program, as required by law? What were the findings of the most recent external audit report on compensatory funds?

### **Budgeting**

How is the budget linked to the various planning documents in the district? How are planning documents linked back to the budget? How are goals and priorities identified in the budget? What budget documents such as budget calendars, instructions and training materials support the linking of budget to the goals and objectives contained in district plans?

Does the board consider how and if to use its flexibility under federal law to transfer funds among programs identified in No Child Left Behind as eligible for flexibility? How does the board communicate such decisions? Based on what criteria and performance data?

### **Evaluation**

Does the district regularly review and use evaluation results to improve the performance and cost efficiency of its major educational and operational programs? Are these evaluations used when deciding to keep or replace educational programs?

How and when does the district provide to stakeholders school and district report cards, as required by federal law? How have state compensatory education resources been redirected when evaluations indicate that programs and/or services are unsuccessful in producing desired results for students at risk of dropping out of school?

How and when does the district distribute Texas Assessment of Knowledge and Skills (TAKS) test results to ensure that parents have the information before the beginning of the next academic year? Does the district identify those schools in need of improvement, based on the TAKS results and offer parents and students supplemental educational services, school choice and transportation as required under federal law?

When and how does the district provide parents with information about their student's teacher, including the teacher's qualifications, as required by federal law?

How and when does the board monitor the academic standing of schools in relation to federal requirements to meet Adequate Yearly Progress? Are plans in place to provide mandated technical assistance to schools identified for improvement? Are plans in place to provide mandated corrective actions for schools that have failed to improve after four years?

How are non-educational programs evaluated? Does the board conduct an annual self-evaluation? Does the district regularly evaluate the food service program based on established benchmarks and implement improvements to increase revenue and reduce costs? Does the district regularly monitor and evaluate its self-insurance program to ensure the feasibility of its self-ensured coverage?

Do locally developed board policies require district management to conduct periodic program evaluations? Is a program evaluation schedule presented annually to the board? Are long-range plans for program evaluation reviewed and revised annually?

Is there a periodic review of all district programs? Are procedures for review and evaluation of district programs and services published and disseminated? Are evaluations of program and services reviewed with staff before the next year's planning process? Are program and services evaluation results shared with the board and where appropriate, advisory committees? Is cost data reviewed and compared with program and service objectives and results?

How does the board and administration review TEA campus ratings, evaluations and monitoring initiatives? What is the decision making process regarding the types and number of internal/external special audits completed each year? How does the board and administration ensure that they receive an annual external audit and use the audit to improve operations?

What reports have been prepared by external groups? How are the results tracked and reported? Has the district established and implemented strategies to continually assess the reliability of its data?

Are customer satisfaction (internal and external) surveys conducted by the district?

Does the district make itself accountable to parents and other taxpayers by:

- having clearly stated goals and measurable objectives for its major educational and operational programs?
- using appropriate performance and measures to evaluate its major educational and operational programs and using these in management decision-making?
- setting performance benchmarks for its major educational and operational programs that may include appropriate standards from comparable school districts, government agencies and private industry?
- reporting on the performance and cost efficiency of its major educational and operational programs to ensure accountability to parents and other taxpayers?

### **1.I. Review and Evaluation of Contracting Process**

District management functions such as staff development and legal services can be purchased or contracted for through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important

to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.



***EDUCATIONAL SERVICE  
DELIVERY***





# 1. EDUCATIONAL SERVICE DELIVERY

Above all else, school districts must provide high quality educational services. Having adequate processes in place to identify student educational needs, providing for those needs and measuring performance as a result of these programs, represents the most vital mission for every school district. Educational service delivery includes the provision of programs for students with special needs as well as careful adherence to other state and federal mandates concerning curriculum. The Texas School Performance Review measures the effectiveness of educational service delivery through cost benefit analyses, comparing program resources with the benefits to students. The Educational Service Delivery protocol evaluates the effectiveness and efficiency of the instructional delivery system, program management, student performance measures and student services in the following areas:

- 2.A. Organization and Management
- 2.B. Curriculum Policies and Management
- 2.C. Instructional Program Evaluation
- 2.D. Student Performance
- 2.E. Instructional and Administrative Technology
- 2.F. Staff Development
- 2.G. Special Programs
  - 2.G.a Special Education
  - 2.G.b Bilingual Education/English as a Second Language (ESL)
  - 2.G.c Advanced Academics (Gifted and Talented (G/T), dual credit, pre-Advanced Placement/Advanced Placement (pre-AP/AP), early college high school, International Baccalaureate (IB), academic magnets)
  - 2.G.d Response to Intervention (RtI)
  - 2.G.e Student Success Initiative (SSI)
  - 2.G.f Compensatory and Alternative Education
  - 2.G.g Career and Technical Education
  - 2.G.h Migrant Programs
  - 2.G.i Athletics and Extracurricular Activities
- 2.H. Student Services
- 2. I. Student Behavior Management
- 2. J. Disciplinary Alternative Education Programs (DAEPs) and Referrals for Juvenile Justice Alternative Education Programs (JJAEPs)
- 2.K. Review and Evaluation of Contracting Process

## 2.A. ORGANIZATION AND MANAGEMENT

For curriculum to be successfully delivered across all grade levels and to students with varied needs, the organization must be appropriately aligned. Staffing must be sufficient to provide services to students at each grade level and area of need, and must expand and contract based on student enrollments not only at the district level, but also within each grade and program. The system must provide support services for instructional staff, such as teacher training, technical support for teachers and for technology used in the classrooms, and the provision of resources for specific courses and programs.

**DATA NEEDS**

- Campus directories
- Organization chart for all educational delivery functions
- Full-time equivalent (FTE) staffing by position for each campus
- Job descriptions for central office and campus-based instructional personnel
- District and Campus Improvement Plans
- Map of attendance zone boundaries and/or information on any recent attendance zone changes
- List of teachers and their certifications and/or endorsements
- If under court ordered desegregation, obtain a copy of the summary of the terms and conditions of the order and copies of reports to the Justice Department for the last three years
- Orientation materials and training offerings for substitute teachers
- Policies, call-in procedures and pay scales for substitute teachers
- Master course schedules by campus, teacher, subject area and enrollment
- Districtwide list of instructional personnel by program
- Individual campus budgets
- Site-based decision-making team membership and membership criteria

**PEOPLE TO INTERVIEW**

Superintendent

Assistant superintendent with assigned responsibility

Director of Curriculum and Instruction

Curriculum specialist

Principals

Department heads

Teachers (consider a focus group including both less experienced and more experienced staff)

Testing coordinators

Librarians

Technology director

Guidance counselors

PEIMS coordinator

Instructional Technology coordinator

### **ACTIVITIES TO PERFORM**

1. 2.A.1. Examine the organization and staffing charts and job descriptions for the curriculum and instruction functions and interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department(s); and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the background for changes. Include any contracted individuals or services or committees that oversee curriculum and instruction in the organization chart and show the reporting relationship and who is responsible for monitoring the contracts.
2. 2.A.2. Prepare a chart showing the overall per-pupil funding and staffing levels of each campus by position, level of experience and certifications held. Compare per-pupil funding amounts and staffing levels, teaching credentials and expertise across all schools serving similar grade levels and identify anomalies and through interviews seek to determine the reason for those differences.
3. 2.A.3. Prepare a flowchart showing how teachers, counselors, assistant principals and principals are recruited, hired and placed on a campus, including the role of site-based decision-making committees, principals and central office staff. Examine district and campus improvement plans to determine if they are being used as an organizational tool in this process. Show the timeframe for each step in the process and note any areas where delays are typically encountered, where communication has broken down or where other problems have been encountered.
4. 2.A.4. Prepare a diagram of the feeder patterns and attendance zones for the district and note any changes that have taken place within the last 5-10 years, or major events that could impact the configuration of schools, including any court ordered desegregation plans. Determine why changes have occurred and how the process has helped to spread enrollment.
5. 2.A.5. Prepare a chart showing the high, average and low class loads per teacher per campus. Determine how many classes/courses the district or campus requires each teacher to teach to determine whether teaching loads are equitable across disciplines (English Department versus Math Department, for example).
6. 2.A.6. Diagram the process flow for substitute teacher recruitment, training, assignment and evaluation. Through interviews with both campus and central office staff, determine what aspects of the process are working and what points in the process cause concern or disruption.

### **QUESTIONS TO ASK**

#### **Organization**

How does the current organizational structure support instruction? Encourage cross-functional and interdisciplinary cooperation? Provide support for classroom teachers? Facilitate the needs of campus-based staff? Ensure compliance with federal, state and local laws, rules and regulations? Where does the system break down? What efforts have been made in recent years to improve the structure and ensure that campuses and particularly teachers, have what they need to be successful? Are the responsibilities of central office staff clearly defined? Are the responsibilities of campus-based personnel clearly defined? Is each category of employee performing their intended function? What evidence indicates collaboration between instructional and non-instructional groups with the technology function, to ensure that technology supports the organization and its goals?

How does communication flow from the central office to the campuses and vice versa? At what points in the process is communication hampered or enhanced? How could obstacles to communication be overcome? What formal and informal mechanisms exist to ensure good communication?

### **Budgets and staff allocations**

How are budgets allocated to individual campuses? How is staff allocated to the campuses including

principals, assistant principals, counselors, teachers, librarians, teacher aides and nurses? Does the district have a targeted student teacher and staff-student ratios for the district? For campuses? For each grade-level? Are these ratios based upon a district goal or strategy, or on industry or other standards? Are staffing ratios equitable between campuses serving similar grade levels? Is there a direct correlation between higher than average staffing levels at specific campuses and higher than average numbers of special need students? Is the staffing equitable from campus to campus? Are inequities explained by the special needs of the student population at those campuses with higher allocations of resources?

Does the district have certified teachers for all courses and grade levels? When certified teachers are not available, how does the district fill the positions? How and when does the district notify parents that a non-certified teacher is teaching a particular subject? Does the district have strategies in place to recruit and retain teachers in critical shortage areas? Does the district have a policy regarding the use of non-certified teachers? Does the district have procedures for granting a district specific certification? How many certified teachers are teaching outside the field in which they are certified? Do these teachers have appropriate emergency permits? Is the district applying within specified timeframes for emergency permits? Is the district providing any training, stipends or paying for classes to appropriately certify teachers with emergency permits? How many Master Reading, Math or Technology teachers are certified in the district? How does the district recognize or compensate Master teachers?

Does the district assign extra days to administrators such as assistant principals or professionals such as diagnosticians? If so, what do these staff do on the assigned extra days (for example, sometimes assistant principals distribute textbooks during the summer as part of their extra days)? How does the district justify these extra assignments? Is the completed work significant? How does the district ensure that extra duty pay is linked directly to extra duty and is not a mechanism used to affect a pay raise for select individuals?

How are instructional supplies and materials (other than textbooks) allocated to campuses? Do campuses have an opportunity to give input about their needs? How does the district ensure the equitable distribution of resources per pupil, grade level and subject matter? What type of inventory of instructional material and supplies does each campus maintain? Does each campus have Internet connectivity so that statewide databases such as encyclopedias and various catalogs of information can be easily accessed? If not, why not?

Do campuses have flexibility in the use of budgeted funds? How are campus employee salaries budgeted? Centrally? Or at the campus level?

How are campus budgets monitored? How are campus administrators held accountable for their budgets? How are site-based decision-making committees used in the campus budget planning process?

### **Recruiting and hiring**

How is the board involved in hiring, transferring or termination of campus-based personnel? Central office personnel? Others? Does board involvement in personnel matters support or hinder educational service delivery?

Do campus administrators have flexibility in the type of staff they hire? How are campus-based staffing decisions reflected in the campus improvement plan? Do campus administrators and principals have input into hiring decisions? Do teachers have a role in staffing decisions at their campus? How and when are the colleagues of a potential employee, such as counselors when filling a counselor vacancy, consulted when filling vacancies? Are campus administrators involved in recruitment activities? How are employment applications and resumes made available to campus administrators?

### **Feeder patterns and attendance zones**

Are feeder patterns appropriately aligned and defined? How do schools and teachers within a feeder pattern work together to ensure that all children are well prepared to enter the next educational level?

Do attendance zones appropriately allocate students to schools to reduce overcrowding, balance ethnic diversity and contribute to appropriate feeder patterns? When was the last time that attendance zones were adjusted? What process is used to adjust attendance zones? Do attendance zone adjustments require approval of the Justice Department because of a desegregation order?

### **Teaching loads**

Does the district offer classes based upon expressed interest or needs of students, parents or businesses in the community?

Does the district schedule instructional staff to achieve maximum efficiency and effectiveness? How do principals and central administration review teacher's schedules/assignments to ensure maximum use of instructional personnel? Are staff with special assignments such as coaching or specialized classes assigned a full-time equivalent teaching load to the extent possible? If not, why not?

### **Substitute teachers**

Do board policies outline minimum requirements for long and short-term substitute teachers? What training is provided to substitutes? Are there certain classes where substitutes are given additional training such as alternative education and special education?

At what point does the district provide written notice to parents when long-term substitutes or non-certified teachers are in the classroom for longer than 30 days as stipulated in state law? How much is the district spending and/or budgeting annually for substitutes? Are substitutes tracked by campus program or course?

How does the district procure substitutes? Do they have an automated or call-in system? Are there any difficulties getting substitutes? Does the district have procedures governing the use of substitutes and specifying what should happen if a teacher or campus is unable to get a substitute? Who takes the place of a substitute if necessary – administrators, professionals, paraprofessionals?

## **2.B. CURRICULUM POLICIES AND MANAGEMENT**

For instructional systems to achieve their stated goals, the written, taught and tested curricula must be closely linked. In Texas, the Texas Essential Knowledge and Skills (TEKS) identifies what Texas students should know and be able to do at every grade and in every course in the foundation and enrichment areas as they move through the state's public schools. It is these foundation standards that are then tested through the state's standardized assessments. Using TEKS to design curriculum, guide teaching and maximize student achievement is a challenge facing principals, curriculum directors and classroom teachers because the basic curriculum design and alignment can and will impact student achievement.

### **DATA NEEDS**

- List of all courses offered at all grade levels, noting which courses have curriculum guides and the date of last revision for each guide
- Copies of curriculum guides (for examination during on-site work)
- List of all board policies and internal procedures relating to instructional programs (originals for examination during on-site)
- Curriculum five-year review schedule or plan
- Description of the curriculum development cycle
- Copies of internal procedure or guides that address the administration, monitoring or evaluation of the curriculum or specific instructional programs

- Campus and district improvement plans as they pertain to curriculum management
- Analyses of Performance Based Monitoring Analysis System (PBMAS) data
- Campus rating reports or state required report cards on student performance for the last five years
- Instructional technology plans or documents with emphasis on the ways for teachers to integrate technology into the curriculum
- Other long-range plans that address curriculum management or technology integration in the classroom

**PEOPLE TO INTERVIEW**

Board members

Superintendent

Director of Curriculum

Assistant superintendent for Curriculum and Instruction or other administrator with assigned duties

Teachers, librarians, instructional technology staff and campus-based support staff

Campus administrators and principals

Directors or coordinators responsible for curriculum management and instructional technology

**ACTIVITIES TO PERFORM**

7. 2.B.1. Examine curriculum guides, if available, and prepare a table showing most recent update, whether the curriculum is aligned with TEKS and the state standardized assessments and whether curriculum scope and sequence is clear and appropriate across all grade levels and subjects. Compare and contrast student performance in areas where no curriculum is available or is outdated with those areas where the curriculum is strong and note whether there is a direct correlation.
8. 2.B.2. Examine the curriculum guide development and update schedule, if available and prepare a diagram or process flow chart showing the operational steps in the curriculum creation or update process.
9. 2.B.3. Prepare a list of all board policy on curriculum management and development and compare
10. the list to those expected to be present in a well-run educational system. Note areas of concern and attempt to identify how this may or may not have affected student performance.
11. 2.B.4. Describe in detail the curriculum monitoring system at sample campuses and validate that the systems portrayed by the sample are representative of campuses throughout the district and include central office administrators with assigned responsibility. Note areas of strength or concern in the system and determine where inconsistency between programs or campuses exists.

**Questions to Ask**

***Curriculum guides or documents***

Does the district have curriculum guides for all courses at all grade levels? Who is ultimately

responsible for ensuring that the written curriculum contains the information that will be tested? Is the curriculum aligned with the Texas Essential Knowledge (TEKS) and the state standardized assessments?

Is curriculum aligned to adequately define the scope and sequence of courses so that all students are fully prepared to enter the next grade level? (Vertical alignment) How do teachers perceive the current curriculum guides?

How are weak student performance elements addressed by the written curriculum? How have recent modifications to the curriculum attempted to address weak areas of student performance?

How are special populations addressed in curriculum guides? What enrichment activities are shown in guides for gifted students? Do these activities conform to the Texas Plan for the Gifted and Talented criteria? How do the guides address the needs of children with specialized learning needs?

How is the use of technology incorporated into the curriculum guides? What resources are identified in the guides that would help teachers to integrate technology into their lesson plans? What evidence exists of collaboration between teachers, librarians and instructional technology staff? How are the Technology Applications Texas Essential Knowledge and Skills (19 TAC Chapter 126) being integrated into grades K-8 classrooms? What kind of documentation exists to show that students in grades 2, 5 and 8 have met the Technology Applications benchmarks in the TEKS? How does the curriculum address the K-12 Technology Applications guidelines?

### *Curriculum development*

Which teachers participate in scheduled curriculum updates? How are special population teachers or coordinators used in the development process? Is the curriculum regularly evaluated and updated by staff members who use the guides and by administrators responsible for curriculum management? If not, why not?

How are resources from the state or regional education service centers used to develop district instructional guides?

What procedures does the district have in place for the creation or modification of curriculum? Is an advisory committee used to assist in this process?

Is the curriculum reviewed/revised as part of the annual planning and budgeting process? How are resource personnel such as the instructional staff used to provide input in their area of expertise?

What are the costs associated with developing updated curriculum guides? Are teachers paid extra? Are they updated over the summer?

### *Curriculum policy*

Do board policies support the delivery of educational services? Are board policies in place to address each of the critical areas identified by the Texas Association of School Administrators Curriculum Audits program?

Does the district have board policy on curriculum development and management? When was it last reviewed?



How does the board use public debate regarding student performance and achievement to guide the curriculum development process?

How does the district provide for public debate regarding curriculum issues? How does the board receive information regarding progress in curriculum development? How does board policy provide for the curriculum development, implementation and evaluation process?

How does the board ensure that district administrators adhere to the district's curriculum review schedule? How does the board policy and board as a whole ensure or verify that curriculum is aligned with the TEKS and the state standardized assessments?

What training has the board or superintendent had in curriculum issues in the last two years?

### *Curriculum management*

How do administrators and principals work together to ensure that children from elementary schools consistently enter middle school well prepared? How do administrators and principals work together

to ensure that students from middle schools consistently enter high school well prepared?

What processes or procedures ensure that guides are used in the instructional program? Is periodic monitoring accomplished through reviews of lesson plans, regular meetings with grade level teams, observation, etc.? If not, why not?

Has the district provided for a master schedule for updating all curriculum guides? Is the revision schedule appropriate and aligned to revisions of the Texas Essential Knowledge and Skills (TEKS)? Who is responsible for updating the schedule? Are lesson plans regularly reviewed by team leaders, curriculum specialists and/or principals? To what extent is feedback given on lesson plans? Are regular meetings held with grade level teams to discuss instructional programs?

Do building level administrators regularly observe teachers to monitor teaching of the approved curriculum? Are teachers given feedback regarding instructional progress? How is the observation and monitoring of classroom instruction and student performance used to modify the curriculum or improve teaching techniques?

How much money is currently spent on pre-testing materials? How much time is spent on practice sheets or tests in preparation for the state standardized assessment? What is the district's strategy for aligning the curriculum with the assessment? For aligning the curriculum with the TEKS?

## **2.C. Instructional Program Selection, Implementation, and Evaluation Process**

Requirements for instructional programs are well defined and in most cases mandated by the state. However, the management and oversight role in implementing these programs and ensuring continual improvements in student performance and adherence to established standards is the responsibility of individual districts.

In Texas, certain program evaluations are required. For example, TEA's Financial Accountability System Resource Guide (FASRG) Section 9.2.7, "Evaluation of State Compensatory Education Programs" requires school districts to evaluate the effectiveness of their state compensatory education programs and include the results in their district improvement plans. Districts are instructed to evaluate their compensatory programs through the examination of the test performance and high school completion rates of at-risk versus other students. In 2001, the commissioner of Education changed the requirements for local school district annual audit reports to include a provision that the external auditor "determine whether the district evaluated the effectiveness of strategies involving students at risk of dropping out of school." In 2006, the Texas Education Agency produced the first state report of the Performance-Based Monitoring Analysis System (PBMAS), an automated data system that reports on student performance in selected program areas such as special education and bilingual education. The agency now produces annual PBMAS reports for school districts and open-enrollment charter schools.

Good management of instructional programs:

provides for systematic monitoring of instructional programs;

provides feedback on successful aspects of curriculum and instruction;

identifies areas for program revision;

provides professional development to teachers and administrators based on students' needs; and

benefits overall student achievement.

Because of the differences in the size and geographic location of school districts as well as the diversity of the children served within a district, each district has differing capacities for delivering

educational services, providing training and addressing the special needs of children in the district. Yet, all are held to the same system of accountability in Texas.

This module focuses on development, evaluation and modification of curricular programs and identified support services, staff development and general management processes which are in place in the area of instruction.

### **Data Needs**

Copies of any program or specific course evaluations done within the last three years

Pertinent instruction-related internal audits conducted within the last three years

Written evidence of program descriptions and goals and corresponding evaluation system and results

District and campus improvement plans

Documentation of professional development opportunities

Copy of compensatory education audit findings and reports

Copy of dropout audit findings and reports, as applicable

Program evaluation model used by the district

Test or other evaluation results used to measure the effectiveness of programs

Description about how district has translated learning objectives into professional development and teacher support activities

List of routinely produced research and/or evaluation reports

List of programs discontinued in the last three years

District level information from the Texas Education Agency's (TEA's) Performance Based Monitoring Analysis System (PBMAS) for the last three to five years.

### **People to Interview**

Superintendent

Assistant superintendent or other administrator with assigned responsibility for program evaluation

Principals

Department or program managers

Research and evaluation or accountability staff, if in a separate department

Teachers, librarians and instructional technology staff

Internal auditor(s)

### **Activities to Perform**

2.C.1. Identify and document the process used by the district to select and implement new programs or modify existing programs, showing any differences in the process that may exist if the program is a research-based program or one that has not been researched and documented. To the extent possible, determine if the system includes input from teachers who are expected to implement the new programs; begins with clear and measurable performance expectations and is subjected to debate by the board and community prior to implementation.

2.C.2. Identify and thoroughly document any program evaluation procedures or systems used by the district including any specific lines of accountability, including any board policy specifically relating to program evaluation and processes for holding staff or administration accountable for performance. Diagram the evaluation cycle and show when and how results are used to modify the educational delivery system.

2.C.3. Obtain copies of any outside program evaluations, audits and state or federal regulatory compliance visits such as visits from TEA and compile a list of findings, the district's corresponding response plan and subsequent actions taken by the district.

2.C.4. Prepare a chart using Performance Based Monitoring Analysis System (PBMAS) data. Develop trend analyses of participation rates of minority and economically disadvantaged students in special education, bilingual education and other special programs. Through interviews and examination of planning documents, determine how the district is using this information to improve the identification processes as well as the program delivery in these areas.

### **Questions to Ask**

#### ***New and modified program implementation***

Are decisions to bring in new programs or discontinue existing programs made based upon quantifiable data? When new programs are brought into the district are expected results defined? Are decisions regarding the introduction of new programs research-based?

Are there policies or procedures in place for piloting instructional programs that are not research-based? Under what circumstances or conditions can instructional programs that are not researched based be piloted in the district?

#### ***Program evaluations***

What staff is specifically assigned to perform program evaluations? Are these employees qualified for the job? Why or why not? Are their duties and responsibilities in program evaluation clearly defined in job descriptions? Is program evaluation appropriately aligned within the district's organization to ensure effectiveness?

How does the district ensure that there is high quality instruction at each school? How are principals held accountable for being the instructional leaders at their campuses? What systems are in place to provide teachers feedback regarding the results being achieved in their classrooms? How effective are the district and campus site-based decision-making committees in driving program improvements?

How accurate and effective are the strategies and performance targets portrayed in the campus and district improvement plans? Who is responsible for examining campus and district improvement plans to ensure that they include required staffing and appropriate budget allocations?

What data about various programs is collected routinely? How do the district and individual campuses prepare for the state standardized assessments? How many practice tests do they administer? What percent of time do they spend reviewing for the state standardized assessments? How much money does the district spend on pre-testing materials? What is the district's strategy for aligning curriculum with testing?

How frequently does the district evaluate the regular, bilingual/ESL, and special needs instructional programs? Is the program evaluation based upon measurable performance standards? When programs are not achieving the desired

results, is there an orderly process for modification that involves teachers and administrators in the decision-making process? Are decisions to discontinue existing programs reached with input from teachers and administrators?

How are program evaluations used to identify weaknesses in the curriculum? Professional development needs for teachers collectively or individually? Are state standardized test scores or other test scores analyzed both at a district and campus level to identify areas of instruction that need to be strengthened? What professional development opportunities are linked directly to identified program weaknesses?

Does the district review and analyze comparative data between similar districts to develop an evaluation of the district? Are teachers and administrators involved in review of current effective schools research to identify areas for improvement and/or further study?

How does the district use current or longitudinal student performance to analyze academic success, assess curriculum and assess the strengths and weaknesses of instruction?

What programs have been discontinued in the last three years because the program evaluations proved them to be ineffective? What programs have been discontinued without evaluation and why?

### ***External evaluations***

What criteria does the district use to select external evaluators? How has the district prepared for external audits or programs in the past? What data does the district examine to determine if they are at risk for an external program review by TEA or some other group or organization? How does the district ensure that all federal guidelines are adhered to, particularly those that are subject to external review?

What major findings have resulted from external evaluation? How has the district responded? What substantive improvements have been made as a result of external findings? What major elements of an audit or external evaluation have not been addressed and why?

## **2.D. Student Performance**

School districts need sound systems for managing the instructional process to ensure that programs provided to students produce continual improvements in student performance. This effort includes maintaining a comprehensive program for student assessment that accurately evaluates student achievement across all content areas, grade levels and demographic groups.

### **Data Needs**

Data for the district and each campus for the last five years, including statistics on student assessments at all levels, participation rates on assessments, retention rates by grade level, graduation rates in total and under each of the various programs, dropout rates and the like.

SAT and ACT reports by campus for the last five years, if available

Schedule and job descriptions for guidance counselors if involved in district or campus assessments

Performance Based Monitoring Analysis System (PBMAS) data for the past five years

District and campus improvement plans

Compensatory and dropout audit results for all years available (first done in 2002-03)

Reports showing the disaggregation of test scores and other related data as well as any corresponding procedures that discuss how the data is used by teachers and administrators to modify programs, enhance staff development, etc.

Board policies or other internal or external publications given to students and parents regarding the recommended high school program, advanced placement examinations, concurrent or dual enrollment programs and SAT and ACT preparation and testing opportunities.

TEA observations or other external evaluations.

### **People to Interview**

Superintendent

Principals

Curriculum and Instruction director or specialist

Program evaluator and/or data specialist

Information technology specialist or director

Guidance counselors

Department or program managers

Teachers

### **Activities to Perform**

2.D.1. Chart trends in student performance on the state standardized assessments, Scholastic Achievement Test (SAT) and American College Test (ACT), Advanced Placement exams, as well as dropout and attendance data for the last five years, disaggregated by ethnicity, economic grouping and grade level. Include state standardized assessments participation and exemption rates by campus, grade, sub-population and economic group. Examine the gaps in performance at various grade levels and test types (i.e., math, reading, writing) between ethnic minority and Anglo students and determine if the trend is toward continuous improvement at all levels.

2.D.2. Review DIP, CIPs and documents responsive to Performance Based Monitoring Analysis System (PBMAS) data or other reports for specifics addressing student performance, including strategies and subsequent evaluations of

identified programs and corresponding budgeted funds. Prepare a list of strategies by component and to the extent possible, show how these efforts have affected student performance.

2.D.3. Prepare a chart showing all policies and publications pertaining to college and career readiness such as the recommended high school program, advanced placement examinations, concurrent or dual enrollment programs, SAT and ACT preparation and testing opportunities; and determine the effectiveness of each. Determine the amount of time spent and the role of counselors in pre-college and career counseling and how this ties to the various programs described above.

## **Questions to Ask**

### *Performance*

What trends in student performance have emerged over the last five years? How do those trends

compare to what is happening in the state, region and peer districts? How are ethnic minority and economically disadvantaged students performing in comparison to non-minority and advantaged students? When negative trends have been observed, how has the district responded? How have individual campuses responded? How successful were countermeasures?

How are students exempted from the state standardized assessments? Are the numbers of state standardized assessments exemptions increasing (or decreasing)? Are they increasing (or decreasing) at certain campuses? Are exemptions increasing (or decreasing) among certain programs such as special education or bilingual education? Are exemptions increasing (or decreasing) among certain gender, ethnic or economic groups of students? If so, why? What is the correlation between rising state standardized assessments scores and rising exemption rates? What other anomalies exist in test participation? Were an inordinate number of students absent on test day as compared to other days? Which campuses had higher than average absences on test day?

How does the district ensure that all personnel at all campuses follow state laws regarding testing exemptions for special populations? What is the process used to decide whether students should be tested on state standardized assessments or the state approved alternative assessments for special education students? Are these processes or procedures being uniformly applied at all campuses? If not, which campuses are testing more children with the alternative assessments?

### *Strategies for improvement*

What, if any, findings have been reported during site observations by TEA or other external evaluations? How has the district responded? What strategies in the DIP and CIPs specifically address performance trends? If performance indicators triggered the TEA site observations or other external evaluations, what major initiatives have been undertaken to ensure that the performance problems are not repeated?

Are student test results reviewed, analyzed and evaluated at the district level? At the campus level? At the classroom level? Are programs modified, staff development opportunities planned, or staff evaluated based upon the results of such analyses?

Is planning for support and/or remediation based on item analysis of state standardized assessment data and other evaluative information? How and when are test results reported to parents, the Board of Trustees, media and community?

***College and post-secondary readiness***

How is the district ensuring students are taking the foundation high school program in accordance with the law? How many students are currently graduating under the foundation program? How is the information about the graduation programs disseminated to parents and students? How has the librarian instructed students so that they are ready to use online search strategies and other sophisticated research techniques at the college level?

How many students are participating in other activities such as advanced placement exams and dual or concurrent enrollment courses that would prepare students for college and facilitate college transition? How are counselors involved in the process? At what grade level does counseling regarding college begin? Is this soon enough in the process to allow students to change direction? Are personalized graduation plans developed for students to guide the courses they take during high school?

**2.E. Instructional and Administrative Technology**

Instructional and administrative technologies have become critical parts of a school district's educational programs and general operations. Computers in classrooms, computer labs and automated reporting systems are no longer the exception, but often the norm. A tool for planning and assessing school technology and readiness is the Texas Campus StaR Chart. The StaR Chart was developed by the TEA and provides targets in the areas of teaching and learning, educator preparedness, administration, support services and infrastructure.

**Data Needs**

- Completed Texas Campus StaR Charts
- Documentation to support the data shown in the StaR Charts
- District, campus and technology plans pertaining to instructional technology
- Policies and procedures, including acceptable use policies
- List of all computer hardware and software
- Campus and program computer availability patterns
- Copies of contracts from any outsourced technology support or maintenance
- Job descriptions for technology staff
- Grant funding applications and documentation of awards



Staff training requirements (mandates) related to technology

Number of students taking courses via distance learning by course

### **People to Interview**

Superintendent

Principals

Instructional technology director

Instructional technology technicians and staff

Curriculum leaders

Campus technologists or curriculum integration specialists

Librarians

Teachers

### **Activities to Perform**

2.E.1. Prepare an exhibit showing campus responses for the Campus StaR Chart in each of the key areas. Include information in the chart regarding progress toward meeting the targets, strategies used to meet the targets, numbers of students taking distance learning courses and evidence of how technology is integrated across all curriculum areas at all grade levels. Note areas of strength or weakness and through interviews determine the underlying reasons.

2.E.2. Obtain a list of computers for all campuses and programs by campus, type and capacity of computer and location (whether classroom or lab-based). Establish a pupil-to-computer ratio by campus and program for all computers regarding of usability. Calculate a pupil-to-computer ratio based upon computers that can support grade-appropriate programs and Internet access and compare this to statewide and national goals. Examine opinion survey results to determine the perceived effectiveness of technology in the district.

2.E.3. Compile a list of all educational technology equipment in addition to computers, such as servers, teleconferencing capabilities and connections. Determine areas of strength and weakness in the current infrastructure in comparison to the educational needs of the programs and any planned expansions.

2.E.4. Prepare a chart of budgeted and actual revenues and expenditures associated with computer service and other technology fees for the last few years, including grant funds. Describe the decision-making process within the Information Technology Department and identify who has ultimate responsibility for determining the manner in which funds are expended and how grants and other external and internal funding is sought to meet the district's needs.

2.E.5. Prepare a list of teacher training and support activities that facilitate the integration of technology into classroom instruction, including technical and instructional assistance from fellow teachers, technicians, external providers and others. Examine curriculum guides, published procedures and teacher survey and focus group comments to determine the frequency of use and how each component is evaluated for effectiveness.

2.E.6. Diagram the Public Education Information Management System (PEIMS) data collection

and compilation process starting at the campus level through the final submission and re-verification process. Determine what quality assurance steps are in the system, where there are points of redundancy and identify any other areas of weakness.

## **Questions to Ask**

### ***Technology integration in the classroom***

How does the district assist schools in meeting the targets of the Texas Campus StaR Charts, especially in the teaching and learning areas? How does the district ensure that time is provided for teachers to teach the required technology applications curriculum? How does the district ensure that students have time to learn the technology curriculum? How does the district ensure that students are proficient in the technology portions of the TEKS and meet all technology literacy requirements in No Child Left Behind Act (NCLB), Title II, Part D? How does the district ensure that required coursework (19 TAC Chapter 74, Subchapter A) is offered and/or completed?

### ***Availability of computers***

How does the district compare to state and national goals in the number of computers available to students? How old are computers? What is the capability of the computers? Can they run complex programs and software? How many of the computers can access the Internet? How does the district ensure that older computers are retired and replaced on a regular schedule? How does the district ensure that the computers placed in the classrooms can support the technology needs at each grade level and for specific courses? How do parents, students and teachers feel about the availability of computers?

What types of special programs make technology available to parents and students? For example, can parents or students check out laptops for home use? Is the library open after regular school hours to accommodate community needs? What types of configurations, such as learning labs and portable computer stations, are used to provide computer access without having to buy as many computers?

Is a policy or procedure in place for handling controversial printed and Internet-based materials? What board policy is in place to address questioned resources in the library or classroom? How does the district comply with the Internet Protection Act?

### ***Availability of other hardware***

What additional technological capabilities are available in the district (i.e., distance learning equipment, teleconferencing equipment, wide area networks, local area networks, servers) that are designed to support instruction? How is the district using these capabilities? Are the systems being used to full capacity? If not, why not? What would improve the overall infrastructure and add value to instruction?

### ***Budgets and planning***

Does the district have a long-range plan for use of technology in its instructional program? How is the plan tied to the goals and requirements in No Child Left Behind? How does the long-range technology plan compare to the E-Rate technology plan? Does the district have an approved policy for purchasing and using computers in the instructional program? Does the district have an annual budget allocation established for academic or instructional hardware and software acquisition?

How does the district's selection process ensure that software purchased for the classroom is focused on student learning? How efficient is this delivery system? What other delivery systems exist that may have greater capacity for reaching more students? How are learning objectives linked to the purchase of software and hardware for instructional programs? How many different software programs does the district use for each instructional program area? How does the district justify the purchase of all of these programs?

Who is responsible for finding, writing and submitting grant opportunities and applications for technology? How much money has the district received in grant funds? Has the district taken advantage of E-Rate telecommunication discounts? What has the district done with grant funds?

How are federal funds provided through No Child Left Behind spent to support instruction? What percent of the budget is spent on professional development? How does this percent spent on staff development compare to the recommended percent noted in state and national standards and required in No Child Left Behind?

### *Distance education*

How is the district using distance education? What benefits are being achieved for students through distance education offerings? What savings or efficiencies are achieved through distance education

operationally? What is annually budgeted for distance learning or other electronic or online programs for students that expand learning?

How are distance education opportunities publicized to students and parents? Who is actively searching for new distance education opportunities for the district? How is distance education addressed in technology plans and budgets? What priority does the district place on expanding distance education opportunities? What types of partnering arrangements exist for distance education? How are the partnerships documented? What is the district's role in the partnership?

### *Teacher training and support*

How is technology used in instructional programs? How many courses or grade levels have technology meaningfully integrated into the curriculum?

What evidence exists to show that educators are becoming technology literate as specified in No Child Left Behind or State Board of Educators Certification's (SBEC's) standards? How are teachers trained to use technology in the classroom? How are teachers encouraged to integrate technology into the curriculum? How many courses or grade

levels have technology meaningfully integrated into the curriculum? What support do teachers receive for the use of technology in the classroom? Hardware support? Curriculum and lesson planning support? What technology support and training is provided for the technology applications courses provided at the high school (19 Texas Administrative Code (TAC) Chapter 126)? How is distance education used for staff development in this area?

What time management techniques are in place via software programs to assist administrators, librarians and teachers to plan their time more effectively?

***PEIMS reporting***

Are there policies and procedures in place to ensure accurate collection and reporting of PEIMS, state standardized assessment, and dropout data? What data reporting problems has the district experienced in the last three years and how has the district dealt with those issues? What attendance and other campus-level administrative tasks are automated? What redundant data entry must be done either from manual forms to the computer or from one computerized system to another?

**2.F. Staff Development**

According to Texas Education Code (TEC) Section 21.451, staff development provided by a school district must be conducted in accordance with minimum standards developed by the commissioner for program planning, preparation and improvement including:

must include training in technology, conflict resolution and discipline strategies;

must include training that relates to instruction of students with disabilities and designed to include educators who primarily work outside special education;

may include instruction as to what is permissible under law, including opinions of the United

State Supreme court in regard to prayers in public schools;

must be predominantly campus-based, related to achieving performance objectives and developed and approved by campus site-based decision-making committees; and

may use districtwide staff development developed and approved through the district-level decision process.

Regional Education Service Centers are also specifically assigned responsibility for providing certain types of staff development to school districts within the region, some of which is provided at no charge to the participating districts.

Many districts respond to individual campus needs and include training and activities that enable campus staff to plan together to enhance existing skills, share effective strategies, reflect on curricular and instructional issues, analyze student achievement results, reflect on means of increasing student achievement, study research, practice new methods, identify students' strengths and needs, develop meaningful programs for students and appropriately implement site-based decisions.

## **Data Needs**

Training calendar for coming year

Documentation on staff development programs to help orient new teachers or other instructional staff (i.e., assigned mentors)

List of staff development classes offered externally or internally to instructional staff during the last year and number attending

Total number of class hours attended for each year of the last five years

Campus and district improvement plans as they pertain to staff development plan, or any other staff development planning documents

Texas Campus StaR Charts

Teacher and professional training evaluation or feedback instruments

Staff development budgets (central and campus-based) for last five years

Staff development staff organization charts and job descriptions

Number and dates of in-service training days observed in the last five years

Number of substitute hours used over each year of the last five years to relieve individuals for in-service training

District mentoring policies and procedures

## **People to Interview**

Principals

Staff Development director or coordinator

Teachers, librarians and instructional technology staff

Counselors

## **Activities to Perform**

2.F.1. Prepare flow chart depicting the staff development function including planning, organizing, notification of training availability, offering courses and tracking participation in staff development opportunities. The organization chart should be used as a point of reference to determine how and when the central office organization interacts with campus staff, particularly the involvement of the site-based decision-making committees in the process as well as information about how staff development is linked to teacher and other instructional staff evaluations. Examine the job descriptions of each position shown and determine if duties performed correspond to what is described in the job description content.

2.F.2. Identify primary campus-level, centrally delivered and externally offered staff development initiatives conducted in the last year and examine any documented feedback from teachers or principals to rate the effectiveness

of the programs. Compare the actual classes offered to needs identified in planning documents such as the campus and district improvement plans and note areas of difference.

2.F.3. Document process for tracking required and optional staff development hours. Randomly check personnel files for record of staff development hours – both required hours and optional hours (i.e., required hours: gifted and talented teacher and administrator annual training hours). Through interviews, determine how supervisors or principals use these records when evaluating instructional staff.

2.F.4. Chart the staff development budgets (central and campus-based) for the last five years, the number of full-time employees assigned to staff development activities, the number of teacher in-service days observed during each of the last five years (separating those that require release time and those conducted during the summer or on school holidays), the number of substitute hours used for in-service training in each year of the last five years and total number of class hours attended in each year of the last five years. Identify trends and comment on the appropriateness of the changes identified.

## **Questions to Ask**

### *Staff development delivery system*

Is the responsibility for coordination of staff development centralized or decentralized? How is this

the best delivery method for this district? What communication problems exist among or between campuses and administration that are inhibiting the process? Who is responsible for ensuring that staff development supports current curriculum, state standardized assessments and the TEKS? What is the role of site-based decision-making committees in the staff development process?

How is staff development planned? How does the planning process identify prioritized staff development needs? What relationship exists between new instructional materials adoption and staff development needs? Are surveys of staff development needs conducted on a scheduled basis? How is staff development linked to student performance or needs? How is staff development related to specific content areas that are taught? Is there a process for evaluating the quality of staff development activities? Is staff development based on multi-year planning? Are teachers and campus administrators involved in planning staff development programs? Are teachers used as instructors for

staff development programs? Are teachers offered opportunities to be trained to provide ongoing staff development in specific areas? Is train-the-trainer ever used to bring information back to district personnel? How frequently are teachers and librarians given an opportunity to attend professional conferences?

Are new and beginning teachers provided mentors to help them assimilate into a campus? Are beginning teachers provided an intense mentorship program during their first year of teaching? Are new employees given an adequate orientation to district policies and procedures? Are there staff development opportunities available through shared service arrangements with local area colleges or universities? What staff development is conducted through the Regional Education Service Center?

Does the district have a training calendar? If yes, is it also online? Is there any online and/or distance training provided in the district?

Does the district set minimum continuing education or training hours for instructional staff? How are the number of state-mandated hours of training integrated into these district required minimums (i.e., gifted and talented education requirements)?

Is an in-depth supervisory training program offered? Is attendance mandatory or optional? What are the ramifications of failure to attend?

Does the institution have a partnership with a nearby community college or university for training? Does the institution pay any of the costs for the pursuit of additional certification or degrees? Does the pursuit of additional certification or degrees qualify for mandatory staff development hours?

Are staff development goals linked to districtwide goals? How many days for staff development does the institution allow?

#### ***Documentation and use of participation data***

How does the district or the human resources department collect feedback from participants on training received? How does the human resources department use this feedback to develop and refine training? Does the district evaluate the usefulness of training periodically?

Do provisions exist for a teacher recognition program based on instructional success? Does the board or community recognize outstanding teacher(s)? How are opportunities for improvement and possible training identified during teachers' evaluations? Are teacher appraisals used individually or

collectively to develop in-service/staff development programs and services and in the improvement of instructional delivery?

Who oversees contractors that provide training? How are contractors evaluated? What are the best and worst of the contractors used by the district? How are decisions made regarding contracts? How are purchasing guidelines adhered to when contracting for training services? How is feedback on these training classes used to determine which vendors to ask to return and which ones to discontinue using?

#### ***Budgets and staffing***

Are staff development resources allocated based on prioritized needs? Is training scheduled to be least

disruptive to an employee's job schedule? Does the institution provide incentives for training outside regular hours? How does the district budget for staff development? By employee? By program? Some other method?

What training opportunities are provided in summer months?

What contracted services does the district use? Why is the district contracting for services rather than providing the training in-house? What train-the-trainer opportunities are used to decrease overall costs?

## **2.G. Special Programs**

All districts are faced with the challenge of providing programs for students with special needs. These programs allow a district to provide educational programs that are most beneficial for individual students in terms of instructional level, student interest and/or identified need. Many of these

programs may be combined with regular classroom programs (based on individual needs) that provide for a more complete education and integration with other students. The special programs examined here include:

Special Education

Bilingual Education/English as a Second Language (ESL)

Advanced Academics (Gifted and talented (G/T), dual credit, pre-Advanced Placement/Advanced Placement (pre-AP/AP), early college high school, International Baccalaureate (IB), academic magnets)

Response to Intervention (RtI)

At Risk, Compensatory Education and Alternative Education Programs

Career and Technical Education (CTE)

Migrant Programs

Athletics and Extracurricular Activities

Included in the examination are assessment programs, program monitoring, cost analysis, interface with regular programs, parental/community involvement and program evaluation.

### **Data Needs**

Strategic, campus and district improvement plans as they relate to special programs

School and District Report Cards

Number of children served by each special program, disaggregated by subpopulation, for the last three years, as well as the academic performance of students in each program

Budget information for each special program for the last three years

Staffing information for each special program for the last three years

Any due process hearings or TEA complaints filed against the district in the last two years



Program evaluations either external or internal done in the last three to five years

### **People to Interview**

Superintendent

Assistant superintendent with assigned responsibility

Program directors

Administrative staff with assigned responsibility

Principals

Teachers

Counselors

### **Activities to Perform**

2.G.1. Chart the number of students served in each special program by home campus, ethnicity and economically disadvantaged status. If available, chart the number and demographics of students served over time and show percent change. Where wide variances are observed, attempt to find out the reason for the variance.

2.G.2. Examine the organization and staffing charts and job descriptions for each special program and interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department(s); document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future; and explain the background for changes. Include any contracted individuals or services or committees that oversee curriculum and instruction in the organization chart;

show the reporting relationship; and identify who is responsible for monitoring the contracts.

2.G.3. Chart the budgets and staffing of each special program. If available, chart the budgets and staffing in each special program over time and show percent change as compared to percent change in student enrollment in each special program.

2.G.4. Examine academic performance data of students served in each special program by school, ethnicity and program status. Also chart exemption and alternative testing rates for applicable programs and show trends over time. If available, chart the number and demographics of students served over time and show performance change.

2.G.5. Examine special program strategic plans, DIP and a sample of CIPs and identify all goals,

objectives, strategies and budgeted funds for each special program. Compare this outline to student performance information, any program evaluations done internally or externally and data in PBMAS reports to determine whether the goals are consistent, appropriate and achieve the desired results.

### **Questions to Ask**

***Number and type of students served***

What special programs are growing in the number or percent of students served? What special programs are declining in the number or percent of students served? Why is this happening? What special programs serve students that are demographically disproportionate to the overall student population of the district? Why? What is being done to ensure that students are served equitably in all special programs?

***Organization***

How does the current organizational structure support special programs? Encourage cross-functional and interdisciplinary cooperation? Provide support for classroom teachers? Facilitate the needs of campus-based staff? Ensure compliance with federal, state and local laws, rules and regulations? Where does the system break down? What efforts have been made in recent years to improve the structure and ensure that campuses and particularly teachers have what they need to be successful?

Are the responsibilities of central office staff clearly defined? Are the responsibilities of campus-based personnel clearly defined? Is each category of employee performing its intended function?

How does communication flow from the central office to the campuses and vice versa? At what points in the process is communication hampered or enhanced? How could obstacles to communication be overcome? What formal and informal mechanisms exist to ensure good communication?

***Budgets and staffing***

How are budgets and staffing allocations made to ensure equity? How are budgets and staffing formulas linked to the actual number of students served?

***Academic performance***

What subgroups of students are being most successful academically in the special programs? How is performance data being used to modify programs and delivery methods to ensure student success? How does the district measure success with each special population? Is this measure an accurate measure of student success?

How and when are students exempted from the state's assessments? How and when are alternative testing instruments used? When alternative test instruments are used, does the district use a state developed alternative test, or a locally developed alternative assessment? What percent of students are taking the alternative assessment and is that percent reasonable given the makeup of the student

body? How reasonable and equitable are the exemptions and alternative testing decisions? How does the district use the results of alternative tests to evaluate program effectiveness and make modifications to program delivery?

***Planning***

Does each educational department have a mission statement or an understanding about how their department fits into the overall district mission and goal? How does the department monitor and measure success? How does each department know it is meeting the needs of the identified student population? Who are those students? Who are the relevant teachers, professionals, paraprofessionals, administrators, or others, involved in the programs?

**2.G.a Special Education**

The federal Individuals with Disabilities Education Act (IDEA) requires free, appropriate public education for all children with disabilities in the least restrictive environment, regardless of the severity of their physical, emotional or educational challenges. This law is also designed to protect children and parents in educational decision-making and requires districts to develop an individual education plan for each child with an identified disability that provides access to the same curriculum received by all children.

**Data Needs**

Special Education organization chart

Special Education Procedural Handbook

List of teachers' certifications and permits

Parent/Student Handbooks

Any pertinent special education compliance reports

Special education transportation policies and procedures

Random sample of Individualized Education Plans (IEPs), with names redacted for confidentiality purposes

Pre-referral processes and procedures

Identification process documentation

Admission, Review and Dismissal (ARD) procedures and relevant board policy

Medicaid reimbursements from any source over the last three years

Salary schedule and overtime records for special program staff

**People to Interview**

Superintendent or assistant superintendent with assigned responsibility

Special Programs coordinator

PEIMS coordinator

Principals  
Special Education teachers and aides  
Parents  
Paraprofessionals  
Professionals, including speech therapists and occupational therapists  
Guidance counselors  
Social Workers  
School Psychologist  
Pre-referral teams (campus-based)  
Human Resources director

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for special education:

2.G.a.1. Diagram the special education pre-referral, referral, testing and ARD processes. Note areas

where the system is redundant; does not meet federal or state timelines for compliance; where communication breaks down; or where the process is inefficient or ineffective. Also show how parents are informed about the evaluation process and their rights under the law.

2.G.a.2. Prepare a chart of salaries and overtime for diagnosticians, therapists and other special education

staff and determine if the district or the special education cooperative employs sufficient staff to support the workload, whether there are outside contractors that could be used to supplement or replace staff to increase the quality and quantity of services offered at lower cost. If an external contractor is used, determine the cost of the contract, the amount and quality of work performed and whether in-house staff could provide higher quality and quantity of services at lower cost.

2.G.a.3. Prepare a chart showing reimbursements from the School Health and Related Services

(SHARS) and Medicaid Administrative Claiming (MAC) programs over the last three years. Examine the process used for claiming and determine if there are any services that are eligible for claiming that are not being claimed and why.

### **Questions to Ask**

How does the district provide special education services to students such as speech, counseling services, physical and occupational therapy as needed? Does the district participate in cooperatives or other shared service arrangements with other districts? In what way does the district use the services provided through the Regional Day School for the Deaf? Blind? Other cooperatives?

Does the district use a pre-referral intervention process for identification of special needs students? Are teachers and other support staff trained to refer students with possible special needs? What training is provided to regular education teachers on how to effectively instruct special education students in their classrooms? What percent of referrals are valid or invalid? Are campuses and teachers with high numbers of invalid referrals or referrals that do not qualify given additional training to ensure they understand and use the pre-referral intervention process (if available)?

Since schools are required by law to serve students in the least restrictive environment and to give preference to the home school, how is the district implementing this ruling? What percent of special education students attend their home school?

How are workloads for diagnosticians determined? Is all testing and review conducted in compliance with state and federal laws concerning special education?

Does the district participate fully in the SHARS and MAC programs? How much has the district received in reimbursements over the last five years? What could be done to enhance claiming and increase Medicaid reimbursement revenues?

How does the district handle complaints pertaining to special education? How does the district know if parents have complaints? Do parents have to complain to TEA, or is there a district process? How does the district monitor the internal process for effectiveness? Are special education-related lawsuits, due process hearings or requests for mediation pending in the district? What are primary areas of complaint? How has the district adapted the program to prevent or reduce the risk of legal action?

How does the district ensure compliance with IDEA, which requires access by all special education students to the general curriculum? If there is a separate curriculum, why? Is the district in compliance with this federal regulation? Are performance measures of success for students with disabilities aligned consistently with those of all students? Do IEPs reflect appropriately each student's objectives in meeting TEKS and participating in the state standardized assessments?

Do schools and the district evaluate student performance data to ensure that students are provided instructional programs and support services that are consistent with the IEP and as much as possible, with the learning objectives for all students?

How are community and social services programs used to supplement district programs? What kinds of non-educational money has the district requested from its Regional Education Service Center to support community and social service programs?

Does the district have a special education advisory committee although they are no longer required? If yes, who is on the committee? What is the committee's role and responsibility?

Are special education program offerings consistent with student needs? Are IEPs reviewed annually? Are ARDs conducted as required by law? What percent of parents attend their ARDs? What provisions are in place for private placement when the district cannot meet the needs of a student? Are regularly scheduled reviews performed on private placement programs?

How does the district ensure that students are served in the least restrictive environment? How many students in the district are served for at least 50 percent of the day in regular classrooms? What accommodations are made for mainstreamed students? Does special and regular education staff collaboratively plan curriculum objectives? How does special education staff assist regular education with development of techniques and materials? Do regular and special education staff meet on a regular basis? Do regular and special education staff develop cooperative activities for specific students? What training is provided to teachers who have special education students in their classes? Do they use co-teaching?

Has a cost analysis been performed on the special education program that identifies:

cost per pupil for special education instruction?

percent of district funds spent for special education?

total special education program costs?

percent of student enrollment served by the special education program?

cost of assessment per special education pupil?

per pupil cost of each type of special education program

cost per pupil for supportive services?

special education transportation costs?

How much is spent to bus students to a campus other than the home school? Are these services in response to specifics on a student's IEP? How many special education students ride a regular bus?

How does staff development provide for training of special education staff, regular education staff and gifted and talented staff so that:

regular education staff receive training in special education?

special education staff receive training offered for regular education?

regular education staff receive training in gifted and talented education?

principals and other administrators receive training in special education?

both regular and special education staff receive training on innovative school programs identified in Texas schools?

Does the district use the Regional Education Service Center for special education training efforts? (Also mentioned in Staff Development)

What training opportunities does the district provide to parents relating to confinement, restraint, seclusion, and time-out?

Do schools and the district evaluate and monitor the ratio of students enrolled in special education as a subset of the entire student population? By student group? In comparison to the state, regional and peer averages? Are there significant differences among student groups? Why?

What types of assistive technology are made available to special needs children? What special adaptive devices are available in classrooms? In the library? Are all areas of the campuses ADA compliant, including the libraries? If not, why not; and what plans are in place to remedy areas of

non-compliance?

## **2.G.b Bilingual Education/English as a Second Language (ESL)**

The TEC, Chapter 29 requires all school districts with an enrollment of 20 or more Limited English Proficient (LEP) students in the same grade level to offer Bilingual Education (BE), English as a Second Language (ESL) or an alternative language program. A LEP student is defined as one whose primary language is other than English and whose English language proficiency limits the student's participation in an English language academic environment. The law specifies that BE must be provided in pre-Kindergarten through the elementary grades and that BE/ESL or other transitional language instruction approved by TEA is provided in post-elementary grades through grade 8. For students in grades 9-12, only instruction in ESL is required.

### **Data Needs**

BE/ESL referral numbers

BE/ESL parent waiver/denial numbers

Any program evaluation data

BE/ESL grant applications and awards

Information on, or a list of Language Proficiency Assessment Committees (LPACs) operating in the district

Curriculum guides as they pertain to BE/ESL programs

### **People to Interview**

Superintendent

Principals

BE/ESL Program director (central administration)

BE/ESL Teachers

BE/ESL Teachers' aides and paraprofessionals

LPAC committee members

Parents

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for Bilingual/ESL programs:

2.G.b.1. Diagram the Bilingual/English as a Second Language (ESL) identification, assessment,

educational delivery and exit processes, including the various types of bilingual programs available by grade-level and the use of the Language Proficiency Assessment Committee (LPAC). Note areas where the system is redundant, does not meet federal or state timelines for compliance, where communication breaks down or where the processes are inefficient or ineffective.

2.G.b.2. Prepare a list of all curriculum guides used in the Bilingual/ESL instructional programs and

determine whether the guides are current, are in alignment to TEKS and the state's standardized assessments and contain useful strategies for ensuring that students are meeting state and federal annual English proficiency objectives and academic standards and are exiting the program in a timely manner.

### **Questions to Ask**

Does the district implement and use the No Child Left Behind (NCLB) required English language assessment as a basis for LEP identification and instructional program placement? Are home language surveys distributed? Who is primarily responsible for identifying students? For assessing or evaluating students?

Are parents notified that their child needs specialized language instruction, as required by federal law?

What grade levels have more than 20 students that require services? Is the district complying with the requirements in law to provide services to these students? If not, why not? If the district has an enrollment of less than 20 children in any one grade level that require these services, what services

are provided?



Are parents notified that they can remove their child from LEP programs at any time, as required by federal law? Has the district obtained the signed parental authorization required by state law? If not, why not?

What grade levels offer Bilingual Education? What grade levels offer ESL?

What languages are represented in the bilingual education program? In the ESL program?

If your district offers bilingual education, what model does the district employ (e.g., transitional early exit, transitional late exit, dual language immersion one-way, dual language immersion two-way)?

If you district offers ESL, what mode does the district employ (e.g., content-based ESL, pull-out ESL)?

What percentage of Bilingual/ESL students are also receiving special education services? How are these students served?

How do student assessment programs evaluate student needs for bilingual programs and services? How are community and home surveys completed to determine present and future student needs?

Are there specific criteria adopted for exiting students from bilingual programs? Are criteria consistently applied and do students regularly exit the programs in a timely manner? For students exiting from the bilingual program to the regular curriculum does the district review and monitor student's progress with:

student exit data reviewed and evaluated?

bilingual program objectives developed to ensure student success in English speaking classes?

Does the district track bilingual students' academic performance over time to assess program effectiveness? Are bilingual students offered instructional programs that keep them on grade level expectations for TEKS? Review exemption percentages for students in Bilingual Education. Review the number of students taking the Spanish version of the state standardized assessments.

How are parents involved with the bilingual programs? Is parent input solicited on the bilingual education program? Does the district have a bilingual advisory committee that includes parent representatives? How many parents request a waiver or deny student entry into BE/ESL programs when students qualify?

Are parents offered ESL classes or other services to allow them to help in their child's education? Does the district offer interpreters to non-English speaking parents to promote communication especially during parent conferences? Are printed communications with parents provided in their home language, when feasible?

Is a cost analysis performed on the bilingual program that identifies:

cost per pupil for bilingual instruction?

cost of assessment per bilingual student?

per pupil cost by program, for ESL? Bilingual Education? Tutorial programs?

Do the bilingual program instructional materials meet the district's needs with: costs for materials controlled through district purchasing procedures? The district maintaining an inventory of bilingual material?

What bilingual resources are available in the libraries? How are these resources allocated? Is allocation proportionate to the number of students served? What library resources are available to parents for check out and home use, if any?

Has the district established a plan to employ trained bilingual teachers to meet program needs by cooperating with a university and other staff development programs to train bilingual teachers? Does the district have a formalized recruiting process to hire bilingual teachers? Do recruiting activities include foreign recruitment? Are stipends or other incentives paid to encourage teachers to seek certification?

Is there an ongoing staff development program for teachers in bilingual and regular classes impacted by bilingual students, as required by federal law? Does the district provide staff development in bilingual education for administrators, counselors and teachers? Does staff attend staff development activities offered by professional associations, TEA and others? Have general education as well as bilingual and ESL teachers received training in English Language Proficiency Standards? Who provided the training?

**2.G.c Advanced Academics (Gifted and Talented (G/T), dual credit, pre-Advanced Placement/Advanced Placement (pre-AP/AP), early college high school, International Baccalaureate (IB), academic magnets)**

*Gifted and Talented* Section 29.12 of the TEC states that school districts “shall adopt a process for identifying and serving gifted and talented students in the district and shall establish a program for those students in each grade level.” In accordance with section of 29.123 of the TEC, the State Board of Education (SBOE) created and revised the Texas State Plan for the Education of Gifted/Talented (G/T) Students establishing three levels of performance measures – acceptable, recognized and exemplary – for five program areas: student assessment, program design, curriculum and instruction, professional development and family-community involvement. Recognized or exemplary performance measures are provided as “viable targets that local district educators seeking excellence, both for their district and for its students, may strive to attain.” Effective school districts base their G/T programs on the state plan and provide services to address the intellectual, social and emotional needs of G/T students through the collaborative efforts and support of educators, parents and community members.

*Opportunities to earn college credits* Texas high schools must offer opportunities for college credit, as the Texas Education Code §28.009 requires the following:

Each school district shall implement a program under which students may earn the equivalent of at least 12 semester credit hours of college credit in high school.

Each school district shall annually report to the agency:

the number of district students, including career and technical students, who have participated in the program and earned college credit; and

the cumulative number of courses in which participating district students have enrolled and college credit hours the students have earned.

The opportunity for at least twelve college credit hours can be met through dual credit, Advanced Placement, International Baccalaureate, and advanced technical credit courses, including locally articulated courses.

***Advanced Placement*** Advanced Placement (AP) and pre-Advanced Placement (pre-AP) are key programs in districts' college readiness and academic rigor initiatives. The AP program is facilitated by College Board and partnerships between secondary and postsecondary schools. The AP program includes more than 30 courses, with AP exams offered as an opportunity for college credit by examination. AP exams measure a student's ability of college-level performance. Pre-AP courses prepare students for academic rigor through high expectations and intellectual engagement, thus developing skills for AP, college-level, or rigorous courses.

***International Baccalaureate*** The International Baccalaureate (IB) Diploma Programme is a college-level program offered at the high school level. IB uses high school curriculum "anchored by three core components: a theory of knowledge course; creativity, action, and service activities; and an extended essay project based on original independent research," (IB, 2007). Students are tested through written end of program exams, with performance measured by standard criteria.

***Dual Credit*** Dual credit is a program that allows students to earn college and high school credit simultaneously upon completion of the course. Dual credit courses are college-level, exceeding the high school level of instruction for the corresponding course. Dual credit is an opportunity for students to not only earn credit, but gain preparation for college-level or academically rigorous courses.

***Early College High School*** An Early College High School (ECHS) must be approved and designated by TEA. College-level and high school courses are combined, allowing students to earn up to 60 college credit hours while completing a high school degree. An ECHS is required "the outreach, curricula, and student learning and support programs that enable the participating student to combine high school courses and college-level courses," (TEA).

***Academic Magnets*** Academic magnet schools admit students through a selective application process. An academic magnet school offers advanced courses built upon academic rigor. Academic magnet schools focus on college and career readiness and intellectual growth.

## **Data Needs**

Documentation of administrator and teacher annual training hours

District's G/T plan

Assessment instruments and procedures used for identification of gifted students

G/T curriculum K-12

Teacher certification and training documentation

Student grades in advanced courses

Student scores in advanced course examinations

Student enrollment data in advanced courses

### **People to Interview**

Superintendent or administrator assigned to oversee the G/T programs

Principals and administrators

G/T Program coordinator

Teachers and librarians

Human resources director

Staff development coordinator

Advanced course teachers

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activity is performed specifically for G/T programs:

2.G.c.1. Examine any district or campus level documentation that compares the efforts of the district to the state's Gifted and Talented Plan. In the absence of documentation, compare the state plan to the district's efforts. To the extent possible, chart areas where the district is exceeding or falling behind full implementation of the plan, paying careful attention to the identification process, delivery of services and the training hours and the evaluation process for staff development required for all teachers and staff involved in the gifted programs.

### **Questions to Ask**

Are gifted and talented programs offered at each grade level in the district? Why or why not? How does the district ensure that its gifted and talented programs comply with the state plan for gifted and talented? To what extent does the district comply with the state plan? How is the district progressing toward Exemplary or Recognized status?

How does the district assess and identify gifted and talented students? How equitable is the assessment and identification system? Are students in the program representative of the ethnic population in the district? Do the district's criteria for student placement in the program support diversity? How are Bilingual/ESL students assessed for gifted education? Are students in special education afforded G/T opportunities?

Adequately represented? What percentage of G/T students score Advanced Proficient on the state standardized assessments?

Do gifted and talented program instructional materials meet the district's needs with:

instructional materials readily available to ensure success of the program?

program staff available to present the purpose and planned use of special materials?

costs for materials controlled through district purchasing procedures?

an inventory of instructional material maintained and periodically updated?

surveys to gather feedback?

How do librarians and teachers collaborate to meet gifted students' needs? What resources are available in libraries to challenge gifted students?

Has the district provided for advanced placement or international baccalaureate courses when justified by student enrollment? What is the participation rate? What is the success rate? To what extent does the district supplement program and testing costs for economically disadvantaged students?

Has a cost analysis been performed on the advanced academic programs that identifies:

cost per student for instruction?

cost of assessment per student?

added cost per teacher assigned?

per pupil cost by program?

total program costs?

percent of district enrollment served by the program(s)?

Does the level of instructional staff in the advanced academics programs meet district needs? Does the district follow state guidelines for staff training and certification?

What mechanisms does the district use for parent outreach? Do parents have input into the advanced academic programs through:

parent participation in the program advisory committee?

parent meetings held to discuss the program?

incorporating parent issues and concerns into future planning sessions?

Are advanced academic programs evaluated with:

an annual review and evaluation of programs?

student progress assessed and analyzed?

program revisions based upon evaluations?

**2.G.d Response to Intervention (RtI)**

Response to Intervention (RtI) is the practice of identifying and providing support and services to meet the academic and behavioral needs of all students. According to TEA, RtI services are based upon the following key elements:

high-quality instruction and scientific research-based tiered interventions aligned with individual and student need

frequent monitoring of student progress to make results-based academic and/or behavioral decisions

application of student response data to important educational decisions (such as those regarding placement, intervention, curriculum, and instructional goals and methodologies)

RtI instruction and identification are based on data and research. RtI services are provided in a general education setting, and should show data-based improvement for the school and students. RtI intervention is provided with the following multi-tiered model, as indicated by TEA:

Tier 1: Teachers use high-quality core class instruction aligned with the Texas Essential Knowledge and Skills (TEKS) in which about 80 percent or more of the students are successful. This tier is the crucial foundation of the RtI instructional model.

Tier 2: Students are identified for individual or small group intervention in addition to core class instruction. This level includes scientific research-based programs, strategies, and procedures designed and employed to supplement, enhance, and support Tier 1 activities. District-established standard protocol matches appropriate intervention strategies to specific student needs. Tier 2 addresses the needs of approximately 10–15 percent of the students.

Tier 3: Students who have not responded adequately to Tiers 1 and 2 receive specific, custom-designed individual or small group instruction (designed using a problem solving model) beyond the instruction in Tier 1. This level of intervention is aimed at those students who have identified difficulties academically or behaviorally. Tier 3 addresses the needs of approximately 5–10 percent of the students.

**Data Needs**

District's RtI plan

Student enrollment data in RtI (number of students per grade level) for the current year and past two years

Documentation of administrator and teacher annual training hours in RtI

Assessment instruments and procedures used for identifying students for RtI

Resources specifically acquired for RtI (e.g., software programs, special instructional materials)

**People to Interview**

Superintendent

Curriculum director

Principals

Assistant principals

Teachers

Guidance counselors

**Activities to Perform**

2.G.d.1. Compare the district RtI plan to the state RtI program guides and note areas where the district exceeds the state's recommendations or falls short of meeting the recommendations.

2.G.d.2. Compare the number of students in each RtI tier during the current school year with numbers provided for previous years. Are the changes significant? Have the numbers of students declined over the past years or increased?

2.G.d.3. Review instructional programs and instructional materials acquired for RtI. Determine if the programs are noted for their research-based approach to improving student performance.

2.G.d.4. Examine any documentation provided by the district related to training in RtI. Who has participated in the training (e.g., general education teachers, administrators, special education teachers, counselors)?

**Questions to Ask**

Describe activities represented in the different tiers. How much time is devoted to the activities on a daily basis for students in each tier?

How were special instructional materials, including software programs, selected for RtI?

How often do teachers participate in RtI training? Who provides the training?

What are the specific criteria used to identify students in need of the RtI activities? How does the district determine when RtI activities are no longer warranted for a student?

Describe other personnel involved in RtI activities such as laboratory activities. What are their qualifications?

How are parents kept informed of students' progress in RtI?

## **2.G.e Student Success Initiative (SSI)**

The purpose of the Student Success Initiative (SSI) is to support all students in the subjects of mathematics and reading. The SSI was enacted by the 76<sup>th</sup> Texas Legislature in 1999, and modified by the 81<sup>st</sup> Texas Legislature in 2009. The SSI outlines requirements for grade level promotions, with mandates that students must receive satisfactory performance on grade 5 and grade 8 mathematics and reading state standardized assessments before promotion to grade 6 and grade 9, respectively, or “by unanimous decision of his or her grade placement committee that the student is likely to perform at grade level after additional instruction,” (TEA). The SSI requires by law that schools provide accelerated instruction and up to three opportunities for assessment in the spring and summer. The SSI goal of supporting students in the subjects of mathematics and reading necessitates involvement from stakeholders such as schools, parents/guardians, and the community.

### **Data Needs**

State standardized assessment Scores

Grade-level Retention Data

### **People to Interview**

Principals

Assistant principals

Teachers

Director of Program Evaluation

Director of Technology

Curriculum director

### **Activities to Perform**

2.G.e.1. Review student promotion and retention records and prepare a chart to illustrate data for all students and student groups



2.G.e.2. Review and analyze any evaluations of targeted interventions that have been performed

2.G.e.3. Review summer programming for students in need of intensive intervention or accelerated instruction

2.G.e.4. Analyze and chart STAAR retake pass rates in reading and math In grades 5 & 8

2.G.e.5. Review procedures for Grade Promotion Committee (GPC)

2.G.e.5. Analyze Grade Promotion Committee (GPC) meeting agendas, participation records, and other related documentation

### **Questions to Ask**

Describe the district's use of the online programs that are provided by the SUCCESS initiative. How many students are enrolled in the online programs?

How are students selected? How is progress monitored? To what extent do these programs result in better performance on the state standardized assessments? Is there exit criteria to determine when students are no longer in need of the intervention?

How are the programs evaluated? Who is responsible for ensuring that the programs are implemented with fidelity?

Are the online programs facilitated by a certified teacher or a paraprofessional? What type of professional development for the programs is offered to teachers? Are teachers given job-embedded coaching to promote successful implementation? Are teachers given training on how to analyze the program's assessment data?

What type of technical support is needed to ensure that these programs are fully operational?

### **2.G.f At Risk, Compensatory Education and Alternative Education**

In addition to regular classroom instruction, districts provide other instructional programs designed to support the needs of students at-risk of dropping out of school and students who are not performing at grade level. The Federal Elementary and Secondary Education Act (Title I) originally enacted in 1965 and the Improving America's Schools Act of 1994, provide funds for students not meeting performance standards. TEA receives and sends Title I funds to districts based upon the number of students identified as economically disadvantaged. The TEC requires state compensatory education

funds to be supplemental in nature, like federal Title I funds. In 2002-03, the state required all districts to perform and report the results of an externally conducted audit of their Compensatory Education programs and related funding.

The Education Code requires each school district to provide an alternative education program for students with disciplinary problems. Successful alternative programs are intellectually challenging; often offer nontraditional educational methods that are self-paced and can be tailored to meet the needs of a wide variety of students; have strict discipline, including a dress code that bans the wearing of gang colors; and offer intense counseling for troubled youth.

Not all alternative programs are intended solely for students with disciplinary problems. Some are geared toward students who are not succeeding in a regular educational environment, have dropped out of school, are pregnant teens or are parents, or must work to support a family and cannot attend class during regular class times.

### **Data Needs**

Compensatory Education External Audit

Dropout external audit

Retention data

Leaver code reports

Pertinent internal audit reports

Policies and procedures relevant to compensatory or Title I funding

Budgets for Title I and Compensatory education spending

Campus and district improvement plans

### **People to Interview**

Superintendent or administrator with assigned responsibility

Internal and external auditors

Business manager

Principals

Assistant principals

Title I coordinator

Special Programs coordinator

PEIMS coordinator

Teachers and paraprofessionals for regular and special education

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for compensatory and alternative programs:

2.G.f.1. Examine how the district follows federal and state compensatory education regulations by examining policies and procedures as well as state and federal revenues and expenditures for each type of compensatory education service. Chart the Regular education dollars and the Compensatory and Title I dollars allocated to each campus versus the percent of at-risk students identified at each campus to determine how money is being used to supplement regular education dollars. Note areas where money is used for campus-wide programs, where money is being used inappropriately or where insufficient documentation exists to determine the appropriateness of use (much of this information should be available from the campus and district improvement plans and the external audit reports).

2.G.f.2. Using sound sampling techniques, program evaluations and other available statistical data, assess the performance of the programs funded with Compensatory or Title I dollars. Prepare a chart showing the most effective and least effective programs. Quantify the results being achieved in each program and determine the difference in delivery that may have impacted performance.

2.G.f.3. Chart retention rates by grade level and campus for the last five years. Examine board policies and administrative procedures that might be causing higher or lower than average retention at specific grade levels and among specific student categories.

2.G.f.4. Chart dropout data showing the number and percent of students leaving the district and at what grade level.

2.G.f.5. Diagram the process for gathering leaver code and dropout data and determine the effectiveness of the process and identify areas where weaknesses are found. Confirm findings with the information presented in the external dropout audit and note any areas where improved reporting or gathering has been implemented as a result of the audit.

### **Questions to Ask**

Are there definitive plans in place for the use of compensatory education funds? Does the district have campus-wide programs? How many? Where? How does this affect funding?

Does the district have a procedure for identifying at risk pupils and providing support? Is the process supported by board policy defining at risk pupils with criteria for promotion/retention of students?

Does the district review and evaluate student progress annually? Has the district defined criterion for success in the compensatory education programs which are consistent with the Adequate Yearly Progress (AYP) provisions of the NCLB act?

Does the district provide reduced class sizes to address needs of students at risk? If so, are these efforts evaluated for effectiveness? Are any campuses identified as “special needs” campuses (Title I, SCE)?

What is the student retention rate by grade level? Does the district have policies, goals or other strategies outlined regarding student retention or social promotion? Are mentoring, after school, summer school or other programs in place to assist students that are behind grade level? How is the success of these programs and their providers in bringing students up to grade level evaluated? Does the district offer, manage and evaluate the required supplemental education services for students at schools that have not met expected achievement objectives? Does the district offer parents and students a choice to transfer from low-achieving schools to others as required by federal and state law?

What dropout prevention and dropout recovery programs does the district use? How are these programs evaluated? What mechanisms are in place to continually modify and upgrade these programs? How is the community involved in identifying and recovering dropouts?

What procedures does the district have in place to track students who have dropped out of school? Are dropouts contacted to discover why they left school? Are any efforts in place to contact dropouts and persuade them to return to school?

What GED or other non-traditional programs are in place to educate pregnant teens and other students in need of special assistance? How are these programs funded? How are they evaluated? What process is in place to continually seek to improve the process?

How are leavers tracked, categorized and reported by the district? How are teachers and principals involved in the process? Once a determination has been made about a leaver, who verifies the accuracy of the information? Is the process documented? How is the board informed of the results?

Do the compensatory education programs reflect the ethnic and economic diversity in the district? Is cost analysis performed on the compensatory education program that identifies:

cost per student for accelerated instruction?

cost of assessment per accelerated student?

added cost per teacher assigned?

per pupil cost by program?

total accelerated program costs?

percent of district enrollment served by the program?

Does the level of instructional staff in the compensatory education program meet district needs in terms of highly qualified teachers in core academic subjects and for paraprofessionals assisting in the classroom?

Does the district have a procedure for providing resources to at risk pupils which has been developed and communicated to those responsible and/or affected, including students and their parents?

## **2.G.g Career and Technical Education**

All students, whether they continue their education after high school or not, eventually enter the workplace. A major source of employees for the general workforce is the K-12 educational system. Section 29.181 of the TEC requires school districts to provide a curriculum that affords each student the opportunity to “master the basic skills and knowledge necessary for managing the dual roles of family member and wage earner; and gaining entry-level employment in a high-skill, high-wage job

or continuing the student’s education at the post-secondary level.” Many districts cooperate with local business and community leaders and respond to local workforce needs through courses offered through the Career and Technical Education (CTE) program and student job placements.

### **Data Needs**

CTE course schedule

Course update and/or development schedule

Pertinent program evaluations

Copies of any articulation agreements with colleges or universities

List of dual-credit courses

Policies and procedures relevant to CTE

### **People to Interview**

Superintendent

Principals

CTE program administrator

CTE teachers

Librarians

Business and community leaders

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for CTE programs:

2.G.g.1. Prepare a table identifying any partnership arrangements or articulation agreements used by the district to provide or enhance CTE course offerings in the district by partner or higher education institutions. Note which of these arrangement result in dual or concurrent enrollment and identify any district policies or procedures that limit or encourage students

to enroll in those type courses.

2.G.g.2. Prepare a list of all CTE courses offered in the district by campus, grade level and number of students participating, where appropriate. Identify low-enrollment and high enrollment courses and determine to the extent possible if scheduling and frequency of the course offerings may require adjustment to ensure accessibility and efficiency of the program.

### **Questions to Ask**

Does the level of staffing support the delivery of services to students in CTE? Are classes scheduled and staffed appropriately?

At what grade level does CTE begin in the district? Do middle school students receive information regarding future career opportunities to assist them in high school planning activities? What career and technology resources are available to students in the district's libraries?

Do CTE course offerings lead to jobs in the community? Does the district review course schedules periodically to remove or modify courses that are no longer addressing high needs job areas? How do local businesses participate with the district in CTE programs? Is the district providing local area businesses with the trained workforce they need and expect? How does the district objectively track CTE success?

Does the district currently have a business advisory committee to advise the district on its CTE programs? How does the committee operate? What is the committee's role and responsibility? Does the district work closely with local or state workforce development offices?

Does the district offer classes based upon expressed interest or needs of students, parents, or businesses in the community?

Does the district currently cooperate with or have articulation agreements, interlocal contracts or other shared services arrangements with local area colleges or universities whereby students can obtain enhanced course offerings or other benefits, including dual credit for college courses? Are there opportunities for cooperation that are not being explored?

What percentage of special education students are in CTE vs. separate special education vocational programs? Does the special education program include vocational training opportunities for special need pupils? Are vocational education classes available for "mainstreamed" students with curriculum modifications if necessary? Are vocational education

teachers provided staff development in Special Education? Do IEPs of special education students who are 14 years or older include goals and objectives for career training? See IDEA regulation 300.29.

## **2.G.h Migrant Programs**

In Texas, many students are from families that travel around the nation harvesting crops. These students often miss the first and last weeks and months of school as their families migrate from Texas to the more northern states in the spring and summer months. However, the term migrant can also pertain to individuals who cross county lines within Texas for the same purpose. To ensure that these children are kept at grade level and receive continuous educational services, districts must modify programs and sometimes offer course work electronically.

### **Data Needs**

Migrant program schedules, policies and procedures

Pertinent program evaluations

Copies of any agreements with other districts, colleges or universities

### **People to Interview**

Superintendent or administrator with assigned responsibility

Principals

Migrant Program administrator

Migrant teachers

### **Activity to Perform**

In addition to the activities performed for all special programs, the following activity is performed specifically for migrant programs:

2.G.h.1. Prepare a diagram of the migrant program delivery system. Note how federal and state resources are used to supplement the program, the results of program evaluations and how strategies and goals for the program were set and monitored.

### **Questions to Ask**

Does the level of staffing support the delivery of services to students in migrant education? Are classes scheduled and staffed appropriately? At what grade level does migrant education begin in the district? How does the district review and modify migrant course schedules? How do external groups such as other districts or higher education institutions participate with the district's migrant programs? Are there opportunities for cooperation that are not being explored?

What mechanism or system does the district use to ensure the timely transfer of academic records from a school district in which a migrant student may have enrolled for a portion of an academic year?

What percentage of migrant students are in the special education program? Does the special education program include opportunities for migrant pupils? Are vocational education classes available for migrant students with curriculum modifications if necessary?

## **2.G.i Athletics and Extracurricular Activities**

Athletics and extracurricular activities provide students opportunities to develop social and team skills and many districts have found that there are direct links to improved student performance when students are kept involved in athletics, band and other extracurricular activities. Managing these programs so that they complement rather than detract from the educational programs is the key to success.

### **Data Needs**

List of teachers leading extracurricular activities showing base salary levels, corresponding course loads, stipends and pay for extra duty

Copies of policies and procedures concerning athletics and extracurricular programs including information on how stipends and extra duty pay are determined, district implementation of "no pass/ no play" and gender equity issues

Contracts for staff coordinating or leading extracurricular programs

### **People to Interview**

Superintendent or administrator with assigned responsibilities

Principals

Coaches

Teachers

Booster club parents

### **Activities to Perform**



In addition to the activities performed for all special programs, the following activities are performed specifically for athletics and extracurricular programs:

2.G.i.1. Prepare a list of all policies, procedures or strategic initiatives that address or are directly related to athletics and extracurricular activities. To the extent possible, determine how these policies procedures and strategic initiatives contribute to academic programs, ensure gender and economic equity in access to programs and promote community and parental involvement.

2.G.i.2. Chart salaries, stipends and extra duty pay for all teachers, coaches, band directors and others that participate in athletic and extracurricular programs. Review a sampling of contracts to ensure that the terms and conditions of stipends and extra duty pay are shown in the contracts and are equitable among others within the same employee category. Note where inequities exist and determine why these inequities exist.

### **Questions to Ask**

How are athletics and extracurricular activities linked to the overall academic programs of the district? Does the operation of the program reflect the overall vision for education for the district as established by the board?

How is the student performance of participants in extracurricular activities tracked and monitored? Is this information communicated to the board? Community? How is compliance with “no pass, no play” administered in the district?

Are there policies and procedures in place regarding participation in athletic and extracurricular activities that ensure equal access to all students? How are these policies and procedures monitored to ensure consistent compliance?

What is the total budget for each of these programs? What are the anticipated revenues from each program? How is staffing allocated to these programs? Is staffing consistent between campuses? Are programs offered equitably to all, including programs for males and females?

Do coaches teach academic classes? How many classes do coaches teach each day? Are all of these classes “for credit” classes? How does the ratio of coaches to students compare to peers and statewide averages?

Do coaches receive stipends? Are they listed in their contracts? Do teachers assisting with these activities receive additional stipends? Are they listed in their contracts?

### **2.H. Student Services**

Student services normally encompass counseling, media/library services, health services and social services in most Texas districts. The services provided may include:

college and career counseling;  
health education and health services;  
substance abuse and psychological counseling;  
social services (For example, Communities in Schools);  
library services; and graduate follow-up studies.

Recently, these services have played a more important role in helping students cope with the complexities of the modern world. The role of the educational community in providing needed assistance for career and individual needs will continue to grow in future years.

### **Data Needs**

CIPs or DIP as they pertain to student services  
Policies and procedures pertaining to these programs  
Planning documents and budgets for each program, including any external funding sources  
Student/parent handbooks  
Internal reports pertaining to these programs  
State and federal laws, rules and guidelines for student services  
Recent follow-up studies or surveys of graduates  
Staff job descriptions  
Number of books per library and per student  
Library and media budget, districtwide and by campus  
Number of librarians and library aides (staffing ratios)  
List of counselors by campus and by assignments  
List of nurses by campus and licensing level (RN, LVN)  
School Health Advisory Council meeting minutes and roster  
List of internal and external health services partners  
Bloodborne Pathogen exposure control plan  
Crisis Management Plan  
Staff development records for special services staff

Brochures, newsletters or other information regarding special services available to students and their families

**People to Interview**

Superintendent or administrator with assigned responsibility

Administrative staff with assigned responsibility

Counselors

Principals

Teachers

Community Service Organizations

Librarians

Internal auditor(s)

Curriculum and Instruction director

Nurses and nurse's aides

Campus paraprofessionals

PEIMS coordinator

Parents, including parents of special needs children

Special Education staff who work with students with special health needs

**Activities to Perform**

2.H.1. Compile a list of all student services delivered by the district both externally and internally;

the number of students served if less than the total student population; the annual and

per-pupil-costs for delivery of each service. Determine whether all key services are being delivered and whether there is overlap between programs. Communities in Schools might be one example.

2.H.2. Prepare a chart showing the distribution of counselors by campus and determine whether counselors are allocated equitably to each campus and grade level according to some formula or guideline. Examine policies and procedures to determine the percent time counselors spend on counseling-related activities districtwide and by campus. Where inequities exist determine why this has occurred and whether plans are in place to correct inequities.

2.H.3. Identify any social services available to students and parents in the community, outside agencies or community organizations actively working with the district to provide services and any costs incurred by the district or revenues provided to the district to provide services to students or parents.

2.H.4. Prepare a chart showing health-related services provided at each campus or location, the number and type of personnel, the budget and any revenue sources obtained to offset services rendered. Determine whether nursing positions are allocated equitably to each campus and grade level.

- 2.H.5. Compare nursing staff to standards established by the American Academy of Pediatrics.
- 2.H.6. Examine health office facilities using criteria established by the Texas Department of Health (TDH) General Sanitation Division.
- 2.H.7. Compare the district's Bloodborne Pathogen exposure control plan to TDH's Bloodborne Pathogen Control Plan.
- 2.H.8. Review job descriptions of health services staff using standards established by the Texas State Board of Nurse Examiners.
- 2.H.9. Compare district libraries including number of books and staffing with criterion in TEA's library standards and peer districts.
- 2.H.10. Examine CIPs and DIP to identify any specific long-range and short-term library goals.
- 2.H.11. Examine board policy to identify anything pertinent to library standards.
- 2.H.12. Obtain copies of any graduate follow-up done by the district or external entities.

### **Questions to Ask**

Does the district have a board approved annual plan for student services? How are the student services linked to the district's strategic goals? Site-based procedures?

How is the district's plan based upon an assessment of student needs? Does the district use an advisory committee to assist in the establishment of goals and priorities? Does the district's plan include the identification of and coordination with, community agencies and programs? Are student services annually reviewed and evaluated?

What kinds of communication of specific programs and services are used to alert parents and students to the availability of these services? Announcements? Bulletins to parents and students? Other? Who is responsible for developing and disseminating informative material for parent education on topics such as drug abuse, college admission, and other timely issues?

Are student services efficient and effective? Is clerical support staff provided so that professional staff are allowed to focus on student services? Is technology used for maintaining student records for students receiving special services? Is staff using appropriate community agencies for referral? Are

the annual costs for student services per student comparable with state averages? (State averages can be obtained from TEA).

Are student services designed to meet student and environmental needs? Are students provided an opportunity to relate courses, interests and achievements to career interests? Are parents provided an opportunity to become informed and involved in students' planning activities? Is substance abuse recognized as a potential problem if ignored and covered within the district or campus improvement plans, curriculum or some other function of student services? Is

health education provided as a preventive service? Where and how are health and guidance services identified and provided?

Are staff development programs offered to student services staff? How is the administrative and student services staff made aware of district policies, procedures and state law? Do student services staff have the opportunity to attend workshops, seminars and courses to refresh or upgrade skills? Does the district support training in the use of automated student systems? Do student services staff members have the opportunity to visit other exemplary school systems? Does student services staff provide in-service training to teachers and other instructional staff?

Are job descriptions developed for all student services positions?

Are health service job descriptions congruent with staff education, credentials and skill levels? Are health services practices aligned with board policy and administrative regulations?

Are district personnel (administrative and health services) aware of the regulations and guidelines issued by, or the resources available from the appropriate state authority? Are they followed and used?

Do nurses attend ARD for students with special health needs?

Are nurses involved in 504 planning for students classified as “other health impaired”? What types of staff development activities do health services personnel attend?

Are parents of students with asthma aware that by law their child has the right to carry and self-administer asthma medication according to certain provisions?

Does the district have a crisis management plan and is the district linked with the county’s emergency plan?

***Counseling and guidance services***

What are the defined roles and responsibilities of counselors in the district? Are the defined roles and responsibilities consistently followed by all counselors in the district? How much time are counselors spending in direct contact with students? On other administrative activities?

Are there locally adopted policies and procedures supporting counseling and other student services? Does the district perform a regular review of the level and cost of these services and exploration of alternatives for delivery? Does the district seek external funding to augment or pilot student services programs?

Has the board of trustees adopted a policy on guidance services? Student/staff ratios? Guidance in educational, career and personal planning? Establishing an advisory committee? Does the district have an appeal process?

How are students counseled regarding career opportunities? Who conducts the counseling services? Is counseling adequate? At what grade level does counseling begin?

*Social services*

How are social services coordinated within the district? Are there opportunities for the district to provide additional services to students and families of students through better coordination? When a teacher or other staff member determines that a student or family of a student is in need of social services, what system is in place for referral? How are suspected child abuse cases handled? Is there a written policy regarding child abuse referrals?

*Health services*

What are the hiring practices and supervisory structures for health services? Does the district employ or contract for school nurses? If so, how are school nurses allocated to campuses? How does the district fund nurses and any health service programs?

Who maintains student medical release forms and other insurance related forms in case of a medical emergency? Who maintains student health records in the district? How does the district ensure that all students are current on their immunizations?

What procedures exist to safeguard the health records of students and protect student identities? Are there documented policies regarding the release of records?

What policies and procedures are in place to ensure that medications are dispensed to students appropriately? How are the medical needs of special needs students handled?

How does the district handle bio-hazardous waste? Does the district provide vision, hearing or spinal screenings at appropriate intervals?

Does the district participate in any cooperative or contract health services such as school-based or school-linked clinics? What are the costs and benefits of participation in such programs?

Is there an established peer review process in districts with 10 or more nurses?

What is the process for recruiting a qualified pool of substitute health services staff?

Are licensed nurses (RNs and/or LVNs) receiving clinical competency evaluation by someone with equal or greater education and clinical experience in nursing? If not, are there other types of evaluations in use to address clinical competency issues?

Is there a health services coordinator? Is the health services coordinator or a school nurse a member of the interview team when health services staff are hired?

*Library services*

Are library and/or media services sufficient to support the needs of the district? Is a standard formula used for the allocation of library materials and media equipment?

Are accreditation standards used to allocate library and/or audiovisual materials such as having eight to 10 books per student in the library?

Has the district completed a self-evaluation to identify needs for improving its library programs? If so, what plans are in place to examine weaknesses and strengths and establish measurable goals for improvement?

Is the collection of library resources dated? If so, is the district's plan to update the collections and weed out dated materials? What automated system is used to track the collection, including the published dates so that dated materials can be replaced?

Are any procedures in place for handling controversial printed materials? Internet-based materials? What policies or procedures aid or limit the selection of resources and the handling of questioned resources?

*Graduate follow-ups*

Does the district conduct graduate follow-up surveys? Does the district use the information provided by the State Occupational Information Coordinating Committee (SOICC) to determine whether graduates are successful after high school? Does the district request evaluations of graduates from post-secondary institutions? Does the district ask employers to evaluate workforce preparedness of former students? Does the district conduct a follow-up survey of graduates? Is an annual report given to the board on the follow-up surveys including recommendations for correcting or improving areas of weakness? Do graduation follow-ups include students with disabilities?

2. I. Student Behavior Management

Every Texas school district is required to create a foundation for student discipline through the adoption of a student code of conduct establishing standards for student behavior. A student code of conduct will often reflect the discipline policies a district has in place to manage student behavior while in class and while on school property. In addition to rules of conduct, districts must also provide identification and intervention services designed to correct inappropriate

behavior. Prevention programs should guide students to mature decision-making and provide tools for conflict resolution.

**Data Needs**

Student codes of conduct for each campus, as applicable

Parent/student handbooks

Referrals to ISS per school for last three years by type of conduct (electronic if possible)

Disciplinary action by ethnicity and gender per school for last three years (electronic if possible)

List of truancy related programs or initiatives

Attendance statistics by campus and for the district for the last 5 years

Number of truancy cases filed (both failure to compel and failure to attend) by school for last three years. Include number disposed by deferred disposition, by fine and by community service.

**People to Interview**

Superintendent or assistant superintendent with assigned responsibility

Director of safety or security or police chief

Director of alternative education, discipline alternative education or in school suspension programs

Principals

Teachers

Site-based decision-making committees

Director of the Juvenile Justice Alternative Education Program (JJAEP), if applicable

Counselors

Attendance officers

**Activities to Perform**

2. I. 1. Compile all district and campus level student codes of conduct including any special provisions for extracurricular activities. Prepare a table comparing the consequences for violations of the student code of conduct per campus to each other and to state law and note any areas where the requirements are in conflict.

2. I. 2. Compare the student/parent handbooks to the codes of conduct and to each other and prepare a chart showing areas of inconsistency or conflict, if any.

2. I. 3. Prepare a chart showing disciplinary actions or placements in alternative settings by campus, grade level, gender and ethnicity for the last two or three years (if data is available). Note any changes from year to year and determine which type of actions have increased or decreased and why.

2. 1. 4. Diagram the district's process for dealing with truancy, beginning with the date of the first absence. Further, prepare a chart showing the attendance rates at each campus and the district's cumulative attendance rates for the last five years. Through analysis of the data and interviews, determine the attendance trends, areas of particular concern or excellence, and the effectiveness of the district's process for dealing with truancy.



### **Questions to Ask**

What kind of due process is in place for students who have violated the student code of conduct? Does the district provide adequate due process to students placed in alternative programs? Is there a hearings officer designated for these situations? How are parents involved in student discipline?

What kinds of discipline policies are in place in the district and at each campus to deal specifically with gang issues? Are codes of conducts displayed in the school so that students, administration and parents are aware of the consequences?

Are discipline consequences dealt with uniformly across the district or are they individually dealt with from campus to campus? Are consequences tracked? Who records these consequences?

How frequently do teachers and administrators receive training on disciplinary options in current state laws regarding student discipline? How frequently does the district survey teachers, safety personnel and student's administrative staff to get input regarding the discipline of students?

Does the district have a discipline policy in place for student conduct on school buses? If not, why not? If so, how is it enforced?

Does the district provide training for staff regarding methods of handling discipline problems? Does the district provide training to teachers and staff on current state regulations (i.e. Chapter 37 in the Ed. Code)?

Does the district provide training, support and assistance to students, parents and staff regarding the proper handling of early warning signs of violent behavior such as student threats, reports of planned acts of violence, cruel or unusual student behavior, etc.?

What policies are in place that identify bullies and bullying behavior? What policies are in place to protect victims of bullying and allow transfers to other classrooms or schools?

#### **In school suspension program**

Does the district provide for an In School Suspension (ISS) program? How does it function? Who is responsible for the program? Who staffs it?

Who directs the ISS program? When do Students go into the program? What is the length of stay? What accommodations are available for students with special needs? How does the district deal with special needs students in the area of discipline and its consequences?

What kind of educational services do children in ISS programs follow? Are students kept abreast of daily assignments in their regular education program?

What kinds of behavior management training are available for staff in ISS programs? What kind of behavior change training is provided to students? Does the district use a standard form to refer students to ISS? Does the district track these students?

#### **Truancy**

Who monitors and encourages student attendance at the district level? At the campus level? How does the district use attendance officers? What is the teacher's role in reporting absences? What is the principals role in truancy prevention and intervention? What goals and objectives are found in campus and district improvement plans to curb truancy or improve attendance?

What campuses are having the most significant difficulty with truancy? What has contributed to lower attendance rates on some campuses? How has the campus addressed the problem? Which of the district's schools have open or closed

campuses? What are the rules in place regarding this arrangement? How has this arrangement impacted attendance rates? Truancy? What other policies or processes contribute to higher or lower attendance rates?

What outside assistance does the district have in curbing truancy? How is the constable's office or other law enforcement involved in truancy prevention, intervention and enforcement? How do the courts support truancy in the community? How frequently are parents held accountable by the courts for the truancy of their children?

***School- vs. District-Level Policy***

Is truancy policy established at the school or district level? Is there district-wide monitoring of truancy or is this data maintained at the school level?

***Identification and Reporting***

How are truant students identified? What is your process for reporting a truant student?

Is the procedure different between reporting 3+ days in a 4-week period ("may") and 10+ days in a 6-month period ("must")? (Note: According to statute, schools MAY report a student to courts after 3 absences and MUST report after 10 – we want to see how schools are implementing this)

***Record Keeping***

How are absences recorded and reported? How late must a student be to class for a tardy to be elevated to an absence?

***Excused Absences***

What is the process for correcting attendance errors? Can students appeal? Is the attendance office notified when the school nurse sends a student home due to illness? What is the process for accepting a student's doctor's note? How are notes from parents vs. doctors handled are – is there a difference?

Is there a limit on time that can elapse before a doctor's note is no longer accepted? Are there any differences in treatment of a disability- or pregnancy-related absence?

***Remediation***

How and when are parents notified? What process is in place to identify students with potential for truancy before reporting to the courts? Do you have a truancy reduction program, and if so how does this operate? How are students in violation summoned to court? Ever escorted from school by police?

Is there collaboration with justices of the peace? What does this look like?

***Average Daily Attendance (ADA)***

How do you monitor ADA in relation to truant students? Do you calculate the fiscal impact of truancy on ADA and the district's state funding?

***Effectiveness***

Has dealing with truancy in courts been effective in reducing student absenteeism? What in your opinion would be the most effective way to reduce absenteeism?

## 2. J. Disciplinary Alternative Education Programs (DAEPs) and Referrals for Juvenile Justice Alternative Education Programs (JJAEPs)

There are generally two types of alternative programs: academic alternative education program (AEP) and disciplinary alternative education program (DAEP). AEPs typically deals strictly with a population of students that need an alternative academic setting to be successful, such as a program for pregnant teens, while the DAEP generally deal with disciplinary problems and students that are restricted to an alternative education setting due to violations of the student code of conduct., or have been adjudicated, such as students who are served in JJAEPs. <Does this section of the document need to be revised to match the new title/should the title and all information below (Data needs, People to Interview, Activities to Perform, Questions to Ask) cover all three ~ AEPs, DAEPs, and Referrals to JJAEPs? Currently there have been no revisions to this section to match the revised title.>

### Data Needs

Organizational charts and staffing for all alternative education programs, both disciplinary and academic

Budgets for all alternative educational programs, including grant funding and funding from inter-local agreements with other school districts and the county for the last three years

Curriculum plans and major program elements for each alternative programs

Procedures manuals for staff in alternative programs

Copies of contracts on the outsourcing of an alternative program or a component of the program

Number of referrals to DAEP per school for last three years by type of conduct, gender, bilingual or special education classification and ethnicity (electronic if possible)

Recidivism rates (percentage of returning students) for each alternative program for past three years.

List of counseling/intervention services for students in alternative education programs, particularly those that are program related to assist with transition back to regular education

### People to Interview

Superintendent

Principal of DAEP

Principal of AEP

Assistant principals

Curriculum director

Parents

Central administrator over student discipline issues

Teachers at alternative site and home school

Counselors at alternative site and home school

Administrators at contract sites, such as DAEP or JJAEP

**Activities to Perform**

2. J. 1. Create and/or examine organizational and staffing charts for all alternative education functions in the district including JJAEPs as well as contracted services or providers and show how the campus principals and central office administrators with oversight responsibility for these functions fit into the organizational scheme. For contracted services, discuss the general terms, conditions and services provided.

2. J. 2. Prepare a list of all alternative education programs operating in the district or programs participated in cooperatively with other districts or with other local governments. For each program show the general goal and function of the program; placement type such as disciplinary, pregnant teens, etc.; type of students served such as special education; the number of students served; the location of the program; the budget and source of funds for each; whether the cost of providing the service is shared with another entity; and the number and type of staff assigned to each program.

2. J. 3. Document the process for transition back to regular education beginning with the curriculum plans and major program elements used in each alternative program. If available, note the number of students successfully returning to their home school from a DAEP for the past three years.

2. J. 4. Document the process for referral to a DAEP and chart the number of referrals to DAEP per school for last three years by type of conduct, gender, bilingual or special education classification and ethnicity. Note points of review, approval or oversight.

2. J. 5. Compile and review contracts for DAEP/JJAEP services. Note presence or absence of provisions that allow adequate district communication and oversight.

**Questions to Ask**

Does the district provide for alternative education settings for various age and grade level students with discipline problems? If not, why not? What processes are in place to ensure that students with minor offenses are not exposed to students with chronic problems?

How does the current DAEP program comply with the Safe Schools Act that was designed to make Texas public schools safe from violent students? How do the alternative education programs (AEPs) ensure that students who engage in serious misconduct and who commit certain offenses are promptly removed from regular education settings?

What AEP or DAEP programs are delivered in-house? Which programs are contracted out? What, if any, components of the programs are contracted out (i.e. instruction, curriculum planning and safety officers)?

Where is the DAEP program housed? Who directs it? How many FTE's are involved, salaries, budget. How does the program work?

What kind of educational services do children in DAEP programs receive? Does the district have any mentoring programs for at-risk students who are in alternative programs? Do students get tested for educational skills prior to being placed in the program?

What percent of the student population is special education and what percent of special education students are there for discretionary reasons? If a high percent are special education, why has this occurred? What, if anything, is being done to reduce the number and frequency of special education referrals?

Are Individual Education Plans (IEPs) for special education students implemented in the AEP? If not, why not?

Is there follow up on the students that attend DAEP programs? If so, how is this done? Who is responsible for doing it? Who receives copies of results? What are the recidivism rates for students that have gone through each program? Are there any tracking mechanisms in place for students that have attended DAEP programs?

How are the DAEP programs evaluated? By who? What kinds of training are available for staff in DAEP programs? For parents? For siblings of students with chronic disciplinary problems?

How are DAEP students transitioned back to their regular education settings? What educational programs ensure that students will be successfully academically in the regular education setting? What programs are in place to remediate the behavioral problems?

Are students in the DAEP tested on the Texas Academic Knowledge and Skills test? What is the overall academic rating of the DAEPs? Has the DAEP ever undergone a peer review? What were the results?

How does the district ensure that the DAEP staff and teachers are properly trained and motivated to work with troubled youth? How does the district ensure that special education students placed in the DAEP are adequately served?

### **Instructional Program**

Describe the staffing for DAEP and ISS.

Describe the instructional program. Who is responsible for monitoring the instructional program for ISS and DAEP?

What types of instructional resources are available at the DAEP and ISS locations?

Describe the referral process for sending students to DAEP. Describe the process for sending students to ISS. How does the district ensure continuity in instruction for students in DAEP and ISS?

What are the characteristics of the students in DAEP – do they have attendance issues, repeat offenders? What is the average time in DAEP?

Does the district and community have adequate health and social services to meet the needs of the students in DAEP and ISS?

What role does discipline management play in discretionary discipline placements?

Discuss how the needs of special education students or students with other specialized needs (Bilingual/ESL, dyslexic) are met in DAEP or ISS.

Describe what communication looks like between ISS/DAEP teachers and referring campuses/teachers.

Describe the transition process for returning students to referring campuses.

How discipline is typically handled in the district and at your campus. Are there any issues or concerns?

Describe the role of counselors in the district? What types of services do counselors provide for students in discretionary placements?

Do the ISS and DAEP locations have adequate technology so that students may continue Credit Recovery, if applicable?

Describe parental perceptions of discipline in the district.

What types of analyses are conducted by the district to determine the effectiveness of the DAEP/ISS programs? Is there any type of analysis of referrals or TEA discipline reports? Rates of recidivism? Repeat offenders? Referring teachers or staff?

What type of professional development is offered to teachers and staff regarding discipline management or classroom management techniques?

To what extent does the district consistently enforce the Student Code of Conduct?

To what extent are disciplinary placements fairly and consistently assigned?

Does the district have a DAEP Handbook? How are parents involved in discipline matters, especially DAEP placement?

### **Juvenile Justice Alternative Education Program (JJAEP) Program**

Does the district participate in a JJAEP for adjudicated students? What other districts are members of the program? How does the district provide alternative educational opportunities for students who are adjudicated? What is the role of the county judges and/or other judiciary? Does the district periodically review the program to ensure state mandates/guidelines are met?

What kind of budget does the district have for this program? Are any district staff used as part of the program? How does the district account for the student population in average daily attendance? What unique data reporting problems exist within this program?

### **People to Interview**

Superintendent

Principals

Assistant principals

Curriculum director

Teachers

Parents

### **Activities to Perform**

Review student discipline data and compare to statewide data.

### **Questions to Ask**

Describe the staffing for DAEP and ISS.

Describe the instructional program. Who is responsible for monitoring the instructional program for ISS and DAEP?

What types of instructional resources are available at the DAEP and ISS locations?

Describe the referral process for sending students to DAEP. Describe the process for sending students to ISS. How does the district ensure continuity in instruction for students in DAEP and ISS?

What are the characteristics of the students in DAEP – do they have attendance issues, repeat offenders? What is the average time in DAEP?

Does the district and community have adequate health and social services to meet the needs of the students in DAEP and ISS?

What role does discipline management play in discretionary discipline placements?

Discuss how the needs of special education students or students with other specialized needs (Bilingual/ESL, dyslexic) are met in DAEP or ISS.

Describe what communication looks like between ISS/DAEP teachers and referring campuses/teachers.

Describe the transition process for returning students to referring campuses.

How discipline is typically handled in the district and at your campus. Are there any issues or concerns?

Describe the role of counselors in the district? What types of services do counselors provide for students in discretionary placements?

Do the ISS and DAEP locations have adequate technology so that students may continue Credit Recovery, if applicable?

Describe parental perceptions of discipline in the district.

What types of analyses are conducted by the district to determine the effectiveness of the DAEP/ISS programs? Is there any type of analysis of referrals or TEA discipline reports? Rates of recidivism? Repeat offenders? Referring teachers or staff?

What type of professional development is offered to teachers and staff regarding discipline management or classroom management techniques?

To what extent does the district consistently enforce the Student Code of Conduct?

To what extent are disciplinary placements fairly and consistently assigned?



Does the district have a DAEP Handbook? How are parents involved in discipline matters, especially DAEP placement?

## **2. K. Review and Evaluation of Contracting Process**

Educational service functions such as disciplinary alternative centers and services for students with disabilities can be purchased or contracted through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement. This evaluation process is discussed in great detail in the Purchasing protocol, Section 8.G. Contracting Process and Section 8.H. Yellow Pages Test.

Additional Resources:

Academic Excellence Indicator System

Contains reports for every public school, district, or region of Texas

Texas Education Agency

<<http://www.tea.state.tx.us/perfreport/aeis/index.html>>

Texas Essential Knowledge and Skills

Texas Education Agency

<<http://www.tea.state.tx.us/teks/index.html>>

***EDUCATIONAL SERVICE  
DELIVERY***



# ***1. Educational Service Delivery***

Above all else, school districts must provide high quality educational services. Having adequate processes in place to identify student educational needs, providing for those needs and measuring performance as a result of these programs, represents the most vital mission for every school district. Educational service delivery includes the provision of programs for students with special needs as well as careful adherence to other state and federal mandates concerning curriculum. The Texas School Performance Review measures the effectiveness of educational service delivery through cost benefit analyses, comparing program resources with the benefits to students. The Educational Service Delivery protocol evaluates the effectiveness and efficiency of the instructional delivery system, program management, student performance measures and student services in the following areas:

- 2.A. Organization and Management
- 2.B. Curriculum Policies and Management
- 2.C. Instructional Program Evaluation
- 2.D. Student Performance
- 2.E. Instructional and Administrative Technology
- 2.F. Staff Development
- 2.G. Special Programs
  - 2.G.a Special Education
  - 2.G.b Bilingual Education/English as a Second Language (ESL)
  - 2.G.c Advanced Academics (Gifted and Talented (G/T), dual credit, pre-Advanced Placement/Advanced Placement (pre-AP/AP), early college high school, International Baccalaureate (IB), academic magnets)
  - 2.G.d Response to Intervention (RtI)
  - 2.G.e Student Success Initiative (SSI)
  - 2.G.f Compensatory and Alternative Education
  - 2.G.g Career and Technical Education
  - 2.G.h Migrant Programs
  - 2.G.i Athletics and Extracurricular Activities
- 2.H. Student Services
- 2. I. Student Behavior Management
- 2. J. Disciplinary Alternative Education Programs (DAEPs) and Referrals for Juvenile Justice Alternative Education Programs (JJAEPs)
- 2.K. Review and Evaluation of Contracting Process

## **2.A. Organization and Management**

For curriculum to be successfully delivered across all grade levels and to students with varied needs, the organization must be appropriately aligned. Staffing must be sufficient to provide services to students at each grade level and area of need, and must expand and contract based on student enrollments not only at the district level, but also within each grade and program. The system must provide support services for instructional staff, such as teacher training, technical support for teachers and for technology used in the classrooms, and the provision of resources for specific courses and programs.

### **Data Needs**

- Campus directories
- Organization chart for all educational delivery functions
- Full-time equivalent (FTE) staffing by position for each campus

- Job descriptions for central office and campus-based instructional personnel
- District and Campus Improvement Plans
- Map of attendance zone boundaries and/or information on any recent attendance zone changes
- List of teachers and their certifications and/or endorsements
- If under court ordered desegregation, obtain a copy of the summary of the terms and conditions of the order and copies of reports to the Justice Department for the last three years
- Orientation materials and training offerings for substitute teachers
- Policies, call-in procedures and pay scales for substitute teachers
- Master course schedules by campus, teacher, subject area and enrollment
- Districtwide list of instructional personnel by program
- Individual campus budgets
- Site-based decision-making team membership and membership criteria

### **People to Interview**

Superintendent

Assistant superintendent with assigned responsibility

Director of Curriculum and Instruction

Curriculum specialist

Principals

Department heads

Teachers (consider a focus group including both less experienced and more experienced staff)

Testing coordinators

Librarians

Technology director

Guidance counselors

PEIMS coordinator

Instructional Technology coordinator

### **Activities to Perform**

- 2.A.1. Examine the organization and staffing charts and job descriptions for the curriculum and instruction functions and interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department(s); and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the background for changes. Include any contracted individuals or services or committees that oversee curriculum and instruction in the organization chart and show the reporting relationship and who is responsible for monitoring the contracts.
- 2.A.2. Prepare a chart showing the overall per-pupil funding and staffing levels of each campus by position, level of experience and certifications held. Compare per-pupil funding amounts and staffing levels, teaching credentials and expertise across all schools serving similar grade levels and identify anomalies and through interviews seek to determine the reason for those differences.
- 2.A.3. Prepare a flowchart showing how teachers, counselors, assistant principals and principals are recruited, hired and placed on a campus, including the role of site-based decision-making committees, principals and central office staff. Examine district and campus improvement plans to determine if they are being used as an organizational tool in this process. Show the timeframe for each step in the process and note any areas where delays are typically encountered, where communication has broken down or where other problems have been encountered.
- 2.A.4. Prepare a diagram of the feeder patterns and attendance zones for the district and note any changes

that have taken place within the last 5-10 years, or major events that could impact the configuration of schools, including any court ordered desegregation plans. Determine why changes have occurred and how the process has helped to spread enrollment.

- 2.A.5. Prepare a chart showing the high, average and low class loads per teacher per campus. Determine how many classes/courses the district or campus requires each teacher to teach to determine whether teaching loads are equitable across disciplines (English Department versus Math Department, for example).
- 2.A.6. Diagram the process flow for substitute teacher recruitment, training, assignment and evaluation. Through interviews with both campus and central office staff, determine what aspects of the process are working and what points in the process cause concern or disruption.

## **Questions to Ask**

### ***Organization***

How does the current organizational structure support instruction? Encourage cross-functional and interdisciplinary cooperation? Provide support for classroom teachers? Facilitate the needs of campus-based staff? Ensure compliance with federal, state and local laws, rules and regulations? Where does the system break down? What efforts have been made in recent years to improve the structure and ensure that campuses and particularly teachers, have what they need to be successful? Are the responsibilities of central office staff clearly defined? Are the responsibilities of campus-based personnel clearly defined? Is each category of employee performing their intended function? What evidence indicates collaboration between instructional and non-instructional groups with the technology function, to ensure that technology supports the organization and its goals?

How does communication flow from the central office to the campuses and vice versa? At what points in the process is communication hampered or enhanced? How could obstacles to communication be overcome? What formal and informal mechanisms exist to ensure good communication?

### ***Budgets and staff allocations***

How are budgets allocated to individual campuses? How is staff allocated to the campuses including principals, assistant principals, counselors, teachers, librarians, teacher aides and nurses? Does the district have a targeted student teacher and staff-student ratios for the district? For campuses? For each grade-level? Are these ratios based upon a district goal or strategy, or on industry or other standards? Are staffing ratios equitable between campuses serving similar grade levels? Is there a direct correlation between higher than average staffing levels at specific campuses and higher than average numbers of special need students? Is the staffing equitable from campus to campus? Are inequities explained by the special needs of the student population at those campuses with higher allocations of resources?

Does the district have certified teachers for all courses and grade levels? When certified teachers are not available, how does the district fill the positions? How and when does the district notify parents that a non-certified teacher is teaching a particular subject? Does the district have strategies in place to recruit and retain teachers in critical shortage areas? Does the district have a policy regarding the use of non-certified teachers? Does the district have procedures for granting a district specific certification? How many certified teachers are teaching outside the field in which they are certified? Do these teachers have appropriate emergency permits? Is the district applying within specified timeframes for emergency permits? Is the district providing any training, stipends or paying for classes to appropriately certify teachers with emergency permits? How many Master Reading, Math or Technology teachers are certified in the district? How does the district recognize or compensate Master teachers?

Does the district assign extra days to administrators such as assistant principals or professionals such as

diagnosticians? If so, what do these staff do on the assigned extra days (for example, sometimes assistant principals distribute textbooks during the summer as part of their extra days)? How does the district justify these extra assignments? Is the completed work significant? How does the district ensure that extra duty pay is linked directly to extra duty and is not a mechanism used to affect a pay raise for select individuals?

How are instructional supplies and materials (other than textbooks) allocated to campuses? Do campuses have an opportunity to give input about their needs? How does the district ensure the equitable distribution of resources per pupil, grade level and subject matter? What type of inventory of instructional material and supplies does each campus maintain? Does each campus have Internet connectivity so that statewide databases such as encyclopedias and various catalogs of information can be easily accessed? If not, why not?

Do campuses have flexibility in the use of budgeted funds? How are campus employee salaries budgeted? Centrally? Or at the campus level?

How are campus budgets monitored? How are campus administrators held accountable for their budgets? How are site-based decision-making committees used in the campus budget planning process?

### ***Recruiting and hiring***

How is the board involved in hiring, transferring or termination of campus-based personnel? Central office personnel? Others? Does board involvement in personnel matters support or hinder educational service delivery?

Do campus administrators have flexibility in the type of staff they hire? How are campus-based staffing decisions reflected in the campus improvement plan? Do campus administrators and principals have input into hiring decisions? Do teachers have a role in staffing decisions at their campus? How and when are the colleagues of a potential employee, such as counselors when filling a counselor vacancy, consulted when filling vacancies? Are campus administrators involved in recruitment activities? How are employment applications and resumes made available to campus administrators?

### ***Feeder patterns and attendance zones***

Are feeder patterns appropriately aligned and defined? How do schools and teachers within a feeder pattern work together to ensure that all children are well prepared to enter the next educational level?

Do attendance zones appropriately allocate students to schools to reduce overcrowding, balance ethnic diversity and contribute to appropriate feeder patterns? When was the last time that attendance zones were adjusted? What process is used to adjust attendance zones? Do attendance zone adjustments require approval of the Justice Department because of a desegregation order?

### ***Teaching loads***

Does the district offer classes based upon expressed interest or needs of students, parents or businesses in the community?

Does the district schedule instructional staff to achieve maximum efficiency and effectiveness? How do principals and central administration review teacher's schedules/assignments to ensure maximum use of instructional personnel? Are staff with special assignments such as coaching or specialized classes assigned a full-time equivalent teaching load to the extent possible? If not, why not?

### ***Substitute teachers***

Do board policies outline minimum requirements for long and short-term substitute teachers? What training is provided to substitutes? Are there certain classes where substitutes are given additional training such as alternative education and special education?

At what point does the district provide written notice to parents when long-term substitutes or non-certified teachers are in the classroom for longer than 30 days as stipulated in state law? How much is the district spending and/or budgeting annually for substitutes? Are substitutes tracked by campus program or course?

How does the district procure substitutes? Do they have an automated or call-in system? Are there any difficulties getting substitutes? Does the district have procedures governing the use of substitutes and specifying what should happen if a teacher or campus is unable to get a substitute? Who takes the place of a substitute if necessary – administrators, professionals, paraprofessionals?

## **2.B. Curriculum Policies and Management**

For instructional systems to achieve their stated goals, the written, taught and tested curricula must be closely linked. In Texas, the Texas Essential Knowledge and Skills (TEKS) identifies what Texas students should know and be able to do at every grade and in every course in the foundation and enrichment areas as they move through the state's public schools. It is these foundation standards that are then tested through the state's standardized assessments. Using TEKS to design curriculum, guide teaching and maximize student achievement is a challenge facing principals, curriculum directors and classroom teachers because the basic curriculum design and alignment can and will impact student achievement.

### **Data Needs**

- List of all courses offered at all grade levels, noting which courses have curriculum guides and the date of last revision for each guide
- Copies of curriculum guides (for examination during on-site work)
- List of all board policies and internal procedures relating to instructional programs (originals for examination during on-site)
- Curriculum five-year review schedule or plan
- Description of the curriculum development cycle
- Copies of internal procedure or guides that address the administration, monitoring or evaluation of the curriculum or specific instructional programs
- Campus and district improvement plans as they pertain to curriculum management
- Analyses of Performance Based Monitoring Analysis System (PBMAS) data
- Campus rating reports or state required report cards on student performance for the last five years
- Instructional technology plans or documents with emphasis on the ways for teachers to integrate technology into the curriculum
- Other long-range plans that address curriculum management or technology integration in the classroom

### **People to Interview**

Board members

Superintendent

Director of Curriculum

Assistant superintendent for Curriculum and Instruction or other administrator with assigned duties



Teachers, librarians, instructional technology staff and campus-based support staff  
Campus administrators and principals  
Directors or coordinators responsible for curriculum management and instructional technology

### **Activities to Perform**

- 2.B.1. Examine curriculum guides, if available, and prepare a table showing most recent update, whether the curriculum is aligned with TEKS and the state standardized assessments and whether curriculum scope and sequence is clear and appropriate across all grade levels and subjects. Compare and contrast student performance in areas where no curriculum is available or is outdated with those areas where the curriculum is strong and note whether there is a direct correlation.
- 2.B.2. Examine the curriculum guide development and update schedule, if available and prepare a diagram or process flow chart showing the operational steps in the curriculum creation or update process.
- 2.B.3. Prepare a list of all board policy on curriculum management and development and compare the list to those expected to be present in a well-run educational system. Note areas of concern and attempt to identify how this may or may not have affected student performance.
- 2.B.4. Describe in detail the curriculum monitoring system at sample campuses and validate that the systems portrayed by the sample are representative of campuses throughout the district and include central office administrators with assigned responsibility. Note areas of strength or concern in the system and determine where inconsistency between programs or campuses exists.

### **Questions to Ask**

#### *Curriculum guides or documents*

Does the district have curriculum guides for all courses at all grade levels? Who is ultimately responsible for ensuring that the written curriculum contains the information that will be tested? Is the curriculum aligned with the Texas Essential Knowledge (TEKS) and the state standardized assessments?

Is curriculum aligned to adequately define the scope and sequence of courses so that all students are fully prepared to enter the next grade level? (Vertical alignment) How do teachers perceive the current curriculum guides?

How are weak student performance elements addressed by the written curriculum? How have recent modifications to the curriculum attempted to address weak areas of student performance?  
How are special populations addressed in curriculum guides? What enrichment activities are shown in guides for gifted students? Do these activities conform to the Texas Plan for the Gifted and Talented criteria? How do the guides address the needs of children with specialized learning needs?

How is the use of technology incorporated into the curriculum guides? What resources are identified in the guides that would help teachers to integrate technology into their lesson plans? What evidence exists of collaboration between teachers, librarians and instructional technology staff? How are the Technology Applications Texas Essential Knowledge and Skills (19 TAC Chapter 126) being integrated into grades K-8 classrooms? What kind of documentation exists to show that students in grades 2, 5 and 8 have met the Technology Applications benchmarks in the TEKS? How does the curriculum address the K-12 Technology Applications guidelines?

#### *Curriculum development*

Which teachers participate in scheduled curriculum updates? How are special population teachers or coordinators used in the development process? Is the curriculum regularly evaluated and updated by staff members who use the guides and by administrators responsible for curriculum management? If not, why not?

How are resources from the state or regional education service centers used to develop district instructional guides?

What procedures does the district have in place for the creation or modification of curriculum? Is an advisory committee used to assist in this process?

Is the curriculum reviewed/revised as part of the annual planning and budgeting process? How are resource personnel such as the instructional staff used to provide input in their area of expertise?

What are the costs associated with developing updated curriculum guides? Are teachers paid extra? Are they updated over the summer?

### ***Curriculum policy***

Do board policies support the delivery of educational services? Are board policies in place to address each of the critical areas identified by the Texas Association of School Administrators Curriculum Audits program?

Does the district have board policy on curriculum development and management? When was it last reviewed?

How does the board use public debate regarding student performance and achievement to guide the curriculum development process?

How does the district provide for public debate regarding curriculum issues? How does the board receive information regarding progress in curriculum development? How does board policy provide for the curriculum development, implementation and evaluation process?

How does the board ensure that district administrators adhere to the district's curriculum review schedule? How does the board policy and board as a whole ensure or verify that curriculum is aligned with the TEKS and the state standardized assessments?

What training has the board or superintendent had in curriculum issues in the last two years?

### ***Curriculum management***

How do administrators and principals work together to ensure that children from elementary schools consistently enter middle school well prepared? How do administrators and principals work together to ensure that students from middle schools consistently enter high school well prepared?

What processes or procedures ensure that guides are used in the instructional program? Is periodic monitoring accomplished through reviews of lesson plans, regular meetings with grade level teams, observation, etc.? If not, why not?

Has the district provided for a master schedule for updating all curriculum guides? Is the revision schedule appropriate and aligned to revisions of the Texas Essential Knowledge and Skills (TEKS)? Who is responsible for updating the schedule? Are lesson plans regularly reviewed by team leaders, curriculum

specialists and/or principals? To what extent is feedback given on lesson plans? Are regular meetings held with grade level teams to discuss instructional programs?

Do building level administrators regularly observe teachers to monitor teaching of the approved curriculum? Are teachers given feedback regarding instructional progress? How is the observation and monitoring of classroom instruction and student performance used to modify the curriculum or improve teaching techniques?

How much money is currently spent on pre-testing materials? How much time is spent on practice sheets or tests in preparation for the state standardized assessment? What is the district's strategy for aligning the curriculum with the assessment? For aligning the curriculum with the TEKS?

## **2.C. Instructional Program Selection, Implementation, and Evaluation Process**

Requirements for instructional programs are well defined and in most cases mandated by the state. However, the management and oversight role in implementing these programs and ensuring continual improvements in student performance and adherence to established standards is the responsibility of individual districts.

In Texas, certain program evaluations are required. For example, TEA's Financial Accountability System Resource Guide (FASRG) Section 9.2.7, "Evaluation of State Compensatory Education Programs" requires school districts to evaluate the effectiveness of their state compensatory education programs and include the results in their district improvement plans. Districts are instructed to evaluate their compensatory programs through the examination of the test performance and high school completion rates of at-risk versus other students. In 2001, the commissioner of Education changed the requirements for local school district annual audit reports to include a provision that the external auditor "determine whether the district evaluated the effectiveness of strategies involving students at risk of dropping out of school." In 2006, the Texas Education Agency produced the first state report of the Performance-Based Monitoring Analysis System (PBMAS), an automated data system that reports on student performance in selected program areas such as special education and bilingual education. The agency now produces annual PBMAS reports for school districts and open-enrollment charter schools.

Good management of instructional programs:

- provides for systematic monitoring of instructional programs;
- provides feedback on successful aspects of curriculum and instruction;
- identifies areas for program revision;
- provides professional development to teachers and administrators based on students' needs; and
- benefits overall student achievement.

Because of the differences in the size and geographic location of school districts as well as the diversity of the children served within a district, each district has differing capacities for delivering educational services, providing training and addressing the special needs of children in the district. Yet, all are held to the same system of accountability in Texas.

This module focuses on development, evaluation and modification of curricular programs and identified support services, staff development and general management processes which are in place in the area of instruction.

### **Data Needs**

- Copies of any program or specific course evaluations done within the last three years
- Pertinent instruction-related internal audits conducted within the last three years
- Written evidence of program descriptions and goals and corresponding evaluation system and results
- District and campus improvement plans
- Documentation of professional development opportunities
- Copy of compensatory education audit findings and reports
- Copy of dropout audit findings and reports, as applicable
- Program evaluation model used by the district
- Test or other evaluation results used to measure the effectiveness of programs
- Description about how district has translated learning objectives into professional development and teacher support activities
- List of routinely produced research and/or evaluation reports
- List of programs discontinued in the last three years
- District level information from the Texas Education Agency's (TEA's) Performance Based Monitoring Analysis System (PBMAS) for the last three to five years.

### **People to Interview**

Superintendent

Assistant superintendent or other administrator with assigned responsibility for program evaluation

Principals

Department or program managers

Research and evaluation or accountability staff, if in a separate department

Teachers, librarians and instructional technology staff

Internal auditor(s)

### **Activities to Perform**

- 2.C.1. Identify and document the process used by the district to select and implement new programs or modify existing programs, showing any differences in the process that may exist if the program is a research-based program or one that has not been researched and documented. To the extent possible, determine if the system includes input from teachers who are expected to implement the new programs; begins with clear and measurable performance expectations and is subjected to debate by the board and community prior to implementation.
- 2.C.2. Identify and thoroughly document any program evaluation procedures or systems used by the district including any specific lines of accountability, including any board policy specifically relating to program evaluation and processes for holding staff or administration accountable for performance. Diagram the evaluation cycle and show when and how results are used to modify the educational delivery system.
- 2.C.3. Obtain copies of any outside program evaluations, audits and state or federal regulatory compliance visits such as visits from TEA and compile a list of findings, the district's corresponding response plan and subsequent actions taken by the district.
- 2.C.4. Prepare a chart using Performance Based Monitoring Analysis System (PBMAS) data. Develop trend analyses of participation rates of minority and economically disadvantaged students in special education, bilingual education and other special programs. Through interviews and examination of planning documents, determine how the district is using this information to improve the identification processes as well as the program delivery in these areas.

## **Questions to Ask**

### ***New and modified program implementation***

Are decisions to bring in new programs or discontinue existing programs made based upon quantifiable data? When new programs are brought into the district are expected results defined? Are decisions regarding the introduction of new programs research-based?

Are there policies or procedures in place for piloting instructional programs that are not research-based? Under what circumstances or conditions can instructional programs that are not researched based be piloted in the district?

### ***Program evaluations***

What staff is specifically assigned to perform program evaluations? Are these employees qualified for the job? Why or why not? Are their duties and responsibilities in program evaluation clearly defined in job descriptions? Is program evaluation appropriately aligned within the district's organization to ensure effectiveness?

How does the district ensure that there is high quality instruction at each school? How are principals held accountable for being the instructional leaders at their campuses? What systems are in place to provide teachers feedback regarding the results being achieved in their classrooms? How effective are the district and campus site-based decision-making committees in driving program improvements?

How accurate and effective are the strategies and performance targets portrayed in the campus and district improvement plans? Who is responsible for examining campus and district improvement plans to ensure that they include required staffing and appropriate budget allocations?

What data about various programs is collected routinely? How do the district and individual campuses prepare for the state standardized assessments? How many practice tests do they administer? What percent of time do they spend reviewing for the state standardized assessments? How much money does the district spend on pre-testing materials? What is the district's strategy for aligning curriculum with testing?

How frequently does the district evaluate the regular, bilingual/ESL, and special needs instructional programs? Is the program evaluation based upon measurable performance standards? When programs are not achieving the desired results, is there an orderly process for modification that involves teachers and administrators in the decision-making process? Are decisions to discontinue existing programs reached with input from teachers and administrators?

How are program evaluations used to identify weaknesses in the curriculum? Professional development needs for teachers collectively or individually? Are state standardized test scores or other test scores analyzed both at a district and campus level to identify areas of instruction that need to be strengthened? What professional development opportunities are linked directly to identified program weaknesses?

Does the district review and analyze comparative data between similar districts to develop an evaluation of the district? Are teachers and administrators involved in review of current effective schools research to identify areas for improvement and/or further study?

How does the district use current or longitudinal student performance to analyze academic success, assess curriculum and assess the strengths and weaknesses of instruction?

What programs have been discontinued in the last three years because the program evaluations proved them to be ineffective? What programs have been discontinued without evaluation and why?

***External evaluations***

What criteria does the district use to select external evaluators? How has the district prepared for external audits or programs in the past? What data does the district examine to determine if they are at risk for an external program review by TEA or some other group or organization? How does the district ensure that all federal guidelines are adhered to, particularly those that are subject to external review?

What major findings have resulted from external evaluation? How has the district responded? What substantive improvements have been made as a result of external findings? What major elements of an audit or external evaluation have not been addressed and why?

**2.D. Student Performance**

School districts need sound systems for managing the instructional process to ensure that programs provided to students produce continual improvements in student performance. This effort includes maintaining a comprehensive program for student assessment that accurately evaluates student achievement across all content areas, grade levels and demographic groups.

**Data Needs**

- Data for the district and each campus for the last five years, including statistics on student assessments at all levels, participation rates on assessments, retention rates by grade level, graduation rates in total and under each of the various programs, dropout rates and the like.
- SAT and ACT reports by campus for the last five years, if available
- Schedule and job descriptions for guidance counselors if involved in district or campus assessments
- Performance Based Monitoring Analysis System (PBMAS) data for the past five years
- District and campus improvement plans
- Compensatory and dropout audit results for all years available (first done in 2002-03)
- Reports showing the disaggregation of test scores and other related data as well as any corresponding procedures that discuss how the data is used by teachers and administrators to modify programs, enhance staff development, etc.
- Board policies or other internal or external publications given to students and parents regarding the recommended high school program, advanced placement examinations, concurrent or dual enrollment programs and SAT and ACT preparation and testing opportunities.
- TEA observations or other external evaluations.

**People to Interview**

Superintendent  
Principals  
Curriculum and Instruction director or specialist  
Program evaluator and/or data specialist  
Information technology specialist or director  
Guidance counselors  
Department or program managers  
Teachers

### **Activities to Perform**

- 2.D.1. Chart trends in student performance on the state standardized assessments, Scholastic Achievement Test (SAT) and American College Test (ACT), Advanced Placement exams, as well as dropout and attendance data for the last five years, disaggregated by ethnicity, economic grouping and grade level. Include state standardized assessments participation and exemption rates by campus, grade, sub-population and economic group. Examine the gaps in performance at various grade levels and test types (i.e., math, reading, writing) between ethnic minority and Anglo students and determine if the trend is toward continuous improvement at all levels.
- 2.D.2. Review DIP, CIPs and documents responsive to Performance Based Monitoring Analysis System (PBMAS) data or other reports for specifics addressing student performance, including strategies and subsequent evaluations of identified programs and corresponding budgeted funds. Prepare a list of strategies by component and to the extent possible, show how these efforts have affected student performance.
- 2.D.3. Prepare a chart showing all policies and publications pertaining to college and career readiness such as the recommended high school program, advanced placement examinations, concurrent or dual enrollment programs, SAT and ACT preparation and testing opportunities; and determine the effectiveness of each. Determine the amount of time spent and the role of counselors in pre-college and career counseling and how this ties to the various programs described above.

### **Questions to Ask**

#### ***Performance***

What trends in student performance have emerged over the last five years? How do those trends compare to what is happening in the state, region and peer districts? How are ethnic minority and economically disadvantaged students performing in comparison to non-minority and advantaged students? When negative trends have been observed, how has the district responded? How have individual campuses responded? How successful were countermeasures?

How are students exempted from the state standardized assessments? Are the numbers of state standardized assessments exemptions increasing (or decreasing)? Are they increasing (or decreasing) at certain campuses? Are exemptions increasing (or decreasing) among certain programs such as special education or bilingual education? Are exemptions increasing (or decreasing) among certain gender, ethnic or economic groups of students? If so, why? What is the correlation between rising state standardized assessments scores and rising exemption rates? What other anomalies exist in test participation? Were an inordinate number of students absent on test day as compared to other days? Which campuses had higher than average absences on test day?

How does the district ensure that all personnel at all campuses follow state laws regarding testing exemptions for special populations? What is the process used to decide whether students should be tested on state standardized assessments or the state approved alternative assessments for special education students? Are these processes or procedures being uniformly applied at all campuses? If not, which campuses are testing more children with the alternative assessments?

#### ***Strategies for improvement***

What, if any, findings have been reported during site observations by TEA or other external evaluations? How has the district responded? What strategies in the DIP and CIPs specifically address performance trends? If performance indicators triggered the TEA site observations or other external evaluations, what major initiatives have been undertaken to ensure that the performance problems are not repeated?

Are student test results reviewed, analyzed and evaluated at the district level? At the campus level? At the classroom level? Are programs modified, staff development opportunities planned, or staff evaluated based upon the results of such analyses?

Is planning for support and/or remediation based on item analysis of state standardized assessment data and other evaluative information? How and when are test results reported to parents, the Board of Trustees, media and community?

### ***College and post-secondary readiness***

How is the district ensuring students are taking the foundation high school program in accordance with the law? How many students are currently graduating under the foundation program? How is the information about the graduation programs disseminated to parents and students? How has the librarian instructed students so that they are ready to use online search strategies and other sophisticated research techniques at the college level?

How many students are participating in other activities such as advanced placement exams and dual or concurrent enrollment courses that would prepare students for college and facilitate college transition? How are counselors involved in the process? At what grade level does counseling regarding college begin? Is this soon enough in the process to allow students to change direction? Are personalized graduation plans developed for students to guide the courses they take during high school?

## **2.E. Instructional and Administrative Technology**

Instructional and administrative technologies have become critical parts of a school district's educational programs and general operations. Computers in classrooms, computer labs and automated reporting systems are no longer the exception, but often the norm. A tool for planning and assessing school technology and readiness is the Texas Campus StaR Chart. The StaR Chart was developed by the TEA and provides targets in the areas of teaching and learning, educator preparedness, administration, support services and infrastructure.

### **Data Needs**

- Completed Texas Campus StaR Charts
- Documentation to support the data shown in the StaR Charts
- District, campus and technology plans pertaining to instructional technology
- Policies and procedures, including acceptable use policies
- List of all computer hardware and software
- Campus and program computer availability patterns
- Copies of contracts from any outsourced technology support or maintenance
- Job descriptions for technology staff
- Grant funding applications and documentation of awards
- Staff training requirements (mandates) related to technology
- Number of students taking courses via distance learning by course

### **People to Interview**

Superintendent  
Principals



Instructional technology director  
Instructional technology technicians and staff  
Curriculum leaders  
Campus technologists or curriculum integration specialists  
Librarians  
Teachers

### **Activities to Perform**

- 2.E.1. Prepare an exhibit showing campus responses for the Campus StaR Chart in each of the key areas. Include information in the chart regarding progress toward meeting the targets, strategies used to meet the targets, numbers of students taking distance learning courses and evidence of how technology is integrated across all curriculum areas at all grade levels. Note areas of strength or weakness and through interviews determine the underlying reasons.
- 2.E.2. Obtain a list of computers for all campuses and programs by campus, type and capacity of computer and location (whether classroom or lab-based). Establish a pupil-to-computer ratio by campus and program for all computers regarding of usability. Calculate a pupil-to-computer ratio based upon computers that can support grade-appropriate programs and Internet access and compare this to statewide and national goals. Examine opinion survey results to determine the perceived effectiveness of technology in the district.
- 2.E.3. Compile a list of all educational technology equipment in addition to computers, such as servers, teleconferencing capabilities and connections. Determine areas of strength and weakness in the current infrastructure in comparison to the educational needs of the programs and any planned expansions.
- 2.E.4. Prepare a chart of budgeted and actual revenues and expenditures associated with computer service and other technology fees for the last few years, including grant funds. Describe the decision-making process within the Information Technology Department and identify who has ultimate responsibility for determining the manner in which funds are expended and how grants and other external and internal funding is sought to meet the district's needs.
- 2.E.5. Prepare a list of teacher training and support activities that facilitate the integration of technology into classroom instruction, including technical and instructional assistance from fellow teachers, technicians, external providers and others. Examine curriculum guides, published procedures and teacher survey and focus group comments to determine the frequency of use and how each component is evaluated for effectiveness.
- 2.E.6. Diagram the Public Education Information Management System (PEIMS) data collection and compilation process starting at the campus level through the final submission and re-verification process. Determine what quality assurance steps are in the system, where there are points of redundancy and identify any other areas of weakness.

### **Questions to Ask**

#### ***Technology integration in the classroom***

How does the district assist schools in meeting the targets of the Texas Campus StaR Charts, especially in the teaching and learning areas? How does the district ensure that time is provided for teachers to teach the required technology applications curriculum? How does the district ensure that students have time to learn the technology curriculum? How does the district ensure that students are proficient in the technology portions of the TEKS and meet all technology literacy requirements in No Child Left Behind Act (NCLB), Title II, Part D? How does the district ensure that required coursework (19 TAC Chapter 74, Subchapter A) is offered and/or completed?

***Availability of computers***

How does the district compare to state and national goals in the number of computers available to students? How old are computers? What is the capability of the computers? Can they run complex programs and software? How many of the computers can access the Internet? How does the district ensure that older computers are retired and replaced on a regular schedule? How does the district ensure that the computers placed in the classrooms can support the technology needs at each grade level and for specific courses? How do parents, students and teachers feel about the availability of computers?

What types of special programs make technology available to parents and students? For example, can parents or students check out laptops for home use? Is the library open after regular school hours to accommodate community needs? What types of configurations, such as learning labs and portable computer stations, are used to provide computer access without having to buy as many computers?

Is a policy or procedure in place for handling controversial printed and Internet-based materials? What board policy is in place to address questioned resources in the library or classroom? How does the district comply with the Internet Protection Act?

***Availability of other hardware***

What additional technological capabilities are available in the district (i.e., distance learning equipment, teleconferencing equipment, wide area networks, local area networks, servers) that are designed to support instruction? How is the district using these capabilities? Are the systems being used to full capacity? If not, why not? What would improve the overall infrastructure and add value to instruction?

***Budgets and planning***

Does the district have a long-range plan for use of technology in its instructional program? How is the plan tied to the goals and requirements in No Child Left Behind? How does the long-range technology plan compare to the E-Rate technology plan? Does the district have an approved policy for purchasing and using computers in the instructional program? Does the district have an annual budget allocation established for academic or instructional hardware and software acquisition?

How does the district's selection process ensure that software purchased for the classroom is focused on student learning? How efficient is this delivery system? What other delivery systems exist that may have greater capacity for reaching more students? How are learning objectives linked to the purchase of software and hardware for instructional programs? How many different software programs does the district use for each instructional program area? How does the district justify the purchase of all of these programs?

Who is responsible for finding, writing and submitting grant opportunities and applications for technology? How much money has the district received in grant funds? Has the district taken advantage of E-Rate telecommunication discounts? What has the district done with grant funds?

How are federal funds provided through No Child Left Behind spent to support instruction? What percent of the budget is spent on professional development? How does this percent spent on staff development compare to the recommended percent noted in state and national standards and required in No Child Left Behind?

***Distance education***

How is the district using distance education? What benefits are being achieved for students through distance education offerings? What savings or efficiencies are achieved through distance education

operationally? What is annually budgeted for distance learning or other electronic or online programs for students that expand learning?

How are distance education opportunities publicized to students and parents? Who is actively searching for new distance education opportunities for the district? How is distance education addressed in technology plans and budgets? What priority does the district place on expanding distance education opportunities? What types of partnering arrangements exist for distance education? How are the partnerships documented? What is the district's role in the partnership?

***Teacher training and support***

How is technology used in instructional programs? How many courses or grade levels have technology meaningfully integrated into the curriculum?

What evidence exists to show that educators are becoming technology literate as specified in No Child Left Behind or State Board of Educators Certification's (SBEC's) standards? How are teachers trained to use technology in the classroom? How are teachers encouraged to integrate technology into the curriculum? How many courses or grade levels have technology meaningfully integrated into the curriculum? What support do teachers receive for the use of technology in the classroom? Hardware support? Curriculum and lesson planning support? What technology support and training is provided for the technology applications courses provided at the high school (19 Texas Administrative Code (TAC) Chapter 126)? How is distance education used for staff development in this area?

What time management techniques are in place via software programs to assist administrators, librarians and teachers to plan their time more effectively?

***PEIMS reporting***

Are there policies and procedures in place to ensure accurate collection and reporting of PEIMS, state standardized assessment, and dropout data? What data reporting problems has the district experienced in the last three years and how has the district dealt with those issues? What attendance and other campus-level administrative tasks are automated? What redundant data entry must be done either from manual forms to the computer or from one computerized system to another?

**2.F. Staff Development**

According to Texas Education Code (TEC) Section 21.451, staff development provided by a school district must be conducted in accordance with minimum standards developed by the commissioner for program planning, preparation and improvement including:

- must include training in technology, conflict resolution and discipline strategies;
- must include training that relates to instruction of students with disabilities and designed to include educators who primarily work outside special education;
- may include instruction as to what is permissible under law, including opinions of the United State Supreme court in regard to prayers in public schools;
- must be predominantly campus-based, related to achieving performance objectives and developed and approved by campus site-based decision-making committees; and
- may use districtwide staff development developed and approved through the district-level decision process.

Regional Education Service Centers are also specifically assigned responsibility for providing certain types of staff development to school districts within the region, some of which is provided at no charge to

the participating districts.

Many districts respond to individual campus needs and include training and activities that enable campus staff to plan together to enhance existing skills, share effective strategies, reflect on curricular and instructional issues, analyze student achievement results, reflect on means of increasing student achievement, study research, practice new methods, identify students' strengths and needs, develop meaningful programs for students and appropriately implement site-based decisions.

### **Data Needs**

- Training calendar for coming year
- Documentation on staff development programs to help orient new teachers or other instructional staff (i.e., assigned mentors)
- List of staff development classes offered externally or internally to instructional staff during the last year and number attending
- Total number of class hours attended for each year of the last five years
- Campus and district improvement plans as they pertain to staff development plan, or any other staff development planning documents
- Texas Campus StaR Charts
- Teacher and professional training evaluation or feedback instruments
- Staff development budgets (central and campus-based) for last five years
- Staff development staff organization charts and job descriptions
- Number and dates of in-service training days observed in the last five years
- Number of substitute hours used over each year of the last five years to relieve individuals for in-service training
- District mentoring policies and procedures

### **People to Interview**

Principals  
Staff Development director or coordinator  
Teachers, librarians and instructional technology staff  
Counselors

### **Activities to Perform**

- 2.F.1. Prepare flow chart depicting the staff development function including planning, organizing, notification of training availability, offering courses and tracking participation in staff development opportunities. The organization chart should be used as a point of reference to determine how and when the central office organization interacts with campus staff, particularly the involvement of the site-based decision-making committees in the process as well as information about how staff development is linked to teacher and other instructional staff evaluations. Examine the job descriptions of each position shown and determine if duties performed correspond to what is described in the job description content.
- 2.F.2. Identify primary campus-level, centrally delivered and externally offered staff development initiatives conducted in the last year and examine any documented feedback from teachers or principals to rate the effectiveness of the programs. Compare the actual classes offered to needs identified in planning documents such as the campus and district improvement plans and note areas of difference.

- 2.F.3. Document process for tracking required and optional staff development hours. Randomly check personnel files for record of staff development hours – both required hours and optional hours (i.e., required hours: gifted and talented teacher and administrator annual training hours). Through interviews, determine how supervisors or principals use these records when evaluating instructional staff.
- 2.F.4. Chart the staff development budgets (central and campus-based) for the last five years, the number of full-time employees assigned to staff development activities, the number of teacher in-service days observed during each of the last five years (separating those that require release time and those conducted during the summer or on school holidays), the number of substitute hours used for in-service training in each year of the last five years and total number of class hours attended in each year of the last five years. Identify trends and comment on the appropriateness of the changes identified.

### **Questions to Ask**

#### ***Staff development delivery system***

Is the responsibility for coordination of staff development centralized or decentralized? How is this the best delivery method for this district? What communication problems exist among or between campuses and administration that are inhibiting the process? Who is responsible for ensuring that staff development supports current curriculum, state standardized assessments and the TEKS? What is the role of site-based decision-making committees in the staff development process?

How is staff development planned? How does the planning process identify prioritized staff development needs? What relationship exists between new instructional materials adoption and staff development needs? Are surveys of staff development needs conducted on a scheduled basis? How is staff development linked to student performance or needs? How is staff development related to specific content areas that are taught? Is there a process for evaluating the quality of staff development activities? Is staff development based on multi-year planning? Are teachers and campus administrators involved in planning staff development programs? Are teachers used as instructors for staff development programs? Are teachers offered opportunities to be trained to provide ongoing staff development in specific areas? Is train-the-trainer ever used to bring information back to district personnel? How frequently are teachers and librarians given an opportunity to attend professional conferences?

Are new and beginning teachers provided mentors to help them assimilate into a campus? Are beginning teachers provided an intense mentorship program during their first year of teaching? Are new employees given an adequate orientation to district policies and procedures? Are there staff development opportunities available through shared service arrangements with local area colleges or universities? What staff development is conducted through the Regional Education Service Center?

Does the district have a training calendar? If yes, is it also online? Is there any online and/or distance training provided in the district?

Does the district set minimum continuing education or training hours for instructional staff? How are the number of state-mandated hours of training integrated into these district required minimums (i.e., gifted and talented education requirements)?

Is an in-depth supervisory training program offered? Is attendance mandatory or optional? What are the ramifications of failure to attend?

Does the institution have a partnership with a nearby community college or university for training? Does the institution pay any of the costs for the pursuit of additional certification or degrees? Does the pursuit of additional certification or degrees qualify for mandatory staff development hours?

Are staff development goals linked to districtwide goals? How many days for staff development does the institution allow?

***Documentation and use of participation data***

How does the district or the human resources department collect feedback from participants on training received? How does the human resources department use this feedback to develop and refine training? Does the district evaluate the usefulness of training periodically?

Do provisions exist for a teacher recognition program based on instructional success? Does the board or community recognize outstanding teacher(s)? How are opportunities for improvement and possible training identified during teachers' evaluations? Are teacher appraisals used individually or collectively to develop in-service/staff development programs and services and in the improvement of instructional delivery?

Who oversees contractors that provide training? How are contractors evaluated? What are the best and worst of the contractors used by the district? How are decisions made regarding contracts? How are purchasing guidelines adhered to when contracting for training services? How is feedback on these training classes used to determine which vendors to ask to return and which ones to discontinue using?

***Budgets and staffing***

Are staff development resources allocated based on prioritized needs? Is training scheduled to be least disruptive to an employee's job schedule? Does the institution provide incentives for training outside regular hours? How does the district budget for staff development? By employee? By program? Some other method?

What training opportunities are provided in summer months?

What contracted services does the district use? Why is the district contracting for services rather than providing the training in-house? What train-the-trainer opportunities are used to decrease overall costs?

**2.G. Special Programs**

All districts are faced with the challenge of providing programs for students with special needs. These programs allow a district to provide educational programs that are most beneficial for individual students in terms of instructional level, student interest and/or identified need. Many of these programs may be combined with regular classroom programs (based on individual needs) that provide for a more complete education and integration with other students. The special programs examined here include:

- Special Education
- Bilingual Education/English as a Second Language (ESL)
- Advanced Academics (Gifted and talented (G/T), dual credit, pre-Advanced Placement/Advanced Placement (pre-AP/AP), early college high school, International Baccalaureate (IB), academic magnets)
- Response to Intervention (RTI)
- At Risk, Compensatory Education and Alternative Education Programs

- Career and Technical Education (CTE)
- Migrant Programs
- Athletics and Extracurricular Activities

Included in the examination are assessment programs, program monitoring, cost analysis, interface with regular programs, parental/community involvement and program evaluation.

### **Data Needs**

- Strategic, campus and district improvement plans as they relate to special programs
- School and District Report Cards
- Number of children served by each special program, disaggregated by subpopulation, for the last three years, as well as the academic performance of students in each program
- Budget information for each special program for the last three years
- Staffing information for each special program for the last three years
- Any due process hearings or TEA complaints filed against the district in the last two years
- Program evaluations either external or internal done in the last three to five years

### **People to Interview**

Superintendent

Assistant superintendent with assigned responsibility

Program directors

Administrative staff with assigned responsibility

Principals

Teachers

Counselors

### **Activities to Perform**

- 2.G.1. Chart the number of students served in each special program by home campus, ethnicity and economically disadvantaged status. If available, chart the number and demographics of students served over time and show percent change. Where wide variances are observed, attempt to find out the reason for the variance.
- 2.G.2. Examine the organization and staffing charts and job descriptions for each special program and interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department(s); document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future; and explain the background for changes. Include any contracted individuals or services or committees that oversee curriculum and instruction in the organization chart; show the reporting relationship; and identify who is responsible for monitoring the contracts.
- 2.G.3. Chart the budgets and staffing of each special program. If available, chart the budgets and staffing in each special program over time and show percent change as compared to percent change in student enrollment in each special program.
- 2.G.4. Examine academic performance data of students served in each special program by school, ethnicity and program status. Also chart exemption and alternative testing rates for applicable programs and show trends over time. If available, chart the number and demographics of students served over time and show performance change.
- 2.G.5. Examine special program strategic plans, DIP and a sample of CIPs and identify all goals,

objectives, strategies and budgeted funds for each special program. Compare this outline to student performance information, any program evaluations done internally or externally and data in PBMAS reports to determine whether the goals are consistent, appropriate and achieve the desired results.

## **Questions to Ask**

### ***Number and type of students served***

What special programs are growing in the number or percent of students served? What special programs are declining in the number or percent of students served? Why is this happening? What special programs serve students that are demographically disproportionate to the overall student population of the district? Why? What is being done to ensure that students are served equitably in all special programs?

### ***Organization***

How does the current organizational structure support special programs? Encourage cross-functional and interdisciplinary cooperation? Provide support for classroom teachers? Facilitate the needs of campus-based staff? Ensure compliance with federal, state and local laws, rules and regulations? Where does the system break down? What efforts have been made in recent years to improve the structure and ensure that campuses and particularly teachers have what they need to be successful?

Are the responsibilities of central office staff clearly defined? Are the responsibilities of campus-based personnel clearly defined? Is each category of employee performing its intended function?

How does communication flow from the central office to the campuses and vice versa? At what points in the process is communication hampered or enhanced? How could obstacles to communication be overcome? What formal and informal mechanisms exist to ensure good communication?

### ***Budgets and staffing***

How are budgets and staffing allocations made to ensure equity? How are budgets and staffing formulas linked to the actual number of students served?

### ***Academic performance***

What subgroups of students are being most successful academically in the special programs? How is performance data being used to modify programs and delivery methods to ensure student success? How does the district measure success with each special population? Is this measure an accurate measure of student success?

How and when are students exempted from the state's assessments? How and when are alternative testing instruments used? When alternative test instruments are used, does the district use a state developed alternative test, or a locally developed alternative assessment? What percent of students are taking the alternative assessment and is that percent reasonable given the makeup of the student body? How reasonable and equitable are the exemptions and alternative testing decisions? How does the district use the results of alternative tests to evaluate program effectiveness and make modifications to program delivery?

### ***Planning***

Does each educational department have a mission statement or an understanding about how their department fits into the overall district mission and goal? How does the department monitor and measure success? How does each department know it is meeting the needs of the identified student population? Who are those students? Who are the relevant teachers, professionals, paraprofessionals, administrators, or



others, involved in the programs?

### **2.G.a Special Education**

The federal Individuals with Disabilities Education Act (IDEA) requires free, appropriate public education for all children with disabilities in the least restrictive environment, regardless of the severity of their physical, emotional or educational challenges. This law is also designed to protect children and parents in educational decision-making and requires districts to develop an individual education plan for each child with an identified disability that provides access to the same curriculum received by all children.

#### **Data Needs**

- Special Education organization chart
- Special Education Procedural Handbook
- List of teachers' certifications and permits
- Parent/Student Handbooks
- Any pertinent special education compliance reports
- Special education transportation policies and procedures
- Random sample of Individualized Education Plans (IEPs), with names redacted for confidentiality purposes
- Pre-referral processes and procedures
- Identification process documentation
- Admission, Review and Dismissal (ARD) procedures and relevant board policy
- Medicaid reimbursements from any source over the last three years
- Salary schedule and overtime records for special program staff

#### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility  
Special Programs coordinator  
PEIMS coordinator  
Principals  
Special Education teachers and aides  
Parents  
Paraprofessionals  
Professionals, including speech therapists and occupational therapists  
Guidance counselors  
Social Workers  
School Psychologist  
Pre-referral teams (campus-based)  
Human Resources director

#### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for special education:

- 2.G.a.1. Diagram the special education pre-referral, referral, testing and ARD processes. Note areas where the system is redundant; does not meet federal or state timelines for compliance; where

communication breaks down; or where the process is inefficient or ineffective. Also show how parents are informed about the evaluation process and their rights under the law.

- 2.G.a.2. Prepare a chart of salaries and overtime for diagnosticians, therapists and other special education staff and determine if the district or the special education cooperative employs sufficient staff to support the workload, whether there are outside contractors that could be used to supplement or replace staff to increase the quality and quantity of services offered at lower cost. If an external contractor is used, determine the cost of the contract, the amount and quality of work performed and whether in-house staff could provide higher quality and quantity of services at lower cost.
- 2.G.a.3. Prepare a chart showing reimbursements from the School Health and Related Services (SHARS) and Medicaid Administrative Claiming (MAC) programs over the last three years. Examine the process used for claiming and determine if there are any services that are eligible for claiming that are not being claimed and why.

### **Questions to Ask**

How does the district provide special education services to students such as speech, counseling services, physical and occupational therapy as needed? Does the district participate in cooperatives or other shared service arrangements with other districts? In what way does the district use the services provided through the Regional Day School for the Deaf? Blind? Other cooperatives?

Does the district use a pre-referral intervention process for identification of special needs students? Are teachers and other support staff trained to refer students with possible special needs? What training is provided to regular education teachers on how to effectively instruct special education students in their classrooms? What percent of referrals are valid or invalid? Are campuses and teachers with high numbers of invalid referrals or referrals that do not qualify given additional training to ensure they understand and use the pre-referral intervention process (if available)?

Since schools are required by law to serve students in the least restrictive environment and to give preference to the home school, how is the district implementing this ruling? What percent of special education students attend their home school?

How are workloads for diagnosticians determined? Is all testing and review conducted in compliance with state and federal laws concerning special education?

Does the district participate fully in the SHARS and MAC programs? How much has the district received in reimbursements over the last five years? What could be done to enhance claiming and increase Medicaid reimbursement revenues?

How does the district handle complaints pertaining to special education? How does the district know if parents have complaints? Do parents have to complain to TEA, or is there a district process? How does the district monitor the internal process for effectiveness? Are special education-related lawsuits, due process hearings or requests for mediation pending in the district? What are primary areas of complaint? How has the district adapted the program to prevent or reduce the risk of legal action?

How does the district ensure compliance with IDEA, which requires access by all special education students to the general curriculum? If there is a separate curriculum, why? Is the district in compliance with this federal regulation? Are performance measures of success for students with disabilities aligned consistently with those of all students? Do IEPs reflect appropriately each student's objectives in meeting TEKS and participating in the state standardized assessments?

Do schools and the district evaluate student performance data to ensure that students are provided instructional programs and support services that are consistent with the IEP and as much as possible, with the learning objectives for all students?

How are community and social services programs used to supplement district programs? What kinds of non-educational money has the district requested from its Regional Education Service Center to support community and social service programs?

Does the district have a special education advisory committee although they are no longer required? If yes, who is on the committee? What is the committee's role and responsibility?

Are special education program offerings consistent with student needs? Are IEPs reviewed annually? Are ARDs conducted as required by law? What percent of parents attend their ARDs? What provisions are in place for private placement when the district cannot meet the needs of a student? Are regularly scheduled reviews performed on private placement programs?

How does the district ensure that students are served in the least restrictive environment? How many students in the district are served for at least 50 percent of the day in regular classrooms? What accommodations are made for mainstreamed students? Does special and regular education staff collaboratively plan curriculum objectives? How does special education staff assist regular education with development of techniques and materials? Do regular and special education staff meet on a regular basis? Do regular and special education staff develop cooperative activities for specific students? What training is provided to teachers who have special education students in their classes? Do they use co-teaching?

Has a cost analysis been performed on the special education program that identifies:

- cost per pupil for special education instruction?
- percent of district funds spent for special education?
- total special education program costs?
- percent of student enrollment served by the special education program?
- cost of assessment per special education pupil?
- per pupil cost of each type of special education program
- cost per pupil for supportive services?
- special education transportation costs?

How much is spent to bus students to a campus other than the home school? Are these services in response to specifics on a student's IEP? How many special education students ride a regular bus?

How does staff development provide for training of special education staff, regular education staff and gifted and talented staff so that:

- regular education staff receive training in special education?
- special education staff receive training offered for regular education?
- regular education staff receive training in gifted and talented education?
- principals and other administrators receive training in special education?
- both regular and special education staff receive training on innovative school programs identified in Texas schools?

Does the district use the Regional Education Service Center for special education training efforts? (Also mentioned in Staff Development)

What training opportunities does the district provide to parents relating to confinement, restraint, seclusion, and time-out?

Do schools and the district evaluate and monitor the ratio of students enrolled in special education as a subset of the entire student population? By student group? In comparison to the state, regional and peer averages? Are there significant differences among student groups? Why?

What types of assistive technology are made available to special needs children? What special adaptive devices are available in classrooms? In the library? Are all areas of the campuses ADA compliant, including the libraries? If not, why not; and what plans are in place to remedy areas of non-compliance?

## **2.G.b Bilingual Education/English as a Second Language (ESL)**

The TEC, Chapter 29 requires all school districts with an enrollment of 20 or more Limited English Proficient (LEP) students in the same grade level to offer Bilingual Education (BE), English as a Second Language (ESL) or an alternative language program. A LEP student is defined as one whose primary language is other than English and whose English language proficiency limits the student's participation in an English language academic environment. The law specifies that BE must be provided in pre-Kindergarten through the elementary grades and that BE/ESL or other transitional language instruction approved by TEA is provided in post-elementary grades through grade 8. For students in grades 9-12, only instruction in ESL is required.

### **Data Needs**

- BE/ESL referral numbers
- BE/ESL parent waiver/denial numbers
- Any program evaluation data
- BE/ESL grant applications and awards
- Information on, or a list of Language Proficiency Assessment Committees (LPACs) operating in the district
- Curriculum guides as they pertain to BE/ESL programs

### **People to Interview**

Superintendent  
Principals  
BE/ESL Program director (central administration)  
BE/ESL Teachers  
BE/ESL Teachers' aides and paraprofessionals  
LPAC committee members  
Parents

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for Bilingual/ESL programs:

2.G.b.1. Diagram the Bilingual/English as a Second Language (ESL) identification, assessment,

educational delivery and exit processes, including the various types of bilingual programs available by grade-level and the use of the Language Proficiency Assessment Committee (LPAC). Note areas where the system is redundant, does not meet federal or state timelines for compliance, where communication breaks down or where the processes are inefficient or ineffective.

- 2.G.b.2. Prepare a list of all curriculum guides used in the Bilingual/ESL instructional programs and determine whether the guides are current, are in alignment to TEKS and the state's standardized assessments and contain useful strategies for ensuring that students are meeting state and federal annual English proficiency objectives and academic standards and are exiting the program in a timely manner.

### **Questions to Ask**

Does the district implement and use the No Child Left Behind (NCLB) required English language assessment as a basis for LEP identification and instructional program placement? Are home language surveys distributed? Who is primarily responsible for identifying students? For assessing or evaluating students?

Are parents notified that their child needs specialized language instruction, as required by federal law?

What grade levels have more than 20 students that require services? Is the district complying with the requirements in law to provide services to these students? If not, why not? If the district has an enrollment of less than 20 children in any one grade level that require these services, what services are provided?

Are parents notified that they can remove their child from LEP programs at any time, as required by federal law? Has the district obtained the signed parental authorization required by state law? If not, why not?

What grade levels offer Bilingual Education? What grade levels offer ESL?

What languages are represented in the bilingual education program? In the ESL program?

If your district offers bilingual education, what model does the district employ (e.g., transitional early exit, transitional late exit, dual language immersion one-way, dual language immersion two-way)?

If you district offers ESL, what mode does the district employ (e.g., content-based ESL, pull-out ESL)?

What percentage of Bilingual/ESL students are also receiving special education services? How are these students served?

How do student assessment programs evaluate student needs for bilingual programs and services? How are community and home surveys completed to determine present and future student needs?

Are there specific criteria adopted for exiting students from bilingual programs? Are criteria consistently applied and do students regularly exit the programs in a timely manner? For students exiting from the bilingual program to the regular curriculum does the district review and monitor student's progress with:

- student exit data reviewed and evaluated?
- bilingual program objectives developed to ensure student success in English speaking classes?

Does the district track bilingual students' academic performance over time to assess program effectiveness? Are bilingual students offered instructional programs that keep them on grade level expectations for TEKS? Review exemption percentages for students in Bilingual Education. Review the number of students taking the Spanish version of the state standardized assessments.

How are parents involved with the bilingual programs? Is parent input solicited on the bilingual education program? Does the district have a bilingual advisory committee that includes parent representatives? How many parents request a waiver or deny student entry into BE/ESL programs when students qualify?

Are parents offered ESL classes or other services to allow them to help in their child's education? Does the district offer interpreters to non-English speaking parents to promote communication especially during parent conferences? Are printed communications with parents provided in their home language, when feasible?

Is a cost analysis performed on the bilingual program that identifies:

- cost per pupil for bilingual instruction?
- cost of assessment per bilingual student?
- per pupil cost by program, for ESL? Bilingual Education? Tutorial programs?

Do the bilingual program instructional materials meet the district's needs with: costs for materials controlled through district purchasing procedures? The district maintaining an inventory of bilingual material?

What bilingual resources are available in the libraries? How are these resources allocated? Is allocation proportionate to the number of students served? What library resources are available to parents for check out and home use, if any?

Has the district established a plan to employ trained bilingual teachers to meet program needs by cooperating with a university and other staff development programs to train bilingual teachers? Does the district have a formalized recruiting process to hire bilingual teachers? Do recruiting activities include foreign recruitment? Are stipends or other incentives paid to encourage teachers to seek certification?

Is there an ongoing staff development program for teachers in bilingual and regular classes impacted by bilingual students, as required by federal law? Does the district provide staff development in bilingual education for administrators, counselors and teachers? Does staff attend staff development activities offered by professional associations, TEA and others? Have general education as well as bilingual and ESL teachers received training in English Language Proficiency Standards? Who provided the training?

### **2.G.c Advanced Academics (Gifted and Talented (G/T), dual credit, pre-Advanced Placement/Advanced Placement (pre-AP/AP), early college high school, International Baccalaureate (IB), academic magnets)**

*Gifted and Talented* Section 29.12 of the TEC states that school districts “shall adopt a process for identifying and serving gifted and talented students in the district and shall establish a program for those students in each grade level.” In accordance with section of 29.123 of the TEC, the State Board of Education (SBOE) created and revised the Texas State Plan for the Education of Gifted/Talented (G/T) Students establishing three levels of performance measures – acceptable, recognized and exemplary – for five program areas: student assessment, program design, curriculum and instruction, professional development and family-community involvement. Recognized or exemplary performance measures are provided as “viable targets that local district educators seeking excellence, both for their district and for its students, may strive to attain.” Effective school districts base their G/T programs on the state plan and provide services to address the intellectual, social and emotional needs of G/T students through the collaborative efforts and support of educators, parents and community members.

*Opportunities to earn college credits* Texas high schools must offer opportunities for college credit, as

the Texas Education Code §28.009 requires the following:

- Each school district shall implement a program under which students may earn the equivalent of at least 12 semester credit hours of college credit in high school.
- Each school district shall annually report to the agency:
  - the number of district students, including career and technical students, who have participated in the program and earned college credit; and
  - the cumulative number of courses in which participating district students have enrolled and college credit hours the students have earned.

The opportunity for at least twelve college credit hours can be met through dual credit, Advanced Placement, International Baccalaureate, and advanced technical credit courses, including locally articulated courses.

**Advanced Placement** Advanced Placement (AP) and pre-Advanced Placement (pre-AP) are key programs in districts' college readiness and academic rigor initiatives. The AP program is facilitated by College Board and partnerships between secondary and postsecondary schools. The AP program includes more than 30 courses, with AP exams offered as an opportunity for college credit by examination. AP exams measure a student's ability of college-level performance. Pre-AP courses prepare students for academic rigor through high expectations and intellectual engagement, thus developing skills for AP, college-level, or rigorous courses.

**International Baccalaureate** The International Baccalaureate (IB) Diploma Programme is a college-level program offered at the high school level. IB uses high school curriculum "anchored by three core components: a theory of knowledge course; creativity, action, and service activities; and an extended essay project based on original independent research," (IB, 2007). Students are tested through written end of program exams, with performance measured by standard criteria.

**Dual Credit** Dual credit is a program that allows students to earn college and high school credit simultaneously upon completion of the course. Dual credit courses are college-level, exceeding the high school level of instruction for the corresponding course. Dual credit is an opportunity for students to not only earn credit, but gain preparation for college-level or academically rigorous courses.

**Early College High School** An Early College High School (ECHS) must be approved and designated by TEA. College-level and high school courses are combined, allowing students to earn up to 60 college credit hours while completing a high school degree. An ECHS is required "the outreach, curricula, and student learning and support programs that enable the participating student to combine high school courses and college-level courses," (TEA).

**Academic Magnets** Academic magnet schools admit students through a selective application process. An academic magnet school offers advanced courses built upon academic rigor. Academic magnet schools focus on college and career readiness and intellectual growth.

### **Data Needs**

- Documentation of administrator and teacher annual training hours
- District's G/T plan
- Assessment instruments and procedures used for identification of gifted students
- G/T curriculum K-12
- Teacher certification and training documentation
- Student grades in advanced courses

- Student scores in advanced course examinations
- Student enrollment data in advanced courses

### **People to Interview**

Superintendent or administrator assigned to oversee the G/T programs  
Principals and administrators  
G/T Program coordinator  
Teachers and librarians  
Human resources director  
Staff development coordinator  
Advanced course teachers

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activity is performed specifically for G/T programs:

2.G.c.1. Examine any district or campus level documentation that compares the efforts of the district to the state's Gifted and Talented Plan. In the absence of documentation, compare the state plan to the district's efforts. To the extent possible, chart areas where the district is exceeding or falling behind full implementation of the plan, paying careful attention to the identification process, delivery of services and the training hours and the evaluation process for staff development required for all teachers and staff involved in the gifted programs.

### **Questions to Ask**

Are gifted and talented programs offered at each grade level in the district? Why or why not? How does the district ensure that its gifted and talented programs comply with the state plan for gifted and talented? To what extent does the district comply with the state plan? How is the district progressing toward Exemplary or Recognized status?

How does the district assess and identify gifted and talented students? How equitable is the assessment and identification system? Are students in the program representative of the ethnic population in the district? Do the district's criteria for student placement in the program support diversity? How are Bilingual/ESL students assessed for gifted education? Are students in special education afforded G/T opportunities? Adequately represented? What percentage of G/T students score Advanced Proficient on the state standardized assessments?

Do gifted and talented program instructional materials meet the district's needs with:

- instructional materials readily available to ensure success of the program?
- program staff available to present the purpose and planned use of special materials?
- costs for materials controlled through district purchasing procedures?
- an inventory of instructional material maintained and periodically updated?
- surveys to gather feedback?

How do librarians and teachers collaborate to meet gifted students' needs? What resources are available in libraries to challenge gifted students?

Has the district provided for advanced placement or international baccalaureate courses when justified by



student enrollment? What is the participation rate? What is the success rate? To what extent does the district supplement program and testing costs for economically disadvantaged students?

Has a cost analysis been performed on the advanced academic programs that identifies:

- cost per student for instruction?
- cost of assessment per student?
- added cost per teacher assigned?
- per pupil cost by program?
- total program costs?
- percent of district enrollment served by the program(s)?

Does the level of instructional staff in the advanced academics programs meet district needs? Does the district follow state guidelines for staff training and certification?

What mechanisms does the district use for parent outreach? Do parents have input into the advanced academic programs through:

- parent participation in the program advisory committee?
- parent meetings held to discuss the program?
- incorporating parent issues and concerns into future planning sessions?

Are advanced academic programs evaluated with:

- an annual review and evaluation of programs?
- student progress assessed and analyzed?
- program revisions based upon evaluations?

#### **2.G.d Response to Intervention (RtI)**

Response to Intervention (RtI) is the practice of identifying and providing support and services to meet the academic and behavioral needs of all students. According to TEA, RtI services are based upon the following key elements:

- high-quality instruction and scientific research-based tiered interventions aligned with individual and student need
- frequent monitoring of student progress to make results-based academic and/or behavioral decisions
- application of student response data to important educational decisions (such as those regarding placement, intervention, curriculum, and instructional goals and methodologies)

RtI instruction and identification are based on data and research. RtI services are provided in a general education setting, and should show data-based improvement for the school and students. RtI intervention is provided with the following multi-tiered model, as indicated by TEA:

- Tier 1: Teachers use high-quality core class instruction aligned with the Texas Essential Knowledge and Skills (TEKS) in which about 80 percent or more of the students are successful. This tier is the crucial foundation of the RtI instructional model.
- Tier 2: Students are identified for individual or small group intervention in addition to core class instruction. This level includes scientific research-based programs, strategies, and procedures designed and employed to supplement, enhance, and support Tier 1 activities. District-established standard protocol matches appropriate intervention strategies to specific student needs. Tier 2 addresses the needs of approximately 10–15 percent of the students.

- Tier 3: Students who have not responded adequately to Tiers 1 and 2 receive specific, custom-designed individual or small group instruction (designed using a problem solving model) beyond the instruction in Tier 1. This level of intervention is aimed at those students who have identified difficulties academically or behaviorally. Tier 3 addresses the needs of approximately 5–10 percent of the students.

### **Data Needs**

- District’s RtI plan
- Student enrollment data in RtI (number of students per grade level) for the current year and past two years
- Documentation of administrator and teacher annual training hours in RtI
- Assessment instruments and procedures used for identifying students for RtI
- Resources specifically acquired for RtI (e.g., software programs, special instructional materials)

### **People to Interview**

Superintendent  
Curriculum director  
Principals  
Assistant principals  
Teachers  
Guidance counselors

### **Activities to Perform**

- 2.G.d.1. Compare the district RtI plan to the state RtI program guides and note areas where the district exceeds the state’s recommendations or falls short of meeting the recommendations.
- 2.G.d.2. Compare the number of students in each RtI tier during the current school year with numbers provided for previous years. Are the changes significant? Have the numbers of students declined over the past years or increased?
- 2.G.d.3. Review instructional programs and instructional materials acquired for RtI. Determine if the programs are noted for their research-based approach to improving student performance.
- 2.G.d.4. Examine any documentation provided by the district related to training in RtI. Who has participated in the training (e.g., general education teachers, administrators, special education teachers, counselors)?

### **Questions to Ask**

Describe activities represented in the different tiers. How much time is devoted to the activities on a daily basis for students in each tier?

How were special instructional materials, including software programs, selected for RtI?

How often do teachers participate in RtI training? Who provides the training?

What are the specific criteria used to identify students in need of the RtI activities? How does the district determine when RtI activities are no longer warranted for a student?

Describe other personnel involved in RtI activities such as laboratory activities. What are their

qualifications?

How are parents kept informed of students' progress in RtI?

## **2.G.e Student Success Initiative (SSI)**

The purpose of the Student Success Initiative (SSI) is to support all students in the subjects of mathematics and reading. The SSI was enacted by the 76<sup>th</sup> Texas Legislature in 1999, and modified by the 81<sup>st</sup> Texas Legislature in 2009. The SSI outlines requirements for grade level promotions, with mandates that students must receive satisfactory performance on grade 5 and grade 8 mathematics and reading state standardized assessments before promotion to grade 6 and grade 9, respectively, or “by unanimous decision of his or her grade placement committee that the student is likely to perform at grade level after additional instruction,” (TEA). The SSI requires by law that schools provide accelerated instruction and up to three opportunities for assessment in the spring and summer. The SSI goal of supporting students in the subjects of mathematics and reading necessitates involvement from stakeholders such as schools, parents/guardians, and the community.

### **Data Needs**

- State standardized assessment Scores
- Grade-level Retention Data

### **People to Interview**

Principals  
Assistant principals  
Teachers  
Director of Program Evaluation  
Director of Technology  
Curriculum director

### **Activities to Perform**

- 2.G.e.1. Review student promotion and retention records and prepare a chart to illustrate data for all students and student groups
- 2.G.e.2. Review and analyze any evaluations of targeted interventions that have been performed
- 2.G.e.3. Review summer programming for students in need of intensive intervention or accelerated instruction
- 2.G.e.4. Analyze and chart STAAR retake pass rates in reading and math In grades 5 & 8
- 2.G.e.5. Review procedures for Grade Promotion Committee (GPC)
- 2.G.e.5. Analyze Grade Promotion Committee (GPC) meeting agendas, participation records, and other related documentation

### **Questions to Ask**

Describe the district's use of the online programs that are provided by the SUCCESS initiative. How many students are enrolled in the online programs?

How are students selected? How is progress monitored? To what extent do these programs result in better performance on the state standardized assessments? Is there exit criteria to determine when students are no longer in need of the intervention?

How are the programs evaluated? Who is responsible for ensuring that the programs are implemented with fidelity?

Are the online programs facilitated by a certified teacher or a paraprofessional? What type of professional development for the programs is offered to teachers? Are teachers given job-embedded coaching to promote successful implementation? Are teachers given training on how to analyze the program's assessment data?

What type of technical support is needed to ensure that these programs are fully operational?

## **2.G.f At Risk, Compensatory Education and Alternative Education**

In addition to regular classroom instruction, districts provide other instructional programs designed to support the needs of students at-risk of dropping out of school and students who are not performing at grade level. The Federal Elementary and Secondary Education Act (Title I) originally enacted in 1965 and the Improving America's Schools Act of 1994, provide funds for students not meeting performance standards. TEA receives and sends Title I funds to districts based upon the number of students identified as economically disadvantaged. The TEC requires state compensatory education funds to be supplemental in nature, like federal Title I funds. In 2002-03, the state required all districts to perform and report the results of an externally conducted audit of their Compensatory Education programs and related funding.

The Education Code requires each school district to provide an alternative education program for students with disciplinary problems. Successful alternative programs are intellectually challenging; often offer nontraditional educational methods that are self-paced and can be tailored to meet the needs of a wide variety of students; have strict discipline, including a dress code that bans the wearing of gang colors; and offer intense counseling for troubled youth.

Not all alternative programs are intended solely for students with disciplinary problems. Some are geared toward students who are not succeeding in a regular educational environment, have dropped out of school, are pregnant teens or are parents, or must work to support a family and cannot attend class during regular class times.

### **Data Needs**

- Compensatory Education External Audit
- Dropout external audit
- Retention data
- Leaver code reports
- Pertinent internal audit reports
- Policies and procedures relevant to compensatory or Title I funding
- Budgets for Title I and Compensatory education spending
- Campus and district improvement plans

### **People to Interview**

Superintendent or administrator with assigned responsibility  
Internal and external auditors  
Business manager  
Principals  
Assistant principals  
Title I coordinator  
Special Programs coordinator  
PEIMS coordinator  
Teachers and paraprofessionals for regular and special education

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for compensatory and alternative programs:

- 2.G.f.1. Examine how the district follows federal and state compensatory education regulations by examining policies and procedures as well as state and federal revenues and expenditures for each type of compensatory education service. Chart the Regular education dollars and the Compensatory and Title I dollars allocated to each campus versus the percent of at-risk students identified at each campus to determine how money is being used to supplement regular education dollars. Note areas where money is used for campus-wide programs, where money is being used inappropriately or where insufficient documentation exists to determine the appropriateness of use (much of this information should be available from the campus and district improvement plans and the external audit reports).
- 2.G.f.2. Using sound sampling techniques, program evaluations and other available statistical data, assess the performance of the programs funded with Compensatory or Title I dollars. Prepare a chart showing the most effective and least effective programs. Quantify the results being achieved in each program and determine the difference in delivery that may have impacted performance.
- 2.G.f.3. Chart retention rates by grade level and campus for the last five years. Examine board policies and administrative procedures that might be causing higher or lower than average retention at specific grade levels and among specific student categories.
- 2.G.f.4. Chart dropout data showing the number and percent of students leaving the district and at what grade level.
- 2.G.f.5. Diagram the process for gathering leaver code and dropout data and determine the effectiveness of the process and identify areas where weaknesses are found. Confirm findings with the information presented in the external dropout audit and note any areas where improved reporting or gathering has been implemented as a result of the audit.

### **Questions to Ask**

Are there definitive plans in place for the use of compensatory education funds? Does the district have campus-wide programs? How many? Where? How does this affect funding?

Does the district have a procedure for identifying at risk pupils and providing support? Is the process supported by board policy defining at risk pupils with criteria for promotion/retention of students?

Does the district review and evaluate student progress annually? Has the district defined criterion for success in the compensatory education programs which are consistent with the Adequate Yearly Progress (AYP) provisions of the NCLB act?

Does the district provide reduced class sizes to address needs of students at risk? If so, are these efforts evaluated for effectiveness? Are any campuses identified as “special needs” campuses (Title I, SCE)?

What is the student retention rate by grade level? Does the district have policies, goals or other strategies outlined regarding student retention or social promotion? Are mentoring, after school, summer school or other programs in place to assist students that are behind grade level? How is the success of these programs and their providers in bringing students up to grade level evaluated? Does the district offer, manage and evaluate the required supplemental education services for students at schools that have not met expected achievement objectives? Does the district offer parents and students a choice to transfer from low-achieving schools to others as required by federal and state law?

What dropout prevention and dropout recovery programs does the district use? How are these programs evaluated? What mechanisms are in place to continually modify and upgrade these programs? How is the community involved in identifying and recovering dropouts?

What procedures does the district have in place to track students who have dropped out of school? Are dropouts contacted to discover why they left school? Are any efforts in place to contact dropouts and persuade them to return to school?

What GED or other non-traditional programs are in place to educate pregnant teens and other students in need of special assistance? How are these programs funded? How are they evaluated? What process is in place to continually seek to improve the process?

How are leavers tracked, categorized and reported by the district? How are teachers and principals involved in the process? Once a determination has been made about a leaver, who verifies the accuracy of the information? Is the process documented? How is the board informed of the results?

Do the compensatory education programs reflect the ethnic and economic diversity in the district? Is cost analysis performed on the compensatory education program that identifies:

- cost per student for accelerated instruction?
- cost of assessment per accelerated student?
- added cost per teacher assigned?
- per pupil cost by program?
- total accelerated program costs?
- percent of district enrollment served by the program?

Does the level of instructional staff in the compensatory education program meet district needs in terms of highly qualified teachers in core academic subjects and for paraprofessionals assisting in the classroom?

Does the district have a procedure for providing resources to at risk pupils which has been developed and communicated to those responsible and/or affected, including students and their parents?

## **2.G.g Career and Technical Education**

All students, whether they continue their education after high school or not, eventually enter the workplace. A major source of employees for the general workforce is the K-12 educational system. Section 29.181 of the TEC requires school districts to provide a curriculum that affords each student the opportunity to “master the basic skills and knowledge necessary for managing the dual roles of family member and wage earner; and gaining entry-level employment in a high-skill, high-wage job

or continuing the student’s education at the post-secondary level.” Many districts cooperate with local business and community leaders and respond to local workforce needs through courses offered through the Career and Technical Education (CTE) program and student job placements.

**Data Needs**

- CTE course schedule
- Course update and/or development schedule
- Pertinent program evaluations
- Copies of any articulation agreements with colleges or universities
- List of dual-credit courses
- Policies and procedures relevant to CTE

**People to Interview**

Superintendent  
Principals  
CTE program administrator  
CTE teachers  
Librarians  
Business and community leaders

**Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for CTE programs:

- 2.G.g.1. Prepare a table identifying any partnership arrangements or articulation agreements used by the district to provide or enhance CTE course offerings in the district by partner or higher education institutions. Note which of these arrangement result in dual or concurrent enrollment and identify any district policies or procedures that limit or encourage students to enroll in those type courses.
- 2.G.g.2. Prepare a list of all CTE courses offered in the district by campus, grade level and number of students participating, where appropriate. Identify low-enrollment and high enrollment courses and determine to the extent possible if scheduling and frequency of the course offerings may require adjustment to ensure accessibility and efficiency of the program.

**Questions to Ask**

Does the level of staffing support the delivery of services to students in CTE? Are classes scheduled and staffed appropriately?

At what grade level does CTE begin in the district? Do middle school students receive information regarding future career opportunities to assist them in high school planning activities? What career and technology resources are available to students in the district’s libraries?

Do CTE course offerings lead to jobs in the community? Does the district review course schedules periodically to remove or modify courses that are no longer addressing high needs job areas? How do

local businesses participate with the district in CTE programs? Is the district providing local area businesses with the trained workforce they need and expect? How does the district objectively track CTE success?

Does the district currently have a business advisory committee to advise the district on its CTE programs? How does the committee operate? What is the committee's role and responsibility? Does the district work closely with local or state workforce development offices?

Does the district offer classes based upon expressed interest or needs of students, parents, or businesses in the community?

Does the district currently cooperate with or have articulation agreements, interlocal contracts or other shared services arrangements with local area colleges or universities whereby students can obtain enhanced course offerings or other benefits, including dual credit for college courses? Are there opportunities for cooperation that are not being explored?

What percentage of special education students are in CTE vs. separate special education vocational programs? Does the special education program include vocational training opportunities for special need pupils? Are vocational education classes available for "mainstreamed" students with curriculum modifications if necessary? Are vocational education teachers provided staff development in Special Education? Do IEPs of special education students who are 14 years or older include goals and objectives for career training? See IDEA regulation 300.29.

## **2.G.h Migrant Programs**

In Texas, many students are from families that travel around the nation harvesting crops. These students often miss the first and last weeks and months of school as their families migrate from Texas to the more northern states in the spring and summer months. However, the term migrant can also pertain to individuals who cross county lines within Texas for the same purpose. To ensure that these children are kept at grade level and receive continuous educational services, districts must modify programs and sometimes offer course work electronically.

### **Data Needs**

- Migrant program schedules, policies and procedures
- Pertinent program evaluations
- Copies of any agreements with other districts, colleges or universities

### **People to Interview**

Superintendent or administrator with assigned responsibility  
Principals  
Migrant Program administrator  
Migrant teachers

### **Activity to Perform**

In addition to the activities performed for all special programs, the following activity is performed specifically for migrant programs:



2.G.h.1. Prepare a diagram of the migrant program delivery system. Note how federal and state resources are used to supplement the program, the results of program evaluations and how strategies and goals for the program were set and monitored.

### **Questions to Ask**

Does the level of staffing support the delivery of services to students in migrant education? Are classes scheduled and staffed appropriately? At what grade level does migrant education begin in the district? How does the district review and modify migrant course schedules? How do external groups such as other districts or higher education institutions participate with the district's migrant programs? Are there opportunities for cooperation that are not being explored?

What mechanism or system does the district use to ensure the timely transfer of academic records from a school district in which a migrant student may have enrolled for a portion of an academic year?

What percentage of migrant students are in the special education program? Does the special education program include opportunities for migrant pupils? Are vocational education classes available for migrant students with curriculum modifications if necessary?

### **2.G.i Athletics and Extracurricular Activities**

Athletics and extracurricular activities provide students opportunities to develop social and team skills and many districts have found that there are direct links to improved student performance when students are kept involved in athletics, band and other extracurricular activities. Managing these programs so that they complement rather than detract from the educational programs is the key to success.

### **Data Needs**

- List of teachers leading extracurricular activities showing base salary levels, corresponding course loads, stipends and pay for extra duty
- Copies of policies and procedures concerning athletics and extracurricular programs including information on how stipends and extra duty pay are determined, district implementation of "no pass/ no play" and gender equity issues
- Contracts for staff coordinating or leading extracurricular programs

### **People to Interview**

Superintendent or administrator with assigned responsibilities

Principals

Coaches

Teachers

Booster club parents

### **Activities to Perform**

In addition to the activities performed for all special programs, the following activities are performed specifically for athletics and extracurricular programs:

2.G.i.1. Prepare a list of all policies, procedures or strategic initiatives that address or are directly related to athletics and extracurricular activities. To the extent possible, determine how these policies

procedures and strategic initiatives contribute to academic programs, ensure gender and economic equity in access to programs and promote community and parental involvement.

2.G.i.2. Chart salaries, stipends and extra duty pay for all teachers, coaches, band directors and others that participate in athletic and extracurricular programs. Review a sampling of contracts to ensure that the terms and conditions of stipends and extra duty pay are shown in the contracts and are equitable among others within the same employee category. Note where inequities exist and determine why these inequities exist.

### **Questions to Ask**

How are athletics and extracurricular activities linked to the overall academic programs of the district? Does the operation of the program reflect the overall vision for education for the district as established by the board?

How is the student performance of participants in extracurricular activities tracked and monitored? Is this information communicated to the board? Community? How is compliance with “no pass, no play” administered in the district?

Are there policies and procedures in place regarding participation in athletic and extracurricular activities that ensure equal access to all students? How are these policies and procedures monitored to ensure consistent compliance?

What is the total budget for each of these programs? What are the anticipated revenues from each program? How is staffing allocated to these programs? Is staffing consistent between campuses? Are programs offered equitably to all, including programs for males and females?

Do coaches teach academic classes? How many classes do coaches teach each day? Are all of these classes “for credit” classes? How does the ratio of coaches to students compare to peers and statewide averages?

Do coaches receive stipends? Are they listed in their contracts? Do teachers assisting with these activities receive additional stipends? Are they listed in their contracts?

### **2.H. Student Services**

Student services normally encompass counseling, media/library services, health services and social services in most Texas districts. The services provided may include:

- college and career counseling;
- health education and health services;
- substance abuse and psychological counseling;
- social services (For example, Communities in Schools);
- library services; and graduate follow-up studies.

Recently, these services have played a more important role in helping students cope with the complexities of the modern world. The role of the educational community in providing needed assistance for career and individual needs will continue to grow in future years.

### **Data Needs**

- CIPs or DIP as they pertain to student services
- Policies and procedures pertaining to these programs
- Planning documents and budgets for each program, including any external funding sources
- Student/parent handbooks
- Internal reports pertaining to these programs
- State and federal laws, rules and guidelines for student services
- Recent follow-up studies or surveys of graduates
- Staff job descriptions
- Number of books per library and per student
- Library and media budget, districtwide and by campus
- Number of librarians and library aides (staffing ratios)
- List of counselors by campus and by assignments
- List of nurses by campus and licensing level (RN, LVN)
- School Health Advisory Council meeting minutes and roster
- List of internal and external health services partners
- Bloodborne Pathogen exposure control plan
- Crisis Management Plan
- Staff development records for special services staff
- Brochures, newsletters or other information regarding special services available to students and their families

### **People to Interview**

Superintendent or administrator with assigned responsibility  
Administrative staff with assigned responsibility  
Counselors  
Principals  
Teachers  
Community Service Organizations  
Librarians  
Internal auditor(s)  
Curriculum and Instruction director  
Nurses and nurse's aides  
Campus paraprofessionals  
PEIMS coordinator  
Parents, including parents of special needs children  
Special Education staff who work with students with special health needs

### **Activities to Perform**

- 2.H.1. Compile a list of all student services delivered by the district both externally and internally; the number of students served if less than the total student population; the annual and per-pupil-costs for delivery of each service. Determine whether all key services are being delivered and whether there is overlap between programs. Communities in Schools might be one example.
- 2.H.2. Prepare a chart showing the distribution of counselors by campus and determine whether counselors are allocated equitably to each campus and grade level according to some formula or guideline. Examine policies and procedures to determine the percent time counselors spend on counseling-related activities districtwide and by campus. Where inequities exist determine why

- this has occurred and whether plans are in place to correct inequities.
- 2.H.3. Identify any social services available to students and parents in the community, outside agencies or community organizations actively working with the district to provide services and any costs incurred by the district or revenues provided to the district to provide services to students or parents.
  - 2.H.4. Prepare a chart showing health-related services provided at each campus or location, the number and type of personnel, the budget and any revenue sources obtained to offset services rendered. Determine whether nursing positions are allocated equitably to each campus and grade level.
  - 2.H.5. Compare nursing staff to standards established by the American Academy of Pediatrics.
  - 2.H.6. Examine health office facilities using criteria established by the Texas Department of Health (TDH) General Sanitation Division.
  - 2.H.7. Compare the district's Bloodborne Pathogen exposure control plan to TDH's Bloodborne Pathogen Control Plan.
  - 2.H.8. Review job descriptions of health services staff using standards established by the Texas State Board of Nurse Examiners.
  - 2.H.9. Compare district libraries including number of books and staffing with criterion in TEA's library standards and peer districts.
  - 2.H.10. Examine CIPs and DIP to identify any specific long-range and short-term library goals.
  - 2.H.11. Examine board policy to identify anything pertinent to library standards.
  - 2.H.12. Obtain copies of any graduate follow-up done by the district or external entities.

### **Questions to Ask**

Does the district have a board approved annual plan for student services? How are the student services linked to the district's strategic goals? Site-based procedures?

How is the district's plan based upon an assessment of student needs? Does the district use an advisory committee to assist in the establishment of goals and priorities? Does the district's plan include the identification of and coordination with, community agencies and programs? Are student services annually reviewed and evaluated?

What kinds of communication of specific programs and services are used to alert parents and students to the availability of these services? Announcements? Bulletins to parents and students? Other? Who is responsible for developing and disseminating informative material for parent education on topics such as drug abuse, college admission, and other timely issues?

Are student services efficient and effective? Is clerical support staff provided so that professional staff are allowed to focus on student services? Is technology used for maintaining student records for students receiving special services? Is staff using appropriate community agencies for referral? Are the annual costs for student services per student comparable with state averages? (State averages can be obtained from TEA).

Are student services designed to meet student and environmental needs? Are students provided an opportunity to relate courses, interests and achievements to career interests? Are parents provided an opportunity to become informed and involved in students' planning activities? Is substance abuse recognized as a potential problem if ignored and covered within the district or campus improvement plans, curriculum or some other function of student services? Is health education provided as a preventive service? Where and how are health and guidance services identified and provided?

Are staff development programs offered to student services staff? How is the administrative and student

services staff made aware of district policies, procedures and state law? Do student services staff have the opportunity to attend workshops, seminars and courses to refresh or upgrade skills? Does the district support training in the use of automated student systems? Do student services staff members have the opportunity to visit other exemplary school systems? Does student services staff provide in-service training to teachers and other instructional staff?

Are job descriptions developed for all student services positions?

Are health service job descriptions congruent with staff education, credentials and skill levels? Are health services practices aligned with board policy and administrative regulations?

Are district personnel (administrative and health services) aware of the regulations and guidelines issued by, or the resources available from the appropriate state authority? Are they followed and used?

Do nurses attend ARD for students with special health needs?

Are nurses involved in 504 planning for students classified as “other health impaired”? What types of staff development activities do health services personnel attend?

Are parents of students with asthma aware that by law their child has the right to carry and self-administer asthma medication according to certain provisions?

Does the district have a crisis management plan and is the district linked with the county’s emergency plan?

### ***Counseling and guidance services***

What are the defined roles and responsibilities of counselors in the district? Are the defined roles and responsibilities consistently followed by all counselors in the district? How much time are counselors spending in direct contact with students? On other administrative activities?

Are there locally adopted policies and procedures supporting counseling and other student services? Does the district perform a regular review of the level and cost of these services and exploration of alternatives for delivery? Does the district seek external funding to augment or pilot student services programs?

Has the board of trustees adopted a policy on guidance services? Student/staff ratios? Guidance in educational, career and personal planning? Establishing an advisory committee? Does the district have an appeal process?

How are students counseled regarding career opportunities? Who conducts the counseling services? Is counseling adequate? At what grade level does counseling begin?

### ***Social services***

How are social services coordinated within the district? Are there opportunities for the district to provide additional services to students and families of students through better coordination? When a teacher or other staff member determines that a student or family of a student is in need of social services, what system is in place for referral? How are suspected child abuse cases handled? Is there a written policy regarding child abuse referrals?

### ***Health services***

What are the hiring practices and supervisory structures for health services? Does the district employ or contract for school nurses? If so, how are school nurses allocated to campuses? How does the district fund nurses and any health service programs?

Who maintains student medical release forms and other insurance related forms in case of a medical emergency? Who maintains student health records in the district? How does the district ensure that all students are current on their immunizations?

What procedures exist to safeguard the health records of students and protect student identities? Are there documented policies regarding the release of records?

What policies and procedures are in place to ensure that medications are dispensed to students appropriately? How are the medical needs of special needs students handled?

How does the district handle bio-hazardous waste? Does the district provide vision, hearing or spinal screenings at appropriate intervals?

Does the district participate in any cooperative or contract health services such as school-based or school-linked clinics? What are the costs and benefits of participation in such programs?

Is there an established peer review process in districts with 10 or more nurses?

What is the process for recruiting a qualified pool of substitute health services staff?

Are licensed nurses (RNs and/or LVNs) receiving clinical competency evaluation by someone with equal or greater education and clinical experience in nursing? If not, are there other types of evaluations in use to address clinical competency issues?

Is there a health services coordinator? Is the health services coordinator or a school nurse a member of the interview team when health services staff are hired?

### ***Library services***

Are library and/or media services sufficient to support the needs of the district? Is a standard formula used for the allocation of library materials and media equipment?

Are accreditation standards used to allocate library and/or audiovisual materials such as having eight to 10 books per student in the library?

Has the district completed a self-evaluation to identify needs for improving its library programs? If so, what plans are in place to examine weaknesses and strengths and establish measurable goals for improvement?

Is the collection of library resources dated? If so, is the district's plan to update the collections and weed out dated materials? What automated system is used to track the collection, including the published dates so that dated materials can be replaced?

Are any procedures in place for handling controversial printed materials? Internet-based materials? What policies or procedures aid or limit the selection of resources and the handling of questioned resources?

### ***Graduate follow-ups***

Does the district conduct graduate follow-up surveys? Does the district use the information provided by the State Occupational Information Coordinating Committee (SOICC) to determine whether graduates are successful after high school? Does the district request evaluations of graduates from post-secondary

institutions? Does the district ask employers to evaluate workforce preparedness of former students? Does the district conduct a follow-up survey of graduates? Is an annual report given to the board on the follow-up surveys including recommendations for correcting or improving areas of weakness? Do graduation follow-ups include students with disabilities?

## **2. I. Student Behavior Management**

Every Texas school district is required to create a foundation for student discipline through the adoption of a student code of conduct establishing standards for student behavior. A student code of conduct will often reflect the discipline policies a district has in place to manage student behavior while in class and while on school property. In addition to rules of conduct, districts must also provide identification and intervention services designed to correct inappropriate behavior. Prevention programs should guide students to mature decision-making and provide tools for conflict resolution.

### **Data Needs**

- Student codes of conduct for each campus, as applicable
- Parent/student handbooks
- Referrals to ISS per school for last three years by type of conduct (electronic if possible)
- Disciplinary action by ethnicity and gender per school for last three years (electronic if possible)
- List of truancy related programs or initiatives
- Attendance statistics by campus and for the district for the last 5 years
- Number of truancy cases filed (both failure to compel and failure to attend) by school for last three years. Include number disposed by deferred disposition, by fine and by community service.

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility  
Director of safety or security or police chief  
Director of alternative education, discipline alternative education or in school suspension programs  
Principals  
Teachers  
Site-based decision-making committees  
Director of the Juvenile Justice Alternative Education Program (JJAEPP), if applicable  
Counselors  
Attendance officers

### **Activities to Perform**

2. I. 1. Compile all district and campus level student codes of conduct including any special provisions for extracurricular activities. Prepare a table comparing the consequences for violations of the student code of conduct per campus to each other and to state law and note any areas where the requirements are in conflict.
2. I. 2. Compare the student/parent handbooks to the codes of conduct and to each other and prepare a chart showing areas of inconsistency or conflict, if any.
2. I. 3. Prepare a chart showing disciplinary actions or placements in alternative settings by campus, grade level, gender and ethnicity for the last two or three years (if data is available). Note any changes from year to year and determine which type of actions have increased or decreased and why.
2. I. 4. Diagram the district's process for dealing with truancy, beginning with the date of the first absence. Further, prepare a chart showing the attendance rates at each campus and the district's

cumulative attendance rates for the last five years. Through analysis of the data and interviews, determine the attendance trends, areas of particular concern or excellence, and the effectiveness of the district's process for dealing with truancy.

### **Questions to Ask**

What kind of due process is in place for students who have violated the student code of conduct? Does the district provide adequate due process to students placed in alternative programs? Is there a hearing officer designated for these situations? How are parents involved in student discipline?

What kinds of discipline policies are in place in the district and at each campus to deal specifically with gang issues? Are codes of conduct displayed in the school so that students, administration and parents are aware of the consequences?

Are discipline consequences dealt with uniformly across the district or are they individually dealt with from campus to campus? Are consequences tracked? Who records these consequences?

How frequently do teachers and administrators receive training on disciplinary options in current state laws regarding student discipline? How frequently does the district survey teachers, safety personnel and student's administrative staff to get input regarding the discipline of students?

Does the district have a discipline policy in place for student conduct on school buses? If not, why not? If so, how is it enforced?

Does the district provide training for staff regarding methods of handling discipline problems? Does the district provide training to teachers and staff on current state regulations (i.e. Chapter 37 in the Ed. Code)?

Does the district provide training, support and assistance to students, parents and staff regarding the proper handling of early warning signs of violent behavior such as student threats, reports of planned acts of violence, cruel or unusual student behavior, etc.?

What policies are in place that identify bullies and bullying behavior? What policies are in place to protect victims of bullying and allow transfers to other classrooms or schools?

### ***In school suspension program***

Does the district provide for an In School Suspension (ISS) program? How does it function? Who is responsible for the program? Who staffs it?

Who directs the ISS program? When do Students go into the program? What is the length of stay? What accommodations are available for students with special needs? How does the district deal with special needs students in the area of discipline and its consequences?

What kind of educational services do children in ISS programs follow? Are students kept abreast of daily assignments in their regular education program?

What kinds of behavior management training are available for staff in ISS programs? What kind of behavior change training is provided to students? Does the district use a standard form to refer students to ISS? Does the district track these students?

### ***Truancy***

Who monitors and encourages student attendance at the district level? At the campus level? How does the district use attendance officers? What is the teacher's role in reporting absences? What is the principals



role in truancy prevention and intervention? What goals and objectives are found in campus and district improvement plans to curb truancy or improve attendance?

What campuses are having the most significant difficulty with truancy? What has contributed to lower attendance rates on some campuses? How has the campus addressed the problem? Which of the district's schools have open or closed campuses? What are the rules in place regarding this arrangement? How has this arrangement impacted attendance rates? Truancy? What other policies or processes contribute to higher or lower attendance rates?

What outside assistance does the district have in curbing truancy? How is the constable's office or other law enforcement involved in truancy prevention, intervention and enforcement? How do the courts support truancy in the community? How frequently are parents held accountable by the courts for the truancy of their children?

***School- vs. District-Level Policy***

Is truancy policy established at the school or district level? Is there district-wide monitoring of truancy or is this data maintained at the school level?

***Identification and Reporting***

How are truant students identified? What is your process for reporting a truant student? Is the procedure different between reporting 3+ days in a 4-week period ("may") and 10+ days in a 6-month period ("must")? (Note: According to statute, schools MAY report a student to courts after 3 absences and MUST report after 10 – we want to see how schools are implementing this)

***Record Keeping***

How are absences recorded and reported? How late must a student be to class for a tardy to be elevated to an absence?

***Excused Absences***

What is the process for correcting attendance errors? Can students appeal? Is the attendance office notified when the school nurse sends a student home due to illness? What is the process for accepting a student's doctor's note? How are notes from parents vs. doctors handled are – is there a difference? Is there a limit on time that can elapse before a doctor's note is no longer accepted? Are there any differences in treatment of a disability- or pregnancy-related absence?

***Remediation***

How and when are parents notified? What process is in place to identify students with potential for truancy before reporting to the courts? Do you have a truancy reduction program, and if so how does this operate? How are students in violation summoned to court? Ever escorted from school by police? Is there collaboration with justices of the peace? What does this look like?

***Average Daily Attendance (ADA)***

How do you monitor ADA in relation to truant students? Do you calculate the fiscal impact of truancy on ADA and the district's state funding?

***Effectiveness***

Has dealing with truancy in courts been effective in reducing student absenteeism? What in your opinion would be the most effective way to reduce absenteeism?

## **2. J. Disciplinary Alternative Education Programs (DAEPs) and Referrals for Juvenile Justice Alternative Education Programs (JJAEPs)**

There are generally two types of alternative programs: academic alternative education program (AEP) and disciplinary alternative education program (DAEP). AEPs typically deals strictly with a population of students that need an alternative academic setting to be successful, such as a program for pregnant teens, while the DAEP generally deal with disciplinary problems and students that are restricted to an alternative education setting due to violations of the student code of conduct., or have been adjudicated, such as students who are served in JJAEPs.

### **Data Needs**

- Organizational charts and staffing for all alternative education programs, both disciplinary and academic
- Budgets for all alternative educational programs, including grant funding and funding from inter-local agreements with other school districts and the county for the last three years
- Curriculum plans and major program elements for each alternative programs
- Procedures manuals for staff in alternative programs
- Copies of contracts on the outsourcing of an alternative program or a component of the program
- Number of referrals to DAEP per school for last three years by type of conduct, gender, bilingual or special education classification and ethnicity (electronic if possible)
- Recidivism rates (percentage of returning students) for each alternative program for past three years.
- List of counseling/intervention services for students in alternative education programs, particularly those that are program related to assist with transition back to regular education

### **People to Interview**

Superintendent  
Principal of DAEP  
Principal of AEP  
Assistant principals  
Curriculum director  
Parents  
Central administrator over student discipline issues  
Teachers at alternative site and home school  
Counselors at alternative site and home school  
Administrators at contract sites, such as DAEP or JJAEP

### **Activities to Perform**

2. J. 1. Create and/or examine organizational and staffing charts for all alternative education functions in the district including JJAEPs as well as contracted services or providers and show how the campus principals and central office administrators with oversight responsibility for these functions fit into the organizational scheme. For contracted services, discuss the general terms, conditions and services provided.

2. J. 2. Prepare a list of all alternative education programs operating in the district or programs participated in cooperatively with other districts or with other local governments. For each program show the general goal and function of the program; placement type such as disciplinary, pregnant teens, etc.; type of students served such as special education; the number of students served; the location of the program; the

budget and source of funds for each; whether the cost of providing the service is shared with another entity; and the number and type of staff assigned to each program.

2. J. 3. Document the process for transition back to regular education beginning with the curriculum plans and major program elements used in each alternative program. If available, note the number of students successfully returning to their home school from a DAEP for the past three years.

2. J. 4. Document the process for referral to a DAEP and chart the number of referrals to DAEP per school for last three years by type of conduct, gender, bilingual or special education classification and ethnicity. Note points of review, approval or oversight.

2. J. 5. Compile and review contracts for DAEP/JJAEP services. Note presence or absence of provisions that allow adequate district communication and oversight.

### **Questions to Ask**

Does the district provide for alternative education settings for various age and grade level students with discipline problems? If not, why not? What processes are in place to ensure that students with minor offenses are not exposed to students with chronic problems?

How does the current DAEP program comply with the Safe Schools Act that was designed to make Texas public schools safe from violent students? How do the alternative education programs (AEPs) ensure that students who engage in serious misconduct and who commit certain offenses are promptly removed from regular education settings?

What AEP or DAEP programs are delivered in-house? Which programs are contracted out? What, if any, components of the programs are contracted out (i.e. instruction, curriculum planning and safety officers)?

Where is the DAEP program housed? Who directs it? How many FTE's are involved, salaries, budget. How does the program work?

What kind of educational services do children in DAEP programs receive? Does the district have any mentoring programs for at-risk students who are in alternative programs? Do students get tested for educational skills prior to being placed in the program?

What percent of the student population is special education and what percent of special education students are there for discretionary reasons? If a high percent are special education, why has this occurred? What, if anything, is being done to reduce the number and frequency of special education referrals?

Are Individual Education Plans (IEPs) for special education students implemented in the AEP? If not, why not?

Is there follow up on the students that attend DAEP programs? If so, how is this done? Who is responsible for doing it? Who receives copies of results? What are the recidivism rates for students that have gone through each program? Are there any tracking mechanisms in place for students that have attended DAEP programs?

How are the DAEP programs evaluated? By who? What kinds of training are available for staff in DAEP programs? For parents? For siblings of students with chronic disciplinary problems?

How are DAEP students transitioned back to their regular education settings? What educational programs ensure that students will be successfully academically in the regular education setting? What programs are in place to remediate the behavioral problems?

Are students in the DAEP tested on the Texas Academic Knowledge and Skills test? What is the overall academic rating of the DAEPs? Has the DAEP ever undergone a peer review? What were the results?

How does the district ensure that the DAEP staff and teachers are properly trained and motivated to work with troubled youth? How does the district ensure that special education students placed in the DAEP are adequately served?

***Instructional Program***

Describe the staffing for DAEP and ISS.

Describe the instructional program. Who is responsible for monitoring the instructional program for ISS and DAEP?

What types of instructional resources are available at the DAEP and ISS locations?

Describe the referral process for sending students to DAEP. Describe the process for sending students to ISS. How does the district ensure continuity in instruction for students in DAEP and ISS?

What are the characteristics of the students in DAEP – do they have attendance issues, repeat offenders? What is the average time in DAEP?

Does the district and community have adequate health and social services to meet the needs of the students in DAEP and ISS?

What role does discipline management play in discretionary discipline placements?

Discuss how the needs of special education students or students with other specialized needs (Bilingual/ESL, dyslexic) are met in DAEP or ISS.

Describe what communication looks like between ISS/DAEP teachers and referring campuses/teachers.

Describe the transition process for returning students to referring campuses.

How discipline is typically handled in the district and at your campus. Are there any issues or concerns?

Describe the role of counselors in the district? What types of services do counselors provide for students in discretionary placements?

Do the ISS and DAEP locations have adequate technology so that students may continue Credit Recovery, if applicable?

Describe parental perceptions of discipline in the district.

What types of analyses are conducted by the district to determine the effectiveness of the DAEP/ISS programs? Is there any type of analysis of referrals or TEA discipline reports? Rates of recidivism? Repeat offenders? Referring teachers or staff?

What type of professional development is offered to teachers and staff regarding discipline management or classroom management techniques?

To what extent does the district consistently enforce the Student Code of Conduct?

To what extent are disciplinary placements fairly and consistently assigned?

Does the district have a DAEP Handbook? How are parents involved in discipline matters, especially DAEP placement?

**Juvenile Justice Alternative Education Program (JJAEP) Program**

Does the district participate in a JJAEP for adjudicated students? What other districts are members of the program? How does the district provide alternative educational opportunities for students who are adjudicated? What is the role of the county judges and/or other judiciary? Does the district periodically review the program to ensure state mandates/guidelines are met?

What kind of budget does the district have for this program? Are any district staff used as part of the program? How does the district account for the student population in average daily attendance? What unique data reporting problems exist within this program?

**People to Interview**

Superintendent  
Principals  
Assistant principals  
Curriculum director  
Teachers  
Parents

**Activities to Perform**

Review student discipline data and compare to statewide data.

**Questions to Ask**

Describe the staffing for DAEP and ISS.

Describe the instructional program. Who is responsible for monitoring the instructional program for ISS and DAEP?

What types of instructional resources are available at the DAEP and ISS locations?

Describe the referral process for sending students to DAEP. Describe the process for sending students to ISS. How does the district ensure continuity in instruction for students in DAEP and ISS?

What are the characteristics of the students in DAEP – do they have attendance issues, repeat offenders? What is the average time in DAEP?

Does the district and community have adequate health and social services to meet the needs of the students in DAEP and ISS?

What role does discipline management play in discretionary discipline placements?

Discuss how the needs of special education students or students with other specialized needs

(Bilingual/ESL, dyslexic) are met in DAEP or ISS.

Describe what communication looks like between ISS/DAEP teachers and referring campuses/teachers.

Describe the transition process for returning students to referring campuses.

How discipline is typically handled in the district and at your campus. Are there any issues or concerns?

Describe the role of counselors in the district? What types of services do counselors provide for students in discretionary placements?

Do the ISS and DAEP locations have adequate technology so that students may continue Credit Recovery, if applicable?

Describe parental perceptions of discipline in the district.

What types of analyses are conducted by the district to determine the effectiveness of the DAEP/ISS programs? Is there any type of analysis of referrals or TEA discipline reports? Rates of recidivism? Repeat offenders? Referring teachers or staff?

What type of professional development is offered to teachers and staff regarding discipline management or classroom management techniques?

To what extent does the district consistently enforce the Student Code of Conduct?

To what extent are disciplinary placements fairly and consistently assigned?

Does the district have a DAEP Handbook? How are parents involved in discipline matters, especially DAEP placement?

## **2. K. Review and Evaluation of Contracting Process**

Educational service functions such as disciplinary alternative centers and services for students with disabilities can be purchased or contracted through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

### **Additional Resources:**

Academic Excellence Indicator System  
Contains reports for every public school, district, or region of Texas  
Texas Education Agency  
<<http://tea.texas.gov/>>

Texas Essential Knowledge and Skills  
Texas Education Agency  
<<http://tea.texas.gov/>>

***COMMUNITY  
INVOLVEMENT***





### **3. *Community Involvement***

Local school districts were established to be responsive to the needs of their community, which includes students, parents, non-parent residents, taxpayers, businesses, other political subdivisions and special interest groups. By the same token, if the community is to respond appropriately to the district's needs and concerns, it must be well informed about issues facing the district. For this reason, districts need mechanisms to disseminate information and to gather feedback from community members. Effective two-way communication enables school districts to win the confidence, support and involvement of their local communities. Similarly, school districts need the support of local organizations and businesses to enhance educational programs. A good partnership and outreach program needs to be in place; one that fosters the district's relationship with the community and supports school activities. The Community Involvement evaluates the effectiveness and efficiency of the parental and community involvement efforts of the district in the following areas:

- 3.A. Community and Business Involvement General Organization
- 3.B. Open Records Requests and Other General Inquiries
- 3.C. Planning, Policies and Procedures
- 3.D. District/Community/Business Partnerships
- 3.E. Foundations
- 3.F. Communications/Public Relations
- 3.G. Parental Involvement
- 3.H. Review and Evaluation of Contracting Process

#### **3.A. Community and Business Involvement General Organization**

Texas school districts use a variety of methods to generate community and business involvement. Some school districts have large departments dedicated to this function, while smaller districts must rely on a handful of people who perform a variety of community relations' functions. Boards of Trustees can also play an important role in community and business involvement. Boards perceived as accessible and sensitive to citizens' concerns are less likely to be seen as insulated from the community.

#### **Data Needs**

- Organization and staffing charts for all communications, community and parental involvement functions and external liaison positions including open records personnel
- Contracts and agreements (as they apply) with external groups or organizations established to support the goals and objectives of the district
- Department job descriptions
- Three years of budget data including revenues and expenditures for this function including grants, donations and other external funding sources
- List of citizen and community committees including permanent and ad hoc committees and membership, purpose and frequency of meetings
- List of all advisory or ad hoc committees in current use by the district.
- List of business leaders or organizations that work with the district

#### **People to Interview**

Superintendent or associate superintendent with assigned responsibility  
Board members (as appropriate)

Assistant superintendent with assigned responsibility  
Administrative staff with assigned responsibility (directors, coordinators, etc.)  
Principals  
School counselors  
Community and business sector representatives  
Chamber of commerce  
Civic organizations  
Local colleges and universities  
PTA/PTO officers/representatives  
Parent Coordinator/Liaison  
Faith-based groups

**Activities to Perform**

- 3.A.1. Compile organization and staffing charts for all community involvement activities, ombudsman or other external liaison positions including open records management functions and any contracted or external organizations established to assist the district in carrying out its goals and objectives. Interview staff to determine if the organizational structure depicted on the chart(s) reflects the actual organization of the department or function and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain why changes are being made.
- 3.A.2. Obtain copies of job descriptions and based upon the organizational structure and staffing, including support staff, prepare a written evaluation demonstrating whether the structure ensures:
  - Clearly defined units and lines of authority that are reflected in both the district’s organizational charts and job descriptions.
  - Minimal duplication of effort.
  - Direct and accessible support for all campuses and auxiliary programs.
  - Prepare a chart showing the budgeted revenues and expenditures for this function for the last three years and explain major changes and other exceptional items.
- 3.A.3. Compile a list of the district’s various committees whose makeup includes external stakeholders including permanent and ad hoc committees. Determine the membership by position or name, the purpose or mission of the committee and the frequency of meetings. Determine if committee representatives reflect the demographics/diversity of the district and the community and if members have appropriate representation. Note any major products coming from each committee.

**Questions to Ask**

What is the role of the board and the superintendent in the community involvement process? What is the relationship between the superintendent and community or business leaders? What is the relationship between the board members and community or business leaders?

How often does the district conduct reviews to ensure that functions are properly aligned to reduce any overlap of duties? How does the organizational structure encourage community involvement? Based upon job descriptions and the diagramed organization chart(s), what processes or tasks are duplicative? What position(s) is responsible for coordinating the efforts of staff across departmental and campus lines of authority? Based on peer districts, how many staff should be dedicated to this function?

What positions have incomplete or outdated job descriptions? Do job descriptions match actual duties performed? If not, why not? What other documents exist to ensure that peripheral employees such as campus and auxiliary staff know what their role and responsibility is in the community involvement function?

How do central office staff support campus-level community involvement initiatives? How are campus-level staffs supported in their effort to involve community members? What other responsibilities do staff members involved in community involvement have? In what way do any additional responsibilities detract or enhance the mission of the community involvement functions? Who is responsible for tracking community participation? Who is responsible for ensuring that volunteers, donors and others are recognized for their contributions to the district? Where in the organization are publications produced, web sites updated and other external communication efforts coordinated?

How has the budget for the community involvement function changed over time? Why have these changes occurred? What grants or other external funding sources are supplementing the community involvement function?

What committees with external members are used to advise and assist the district's operations? What is the purpose of each committee and does the purpose or condition for which the committee was established still exist? How are committee members selected? How does the committee member selection process ensure representation by a wide array of community members? When a committee has served its purpose, how does the district disband the committee? What funds are budgeted to support these committees and is the amount budgeted appropriate? What products are the committees producing? How is the quality and timeliness of the expected products from the committees assured?

### **3.B. Open Records Requests and Other General Inquiries**

Providing timely information to the public and to parents is a service that often defines the public and parental perception of the district. Courteous and prompt communications reflect openness and an understanding of the district's role as a community partner. However, whether or not the district willingly provides information to the public, the Public Information Act (Chapter 552 of the Texas Government Code) requires districts to share certain information in a timely manner or face penalties for non-compliance.

Public records include any information that is collected, assembled, or maintained by or for a governmental entity, including school districts. The Public Information Act begins by stating that: "Under the fundamental philosophy of the American constitutional form of representative government that adheres to the principle that government is the servant and not the master of the people, it is the policy of this state that each person is entitled, unless otherwise expressly provided by law, at all times to complete information about the affairs of government and the official acts of public officials and employees. The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know. The people insist on remaining informed so that they may retain control over the instruments they have created. The provisions of this chapter shall be liberally construed to implement this policy."

Public information applies to records regardless of their format. It includes information that is maintained in paper, tape, microfilm, video, electronic data held in a computer memory, as well as other mediums specified under law. While the Act does not require the release of information contained in education records of an educational agency or institution, except in conformity with the

Family Educational Rights and Privacy Act of 1974, Sec. 513, most of the operational documents of the districts are subject to open records requirements.

Failure to comply with the provisions of the Act is a misdemeanor punishable by a fine of not more than \$1,000; confinement in the county jail for not more than six months; or both the fine and confinement. Further, a violation under this section constitutes official misconduct, which could result in the loss of an employees certification and sanctions against sitting board members.

### **Data Needs**

- Open records request policies and procedures including pricing guidelines for copying, programming and other reimbursement fees for providing information.
- Lists of recent open records requests, including response time, types of information requested and any charges for copies or programming charged to the requestor
- Published documents explaining the information request process
- Student/parent handbooks showing open records request process for parents to access.

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility

Board members (as appropriate)

Administrative staff with assigned responsibility (directors, coordinators, etc.)

Ombudsman

Legal counsel staff or Open Records representative

### **Activities to Perform**

- 3.B.1. Diagram the Opens Records Request and general inquiry processes employed by the district showing tracking systems, individuals inside the organization with responsibility as well as external entities such as attorneys that are brought into the process. Examine the documentation to determine whether the system adequately captures all requests, including those made to schools or departments, whether the requests are handled within stipulated time frames and whether appropriate, but not excessive, fees are collected to recover expenses related to filling the request.
- 3.B.2. Examine the list of recent open records requests and identify any requests that were not responded to within the prescribed timeline, any requests for information that might be provided on the district's Web site to reduce the workload and cost for reproduction as well as other trends that, with modifications to certain business operations, could reduce the number and frequency of inquiries.

### **Questions to Ask**

Is there a single point of contact for people to call to get information about the district? What mechanisms are in place to educate the public about who to call if they have a question?

Who tracks open records requests and ensures that the district remains in compliance with the law? How are legal questions addressed and monitored? Does the district's legal counsel become involved in the open records process? What charges are associated with legal advice on open records issues?

What mechanisms are in place to ensure that campus staff are complying with open records laws? How are alleged complaints regarding open records resolved? Does the student/parent handbook

contain information on how information can be obtained? What board-approved recourse does a parent/student have when concerns or issues cannot be resolved at the campus level? At the central office level? How do board members handle requests for information that have not been heard at the campus or central office level?

How does the district ensure that privacy laws are complied with when providing information to the public? What is the role of legal counsel in the process? What is the role of the superintendent or high level administrators in the process? What obstacles to open communication exist? How are decisions made regarding the information provided on the district's Web site? How does the district ensure that budgets, proposed budgets and other frequently requested information is available to its constituents?

Where can citizens come to view information without having to pay the cost of reproducing the documents? How are people dealt with, that have circumvented the open records policies or procedures of the district?

### **3.C. Planning, Policies and Procedures**

School districts that develop a strong base of parental and community volunteers, regularly communicate with parents and community members and have a positive relationship with the media and generally create positive relations with their communities. Accomplishing this, however, takes planning and a system of policies and procedures to ensure that the plan is implemented as intended.

#### **Data Needs**

- Departmental mission statement, strategic plan and goals
- Results of strategic performance measures, or other evaluations of strategies plans and goals
- Copies of board policies relating to community and parental involvement
- Operating procedures
- Published procedures for parents or community members regarding complaints, information requests and the like
- Federal policies or grant mandates

#### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility

Board members (as appropriate)

Administrative staff with assigned responsibility (directors, coordinators, etc.)

#### **Activities to Perform**

- 3.C.1. Compile all planning documents as they deal with communications, community and parental involvement and open records and complaints management. Identify how these documents are linked, if there are conflicts and whether gaps exist.
- 3.C.2. Compile a list of policies and procedures as they deal with communications, community and parental involvement and open records and complaints management functions. Determine if the policies and procedure are current, accurately reflect current practices, provide sufficient information to assist users in the process and the like.

### **Questions to Ask**

How is the communication or community involvement plan linked to the district's strategic plan, District Improvement Plan, Campus Improvement Plans or board goals and objectives? How are these planning documents linked to improving education? How do budgets reflect the broader goals and objectives of the function?

Do plans contain strategies for maximizing parent, community, business, alumni and foundation involvement in schools? Do the plans identify the district's stakeholders and customers? How does the department or function measure success? How are modifications made to plans when success is not achieved?

How are procedures for dealing with the media, handling of controversial issues, handling parent complaints, handling of crisis communications and the like communicated to campus staff? What formal training on these issues is available specifically for principals, department heads and the classroom teachers?

When individuals fail to follow policy or procedure, how is the situation dealt with? Who monitors compliance? How are board members communications with the media handled? Do board members have a code of conduct that discusses how they should be dealing with the media? With individual community members?

### **3.D. District/Community/Business Partnerships**

Community and business partnerships play a crucial role in how districts leverage their own services with those provided by the community. By capitalizing on community and business resources and expertise, a school district can experience savings through volunteer hours worked or materials provided. These partnerships include parents, business organizations and leaders and other citizens in the day-to-day operation of the schools, giving participants access to district news as well as an opportunity to contribute their time and expertise.

#### **Data Needs**

- List of community and business partners
- Memoranda of understanding (MOU) and/or interlocal agreements with partners such as businesses, other governmental organizations, other school districts or institutions of higher education
- Annual reports relating to MOUs
- Volunteer plans showing how volunteers will be used, oriented, etc.
- Personnel training log
- Publicity documentation
- Board policy

#### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility  
Board members (as appropriate)  
Administrative staff with assigned responsibility (directors, coordinators, etc.)  
Principals  
Legal staff

Personnel assigned to track/document the number of volunteer hours  
Education Foundation director/liaison  
Business leaders involved with district partnerships

**Activities to Perform**

- 3.D.1. Interview staff and create a matrix of formal and informal partnerships, interlocal agreements, collaborative, special committees, foundations, colleges, local military bases, Rotary Club, local affiliates of the Boys and Girls Club, Boy Scouts of America, Optimists Clubs, Endowment Funds and other local foundations and alumni, etc., who work with the board, administration, schools, principals or teachers. In one or two sentences, describe the nature of the partnership.
- 3.D.2. Examine policies and procedures that pertain to or impact community involvement and determine how each of these policies is encouraging or discouraging community or parental involvement.
- 3.D.3. Examine community needs assessment, parental feedback, etc.

**Questions to Ask**

How does the district use advisory committees, for input and comment in any area required by law, such as Gifted and Talented, English as a Second Language or Title I/No Child Left Behind (NCLB)? (Note that the Federal Act contains stronger language/requirements for Parent Involvement.)

How does the district solicit input from the community relating to special programs, bond issues and goals of the district? How often does the board solicit community input by holding public forums, hearing, rotating board meeting locations and the like? What other mechanisms are used to find out how the community feels about certain issues? Does the district survey its stakeholders such as community leaders, business leaders, civic leaders, etc.?

How does the district make use of partnerships with local foundations, where applicable, as well as national foundations that fund educational initiatives?

What policy and procedures address the use of district facilities by the community? Do these policies or procedures allow all taxpayers to benefit from their investment in the district? How does the board ensure that the district reaches a diverse community of business leaders, religious leaders, civic organizations and community leaders and parents?

How does the district seek innovative ways to:

- Build relationships within the business community and other community groups in order to gain financial or “in kind” donations?
- Conduct cooperative projects with other governmental bodies, educational institutions and community or business organizations?
- Establish partnerships with other school districts to accomplish mutual goals?

When building partnerships, does the district use memoranda of understanding and/or interlocal agreements to ensure clear understanding and agreement among parties involved? Why or why not?

Does the district have assigned staff to carryout tasks required to build partnerships? If so, who? What tangible evidence exists to show that the efforts of this person are being successful?

What are examples of community involvement in the schools (Career Day speakers, etc)? Is there a uniform policy for screening volunteers to determine the best role for each volunteer (particular skills and backgrounds)? How do volunteers feel about the way they are treated by the district, or by an individual campus? How are the contributions of volunteers tracked? What concerted efforts are made to identify additional resources to address specific needs in the district, such as tutors in at-risk schools? How are alumni encouraged to participate in school activities?

How does the district recognize volunteers and partnership programs, such as volunteer/partner of the year and service awards? How does the district obtain funding or budget for volunteer recognition and awards programs? Does the district provide structured volunteer training? If not, how are the volunteers oriented? Do the schools have a lounge or designated rooms for volunteers to use and/or work? If not, where do they work?

How does this department advertise or solicit business or community partners? How does the district ensure that businesses and community organizations are not approached multiple times by various groups within the district?

Who is responsible for fostering business partnerships and collaborating with nonprofit agencies? Who creates and nurtures collaborative partnerships?

Does the district ensure ongoing/continuous training for both stakeholders and staff?

How are local affiliates of nonprofit organizations such as the Boys and Girls Club, Young Men's Christian Association, Boy/Girl Scouts of America and Communities in Schools used in the schools?

Is a community outreach plan part of the annual planning process? Are there strategies for providing feedback to citizens who voice concerns and share ideas?

Does the staff provide a regular liaison to school/community organizations? What administrator is assigned to work as liaison with organizations in the district?

Does the district identify and maintain a list of community resources?

Does the district have a memorandum of understanding, memorandum of agreement or interlocal agreement for providing any partnership services?

How are business and community partners involved in fundraising for scholarships or supplementing the educational or special programs, such as dropout prevention initiatives, mentoring programs and after school programs for parents? Does the district have special initiatives to foster foundations that offer scholarship programs in inner city schools and campuses with high numbers of low-income students?

How does the district promote a positive relationship with non-parent community members? Are there programs in place to encourage retired citizens to become involved in the schools? Are discount cards or special privileges granted to retired citizen are to encourage them to attend school events such as sporting activities, theatrical presentations and concerts?

### **3.E. Foundations**

Foundations are typically non-profit organizations set up to primarily benefit the school district by seeking and securing grants, endowments and donations to enhance educational opportunities. They



are operated apart from the school district and are typically governed by a separate board that organizes fund raising activities and designates the use of funds.

**Data Needs**

- Education foundation bylaws, annual report and newsletters
- Charters and tax determination letters
- Board policy and other internal documents showing how and when a foundation was established.
- Financial information about the foundation, receipts and disbursements
- Copies of any contracts or agreements between the district and the foundation

**People to Interview**

Superintendent  
Chair or other board members of the foundation  
District liaison with the foundation  
Recipients of foundation disbursements

**Activities to Perform**

- 3.E.1. Prepare a list of foundations organized for the primary benefit of the district, if more than one exists. Obtain copies of charters and tax determination letters. Determine how the foundations are organized and incorporated and give a brief explanation of each foundation purpose, restrictions and list the officers and how they are elected or appointed. List the dollar value of total assets of the foundation as applicable and if a trust exists, list the depository and/or executor of each trust.
- 3.E.2. Examine board policy and other internal documents to prepare a narrative on how and when a foundation is established and how the district ensures that the funds from the foundation are used according to the intended purpose.
- 3.E.3. Describe the financial support provided by the district to the foundations and by the foundations to the district.
- 3.E.4. Review contracts between the district and foundations, to determine whether they adequately define the financial support and services provided and whether responsibilities are delineated.

**Questions to Ask**

How does the district use foundations to enhance and enlarge the programs offered at the district? What areas of the district’s operations could be further enhanced by the establishment of a foundation?

What processes and procedures are in place to ensure that the district is carrying out the intent of each foundation? Is there a district employee that serves or acts as liaison to the board of each foundation? How is communication between the foundation board and the district maintained? How does the district communicate its needs to the foundation for consideration?

Describe the working relationship between the foundations and the district. What procedures are in place to resolve any potential conflicts? If there has been a conflict, describe how it was resolved.

What fiscal controls exist to ensure compliance with foundation guidelines? Who has check signing authority on foundation funds? How are requests for funds submitted to the foundation? What is the time frame from submission of requests to disbursement of funds? Are there administrative or operational barriers to fund distribution that do not add value to the process?

### **3.F. Communications/Public Relations**

Honest and timely communication with parents and the community is critical if a district is to maintain the trust and confidence of the community.

#### **Data Needs**

- District communication organization and staffing chart, policy, procedures and plan
- District publications (internal and external)
- Student/parent handbooks
- Newspaper clippings/other media
- Examples of media releases
- Parent survey instruments
- Newsletters and calendars
- Web sites for each campus
- Communication budget
- Evaluation and assessment reports

#### **People to Interview**

Superintendent or associate superintendent with assigned responsibility  
Staff as assigned  
Local media  
Parents  
Parent organizations (booster clubs, PTAs, PTOs)

#### **Activities to Perform**

- 3.F.1. Compile a list of all district publications including external publications and internal newsletters. Prepare a chart showing the frequency of the publication, the target audience, the number of copies distributed, the languages in which the publications are printed or distributed and the approximate costs for publishing, printing and mailing each item.
- 3.F.2. Examine the district's electronic communication network including television or radio broadcasts, any Web sites created and maintained by the district or at individual campuses and email correspondence. Prepare a chart showing each medium's purpose and use, target audience, frequency of use or frequency of updates and the approximate cost for each medium.
- 3.F.3. Diagram the process used to communicate with the media showing how inquiries are handled when directed to campus-level staff or to district administrators. Where possible, show the elapsed time between media inquiries and district responses. Also, show how media releases are originated from the central office or administrative levels and show any board involvement in the process.

### **Questions to Ask**

Does the district maintain a speakers' bureau and furnish community organizations a list of speakers and topics? Is staff given training in public speaking?

Does the district have a user-friendly telephone system? Are district staff members trained in telephone courtesy? When callers do not know the name of a person or department, how are inquiries handled?

How does communication flow from the central office to the campuses? Has the district established a procedure for regular communication with employees? Who is responsible for providing information regarding action taken by the board to employees in a timely manner? Does the district have an ombudsman, who reports to the superintendent, who helps employees, parents and community members negotiate the communication structure?

How does the district develop and distribute its annual report card on student and district performance? Is an individual and/or office assigned responsibility for developing the formal report on district activities and accomplishments for the year? Is distribution of the report accomplished through board meetings, service clubs, realtors, chambers of commerce or direct mail?

What procedures or policies are in place to translate parent and community publications into the home language of the readers? Who does the translation? What publications are available in another language? What publications are only available in English?

How is information regarding district operations, activities of various district committees, district and/or school honors disseminated to the community? Does the district maintain a hotline or informational Web site where parents or community members can obtain information regarding school closures or other emergencies?

Does the district periodically review and evaluate the public relations program? Has the district developed an annual plan for a Community/Public Relations program containing goals and objectives for improved community relations and are resources assigned for effective implementation?

Has the communications office assessed the public's knowledge and attitudes about the district through periodic surveys? What does the district do with survey results and other input/suggestions from the community?

Where/how are board meeting notices posted?

### **Media contacts**

Who reviews, edits and distributes media releases regarding district operations or activities? Who coordinates campus-level media releases?

Who is the spokesperson for the district? Who handles media contacts if the spokesperson is unavailable? Is there a chain-of-command or a reporting mechanism to alert the communications office when a media inquiry has been received?

Are formal policies or procedures in place regarding employee contacts with the media? What processes or procedures exist for working with the media in the event of crisis, emergencies, school closures and the like?

Are campus-level staff members authorized to speak to the media? Who trains staff to work with the media? Who assists in assuring that media-related communication plans and skills exist in each school and department?

What is the district's relationship with the local media? How are relationships with regularly assigned education reporters nurtured? Does the district have established communication with the local media that includes:

- Personal meetings with local editor(s), reporters or media staff?
- Press conferences or news releases for major events and/or activities?
- Advance copies of all board meeting agendas with backup material provided upon request?

### **3.G. Parental Involvement**

Studies and educators agree that involvement of parents in the education of their child is one of the primary keys to the child's educational success.

#### **Data Needs**

- Parental involvement plan including training
- Parent handbooks
- Lists of parental involvement initiatives
- Title I program materials; list of Title I campuses
- Parental involvement agreement(s)
- List of social or community service groups with which the district works
- Documentation on parent resource centers or family centers
- Grants and other external funding sources
- Incentive programs (for parents)
- Web site for teachers to post assignments
- Professional development/training
- Board policies, if any, relating to screening for volunteers
- Parent and volunteer tracking log
- Staff meeting agendas

#### **People to Interview**

Superintendent or associate superintendent with responsibility  
Staff assigned to parental involvement activities  
PTO/PTA leaders  
Community and social service organizations  
Teachers, principals and counselors  
School sponsors of extra and co-curricular activities  
Parents

#### **Activities to Perform**

- 3.G.1. Prepare a list of major parental involvement programs for each campus (including Title I/NCLB, dropout prevention, safe schools programs) or activities including Parent Teacher Organizations (PTOs) or Parent Teacher Associations (PTAs), booster clubs, as well as any programs that encourage volunteerism, educate parents or encourage parents to be involved in their child's education.

- 3.G.2. Prepare a list of social and community services provided to assist parents, students and families, including school-based clinics, communities in schools and any other organizations that provide services in coordination with the schools in the district. Show the type of services provided by each organization, where and to whom these services are available, the budgets associated with each program and the funding source and show how these services are requested or accessed.
- 3.G.3. Compile a list of procedures or policies pertaining to volunteerism such as screening or health card requirements; tour volunteer workrooms and family centers; and talk to parents to gauge their perceptions about the services provided to families and students. Summarize the strengths and weaknesses of the district's outreach efforts and what programs or procedures appear to make parents feel most welcome in schools and to the extent possible determine the impact of policies and procedure on parental participation.

### **Questions to Ask**

What opportunities or forums are available where principals and PTO/PTA leaders can share ideas? What opportunities exist for PTO/PTA leaders from various campuses to exchange information and ideas? What district or campus staff members are assigned to work with parent organizations, booster clubs and other organizations?

What mechanisms are in place to aid in identifying parent concerns and issues? Does the parent handbook contain information on how parents should approach complaint resolution? Are parents given a handbook upon enrollment of their child? Does the district provide information on where to secure copies of the TEA "Parent Rights: a User Guide For Parents and Administrators in the Public Schools of Texas" or make available copies for parents and staff and provide training on this document? What board-approved recourse does a parent have when concerns or issues cannot be resolved at the campus level? At the central office level? How do board members handle parental complaints that have not been heard at the campus or central office level?

How do teachers encourage parental involvement? Have teachers identified specific tasks and opportunities for parental volunteers? Have campus-level administrators identified specific tasks and opportunities for parental volunteers? How are parents notified of needs for volunteers at the campuses? Are teachers properly trained to know how to manage activities of parent volunteers in the classroom? Do they track the hours volunteered?

Does the district sponsor Internet sites or automated telephone system like the Parent Connection, which lists homework assignments by teacher?

Are some campuses more successful at recruiting parent and community volunteers than others? What techniques do these successful campuses use to encourage participation? Are these techniques replicable? What opportunities exist for campus administrators and teachers to share ideas and experiences for increasing parental involvement?

What obstacles exist to parental involvement? Is there a central point (parent and/or family center or room) at each campus where parents can come to volunteer?

How are minority groups, religious organizations and other citizen groups asked for input regarding ways to involve parents? What strategies are used to encourage minority and economically disadvantaged parents to become involved in the education of their children? Are interpreters provided at parent meetings to encourage participation by non-English speaking or hearing-impaired parents? Does the district communicate with parents in writing and in their preferred language?

What social services are available to assist parents and families of students to be successful? How does the district identify and assist families with social needs?

Are there opportunities for parents to meet and build rapport in order to stay connected to one another and to the schools? Does the district offer parenting classes or any other parent education/training programs? Are provisions made for parents and staff representatives to participate in the Statewide Parent Involvement Conference(s) and/or other given opportunities to share what they have learned when they return home?

What are the district's efforts in fulfilling parents' rights according to state and federal laws? For example, is there access to student records; state assessments tools; teaching materials, including textbooks and tests; board meetings; full information about their child(ren); school districts' public records; and a grievance process for any violation of their rights? Are parents taught how to advocate appropriately for the rights of their child? Does the district provide joint training activities for both parents and staff?

How do parents access specific information about their children and the district?

What percent of parents attend admission review dismissals (ARD) meetings?

Are individual education plans (IEP) of students whose parents speak Spanish translated into Spanish as required by state law?

What training is provided to parents?

### **3.H. Review and Evaluation of Contracting Process**

Community and parental involvement and public relations services such as printing and copying could all or in part be purchased or contracted through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

***HUMAN  
RESOURCES  
MANAGEMENT***





## **4. Human Resources Management**

Elementary and secondary education is a labor-intensive undertaking. Labor costs consume approximately 80 percent of the average school district budget. Consequently, appropriately managing personnel is a critical function for a school district. To be effective and efficient, school districts must hire the right number of employees with the right qualifications and credentials to fill each position in the district. Further, employees must be adequately compensated, given opportunities for training and must have access to benefits and services, including grievance and conflict resolution services, to ensure that morale and productivity remain high.

The terms “*personnel*” and “*human resources*” are often used interchangeably. Personnel management was historically limited to the performance of administrative processes and procedures such as hiring and maintaining employee records. Today, personnel functions have evolved into a broader category of services that are provided under a wide variety of complex employment laws.

This chapter evaluates the effectiveness and efficiency of Human Resources (HR) responsibilities in the following areas:

- 4.A. Organization and Management
- 4.B. Policies and Procedures
- 4.C. Personnel Records and Information Systems
- 4.D. Recruitment, Hiring and Retention
- 4.E. Staff Development
- 4.F. Benefits Administration
- 4.G. Compensation and Classification Systems
- 4.H. Performance Management
- 4.I. Employee and Labor Relations and Grievances
- 4.J. Review and Evaluation of Contracting Processes

### **4.A. Organization and Management**

School districts vary in how they organize and manage human resources responsibilities. Some districts have Staff Development and Benefits Departments within Human Resources, while others task them out to departments outside of Human Resources. In some districts the superintendent and his or her secretary handle every function with only minimal assistance from campus staff. Every district is different and the size and complexity of the district often dictates the organization structure that works best for each district.

The human resource area is generally responsible for recruiting employees; overseeing the interviewing, selection and processing of new employees; retaining employees; processing promotions, transfers and resignations; determining and maintaining compensation schedules; planning and forecasting personnel needs; maintaining complete employee records; developing and maintaining job descriptions; managing the employee evaluation process; handling employee complaints and grievances; developing personnel policies; and ensuring that related laws and regulations are followed.

#### **Data Needs**

- HR organizational and functional chart(s) for the past three years
- List of HR staff, showing classification, job title and salary

- Job descriptions for all HR positions and for positions not in HR, if performing HR-related duties and responsibilities; and the corresponding organizational charts for any such positions, for the past three years
- Applications, resumes, experience and training records for HR staff
- Proof of any professional memberships and/or affiliations of key HR staff, if not included in the resumes
- HR Strategic plan or department goals, objectives and mission statement
- Performance measures
- HR departmental budgets for the last five years
- Website information, if applicable and HR information available on the district's Intranet

### **People to Interview**

Superintendent, assistant superintendent or other administrator with oversight responsibility for HR functions

Payroll, benefits and staff development employees

Individuals that oversee or are responsible for Employee Relations and compliance with the Americans With Disabilities Act (ADA); Family and Medical Leave Act (FMLA); and Equal Employment Opportunity (EEO) Act

Business manager and assistant business manager

### **Activities to Perform**

- 4.A.1. Create or review HR organizational and functional charts and compare to staff job descriptions for a description of work actually performed; required elements of a comprehensive job description; reporting relationships; and whether the organizational structure depicted on the chart reflects the actual organization of the department. Note any external or contracted services that contribute to the function such as attorneys. Document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the reason(s) for changes. Also note if there are vacancies and whether the turnover rate among HR staff is in line with other areas of the district's operation.
- 4.A.2. Prepare a chart comparing the ratio of total district staff to HR staff and to staffing levels in peer districts and industry standards such as those used by Southern Association of Colleges and Schools (SACS). Identify areas where district staffing is higher or lower than the comparison group. Note: The comparison must count staff in similar HR functions to ensure comparability.
- 4.A.3. Review HR staff applications, resumes, transcripts and training records then prepare a chart showing the qualifications and years of HR experience for key personnel. List any professional organizations that HR employees belong to, or hold office in.
- 4.A.4. Prepare a list of continuing education hours by type of training attended for HR professional staff and compare the number of hours attended to industry standards.
- 4.A.5. Prepare a chart showing the departmental budget for the last five years, broken out by category and function where possible and identify trends. Where significant variances are identified, seek to locate the reason for the change through staff interviews.
- 4.A.6. Examine all HR planning documents or other documents that provide goals, objectives and a mission statement for the department or function. Compile a list of the goals, objectives and performance measures contained in those documents and determine whether the department or function's goals are clearly defined, applicable and whether the department is meeting its goals for HR.

## **Questions to Ask**

### **Organization**

Who heads the HR division? In smaller districts, is there a position designated to coordinate and/or perform HR administrative duties? How and where are functions that relate to HR such as payroll and benefits, Americans with Disabilities Act (ADA), Family and Medical Leave Act (FMLA) and Equal Employment Opportunity (EEO) law, aligned within the overall district organization? What is the staffing configuration of the HR division? What functions does HR support? How are other HR-related functions coordinated and administered by the district? What are some of the essential job duties performed by HR staff and management?

Who does the top level HR administrator, manager, or director report to? Are functions assigned to HR that are not directly related to personnel and HR services? If so, what and why? What HR-related responsibilities does the business office perform? How is information related to leave, overtime, contracts, payroll, etc. communicated between campuses and central office?

Which HR functions are centralized and which are decentralized, or partially decentralized? Are any of the existing HR functions in process of being centralized, or decentralized? What is the business reason(s) for the change in practice? How do the HR division and manager partner with administrators and other HR customers to provide services, administer programs and add value?

What legal advice does the district receive relative to more complex and sensitive HR management issues and policies? Is the district's attorney experienced in public sector legal issues, education and employment laws?

### **Departmental staffing and qualifications**

Does the HR function have sufficient employees to get the job done? How do staffing levels within the HR office compare to those of peer districts? To industry standards?

What special qualifications do employees in the HR office possess? How do the employees' qualifications, education and certifications make them uniquely qualified to do what they are doing? What skill sets are missing or are needed to round out the HR team?

Do job descriptions exist for all HR staff? If not, why not? Which job descriptions are outdated and which are current? What recent events could have impacted the accuracy of job descriptions?

How is medical information obtained from an employee and under what conditions? Which positions are designated to accept, review and/or collect employee medical information? Which positions are authorized to correspond and/or otherwise communicate with an employee's medical providers? Which positions in the district usually have need-to-know employee medical information, other than HR designated custodians?

### **Continuing education**

What training does staff in HR receive to better understand current and emerging developments in the HR profession? How does HR staff serve as resources to customer divisions in various HR matters? Are employees in the division cross-trained? Is staff familiar with the application document flow and procedures in order to prevent slowdown during employee absences?

To what extent do HR staff participate in workshops, conferences, seminars, read professional literature and interact with other HR staff in both public and private sectors to improve job performance and add value to the district?

### **Budgets**

What is the HR division's current budget? How does the current budget compare to previous years? How are departmental expenditures planned and controlled? Does the funding allow for legally compliant HR programs and services?

### **Planning and evaluation**

Does the HR division have a mission statement? Goals? Performance measures? How is the HR function treated in the district's strategic plan? Who are the division's customers? How does the division know it is meeting its customers' needs? How does the division measure and monitor success? What measures of performance are captured and reported by HR; to whom; and, how often are such measures reported?

What are the department's quality improvement initiatives? When was the last time that a user survey or other feedback mechanism was used to gauge the level of customer satisfaction with the function?

## **4.B. Policies and Procedures**

All school districts and most employers are required to comply with various state, federal and local laws. Many employer policies and procedures are based on such laws. Policies and procedures inform staff about workplace rules and employee rights and responsibilities. Without documentation, the district may be at risk of inequitably treating individual employees or employees may argue that they had no knowledge of the rules and regulations and therefore cannot be held accountable for their actions.

### **Data Needs**

- Employee handbook(s) or on-line guides for employees
- Board policies relating to employees or human resource responsibilities
- Copy of HR administrative procedures
- New-hire employee paperwork and required forms
- Copies of forms created or used to administer HR duties

### **People to Interview**

Superintendent

Assistant superintendent or deputy superintendent or other administrators with assigned responsibility

Employees

HR staff responsible for processing new hires

### **Activities to Perform**

- 4.B.1. Prepare a list of all HR-related policies. For each policy, note the topic, policy number, date updated, class of employee impacted by the policy, if applicable and whether the policies presented are comprehensive in scope. Highlight any areas that are not covered in policy that should be or ones that are inadequately covered.
- 4.B.2. Examine and review any forms created and/or administered by HR responsive to various employment laws; determine whether the forms are in compliance with state, federal and local laws; whether the forms have an identification methodology; date created and revised; "owner" in HR; frequency and methodology for review; approval process for edits; and whether there is a master list of HR forms.
- 4.B.3. Prepare a list of all key HR tasks and examine the HR internal procedures manual or any other documented procedures and note whether the documentation provides a step-by-step

- guide of how to perform key HR tasks. Note any tasks that are not well-documented and find out who does those tasks and what they use to perform those tasks.
- 4.B.4. Compile a list of all written or published employee policies or procedures, such as employee handbooks, on-line guides and the like. Compare documentation to board policies and note any areas of variance. Also determine how the documents are distributed and whether the distribution methodology ensures that all employees of the district are provided with a copy of the rules and can be held accountable for compliance. (A policy does not ensure knowledge of the rules.)
- 4.B.5. Prepare a chart showing all materials given to newly hired employees and note whether the information is legally compliant and provides clear guidance to new hires on the terms and conditions of employment.

### **Questions to Ask**

#### **Policies**

Are there written policies that staff requests for reasonable accommodation in employment under the ADA; staff discipline; FMLA; and absenteeism? Do the policies designate or identify positions responsible for ADA, FMLA and EEO coordination?

What policies address hiring; job postings; promotion; staff complaints and grievances; probation, orientation, or induction period; performance appraisals; equal employment opportunity statement of philosophy; Drug Free Workplace Act; termination; benefits; and compensation and position classification?

Is there a policy governing sexual harassment and other inappropriate workplace behaviors? Is there a defined and specific complaint procedure for staff to follow to report sexual harassment allegations and other allegations of inappropriate workplace behavior(s)?

How often does the board review personnel-related policies? What is the role of HR staff and district administration in the review and revision process? How are district policies communicated and distributed to staff? Do employees acknowledge signed receipt of district policies during the course of employment with the district?

Does HR provide any policy training for managers and employees? When were the district's HR policies last updated and/or revised? Are policies available online? If policies are online, how does HR ensure that all employees, regardless of position function have access to a computer and the online policies?

Which position is responsible for administering the Uniformed Services Employment and Reemployment Rights Act (USERRA's) reemployment of qualifying Veterans? Since September 11th 2002, how many requests for veteran reinstatement to employment have they been handled, coordinated and resolved?

What process is in place relative to employee allegations of sexual harassment and/or other inappropriate workplace conduct? Is there a distinction of inappropriate workplace behavior that would not be considered sexually harassing conduct under the law? What are the consequences for non-compliance?

Are EEO charges and employee requests for reasonable accommodation in employment included as part of HR's performance measures reporting?

What is the process for an employee to file a grievance and/or internal complaint? Is the process the same for sexual harassment allegations and complaints? Is there a timeline to final decision on employee grievances?

Has HR developed uniform correspondence for Consolidated Omnibus Budget Reconciliation Act (COBRA) and FMLA notifications; how do both of those notifications to employees and former employees work?

What is the district's practice for any employee requests for co-worker representation during investigatory and/or fact-finding interviews?

**HR administrative procedures**

How do administrative procedures prevent the hiring of unqualified candidates? How are administrative procedures linked to applicable law or policy? What checks and balances exist within the department or function to prevent the release of confidential information?

What procedures are in place to ensure appropriate separation of powers so that a single individual does not have the authority to authorize and issue checks?

What internal control weaknesses in the cash management process external auditors have identified in the last three years? What internal control weaknesses in the cash management process has internal auditor identified in the last three years? How are identified control deficiencies communicated to the relevant administrator in charge? How have procedures and policies been modified when control weaknesses are identified?

Are there any long-standing practices administered by HR that are not in writing? If yes, how have they been administered and communicated to employees and managers?

**Employee policy or procedure manuals**

How are employees provided a copy of the policies and procedures? Who is responsible for updating employee policies and handbooks? How are employees made aware of changes to HR policy? How is other HR news communicated regularly to staff?

Does the district maintain a staff directory (either electronically or in hardcopy)?

**New hire materials**

Does the district conduct orientation on HR policies for new employees? Are newly hired employees provided the opportunity to decline disclosure of personal addresses and phone numbers?

**4.C. Personnel Records and Information Systems**

Texas Local Government Records Act (TLGRA) of 1989 requires school districts to establish a local records management program that should include a locally developed retention schedule. The local schedule must meet the minimum retention periods established by the Texas State Library and Archives Commission. Most records may not be retained past the record retention deadline, unless litigation is involved.

Because school districts have become more technologically advanced and are automating many labor-intensive tasks, including applicant tracking and the employment application process, records management takes on new meaning. This section of the protocol examines the use of technology to improve the effectiveness and efficiency of the programs and processes administered through the HR function and how both computerized and hard copy files are maintained.

### **Data Needs**

- District retention policies and procedures
- Access to a sample of personnel files (while on-site)
- District's retention and destruction schedule for all HR-related records and information
- HR position description identifying the records retention function, duty and role
- District's records retention contact at the Texas State Library and Archives Commission
- Copy of routine or ad hoc management reports
- Information pertaining to computer software applications that support the HR functions

### **People to Interview**

HR director and supervisors

HR Records Retention representative or coordinator(s)

HR administrative and support staff

Information Technology administrator

### **Activities to Perform**

- 4.C.1. Obtain or prepare a standard checklist of data expected to be present in an employee's permanent files and through a visual inspection of a sample set of files, determine if the files are complete. Note any missing or extraneous information contained in the files and determine how or if confidential information and information subject to open records are differentiated. Note which, if any, employee records are kept separate from the employee personnel files and determine the appropriateness of this practice.
- 4.C.2. Through interviews and an examination of policies and procedures, diagram the records retention process and show how current policies and procedures ensure that records are maintained or destroyed according to state guidelines.
- 4.C.3. Prepare a checklist showing whether the district uses an indexed system for filing its employee files and records; has a well-documented procedure for auditing the accuracy and completeness of records; files its employee records electronically; has a method of securing files and employee records from unauthorized access; keeps hard copy files in fireproof locking cabinets; has a disaster recovery plan that addresses both computer files and restoration of the personnel business functions; and has a well-documented and easy to use access and retrieval methodology.
- 4.C.4. List HR manual and automated processes and identify the computer software or applications that are being used for automated processes, including the districts intranet and Internet sites, as applicable. Through interviews, determine if there are processes that could be automated and if there are available computer applications or modules or Web-based applications that the district already owns or has access to that are not being fully used.
- 4.C.5. Compile a list of routine and ad hoc reports prepared and issued by HR staff to analyze and report district workforce trends; position control methods; staffing needs; current vacancies; aging of vacancies; staff-to-student ratio; staffing demographics; payroll costs; number of hires and terminations; employee turnover; and the like.

## **Questions to Ask**

### **Personnel files**

What is the process and procedure for creating new employee personnel files? Which positions in HR are responsible for filing and maintaining employee personnel files and records? What information is stored and captured in employee personnel files?

Where are the personnel files kept? Are the personnel files locked and/or secured at the end of the day? Are the files in a fire-proof cabinet? What positions outside of HR are granted access to employee personnel files? Is there a policy governing file handling, maintenance, access and release of information? How does the district assure personnel records are safeguarded against loss or damage?

Does the district maintain any employee records electronically? How long does the department keep physical documents before electronic imaging and transfer to storage? If not, are there plans to implement such a system anytime in the future?

How does the district regulate access to personnel records? If the district maintains personnel files electronically, does the district have a policy and/or procedure for electronic file maintenance?

How often are personnel files updated? Is there a uniform system of file maintenance? How are personnel files maintained by supervisors coordinated with HR files, if at all? What departments keep the permanent files in the department? Why is this an acceptable practice?

What is the practice, policy and procedure in place governing employee requests to access and/or view personnel files?

What HR protocol and/or practice governs whether a particular document may be introduced to an employee's personnel file, or not and at whose request?

Are disciplinary actions and performance evaluations maintained in the personnel file, or elsewhere? Where are they maintained, if not? How long are they maintained in the personnel file? Have personnel records in the district ever been "purged" of information? If yes, when and why?

Are all employee files centrally located, or are some personnel file records located in areas other than HR? If other than HR, which position(s) are responsible for administering those personnel files and why?

How are employee medical records maintained? Where are such medical records stored and how are they secured?

### **Records retention**

What policies and procedures exist dealing with records retention? What employee in the district has primary responsibility for the records retention function? How does the district ensure that all departments and campuses are complying with records retention guidelines?

How and when are records destroyed? What records exist that should have been destroyed and have not been? What records are missing that have a permanent retention period or the retention period has not expired? Why are these files or records missing?



### **Information systems**

Which HR functions are performed manually and which are automated?

Is there a technology system or software in the district that links payroll to budget to HR and/or to benefits? What system interfaces exist to eliminate duplicative data entry? To ensure that employee information is consistently accurate across all systems?

Does the district's information technology system provide breakdowns by staff-to-student ratios?

Does the district have a system for position control that is automated and integrated with budgeting, personnel and payroll to ensure effective position control?

Is there an HR intranet Web site? If yes, does the website provide an overview of all HR service areas and functions? Has the site been checked by the district's technology specialists to ensure compliance with more recent laws governing access to disabled individuals?

If the district has an intranet site, how does HR use the site and how often is the information updated?

What HR information or transactions is available on the Internet (i.e. job postings, on-line applications, etc.)?

### **Reporting capabilities**

What HR reports are the automated system capable of independently generating? Workforce data and/or reports such as the number of positions? Employee transfers, promotions, or terminations? Certifications held by teachers and administrators? Salaries, job classification, race, age, date of hire and other personnel-related data?

How are these reports used? Who decides when to discontinue a report or add a new reporting requirement? Who can generate these reports? Are these the same people who need the information? How can this process of report generation be made more user friendly?

## **4.D. Recruitment, Hiring and Retention**

Recruiting, hiring and retaining highly qualified staff at all levels of the district's operations, particularly classroom teachers, is often a challenging task. Yet, highly qualified and experienced staff can positively impact productivity and student performance.

### **Data Needs**

- Recruitment plans and strategies
- Recruitment budget for last three years
- Record of recruitment trips and results for last three years
- Policies concerning signing bonuses or other district recruitment incentives
- List of signing bonuses and incentives paid by position in last three years
- Sample job postings (and URL if electronically posted)
- Application forms (hardcopy and electronic)
- Benefits handout/packet used to recruit and hire
- Hiring policies and procedures
- New employee orientation schedule and agenda
- Sample orientation materials and/or packet

- Staff turnover by job category and school or department
- Exit interview reports, data and trend analyses
- Organizational health or other employee satisfaction surveys administered in the last three years
- List of any employee retention strategies being employed by the district

### **People to Interview**

Superintendent

HR director

Employment specialists or representatives

Department heads and campus administrators

HR receptionist or administrative positions responsible for handling employment applications

### **Activities to Perform**

- 4.D.1. Review the district's recruitment plan, practices, records and budget. Diagram the district's recruitment practices and programs, beginning with any recruitment trips and ending with a contract being extended. Show the timing of the events and, to the extent possible, determine how the personnel involved and the timing of the events contributes to or deters the district in recruiting highly qualified applicants. If different recruitment practices are used for different categories of employees, note the differences or if the practices vary extensively, prepare a separate diagram for each category.
- 4.D.2. Prepare a three year trend analysis of the recruiting budget and break out the budget into category of expenditure including travel, advertising and Web design and maintenance. Through interviews, show how the budget is developed and where costs have risen significantly, determine the reason for the change and how the district is evaluating the effectiveness in its change in strategy.
- 4.D.3. Compile a list of all hiring or signing bonuses given by class of employee and other incentives used by the district to recruit applicants in hard-to-fill positions. Show the hiring rate prior to the bonuses and after the bonuses to validate the effectiveness of the program.
- 4.D.4. Prepare a list of the recruitment trips made in the last three years and show who traveled, the cost of the trip, the number of candidates interviewed or contacted, the number of candidates hired as a result of the trip. Note the most successful and least successful trips and determine how the district uses the trend analysis to modify recruitment efforts in subsequent years.
- 4.D.5. Diagram the job posting and hiring process, beginning with the authorization to post the job, any encumbrance of budgets or positions, the application process, screening and interviewing of applicants and the final job offer, noting cycle times. If contracting is involved, show the process and timeline for extending the contract. Review the HR posting/hiring/selection packet or on-line system, if one exists and show how the packet and/or system ensures that all district policies and procedures for hiring and contracting are followed and that the process from posting to filling vacancies is timely.
- 4.D.6. Prepare exhibit showing employee turnover rates by functional area for the past three to five years by department or staffing category, as applicable. Explore and note the reason for any higher-than-average turnover rates.
- 4.D.7. Compile a list of the efforts being used in the district to retain employees, whether formal or informal (i.e., competitive salaries, organizational health surveys, absentee prevention programs, mentoring arrangements, etc.). Note how these strategies are impacting turnover, particularly areas identified above as experiencing higher than average turnover.

- 4.D.8. List key employee recognition programs administered and/or facilitated by the district and determine whether the programs recognize and/or reward safety, increased productivity, customer service, attendance, or otherwise add value to the district's business objectives.

### **Questions to Ask**

#### **Recruitment**

What are the district's primary recruitment sources? How are recruitment targets identified by HR? Is advertising used? What sources and resources are used for advertising? Is there a recruitment budget? Is there a written recruitment plan and/or a workforce plan? How are recruitment activities and/or programs financed? How does the district measure the success of its recruiting efforts? How does the district maintain professional relationships with placement offices, faculty members and officials of colleges and universities? Does the district have strategies to address teacher shortages in specific areas such as math, science, bilingual and special education? Do recruiters have the authority to extend offers to candidates on recruitment trips? Does the district hire from a pool of vacancies or is hiring done on a one-on-one basis? Do HR staff, including recruiters request and review documentation from applicants such as an employment application, transcripts and other documents that might reasonably establish an applicant's credentials, experience and qualifications for a position in the district?

Is there any college recruitment practice? Are recruitment incentives being used? Are there recruitment brochures and/or handouts in use? Is there an HR career or job Web page for the district?

How does the district market itself to prospective applicants? What is the most effective recruitment source for the district; for hard-to-fill positions? Are there any position shortages and/or skills shortages in the district? Does the district have a grow-your-own program for hard to fill positions? Does the district engage in succession planning to prepare administrative replacements? What strategies does the district use to ensure workforce diversity?

How does the district identify staffing needs? Does the district distribute written information to candidates for employment explaining the school system, employment requirements and characteristics of the community?

Is the district using any long-term strategies to fill critical need positions such as targeting college students early in their careers and offering them some incentives for committing to work in the district upon graduation?

How does the district market to prospective employees? Does it have information readily available to prospective employees regarding pay, benefits and community? Are jobs posted online?

What is the district doing to prepare for compliance with the No Child Left Behind Act as related to the training that will be required for paraprofessionals?

Who provides interview and selection training for divisional screeners? How often is the training provided? How does the district provide training for existing staff who participate in interviewing activities and hiring decisions?

What defines a full-time versus a part-time position? Is the definition in line with the Teacher Retirement System definition? What benefits apply to each category of position? How many hours does one have to work on a regular basis to be eligible for benefits? Do hiring practices differ for temporary or part-time employees?

How does the staffing of the district compare to the ethnic composition of the student population and the available and qualified labor pool? If ethnic composition of staff does not parallel ethnic composition of student population, what are district efforts to recruit minority applicants?

What positions are considered hard-to-fill and why? What recruitment strategies are used for hard-to-fill positions?

### **Hiring**

What written hiring policies and procedures exist? What is the role of campus administrators and supervisors in the hiring and selection process? Has the districts' hiring policy, practice and/or procedure changed within the past year? Why? How does the district document the hiring process to avoid possible litigation?

Where does the district post job openings? Are all job postings consistent in form and format? How does the district use the Internet for posting jobs? How are internal and external postings treated differently? Does the district use a standard and consistent employment application form? Where is the application form available? Can an application be submitted electronically via the Internet?

What is the district's practice relative to criminal background checks (CBCs) and other reference checks for new hires and/or candidates who are selected for hire? Where is the information stored and how is it secured? Which positions have access to the CBCs? Is the CBC information communicated to, or shared with the hiring supervisor by HR?

At what stage of the hiring process are the CBCs completed? Who is responsible for performing CBCs? For checking references? What is the source of the CBC information and how much does it cost to obtain? Are there other alternatives that are less costly?

How does the district select substitute teachers? Are appropriate background checks conducted on substitute employees? Is there a policy, practice or procedure on this?

How does district use job descriptions and essential qualifications to select and recruit personnel? How are district employees advised of current vacancies? Are any positions posted internally and not to the public? If yes, what is the process and how are district employees advised of the internal posting? Is there a practice of department and/or campus-based job announcements not open to the entire district? If yes, what is HR's role in that process?

How are job postings screened and by whom? How are the needs of disabled individuals met in the hiring process, if required?

Does the district use temporary workers? Are there also temporary positions? What criteria are used to determine whether to make a position temporary, or regular status? What is the review and approval process in place for hiring temporary workers through external agencies? Is there a district temporary coordinator or administrator oversight function in the business office and/or HR?

Does the district develop performance criteria for all vacancies being filled prior to offers being extended?

What campus-based staff participate in the posting and hiring process? How often are positions posted? How are current district employees notified of job openings? Are any positions posted with the Texas Workforce Commission?

How are employment applications tracked and by whom? Are resumes accepted in lieu of applications? How long are applications retained on file? Are applications accepted at all times, or only when positions are posted?

Are there records of all employment advertising kept, including cost, source and date?

Are there any employment and/or applicant tests administered by HR and/or campus-based tests for any positions in the district? Where were the tests developed and how are they administered?

What positions are currently vacant and posted?

### **Retention**

What percent of the districts employees are eligible to retire now and in the next three years? What are the turnover trends in the district? Does the district analyze turnover by employee type? How does the division use turnover data to determine staffing needs? How does the district track the reasons why employees leave the district (voluntary separation, retirement, termination for cause and transfer to a different classification such as a teacher to administrator moving to another district)? Does the district conduct exit interviews to determine reasons for resignation, which are then systematically analyzed to determine strategies for reducing turnover? When are exit interviews conducted and by whom? How is the exit interview information used and stored by HR? How does the district use turnover data to develop employee retention initiatives?

Does the district keep turnover by campus? What does the district consider to be a manageable level of turnover? How does the turnover rate compare to peer districts?

Is there a new employee orientation and/or probationary period? If yes, what is the duration? Is there a written policy governing the employee introductory period? Are there district mentors and mentor supervisors or mentor programs in the district? What training is provided during the “probationary” or introductory employment transition period to new hires?

Are all promotions based on competency, performance and job qualifications? How do staff feel about the fairness of treatment for employees? What efforts are being made to ensure that employee morale is high? Productivity is high?

Does HR track absenteeism of teachers? If so, how? What is the district’s retention rate for teachers in the first year of employment; second year; and third year of employment? How do these rates compare to the peer districts? Is there a retention concern for teachers? If yes, what is the district’s action plan or strategy to overcome the retention concern?

How does the district track and deal with excessive absences with employees other than teachers? What is this costing the district in overtime? In productivity?

Are substitute records kept at each campus or by the district as a whole? If kept individually, what campuses are using more substitutes than others? Why?

Are all teachers certified? How does that compare to peer districts, the region and the state? What is the average teacher tenure?

What employee recognition programs does the district have; which are administered by the district, if any?

#### **4.E. Staff Development**

Having a well-trained workforce is critical, not only from a productivity standpoint, but for school districts, staff development is a tool that is used to focus staff on achieving instructional and academic goals and ultimately improve student performance.

##### **Data Needs**

- Policies or procedures pertaining to staff development
- List of training provided by the internal staff in the district for the last three years
- List of training offered by external organizations such as the regional education service centers for the last three years
- Training offerings/listing for the next three (3) months
- Training attendance reports, logs or databases
- Participant training evaluation records
- List of positions requiring special licensing, certification and/or continuing education
- Training needs assessments conducted within the past two years, or in progress
- Copies of district and campus improvement plans that contain staff development goals, objectives or strategies

##### **People to Interview**

Assistant superintendent with HR oversight  
HR director, manager and supervisor(s)  
Trainers or training specialists  
Teachers

##### **Activities to Perform**

- 4.E.1. Through interviews and an examination of documents, diagram the process used to determine staff development needs, not only for the teaching staff, but for support functions such as transportation, food service, accounting and other business functions. Note where and how continuing education or staff development is delivered to employees requiring specialized training to maintain certain certification or licensing (i.e., certified public accountants, Automotive Service Excellence (ASE) certified mechanics, Texas School Business Official Certification, etc.)
- 4.E.2. Compile a summary of how professional development is tracked by employee or group of employees. If tracking is automated, determine what data is stored in the database, who has access and how information is updated. Whether manual or automated, note whether records are kept for all employees; whether records are current; and how the district uses its system(s) to ensure that goals and guidelines for professional development are being met.
- 4.E.3. Prepare a chart of major staff development performed in the last three years and show the training audience, cost and number attending. Examine a sample of any evaluations of the training to determine staff response.

##### **Questions to Ask**

Is the responsibility for coordination of staff development centralized or decentralized? Why is this the best method of delivery for this district? What minimum continuing education or training hours are required by policy for staff or categories of staff?

Does the district have a training calendar? If yes, is it also online? Is there any online and/or distance training provided in the district? Is there a training budget?

Does HR provide EEO training, supervisory and management training? How does HR identify other training needs? By campus administrators? By department heads? What divisions, departments or campuses use individual employee development plans? How are evaluation instruments and employee expectations tied to the staff development plans?

Are there minimum training hours required for district employees? If yes, how is this enforced?

Is there a tuition reimbursement program and policy? Are there financial incentives in place for additional certification and/or degrees?

Are staff development goals linked to district wide goals?

What training is offered to substitute teachers? What training is offered to student teachers? How are teacher substitutes trained? Who is responsible for working with substitute teachers to ensure that the educational programs and students' education are not interrupted?

Does the district have a training partnership with any area colleges and/or universities? How does the district use training offered by the Regional Education Service Center (RESA)? What training opportunities are provided in summer months?

Is training scheduled to be least disruptive to an employee's job schedule? What training is offered to substitute teachers? Does the district provide incentives for training outside regular hours? How does the district use training offered by the RESA? What training opportunities are provided in summer months?

Does the district have a partnership with a nearby community college, RESA, or university for training? Does the district pay any of the costs for the pursuit of additional certification or degrees? Does the pursuit of additional certification or degrees qualify for mandatory staff development hours?

Are staff development goals linked to districtwide goals? How many days for staff development does the district allow?

What training have the HR trainers had in curriculum design and planning?

What management and supervisory training is provided and/or offered by HR? by the RESA? By contractor? Who develops the internal training curriculum?

### **Tracking**

What records does HR keep on employee training? How is the method of tracking training hours attended useful to supervisors for evaluation purposes? How easy is the data to access? How far back do training records go? How does the district use historic training information? By campus administrators? Department heads?

Can employees sign up for training on line? Is the signup process linked to the attendance tracking system? How does the district handle training no-shows?

### **Feedback**

What forms are used by HR to collect feedback from trainees on training received? How is the feedback tracked and used to determine future trainers, training styles or needs? How does HR use

this feedback to develop and refine training? How does the district evaluate the usefulness of training periodically? Has the HR department ever conducted a districtwide needs assessment?

#### **4.F. Benefits Administration**

Part of a comprehensive employer compensation strategy is a legally compliant benefit strategy. Benefits, regulations and cost containment are critical to successful benefits administration in any district. There are mutual advantages to a comprehensive benefits program for a district and its employees, including being able to attract and retain qualified workers. In some instances, there are even tax advantages for program plan participants, reducing out-of-pocket costs.

##### **Data Needs**

- List a description of all of the district's benefits, such as leave, insurance coverages, retirement supplements like 401Ks, child care or other special services like employee assistance programs
- District's benefits rate(s) as a percent of salary, by employment category
- FMLA notice(s) to employees
- ADA notices, forms and information given to employees and in use by HR and districtwide
- Benefit-related policies and procedures
- Employee handbooks or other documents showing benefits and/or benefit rates

##### **People to Interview**

Superintendent

Assistant superintendent with oversight for Benefits function and/or Business manager

HR manager or director

Benefits supervisor and/or manager

Benefits specialists and support personnel, including clerks

##### **Activities to Perform**

- 4.F.1. Prepare a comprehensive chart of all employee benefits including such items as insurances, social security, sick and annual leave and special retirement programs. Show the employee contribution rate, if applicable and note if there are benefits that apply to only certain classes or types of employees and at what point part-time employees become eligible for benefits. Calculate or obtain a budgetary benefit rate by class of employee, if applicable and note any area of potential overlap or conflict.
- 4.F.2. Compile a list of all employee handbooks and other documents providing benefit-related information, including memoranda, e-mails, payroll stuffers and online information. Show whether the information is current and in compliance with board policy and state and federal laws, the method used to disseminate the information and the frequency of updates.
- 4.F.3. Summarize any FMLA, ADA or Workers' Compensation performance reporting measures; policies governing ADA, FMLA and Workers' Compensation and show whether the policies are coordinated and how employees are notified of their rights and responsibilities under each of the benefits.



## **Questions to Ask**

### **Benefits**

What benefits would employees like to have access to but the district does not provide? How does the district obtain input from employee organizations or groups of employees about benefit decisions? An employee advisory committee? Surveys? Negotiations with organizations?

Have there been any changes within the most recent benefit plan year to any of the district's benefit plans? If yes, why and what plans have been replaced?

What is the district's policy and practice with respect to accrued sick leave and vacation leave balances upon termination of employment? When making decisions regarding leave, does the district consider the cost of substitutes, overtime and the like, that will need to be paid in addition to the leave?

What are benefits costing the district? What do benefits cost employees? How does the district determine what employees pay for and what the district pays for?

### **Notification procedures**

How do employees know what benefits are available to them in the district? Are all benefit terms and conditions stipulated in the employee handbook or in some other document made accessible to employees? Does the employee handbook identify and summarize the benefits offered by the district and eligibility requirements? Does the district offer a comprehensive benefit program including life, health, optical and dental insurance with other special programs such as capital accumulation plan, long/short term disability, etc.? How does the district ensure that its benefit program is competitive with neighboring districts?

What process do newly hired employees follow for benefits enrollment and information?

How are employees notified of qualifying conditions that may be relevant to the individual's original benefits elections?

How are employees notified of FMLA protections afforded under the law? What is the district's trigger for qualifying an employee's absence under the FMLA? Does the district use a calendar year or rolling year to calculate FMLA approved leave requests?

What software and technology systems do the Benefits representatives use to administer benefits for the district? Do benefits representatives have access to benefits related employee data such as hire date, current salary, benefits elections, service records, hours worked and other relevant data?

What are the primary methods of communicating with district employees when changes are made to the plans?

What summary plan descriptions are maintained for each benefit plans?

### **Legal compliance**

What types of employee requests for assistance are handled by the benefits representatives? Do the benefits representatives conduct any employee training, including during annual enrollment and/or if benefits plans change in the district?

Does the ADA function interact with benefits representatives? If yes, describe the process. Are benefits representatives advised of employee requests under the ADA? How does the FMLA function interact with benefits representatives? What is Benefits role and communication to and/or with employees, supervisors and administrators in the FMLA approval and eligibility process? Where are ADA and FMLA records, files and information kept? What medical records and/or information is maintained by benefits representatives and who generally is granted access to those records?

How does the COBRA notification and administration process occur and which positions are responsible for the process and/or any portions of the process?

How does the district define part-time employee status? How are part-time position benefits different than full-time positions?

#### **4.G. Compensation and Classification Systems**

Compensation plans not only set up a system for equitable salaries and hourly wages for employees currently on the payroll, but a system for placing new-hires on a pay scale based on years of experience, promotions, transfers and merit pay for performance. While there is sometimes a variance in pay between large and small, urban and rural districts, each district must know what businesses or school districts are in competition with them for employees and must be prepared to adopt a compensation plan that recognizes the competition and contains strategies to ensure that the district is able to recruit and retain good employees at all levels.

##### **Data Needs**

- Wage surveys for the past three years
- Salary structure and ranges for all positions in the district (career ladders)
- Wage and salary reports for all employees for the current year including information regarding stipends and extra duty pay by employee and group of employees
- District policies governing starting salaries for new hires, promotions, transfers, demotions, position classification and salary increases based on performance
- Policies concerning stipends and extra duty pay as well as overtime and compensatory time, if applicable
- Copies of all job descriptions
- Schedule for the periodic revision of job descriptions
- Copies of standard position classification and personnel action forms, questionnaires and/or form letters
- Copies of all performance evaluation forms in use
- Budget and actual information regarding overtime by department and campus

##### **People to Interview**

Superintendent

Assistant superintendent with oversight for Benefits function and/or Business manager

HR manager or director

Compensation manager and analysts

Payroll administrator or coordinator

### **Activities to Perform**

- 4.G.1. Use Public Education Information Management System (PEIMS) data to prepare a chart of average salary levels for categories of staff for the last three to five years. Compare average salary levels with peers and the state average and compare to salaries in neighboring districts and to competing positions in the private market. Note: Be sure to account for differences in experience levels of teachers when averaging salaries for the district.
- 4.G.2. Examine board policy and district salary or wage schedules for all employee categories and chart the high, low and median range of salaries for each category. Compare the schedules to the actual salaries or wages of a sample set of employees within each group to determine if the schedules are being followed. Where anomalies are found, determine the reason for the variances. Further, if a recent classification audit has been done for the district or for certain categories of employees, note whether the recommendations in the report have been implemented and how the current schedules were impacted by implementation.
- 4.G.3. Prepare a chart showing the years of experience for teachers and compare the experience level of teachers in the district to the average for peers or neighboring districts, the region and state. Determine through interviews how the experience level of teachers is impacting the average salaries of teachers in the district. Examine salary surveys and list any hard-to-fill positions and industry and area trends.
- 4.G.4. Compile a list of all stipends and extra duty pay for all employees showing the amount of the stipend or extra duty pay, the basis for the stipend or extra duty pay, the total number of employees receiving a given type of stipend or extra duty pay and the basis for the extra pay in board policy. Determine how the district ensures that these stipends and extra duty pay are equitably distributed and how the granting of these stipends is controlled to prevent this mechanism for becoming a way to pay “favored” employees amounts above the approved salary schedules.
- 4.G.5. Examine overtime and compensatory time records and to the extent possible, chart the amount for overtime/compensatory time being accumulated, budgeted and expended by campus and department. Identify areas with inordinate amounts of paid overtime or accumulated compensatory time. Also determine to the extent possible whether the district is appropriately tracking and reporting compensatory and overtime hours worked in compliance with Fair Labor Standards Act (FLSA) requirements.
- 4.G.6. Prepare a list of key administrators and other categories of employees that are extended contracts. Note whether the contracts are required by law or whether they are discretionary. Show the number of contracts extended annually by category of employee, the number of years of the contract, the renewal frequency and any non-standard terms and conditions that may apply only to a single employee or a group of employees that are not extended to all employees.
- 4.G.7. Examine all job descriptions and schedules for the periodic review of job descriptions used in the district and prepare a chart showing which groups or categories of job descriptions are current, which are currently under revision, outdated and in need of revision and which are missing entirely. Additionally, while examining the job descriptions, determine if a consistent format is used that contains specific responsibilities, performance standards, as well as education knowledge and skills requirements and note variances.

### **Questions to Ask**

#### **Compensation**

What is the board’s role in hiring, firing, promotion, or other salary actions for positions other than the superintendent? Does the board or district administration have a compensation strategy to align the district’s salaries?

What are the pay systems in the district for various position designations such as teachers and other staff?

How have salaries changed over the past five years? How do salaries compare with similarly sized districts for similar positions? How do salaries compare with similar positions in the district's market?

Is there a practice of using cost-of-living adjustments (COLA)? What is the district's history of pay increases for the last five years? Have pay increases kept pace with inflation and compensation rates in neighboring districts or the marketplace? Are there any position categories paid below market rate and how has that impacted turnover rates? Are there any positions paid less than the federally-mandated minimum wage?

Do the district's salary ranges include minimum, midpoint and maximum salary increments and the range spread does not exceed 60 percent? How does the district's midpoint compare to the market, peer districts, the region and the state?

Does the district periodically adjust its compensation structure using verifiable salary survey information, benchmarking and analysis of higher, lower and comparable salary data? When was the last time the district performed a comprehensive salary survey? Did the board fund any pay adjustments recommended in the survey? Has the district made any internal equity and/or market adjustments to salaries within the past two years?

Does the district use salary bonuses and/or merit pay systems? How do employees become eligible for either? Are there career ladders developed by HR and/or customer departments for any position categories?

Does the district actively manage payroll costs through balancing the numbers of staff at all experience levels? When was the last time that the district offered any incentives for early retirement or early contract renewal?

Which position(s) decides starting salary for the successful candidate(s)? What input does HR provide to starting salary determination and exceptions?

What forms does the district use to document salary increases, decreases and other personnel or employee status changes?

### **Classification system**

Which position is responsible for position classification? What are the steps and methodology of position classification in the district? Who recommends that a position be reclassified and what is the review and final approval process? What records and documents are created and/or result from a position classification review?

### **Stipends and extra duty pay**

What classifications of staff receive a stipend in the district? What is the purpose of each type of stipend paid? How much does the district spend on stipends as a percent of salary costs? How are stipends determined? What types of stipends are there (i.e., teaching stipends, supplemental duty stipends, etc.)?

Who receives extra duty pay? How does the district ensure that the extra days are actually worked?

What procedures are in place to ensure that supervisors or managers are not using stipends and extra duty pay to grant salary increases outside of approved salary schedules? How does the current system ensure equity among all employees? What employees should be getting stipends or extra duty pay that are not currently receiving any? What employees are receiving this extra pay and should not?

**Overtime and compensatory time**

Does the district uniformly comply with all requirements of the FLSA regarding overtime and compensatory pay? When is the FLSA designation assigned to positions in the district? Does the district keep weekly time records on all nonexempt personnel? Does the district classify exempt and nonexempt personnel in payroll records? How is overtime documented, recorded and communicated to central office? Does the district have any open Department of Labor complaints and/or inquiries from the Department of Labor related to wage and hour practices and administration?

**Contracts**

Which classes of district employees have contracts? How are contract renewals handled? Does the district give contracts with renewal rights (Chapter 21 term contracts) to staff members who are not entitled to such contracts by law? What length are teacher and administrator contracts? Does the district use term or continuing contracts? Why?

**Job descriptions**

What input and/or service does HR provide in the district's development of job descriptions? How are physical and mental demands of the district's various jobs reflected in its job descriptions?

What system is in place to ensure that all job descriptions are periodically reviewed and updated? What positions are not currently covered by a job description? Why? What job descriptions are outdated? Why?

**4.H. Performance Management**

A sound system of performance evaluation can provide good employees encouragement and poorly performing employees an opportunity to improve performance. But, for this to work as intended, the evaluation system must be consistently applied and the appraisals must be objective and fair, but also honest and accurate. Consistent poor performance should lead to eventual dismissal if problems are not corrected and outstanding performance must be rewarded.

**Data Needs**

- Copies of all performance evaluation forms in use
- Schedule of performance evaluation due dates by job category
- Records of performance evaluations performed and pending, or access to a sample set of employee files to determine the frequency of evaluations

**People to Interview**

Superintendent  
Assistant superintendent with oversight for Benefits function and/or Business manager  
HR manager or director  
Compensation manager and analysts  
Payroll administrator or coordinator

### **Activities to Perform**

- 4.H.1. Examine employee performance appraisal forms for teachers, administrators and support staff and chart the evaluation date due, content and compliance with the Texas Education Code, as well as federal and state employment laws and practices. Note the specific areas of the district's operation where evaluations are being handled in a timely and appropriate manner and where improvement is needed.
- 4.H.2. Examine any records maintained regarding the frequency and current status of performance evaluations by division, campus or category of employee, or in the absence of such information, compile information from reviewing a sample set of employee files. the supporting HR documentation of salary actions for merit increases, position status changes, hires, terminations, demotions and other actions affecting an employee's pay to review consistency of practice, business justification and policy compliance.

### **Questions to Ask**

Does the district have a formal performance evaluation program documented in board policy or administrative procedures? How often are appraisals given to employees (evaluation cycle)? Are the performance standards measurable? Is performance measured against pre-established standards? Are the evaluation standards reflected in the job descriptions? What training does HR offer to customer divisions on job description design and job content and the evaluation of performance by supervisors and administrators?

What is the district's performance evaluation cycle? Is performance measured against pre-established standards? Is the superintendent and district management evaluated following the cycle prescribed by law? Are employees allowed any self-assessment input to the evaluation process? Are performance evaluations timely, or not? Is there any notification system by HR for overdue performance evaluations, or not? What are the consequences for non-compliance by supervisors?

What is the evaluation hierarchy? What feedback is allowed by the person being evaluated?

Do managerial and supervisory appraisals allow for subordinate or self-ratings? How do appraisals tie weaknesses or strengths to recommended actions for future performance? What is the evaluation hierarchy and what levels conduct which evaluations? What feedback is allowed by the person being evaluated?

Does the district tie performance to student achievement for teachers? Does the district tie performance to student achievement for other employees such as administrators and principals? Are teachers evaluated using the Professional Development Appraisal System (PDAS) method? If not, what approval has been obtained by the district to use an alternate teacher evaluation instrument?

Does the district have a performance-based system for compensation? If not, has the district considered such a system? In the past two years, has the district changed its compensation practice, strategy and/or philosophy? What was the original practice and what changed? Where are performance evaluation documents filed? Are performance evaluation forms available online or in hardcopy form?

### **4.I. Employee and Labor Relations and Grievances**

Maintaining high morale and insuring that all employees are treated fairly and equitably can be a challenge for any organization, but it is even more critical in public school districts. Texas schools are

not allowed to bargain collectively, recognize exclusive labor organizations, nor coerce employees either directly or indirectly to join labor organizations. There are many different professional associations for school employees and a large population of non-joiners. Schools need to provide equal access and representation to all without regard to organizational membership.

### **Data Needs**

- HR newsletter(s)
- HR communiqués
- Management and administration communiqués to employees
- Employee Assistance Program (EAP) brochures and handouts
- Grievance policy and procedure
- Exit interview reports
- HR handbook(s)

### **People to Interview**

Superintendent

Assistant superintendent with HR oversight

HR director or manager

Employee relations coordinator or individual with responsibility for employee relations

Employee organization representatives

Employee advisory committee members

### **Activities to Perform**

- 4.I.1. Prepare a list of employee organizations that are active in the district. Determine how the district interacts with these groups, whether through an exclusive representation agreement or perhaps an advisory panel made up of representatives from all of the groups.
- 4.I.2. Outline the employee grievance process as called for in district policy or procedures. Identify the position(s) responsible for conducting HR fact-findings and internal investigations. Identify whether there is a grievance administrator, ombudsman dispute resolution officer and EEO officer in the district and determine the scope of duties, roles and areas of overlap. Through interviews determine whether the process is working, whether procedures are being followed consistently and where in the process is communication breaking down, if at all.
- 4.I.3. Prepare a list of all employee services such as counseling, wellness or employee assistance programs. Determine how frequently the services are used and how information is disseminated about the program (i.e., forms, brochures and HR bulletins).
- 4.I.4. Prepare a list of any HR handbooks, brochures, e-mails or memos to employees related to district policies, employment practices and services. Randomly interview employees and note whether district employees know the process for seeking HR employee relations assistance, filing internal complaints or grievances and how to request services or an accommodation in employment.
- 4.I.5. Prepare a list of charges and examine the district's response to EEO charges filed with the Texas Commission on Human Rights (TCHR) and/or Equal Employment Opportunity Commission (EEOC) and note timeliness of reply; legal review of the district's response prior to release; and compliance with EEOC/TCHR requests for records, or additional information.

## **Questions to Ask**

### **Employee organizations**

If there are employee or labor organizations active in the district, how does the administration interact with these organizations? If relations are good with these organizations, what has been the reason for the strong relationship? If relations are poor with these groups, what has been the reason for the breakdown?

How involved are these organizations in decision-making? How does the district bring in these groups to help them to make good decisions for its employees?

### **Grievances and disciplinary actions**

Does the district have clear policies governing grievances, discipline and discharge and reductions in force? Does the district have a no re-hire policy, practice, or clause? If yes, what makes an individual ineligible for rehire?

Does the district have a policy, practice and/or procedure for employee reassignments? How does the process work? Is there a process by which an employee can protest management actions?

What is the district's practice for any employee requests for co-worker representation during investigatory and/or fact-finding interviews?

Does the district have an employee ombudsman, mediation, or Dispute Resolution representative? If yes, where does the position report organizationally?

Who is the district's legal advisor on grievance procedures? How does this person remain current on latest state and federal employment laws?

Does the district have a plan and/or policy governing discipline administration, including any progression of discipline? If yes, which positions are under that policy?

Does the district provide for immediate suspension and/or termination for serious policy violations such as child molestation, assault, theft, drinking or drug use on the job; etc.? Are non-routine disciplinary actions reviewed by anyone with employment law training and expertise before they are administered to employees?

How is less-than-satisfactory performance managed prior to recommending termination and/or discipline, barring serious policy violations by employees? If there is an introductory period or "probationary" period, do managers and supervisors monitor the work of the employees during the relevant period and how is feedback given to "probationary" employees? Is performance feedback documented during the introductory period? When did the most recent legal review of termination and reduction in force policies occur? Does the district have checklists in these areas to facilitate compliance and potentially avoid legal costs for violations of policy and due process? What training is provided to managers and supervisors in the area of performance management liability considerations?

### **Employee services**

When an employee is found to have personal problems that are impacting their ability to perform their job adequately, how does the district attempt to help that employee or the employee's family? Does the district have an employee assistance program that provides counseling and/or referral for employees with drug or alcohol abuse problems? Emphasizes employee health and wellness?



How is the confidentiality of the employees who are using these services maintained?

**Employee communications**

Who is responsible for disseminating rules, regulations and policies to all employees; administering HR policies; overseeing uniformity of practice; and investigating allegations of inappropriate conduct and other HR policy violations?; Do district rules on employee actions allow due process? If an employee provides a written letter of resignation, to whom is the resignation submitted? Is there a practice of written acceptance of employee resignations? If so, who issues the letter of acceptance? When and how does the HR department receive a copy of a written letter of resignation and/or notification that an employee in the district has resigned? What is HR's handling of that process and which HR position(s) are involved?

Are employees informed as part of HR out-processing on the conditions governing reinstatement, re-employment and withdrawal of retirement contributions and termination of insurance coverage? How is this information communicated to the departing employee? Do criteria for the district's reduction in force demonstrate legal compliance for selection of individuals for reduction-in-force?

**External charges and complaints**

If external complaints have been filed against the district, how has the district reacted? What new policies, procedures or practices have been put into place to ensure that the district remains within legal compliance standards? What training has been provided to staff to ensure that everyone knows the rules and abides by them?

Who is responsible for monitoring procedures and practices to ensure that the staff follow the policies? Do administrators take immediate action when an employee is not complying with policy? Give examples.

What evidence exists that the board and administration take seriously the need for management training or retraining? How does the district ensure that managers not only know and follow the laws, rules and regulations, but to work closely with parents to ensure that they view the district as a partner in the child's education and not a legal adversary? Work closely with employees to ensure that they view themselves as a member of the team, not a legal adversary?

**4.J. Review and Evaluation of Contracting Processes**

HR services such as staff development, payroll or recruitment can be administered by the district or contracted. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

**Data Needs**

- Current contracts, memorandum of understanding (MOUs) or interlocal agreements being used by HR
- Requests for Proposal (RFP) use to solicit bids for service(s), both approved and pending, or other contract approval process
- HR studies, cost benefit analyses, performance data or service reports related to contracted services

## **People to Interview**

Assistant superintendent with HR oversight  
HR director or manager  
Chief financial officer  
Purchasing director

## **Activities to Perform**

- 4.J.1. Prepare a list of HR functions that are contracted and by examining the contracts, MOUs or interlocal agreements, RFPs and other documentation such as performance or status reports, determine the terms and conditions of the contract, the annual cost for the services and the level of satisfaction with the services being performed. Also determine if the services could be done in house more effectively and efficiently.
- 4.J.2. Compare the terms and conditions of the contract with the level of performance as documented in status and performance reports and chart those areas where performance is above or below expectations. Determine who in the district is monitoring the contract terms and through interviews, note what corrective actions have been taken to improve services in areas where service is below expectations.

## **Questions to Ask**

What aspects of HR such as FMLA administration, recordkeeping, microfilming, job searches or other HR areas of operation are contracted for, if any? Does the district routinely examine options for contracting personnel services or perform any sort of “yellow pages test” of HR services and programs?

If any services are performed or contracted for through private companies or interlocal agreements: Was a cost benefit analysis and feasibility study performed prior to bidding the service and entering into the contract? Was the service a professional service, or procured through an interlocal agreement, or competitive procurement required? If so, what competitive procurement processes was used? Did the process used comply with state law? Did face-to-face negotiation occur? Were all stakeholders in the service represented in the negotiation and in the evaluation? How was the reputation and capability of the vendor verified during the evaluation process? How were proposals evaluated? Were vendor references checked? What were the quantitative and qualitative measures used in evaluating each proposal?

Did vendor presentations or interviews take place and how was this information used in the bid process? Did staff document the evaluation process and make written recommendations?

During contract negotiation, was a contract awarded to the lowest viable vendor? Was the contract written by the district, the vendor, or in collaboration? Were terms and conditions negotiated? Were the purchasing and finance divisions involved in the evaluation? Did a district-employed or district-hired attorney draft or review the final contract before signature? Were all relevant documents referenced in the contract for future reference? Is the contract written?

What are the basic terms and conditions of the contract? Did both the district and the vendor sign the contract? Does the district have a way to shift services back in-house should in-house operations prove the most efficient way to do things? Are escalator clauses tied directly to changes in the market that affects the vendors’ costs? Are increases in contract costs tied directly to rising labor or supply costs? Are terms of the contract favorable in comparison to market rates for services? Are cost

controls part of the contract and are costs monitored for changes? What security measures are taken to protect confidential district information used by the contractor?

Are there options to renew or renegotiate the contract as the result of the period of performance ending? Are there options to renegotiate the contract in response to changes in district needs or market conditions?

Did the contract include all relevant terms and conditions required by board policy, local, state and federal law and the uniform commercial code? Are specific steps outlined in the contract for dispute resolution? What is the district's liability and what is the vendor's liability? When does the contract expire?

**Contract monitoring**

Are contractors required to report regularly to the board? To the administration? If so, how do they report? If so, are they reporting as required? Does the contract include a contract change mechanism?

Has the district dedicated correct and sufficient contract management resources to manage the contract? Who manages the contract in the district? Does this person have the authority to enforce or change the contract? Does the contract include the name of the contract manager and who represents the district as the final authority for contract disputes?

What reports must the vendor provide the district and when do they have to be provided? What mechanisms are in the contract for providing the vendor with feedback on performance?

Does the vendor have to account for any cost changes to the district? Does the district require the vendor to notify the district in the event the vendor changes suppliers for items included in the service agreement?

Does the contract outline how the district can terminate the contract for poor performance or failure to perform without liability to the district? How are risks to the district managed by the contract? How are risks to the district managed by the contract? Is performance bond required? Could the district swiftly assume the contractor's duties or negotiate a new contract should the contractor stop performance mid-contract?

Is a specific individual responsible for reviewing and documenting vendor performance? Does the contract specifically outline minimum and preferred performance standards? Can the district measure the standards objectively? Does the contract describe each service to be performed in sufficient detail?

Does the contract describe specific levels of performance the vendor must meet in performing the service? Are these performance measures tracked by the district or by the vendor? How is performance measured relative to payment?

Does the contract include remedies in the event the vendor fails to perform the contract or fails to perform acceptably? What types of options does the district have in remedying poor performance or terminating the contract? Is payment tied to performance?

Are performance measures related to quality and quantity of activities performed by the vendor? Does the contract include specific periods in which the service must be performed?

**Additional Resources:**

Texas Association of School Personnel Administrators  
<<http://www.taspa.org/>>

Texas Association of School Administrators  
<<http://www.tasanet.org/>>

Texas Association of School Boards  
<<http://www.tasb.org/>>

Texas Classroom Teachers Association  
<<http://www.tcta.org/indexframes.htm>>

Texas State Teachers Association  
<<http://www.tsta.org/>>

Texas Federation of Teachers  
<<http://www.tft.org/>>

Association of Texas Professional Educators  
<<http://www.atpe.org/index.html>>

***FACILITIES  
CONSTRUCTION,  
USE AND  
MANAGEMENT***



## **5. Facilities Construction, Use and Management**

Facility planning and management of construction and renovation projects are significant activities for most districts. Planning for facilities based on student growth, programmatic needs, aging facilities and legislative requirements are essential to provide for student needs without overcrowding, use of substandard facilities, or use of costly portable alternatives. Active management of construction and maintenance projects and procedures can provide cost control, ensure quality of workmanship and help ensure timely completion and facility operations. Facilities also must be maintained and cleaned on a routine basis to ensure a safe and healthy environment for students, teachers and staff. The Facilities Construction, Use and Management chapter evaluates the effectiveness and efficiency of the facility planning, maintenance and management functions in the following areas:

- 5.A. Facilities Management and Organization
- 5.B. Facilities Condition
- 5.C. Classroom and Overall Building Utilization Rates
- 5.D. Plans, Policies and Procedures
- 5.E. Construction Management
- 5.F. Maintenance Operations
- 5.G. Custodial Operations
- 5.H. Energy Management
- 5.I. Review and Evaluation of Contracting Process

### **5.A. Facilities Management and Organization**

This module provides the basis for assessing the facilities management program in the district from a global perspective including both the management of construction and maintenance functions, which can be extremely different. Yet, despite the different skill sets and priorities within each area, construction and maintenance functions must be coordinated to ensure that facilities meet the needs of the staff and students that occupy those facilities. Facilities represent significant capital investments and proper management can preserve and enhance the value of the district's investments. Facilities management and construction can be extremely expensive and wasteful if not properly managed. The differences between facilities construction management and facilities maintenance management must be identified and distinguished.

#### **Data Needs**

- Organization charts for all sections involved directly or indirectly with the facilities functions. Include old organization charts if they have changed over time.
- Job descriptions for positions within the facility construction management and facility maintenance management organization.
- Budget information for all aspects of the facility construction management and facility maintenance management operations.
- Budgets and reports for bond programs.
- Roles/responsibilities of outside architects and other contractors.
- Contracts for any facility construction management and facility maintenance management outsourced services.

#### **People to Interview**

Superintendent  
Board members (as appropriate)  
Assistant or associate superintendent with assigned responsibility

District construction supervisor  
District architect  
Director of Facility Maintenance and Operations  
Contractors

### **Activities to Perform**

- 5.A.1. Create or examine the existing organization and staffing charts and job descriptions for the facilities functions and interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the background for changes. Include any contracted individuals or services or committees that oversee facilities in the organization chart and show the reporting relationship and who is responsible for monitoring the contracts.
- 5.A.2. Prepare a chart showing the staffing and budgets of facility and facility related functions showing the ratio of total staff to staffing within the function. Determine whether the budget and staffing levels compare favorably or unfavorably to industry standards and peer districts.

### **Questions to Ask**

Has the district assigned specific staff to manage the facilities construction and maintenance programs? How is management and control of the district facilities program accomplished? How are construction and renovation projects coordinated with facilities, maintenance and other related departments? What internal resources are available to support staff, such as an in-house architect or construction supervisor, or maintenance and operations leadership?

How are the roles and reporting relationships of any outside architects and contractors defined and documented? Does the organization structure support the monitoring of architects, design team, contracts and contractors?

Is the reporting relationship of facility construction and maintenance related staff aligned? Are there departments or functions that have duplicative roles or responsibilities? How does communication flow between the various departments and the campus staff to prevent conflicting schedules or projects (i.e., installing carpet in an office that is scheduled for tile during renovation, scheduling major renovations or maintenance during test weeks, etc.)? How are warranty issues on construction projects coordinated between facilities and maintenance?

Are specific staff assigned responsibility for various functions to develop and review the district facility master plan on an annual basis including:

- Enrollment projection by grades for each school for a period of five years? Ten years?
- Class size requirements per TEA facility standards by school?
- Special education special facility requirements?
- Federal, state and local construction requirements?
- Assessed evaluation projections (for a minimum of five years)?
- Projected bonding capacities?
- School capacity projections?
- Maintenance and Operations needs.
- Equipment replacement schedule.

Is training provided to facilities construction, maintenance and operations management staff on an annual basis? Is staff cross-trained so that tasks are completed even when specific staff are absent? Is in-service training provided to staff regarding changing laws, regulations and procedures (federal, state and local)? What budget funds are available to ensure staff can attend state and local seminars



on facilities planning, construction and financing? How is district staff (principals, site administrators, custodians and maintenance staff) provided in-service training on inspection, evaluation and identification of facility needs on a regular basis? How is analysis of facilities aligned with advancements in effective use of facilities to promote academic performance?

Does the district have in-house demographers or does the district contract for these services? Does the demographer report to the Facilities Department or another division? How does the reporting relationship of the external or internal demographer ensure the accuracy of projections?

## **5.B. Facilities Condition**

Facility condition is important not only from a safety standpoint, but well-designed and maintained facilities can improve employee morale and provide students an educationally conducive environment in which to learn.

### **Data Needs**

- Facility inventory showing the original construction date and dates of major renovations, including square footage of each facility
- Current facility condition report and general description of the process used to prepare the report
- Maintenance budgets (request and actual) showing allocation of funds to address problems identified in condition assessment for the last three years
- List of any deferred maintenance
- A list of new facilities or major renovations completed in the last five years
- Copy of projected construction and renovation projects
- Campus master plan
- Pertinent internal audits
- Safety plan
- Inspection reports conducted by local building inspectors, fire marshals/departments and safety managers

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility

Architect

Physical plant director

Business manager or Chief Financial Officer

Internal Auditors

Director of maintenance and operations

Custodial manager

Risk manager

Principals

Safety and security officers

Head custodian for each school

Contractors

### **Activities to Perform**

- 5.B.1. Prepare a list of all facilities, the original construction date, dates of major renovations and condition as assigned by the district.

- 5.B.2. Prepare a chart comparing the most recent facility condition report to the projected construction and renovation projects and determine whether the most serious needs are given priority. If not, determine the cause and note this in the chart.
- 5.B.3. Prepare a chart of maintenance budgets for the last five years and the amount of deferred maintenance to determine if the district is budgeting sufficient dollars to maintain a safe, efficient and educationally sound environment for staff and students. Where budgeted dollars are declining and deferred maintenance needs are increasing, determine why and note this in the write-up.
- 5.B.4. Diagram the process used to prepare the facility condition report showing the positions or contractors from whom input is obtained throughout the process.
- 5.B.5. Prepare a chart depicting capital renewal projects completed over the last five years and planned projects for the next five years, including funding sources and financial plans as applicable. Note and discuss any pertinent internal audit findings.

### **Questions to Ask**

Is there a regular facilities assessment program that evaluated exterior, interior, mechanical systems, safety and building code compliance? How are problems reported and to whom? Is staffing adequate to complete needed assessments on a regular basis? Who performs the assessments? What is the process used by the district to prepare the facility condition report?

How is the funding provided to alleviate problems? Is funding adequate? If not, how much additional funding is required on an annual basis?

Is there documentation of facilities suitability for persons with disabilities? What facilities require work to become ADA compliant?

Are the most critical facility issues being addressed on a priority basis by the district?  
Has the amount of deferred maintenance grown or declined in the district over the last five to 10 years? If so, why?

What buildings are in the worst condition? Which are in the best condition? What is the replacement value of each of these facilities? What does the most recent facilities age and condition summary show? Are annual renewal and replacement expenditures approximately 2-5 percent of replacement value?

### **5.C. Classroom and Overall Building Utilization Rates**

Every district should have the right number and types of facilities to handle current programs and the current student enrollment. Too many facilities can be costly to maintain and too few facilities can result in overcrowding and even unsafe conditions for students and staff.

#### **Data Needs**

- Current permanent and portable facility inventory showing square footage of buildings, acreage, any special amenities and occupancy versus capacity rates
- Enrollment projections
- Historical five year construction and major renovation projects
- Historic information concerning attendance zone boundary changes, school closings or openings or other efforts to control facility utilization rates
- Planned five-year construction and major renovation projects
- Policies or procedures governing the use of portable or permanent classrooms

- District's facility master plan
- Pertinent internal audits
- List of activities in schools conducted during and after school hours by non-school organizations

### **People to Interview**

Superintendent

Assistant or associate superintendent with responsibility for facility planning and use

Campus administrators and department heads

Internal Auditors

Director of maintenance and operations

Regulatory compliance officer

Principals (as educational planner)

Key custodial personnel

Contractors

### **Activities to Perform**

- 5.C.1. Prepare a chart showing the permanent current square footage of each facility in the district, the number and square footage of temporary or portable facilities, the acreage of each facility site and any special amenities at each location like stadiums, swimming pools, theaters and the like. List the actual capacity as calculated by the district and the current number of students served in each facility. Compare the facility utilization rates to recommended standards and facility capacity, both educational spaces as well as administrative. Note areas where the district is over or under the standard or where inequities exist between campuses and through interviews determine and document the reason for any variances. Note and discuss any pertinent internal audit findings.
- 5.C.2. Chart the overall portable space to permanent space ratios by campus and facility and determine where the ratio of portable to permanent space is highest and determine the reason for the larger than average use of portables in those locations. Compare actual portable use to any documented policies or procedures governing use and note any variances.
- 5.C.3. Prepare a list of attendance zone boundary changes, school closings or openings as well as any other efforts employed by the district for the last five years to control building use rates. Note the effectiveness of each effort and the long and short-range implications of each change.

### **Questions to Ask**

Are facilities being used efficiently? How much actual educational space does the district have? How much administrative and other space does the district have? How much of each type of surplus space exists or is more space needed? What processes and procedures are in place to address the variances? How is this need or surplus addressed in the district's campus master plan?

Are there adequate space allocation and utilization of school facilities for the DAEP to allow for program and security compliance with the Safe Schools Act?

Is the district using modular facilities in place of regular buildings and portables? How are the facilities being used? What plans are in place for use and movement of modular facilities?

How is the district using portables? By the various campuses? By administration? What policies and procedures exist to prevent excessive use of portables? Who authorizes the placement, removal and movement of portables within the district? How are portable related policies and procedures enforced?

When portables are placed on a campus, how is the custodial and maintenance staff involved in the decision-making process? In the purchasing of portables? In the movement of portables? How long are portables in use on campus? What is the lifecycle of a portable building? Is the district purchasing the same type of portable for all district campuses or does it vary from campus to campus? What is a reasonable lifecycle for a portable building and what is the use expectancy of district portables?

What precautions are in place to protect students and staff housed in portable space, such as fire alarms, bell systems, communication devices, peripheral fences or other security measures, walkways and access to restrooms, lunchrooms, libraries and other core facilities?

When was the last time that attendance zones were adjusted? Were the adjustments effective in controlling overcrowding? Are there impediments to changing attendance zones such as court orders or other restrictions over which the district has little control? What physical or political issues make attendance zone boundary changes more difficult? How has the district tried to overcome those obstacles?

If there are under or over utilized schools, what plans are in place to address these concerns? What measures have been effective or ineffective in maximizing classroom utilization rates?

How are administrative, warehouse and other support services facilities allocated? Which administrative facilities are fully used? Overcrowded? Underused? What efforts are underway to improve administrative space utilization rates?

#### **5.D. Plans, Policies and Procedures**

Effective management is built upon sound planning practices. The board adopts policies governing the district's facility operations as well as policies that are directed at other programs but have an indirect impact on the facilities operation. Procedures show district employees how to carry out the policies in their various functional areas. Taken together, planning is reinforced through well-documented policies and procedures.

#### **Data Needs**

- Facilities Master Plan
- Student Enrollment and student project information
- Budgets and reports on bond programs
- Master planning procedures
- Internal management practices and procedures for construction and renovation projects
- Roles/responsibilities of outside architects and contractor
- Long range financial planning for facility improvement
- Staff input into facility planning
- Contracts
- A list of new facilities or major renovations completed in the last five years, or as available
- Energy related plans, polices or procedures
- Description of energy use and management
- Facility use data
- Pertinent internal audits
- Regulatory compliance documentation

#### **People to Interview**

Superintendent

Board members (as appropriate)  
Assistant superintendent with assigned responsibility  
District construction supervisor  
District architect  
Internal Auditors  
Director of Maintenance and Operations  
Contractors

### **Activities to Perform**

- 5.D.1. Compile of summary of all plans, policies, procedures and published standards that deal with the construction and facility management function. Note the nature of each document, when it was last updated and how it impacts the operations of the district. Note any pertinent internal audit findings.
- 5.D.2. Compare major elements of the district's planning documents (facility master plan if available) to TEA guidelines and determine whether the district long-range facility master plan contains a five (5) year projection of needs with a corresponding financial plan. Chart the major component of both and discuss how the district's plans meet the TEA guidelines for each component.

### **Questions to Ask**

#### **Plans**

How do the district's planning documents address the following components:

- The history and five year projection of student enrollment by grade and site (including special education)?
- The history and five-year projection of campus capacities by grade?
- The history and five year projection of community growth?
- A demographic study and projection of community and school population (minority analysis, etc.)?
- A five-year projection of additional school sites required?
- A five-year projection of excess sites or facilities?
- A five-year projection of special facilities required for special education students?
- A five-year projection of classroom furniture and equipment (replacement and growth) requirements?
- A five-year projection of special service and support service furniture and equipment requirements? (Administration facility, food service maintenance, warehousing, data processing, operation and grounds, transportation, health facilities, guidance and counseling facilities, etc.)
- A five-year projection of available revenue sources?
- A five-year priority listing of facility needs?
- A five-year assignment of funds in accordance with the priority listing?
- Facility projects budgeted and accounted for by project including all direct and indirect costs?
- Facility and construction expenditures coordinated with district investment and cash management programs?
- Successful district initiatives?
- Quantifiable evidence of the success of the recommendations?

Does the master plan, board policy or other construction facility planning document identify short term and long-term construction and facilities needs, which are included in the district's master plan?  
Does the district conduct an annual review and revision of the facilities master plan?

Is the district facilities master plan reviewed, evaluated and revised annually? Is there a published time line for review and evaluation of the construction and facilities master plan annually?

How are staff/community involved in the review and evaluation of district's progress in implementing and updating the facility master plan?

Does the district have a board approved construction and facilities management financial plan? Are funds budgeted for short-term and long-term projects on an annual basis in accordance with an approved construction and facilities master plan? Are funds budgeted for contingency or emergency construction and facility needs? What, if any, external sources of financing have been identified to meet construction and facility needs?

Do facility plans recognize the importance of selecting material and equipment that contribute to efficiency in custodial operations as well as low maintenance costs? Do plans include standardized building components such as wall covering, tile, etc.? Standardized equipment such as HVAC units? Do plans address the quality of equipment and material used in construction projects while complying with state competitive procurement laws?

Is the Director of Maintenance and Operations a member of the facility planning committee (or building committee) to provide input on material and equipment and provide review of architectural plans and specifications?

What are the challenges in developing and maintaining a current and accurate Facilities Master Plan?

### **Policies**

Does the district have board approved construction and facilities management policies? Does board policy provide for a board approved construction and facilities master plan?

What provisions exist for the publication and dissemination of policies and the construction and facilities master plan to staff and community members?

Do guidelines for determining the priority needs for construction and facilities include but are not limited to:

- health and safety of students (are restroom facilities equipped to promote high levels of hygiene.)?
- health and safety of employees?
- instructional needs?
- efficiency of operation?
- cost effectiveness?

Does the district policy provide a methodology that addresses emergency construction and facility needs?

### **Procedures**

What formal and fully documented procedures exist for the maintenance, custodial or construction management functions of the district? What informal documentation exists to guide the day-to-day operations of these functions?

How do procedures prevent violations of purchasing policies when procuring supplies or services? Who has access to petty cash funds? To credit cards? Blanket purchase orders? Why are these privileges necessary? Is there another way that these kinds of purchases could be handled more effectively and efficiently?

What internal control weaknesses in the facilities or maintenance operations process have external or internal auditors identified in the last three years? How are identified deficiencies communicated to

the relevant administrator in charge? How have procedures been modified when control weaknesses are identified?

Does the accounting system generate event and periodic management reports to alert maintenance, custodial or construction staff to irregularities or productivity trends?

How do procedures address the need for the authorization and methodology for selection of architects and other professional service firms required in facilities planning and construction?

Does the district have approved construction and facilities management procedures that are published and disseminated to appropriate staff and community members? Were plans developed with input from Teachers? Principals? Clerical staff? Operation staff? Maintenance staff? District administrators? Community members? Board of Trustees?

Does the district have written Technical Design Guidelines to convey district construction standards to external architects and engineers?

Does the district have current written Educational Specifications detailing the programmatic space requirements for elementary, middle and high school?

Does the district have a Hazardous Materials Management Plan for items such as asbestos, lead paint, mold, etc.?

Does the district have a plan or guidelines for maintaining acceptable levels of Indoor Air Quality?

## **5.E. Construction Management**

Construction projects typically represent some of the largest single expenditures a school district will make. Effective management of these projects can and will save not only money, but also needless delays and controversies often associated with poorly management projects.

### **Data Needs**

- Facilities Master Plan
- Progress report(s) on active construction projects, including financial data
- Budgets and reports on bond programs
- Board policies relating to construction or construction management
- Internal management practices and procedures of construction projects
- Long range financial planning for facility improvement
- Roles/responsibilities of outside architects and contractors
- Contracts for construction or renovation projects in the last three years
- Warranty information for materials, workmanship and equipment installed as part of construction projects completed in the last five years.
- A list of new schools or major renovations completed in the last five years
- Plans for maintaining new facilities
- Shop drawings, close out documents, CAD drawings, specifications, blue line prints, as built, letter for architect that building is asbestos free, architect plans and specifications
- Change orders for recent or ongoing projects and a general description of the process for authorizing change orders

### **People to Interview**

Superintendent  
Board members (as appropriate)

Assistant superintendent with assigned responsibility  
District construction supervisor  
District architect  
Director of Maintenance and Operations  
Contractors

### **Activities to Perform**

- 5.E.1. Review all contracts for new construction or renovations for the last three years and list major terms and conditions of the contracts especially as these contracts may deviate from standard contracts, note any terms or conditions that could impact the price positively or negatively and any performance related assurances to the district that the terms of the contract will be completed timely and within guidelines. Further, review the contracts for compliance with governing board policy and construction procurement procedures and building code compliance requirements, if applicable. Chart any deviations and seek to determine the reason for the deviation.
- 5.E.2. Prepare a list of all change orders to contracts within the last year and diagram the process used to approve change orders. Note areas where the change orders are excessive in number or dollar amount or where the approval process was circumvented.
- 5.E.3. Inspect the financial records and any published progress reports prepared for administration or the board for each construction project maintained by construction managers. Summarize the general condition of the records, the record keeping system, the regularity and completeness of reports and assess how the current system protects the district from fraud or mismanagement and ensures contractor compliance with all terms and conditions of contracts.
- 5.E.4. Examine warranty information from recent construction projects and determine whether the files are complete, contain sufficient information to make claims against the warranty possible, note any conditions that would void the warranties and the like. Note whether any claims against the warranties are pending or have been filed and paid. Examples of warranties on carpets, floors, roofing, cleanable surfaces.
- 5.E.5. Examine and document the process the district uses to establish the new funding stream for maintenance, operations, custodial, groundskeeping and energy management functions for each new school

### **Questions to Ask**

#### **Contracting**

If terms and conditions of the contracts deviate from standard, did the district seek legal advice on those deviations? How were the contract deviations determined to be in the best interest of the district? How were contracts negotiated? Did negotiations result in positive gains for the district? Savings? Better terms? Etc.?

Does the district's management program for construction/renovation include a complete review of all plans and specifications to ensure compliance with relevant local construction code requirements? Statutory requirements? District standards?

Does the project architect and/or assigned district personnel conduct a thorough check of references of the general contractor and subcontractors? How does the district ensure that inspections are coordinated by the architect to provide quality control? Who ensures that comprehensive status reports are provided in a timely manner by the architect and district staff? How are formal communications with the general contractor directed through the project architect?

What process or procedures are in place to ensure standardization of materials, as feasible? Does the district publish a set of material standards? Does the district balance the price of new equipment and



materials with the long-term maintainability of the product? Does the district participate in any quality engineering practices? How were projects impacted by the use of quality engineering?

How does the district evaluate the use of in-house versus contracted construction projects? Are there some projects that, in retrospect, should have been done in-house or by contractors? What circumstances should have been considered in reaching those decisions? Did the evaluation of the true cost of in-house construction projects include indirect costs such as employee benefits, administrative expenses, etc.?

Are facility projects scheduled to ensure coordination with the campus administrator? Are projects scheduled to coincide with the availability of financial resources and the investment schedule? If district employees are being used to complete projects, how does the district ensure staff availability?

### **Monitoring construction contracts**

What are the established procedures for monitoring the project budgets? Who approves progress payments? Who monitors contractor insurance coverage and all bonding requirements? Are monthly project progress reports containing budget, expenditures, encumbrances and balances prepared and presented to the board? Is there current and accurate budget data available to the board and administration upon request?

Is the district's financial and accounting system capable of tracking budgets that span multiple fiscal years? How does the district handle multi-year budgets for long-term construction projects?

Are there established procedures for accepting completed facility projects that includes approval by the construction supervisor, facility and maintenance directors? Approval by the architect? Approval by appropriate inspector(s)? Approval by administration? Monitoring of timely completion of any "punch list" items? Procedures for holding a retainage (portions of final payment) until final acceptance of the project? Ensuring complete "as-built" plans are delivered to the district? What are the district's strategies for actively managing contracts, especially of construction managers?

How are facilities construction and renovation management services evaluated to determine effectiveness and efficiency? What type of analysis of planning, scheduling and completion of facilities projects is completed on an annual basis for the purpose of increasing efficiency and cost effectiveness? Are facility project costs in relation to budget projections evaluated? What evaluations are completed of the performance of contractors, subcontractors, architects, etc.? What historic records are retained for future reference?

### **Change orders**

Is there any evidence that the original contract price was artificially low in anticipation of change orders? How are change orders controlled? Are all changes coordinated through the project architect?

Are change orders reviewed by the appropriate administrators and/or the director of Maintenance and Operations and signed and approved by the architect, superintendent and board? Does the original contract limit change orders? Does the change order specify a time for completion? Are all change orders in compliance with terms of the original contract? Are all change orders fully documented with all reasons for any increase/decrease in costs clearly specified?

### **Warranties**

What historic records include warranty information on carpet, floors and any other cleanable surfaces? Where are manufacturer's recommendations on maintenance procedures for these materials? Who receives copies of warranty information and ensures that conditions that would void the warranties are being met?

How does the district ensure that warranty claims are filed timely? If there are possible claims pending, why have they not been filed?

How are warranties archived? How are shop drawings, specifications and close out documents stored to ensure that warranty information is available to staff?

### **Budgeting for operation of new facilities**

What methodology does the district use to determine operating costs for each new facility? How does the district determine how many custodians and groundskeepers will be needed to clean and maintain the new facility? How will the new facility impact maintenance and operations functions in the district? Will new staff need to be hired or will workloads of existing staff be reallocated? How far are costs projected out and how accurate are the cost projections? How will the district deal with these budget needs? Are these new costs included in the budget? If hiring new staff, when are these staff to be hired? Are orientation costs, training costs, other start up costs included in the cost projections? Are maintenance and operations management and staff included in the development of cost projections for operating the new facilities?

## **5.F. Maintenance Operations**

Maintenance operations in Texas school districts generally include repair and renovation services, equipment installation, grounds care, custodial functions and control and oversight of Regulatory Compliance issues. Efficient maintenance programs provide routine maintenance and preventive and emergency maintenance services for all school facilities along with maintaining Regulator Compliance programs and training. The range of services provided may vary from minor tasks such as hanging chalkboards to more skilled tasks such as replacement of plumbing or electrical fixtures. Staffing patterns may include skilled artisans as well as general and grounds maintenance personnel. Custodial services usually include cleaning services, minor maintenance functions and performing special tasks as assigned by the building staff.

This module encompasses operational aspects including work order system, time reporting, inventory control, control of tools and equipment and purchasing procedures. Also examined are staffing levels, training programs and coordination of repairs, renovations and new construction activities.

### **Data Needs**

- Policies and procedures
- Work order reports
- Maintenance budgets for the last three years
- Organization and staffing charts
- Job descriptions for maintenance staff
- Maintenance records
- Information system reports used by management to monitor productivity, etc.
- Purchase orders and invoices
- Staff training reports
- Customer satisfaction responses
- Warranty adjustments
- List of any outsourced maintenance functions and copies of contracts, if applicable
- List of maintenance software applications and related hardware

### **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibility  
Maintenance director

Principals/campus-based personnel  
Director of Maintenance and Operations  
Contractors  
User departments or campus staff

### **Activities to Perform**

- 5.F.1. Create or examine existing organization and staffing charts and job descriptions for maintenance to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and why. If some or all of the functions are contracted for, show the reporting relationships and organizational structure as well as staffing charts established for contract management.
- 5.F.2. Chart the staffing and budgets of maintenance functions and determine the ratio of total staff to staffing within the maintenance function and the amounts allocated to staff training. Determine whether the budget, staffing levels and training budgets compare favorably to industry standards.
- 5.F.3. Diagram the maintenance process by examining operating procedures, conducting campus site visits, riding along with maintenance crews and interviewing maintenance and campus staff. Differentiate between processes used for emergencies, preventive maintenance, capital projects and normal workorders. Note customer satisfaction levels and attempt to the extent possible to identify those points in the process that are strong and those that could be contributing to customer concerns, as applicable.
- 5.F.4. Prepare a table of sample workorders and determine average completion times for emergencies, preventive maintenance activities, capital projects and normal workorders, including warranty adjustments.
- 5.F.5. Compile a list of software applications and related hardware, showing the purpose of the system, major components of the system, whether all components or modules available to the district are being used and the effectiveness of automated processes.

### **Questions to Ask**

#### **Management**

How does this department or function align its goals and objectives to the mission and goals of the district? How does the departments plan link to the master planning documents of the district? How does this department or function contribute to the educational goals of district? How is success measured?

Does the organizational structure of the maintenance department have a structure that is clearly defined? Does every position have a written job description? Does the structure provide for effective supervision without unnecessary layers of management? Is the span of control or ratio of supervisors to workers appropriate? Does the structure provide for use of crews on a centralized district-wide basis or decentralized site basis as appropriate?

Do the personnel procedures for the maintenance department:

- Provide for the selection process to include personal interviews with line managers who determine technical competence?
- Provide a competitive compensation program to attract skilled employees with special training and qualifications?
- Require personnel to participate in in-service programs on a regular basis?
- Limit overtime to 5-10 percent of total maintenance work hours available?

- Provide for maintenance personnel to have identification as district employees such as badges and/or uniforms?
- Provide for recognition of personnel for their accomplishments (such as employee of the month, perfect attendance for the year)?
- Designate employees who will perform emergency repairs and define the basis for additional compensation to be paid for these call-outs?

Does the district budget provide the necessary resources to carry on a planned program of maintenance services? Does the budget support the annual objectives of the maintenance department? the approved staffing levels? a reserve fund or insurance coverages for catastrophic or unforeseen needs? Normal and preventive maintenance activities and all planned replacement programs? Does district compare per capita maintenance costs with other comparable districts and document the district methodology used in the comparison?

How does the maintenance department control costs? Do purchasing procedures for the maintenance department:

- Require purchases to be made through the central purchasing system of the district?
- Limit petty cash purchases in dollar volume (e.g., \$50) and number?
- Limit open purchase orders by designating time and monetary limitations?
- Stress bulk purchasing for volume discounts?
- Provide for proper security of all items that are purchased and expensed?

Has the district engaged in any interlocal agreements or memorandums of understanding agreements for providing service to or obtaining services from neighboring school districts? Universities or colleges? City or county governments?

How does the department determine whether a good or service can be delivered by businesses outside the district at a lower cost and/or at a higher quality? Are cost comparisons made with fully-loaded costs for providing the services in-house, such as salaries, benefits, overhead or indirect costs, materials and supplies and the like?

What input does the maintenance director in the budget preparation and administration processes?

Is there a differentiation between maintenance and capital outlay projects with maximum monetary limits set for construction of new facilities by the maintenance department (e.g., \$50,000 - \$75,000)? A clear definition of capital outlay expenses versus normal operating expenses? Indirect cost allocation to aid in determining the full cost of all capital projects?

### **Training and educational programs**

Are personnel sufficiently trained through staff development programs? Is staff given opportunities for participation in a planned program of in-service training to enhance functional skills? How are staff trained on or informed of employees of policies, procedures and operating practices? Does staff participate in a comprehensive safety training program? How much is budgeted for internal and external training for staff? Is staff cross-trained to promote job enrichment and ensure that daily tasks continue when staff is absent?

Do the district's educational programs encourage students to respect school facilities? How is vandalism by students and others dealt with? How are student government or clubs encouraged to assume a role in the care of facilities?

### **Community use of facilities**

What written rules and regulations exist regarding the use of school facilities by community groups uniform and effectively enforced? Is one person designated to be responsible for assigning and

monitoring the use of school facilities or is this left to individual campus administrators? Who is responsible for recovering costs for damages to facilities by outside groups from the user? How are after-hour custodians scheduled for cleaning and monitoring facilities when community groups use facilities? How are costs recovered for use of facilities that were not related to public education purposes, such as rental charge for use by religious organizations?

### **Tools, equipment and vehicles**

How does the district maintain its inventory of vehicles, equipment and tools? How are truck inventories maintained? Who maintains maintenance equipment and vehicles? For supply inventories? How is personal use of tools or equipment monitored? When equipment or tools are missing, how does the district deal with the loss? How are employees held accountable for the safekeeping of tools, machinery and equipment?

Does the district have established procedures regarding vehicles, tools and equipment including:

- Budget allocation for purchases of tools and equipment that support operational needs?
- A policy prohibiting use of tools or equipment for personal projects?
- A replacement policy for lost or broken tools?
- A full inventory of all tools with periodic “spot” checks?
- A regular schedule of maintenance for equipment such as mowers, edgers, compressors, etc. and for all vehicles?
- A regular planned replacement schedule for equipment and vehicles?
- Vehicle usage policy limiting personal use of school vehicles and the number of take home vehicles?

### **Preventive maintenance**

Is there a planned or preventive maintenance program that provides schedules for servicing all equipment including heating, ventilation and air conditioning? Are periodic and documented evaluations made of the condition of buildings and grounds of each school? How often? By whom? Is a physical inventory and periodic updates of the condition and age of roofs, heating, ventilations and air-conditioning (HVAC) equipment, etc? used to develop a planned replacement program?

Does the district use maintenance agreements for some equipment? How does the district ensure that warranty repairs are not inadvertently charged to the district? Are parts charges included in the contracts? How are non-covered charges controlled?

### **Work orders**

Is there a system of work orders that provides complete cost data on labor and material costs for each job? Reports all time of each employee including unassigned time and travel time? Requires work orders to be completed accurately and in accordance with written standards? Allows for prioritization of projects? Defines initiators of work orders and provides complete instructions on requests for service? Allows timely communication with the initiator regarding status of work order and/or quality of work completed? Tracks timely completion and any backlog of work?

Has the district developed a record of all maintenance performed by location and within the school district? Does the district have computerized programs to track workorders by location and type of work performed? How does the district use this information to budget for future repairs? To plan for equipment replacement? Etc.?

Does the district have maintenance management procedures? Are there clear instructions and site-maps for emergency utility cutoffs? Does the district have clearly defined operational methods for each craft or function, including custodians and grounds? Are there guidelines defining the types of construction/reconstruction projects, which can and should be completed by the staff? How does

management ensure that projects are completed in a timely manner and according to the standards established by the department? What minor repairs or maintenance do custodians perform?

Is maintenance scheduled to avoid excessive peaks in the workload and disruption to the educational process by scheduling a majority of inside activities, such as painting, when school is not in session? Scheduling major roofing, flooring, ceiling, etc. repairs when school is not in session, or the facility is vacant?

## **5.G. Custodial Operations**

Custodial services usually include cleaning services, minor maintenance functions and performing special tasks as assigned by the building staff.

### **Data Needs**

- Policies and procedures relating to custodial operations
- Organization and staffing charts
- Job descriptions
- List of custodial assignments by facility showing shift times and total hours worked
- List of any non-custodial duties performed by custodians
- Staffing allocation formulas in use by the district, if applicable
- Custodial budget for the last three years, including the cost of personnel and supplies
- Management reports that monitor productivity, etc.
- Purchase orders and invoices
- Staff training reports
- Benchmarks for cleanliness
- Hazardous materials policies and procedures, including any training requirements

### **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibility  
Custodial supervisor  
Custodians  
Principals/campus-based personnel  
Director of Maintenance and Operations  
Contractors

### **Activities to Perform**

- 5.G.1. Create or examine the organization and staffing charts and job descriptions for custodians to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and the reasons for any changes.
- 5.G.2. Prepare a chart showing the number of custodians assigned to each facility in the district and the square footage of the facilities at each campus, including portables. Where practical, determine the cleanable square footage if it differs significantly from the total square footage of the facility. Compare the current average square footage cleaned by each custodian by facility to industry standards, to any standard allocation formula used by the district and to other facilities in the district. Note where variances are identified and through interviews, determine why these variances have occurred.
- 5.G.3. If the district has a custodial staffing formula, prepare a chart showing the calculation being used and look for factors such as facilities assessments, construction type and age of the

- facility, usage and condition. If the formula used by the district produces a cleaning standard that deviates significantly from industry standards, determine the reason for the variance.
- 5.G.4. Prepare a chart showing the hours and shifts worked by custodians by facility, noting who supervises or oversees the work of custodians during each shift. If custodians have other assignments, such as grounds keeping, show how many hours per shift a custodian is available for custodial work.
- 5.G.5. Prepare a five-year analysis of the custodial budget for supplies and determine if it compares favorably to industry standards. Compare the percentage of supplies to the total custodial budget. If the cost is deemed high, examine criteria and evaluation procedures used prior to awards and purchases, bid specifications for the last three years looking for trends in awards and how many brands of similar items are in inventory.
- 5.G.6. Conduct a facility walk-through and compile a chart rating the cleanliness and general appearance of the facilities by area such as restrooms, cafeterias, classrooms and offices. Note any unusual or significant observations and through interviews determine if the condition is an anomaly and the explanation for the observed condition.

### **Questions to Ask**

#### **Staffing and management**

Do custodians report to maintenance or custodial supervisors, or do they report to campus principals? What are the pros and cons of this reporting relationship? What support activities such as training are provided centrally? What is provided at the campus level? Who evaluates custodians? How often are they evaluated?

What type of supervision is provided to custodians, especially custodians that work after hours? How do principals provide feedback to or evaluate custodians assigned to their campus? Who has authority to hire or terminate a custodian? Who trains custodians? Is there a mentorship or internship program for new custodians to train them on specific procedures? Specific campus layouts and needs?

Given the age and use rates of the facilities, how are custodians assigned to clean a standard square footage? Is a staffing formula approved and adopted by the district? Does the district approved formula mirror state and national standards? How does the current system ensure that staffing is equitably distributed throughout the district? Are deviations directly linked to special needs?

Are custodial schedules split so that some custodians work during the day to handle spills and spot clean-ups, while the majority are assigned to clean facilities during the evening hours when staff and students are out of the building? If not, why not? How many times a day are specific areas of a facility cleaned (for example, cafeterias or restrooms)?

How many minutes per shift result in actual cleaning? How is this documented? What resources are available?

Who responds to complaints? What kind of record is kept of deficiencies? Who performs training? What cleaning needs to be done in the daytime?

Are day custodians included in the square footage cleaned count? What non-cleaning functions do custodians perform? How much time is spent on non-cleaning? Is the head custodian working days or nights? When do the custodians performing the bulk of cleaning activities?

How do custodians communicate concerns or preferences to management? Are there incentives for custodians submitting cost saving suggestions?

What cleanliness standard is acceptable for specific areas? (Ratings from 1-Cleanest to 5-Not Acceptable) Has a detailed facility assessment been performed at any time?

Are custodial storage areas sufficient for filling and emptying containers? What are the challenges of using cleaning staff?

Where are equipment repair records kept?

### **Supplies**

Are custodial supplies and equipment adequate to ensure efficient and effective cleaning? How are cleaning supplies and equipment controlled? Who does the ordering and who determines what supplies are ordered? Are supplies delivered to a central warehouse or just in time to the campuses or other sites? Are cleaning supplies ordered and delivered to facilities in a timely manner? In a quantity that can be easily stored on the campus?

What duplicate supplies are not necessary? What criteria are used for evaluating cleaning supplies and equipment? Who does the evaluation? How long has a particular item been in use? How are new chemicals and equipment evaluated based on compatibility with existing systems? How do the custodians like the products purchased? Does it matter? Are cleaning chemicals being used during the day?

## **5.H. Energy Management**

The goal of energy management is to keep operating costs down by reducing energy waste while providing a safe, comfortable environment for learning. Reaching this goal is complicated. Districts are required to meet federal, state and local rules and regulations regarding Americans with Disabilities Act (ADA) facility modifications, indoor air quality, student-teacher ratios and a laundry list of local priorities that can impact a district's operating budget.

### **Data Needs**

- Policies and procedures on energy use and management
- Map showing the locations of all utility meters and cutoffs by facility
- List of positions assigned to energy management with job descriptions
- Organization and staffing charts for energy management function
- Budget for energy management function for the last three years
- Utility bills for the last three to five years
- Information on campus-based conservation initiatives
- Energy audit reports
- Staff training reports
- Energy management practices in new construction

### **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibility  
Energy Management director  
Maintenance director  
Principals/campus-based personnel  
Campus custodial supervisor  
District architect  
Contractors



### **Activities to Perform**

- 5.H.1. Examine district utility bills by location for the last year and create a chart showing the facilities square footage, utility use rates and utility costs. Determine each facility's energy use per square foot and energy cost per square foot. Compare the charges against industry standards (less than \$1.00 per sq. ft) and note deviations.
- 5.H.2. Compile information regarding all district energy management activities including any energy retrofits, energy conservation programs, or utility rate reduction programs. Determine what benefits or savings have been achieved as a result of participation. Also note any programs approved by the board or planned for implementation in the near future.
- 5.H.3. Conduct a site visit of a sample of district facilities, particularly those that are experiencing higher than average utility use rates and prepare a summary of the primary reasons discovered as the cost drivers on those campuses such as inefficient lighting, inefficient HVAC equipment, etc.
- 5.H.4. For larger districts, prepare a chart showing the staffing, budget and scope of the energy management function of the district, as applicable. If no distinct function exists, attempt to determine who in the district is directly or indirectly involved directly or indirectly in managing energy consumption, verifying utility bills and the like.

### **Questions to Ask**

Has the district identified high-energy use equipment and systematically targeted it for replacement? Have cost benefit analyses been given to the board or administration to show how expenditures for new equipment will save money and improve operations? Does the District have a procurement policy requiring that new equipment must be energy efficient, such as EPA-DOE's Energy Star Products?

Does the district have a procurement policy requiring that new equipment be energy efficient? Is the energy purchased by the district regulated or unregulated? What billing problems is the district experiencing?

If the district has an energy management policy, how does the policy statement address the following elements:

- A realistic energy-saving goal?
- Make energy-saving goals and strategies applicable to all?
- Designate an energy manager?
- A plan that keeps the program visible, relevant and responsive?
- Maintain interest in the program by sending newsletters and memos noting the latest accomplishments?
- Link the budget to the plan?

Who is assigned to review district utility bills on a monthly basis? Have significant errors or discrepancies been noted and adjustments sought? Does the energy or maintenance department maintain a spreadsheet of utility use rates so that spikes in service or notable deviations can be researched? How does the district encourage energy conservation? Are rewards given to campuses or facilities that actively pursue energy conservation activities? Does the district have a board approved Energy Conservation Plan? Has the district obtained a utility billing audit--some companies work on commission and if no errors are found the district pays nothing? Are the audits done every five years?

Does the district conduct energy conservation training programs for campus staff and students? Does the district have stated policies or procedures for temperature controls? Does the district have

programmable thermostats or other energy controlling devices that ensure that district policies or procedures are adhered to?

Does the district participate in e-Rate programs, the Lone Star Program, etc.? Have energy retrofits ever been done using low interest loans through the state or external vendors? What current deferred facility improvements could be accomplished as part of an energy saving program? Has the district received grant funds for energy retrofits?

Has the district investigated the use of alternative fuel systems for its fleet of vehicles?

### **5.I. Review and Evaluation of Contracting Process**

There are numerous opportunities within the facility management area for contracting, not the least of which is construction contracting. But, some or all of the many facility operations such as maintenance and custodial operations could be purchased or contracted for through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

***ASSET AND  
RISK MANAGEMENT***



## **6. *Asset and Risk Management***

An effective asset and risk management program aims to control costs by ensuring that the district is adequately protected against all significant losses with the lowest possible insurance premiums. This involves the identification and measurement of risk and techniques to minimize the impact of risk. The district should seek investments with maximum interest earning potential while safeguarding funds and ensuring liquidity to meet fluctuating cash flow demands.

Effective tax management involves quick and efficient tax collections to allow the district to meet its cash flow needs and earn the highest possible interest. Capital asset management should account for district property efficiently and accurately and safeguard it against theft and obsolescence. The district's insurance programs that cover employees' health, workers' compensation and the district's assets should be sound and cost effective to protect the district from financial losses. The Asset and Risk Management chapter evaluates the effectiveness and efficiency of this function in the following areas:

- 6.A. Cash Management and Operations
- 6.B. Cash Management Policies and Procedures
- 6.C. Investment Policies and Procedures
- 6.D. Cash Flow Forecasting
- 6.E. Risk Management Organization
- 6.F. Insurance Coverage
- 6.G. Capital Asset Management
- 6.H. Bond Issuance and Indebtedness
- 6.I. Review and Evaluation of Contracting Process

### **6.A. Cash Management and Operations**

Developing an effective cash management program can provide a district with additional revenue to fund essential programs and operations. Maximizing the return on invested funds while ensuring the safety and liquidity of investments is a high priority for school districts. Effective cash management programs provide market rates of return through various investment instruments. They are based on a comprehensive written investment policy approved by the board and allow personnel to become skilled in investment procedures and techniques.

#### **Data Needs**

- Organization charts for last three years
- Current job descriptions for individuals involved in asset and risk
- Budget documents for the last three years
- Board policy on investments and cash management
- Staff training or continuing education attended within the last three years
- Key staff resumes, including lists of professional organizations to which they belong
- A list of bonded individuals or those covered by errors and omissions policies
- Board policies on investment officer business or family relationships, per Government Code §2256.005 (f), and any corresponding disclosure documents
- Any internal or external audit reports regarding cash management and the cash management organization structure
- Depository contract and related request for proposal
- A list of bank accounts by type and use
- An analysis of average bank account balance and activity
- Bank reconciliations for the last two years
- A list of accounts with investment pools, money markets or other liquid investment instruments.

### **People to Interview**

Superintendent or assistant superintendent with responsibility for asset and risk management  
Finance director  
Internal auditor  
Staff with cash management responsibility  
Investment officer  
Director of information services

### **Activities to Perform**

- 6.A.1. Create or examine existing organization and staffing charts and job descriptions for cash management operations, and interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department. Document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the background for changes. Include any contracted individuals or services or committees that oversee cash management in the organization chart and show the reporting relationships and who is responsible for monitoring the contracts. Determine, to the extent possible, if key staff are attending training needed to stay current on industry changes or statutory requirements.
- 6.A.2. Compare the list of bonded individuals with a compiled list of individuals or positions that are identified as handle cash. Create a list of positions or individuals that handle cash and are not bonded and determine why they are not bonded.
- 6.A.3. Compare the staffing and budget of cash management operations to industry standards and explain areas where the functions compare favorably or unfavorably.
- 6.A.4. Examine the depository contract, the related request for proposal and bank account analysis and prepare a list of all of the major terms and conditions that pertain to each bank account maintained by the district.
- 6.A.5. Prepare a chart listing the district's bank accounts, whether they are interest bearing and the rate of interest paid, the average daily balance in each account for the last year and the balance in the account at a point in time. In addition, list any accounts held with investment pools or other money market accounts that are also liquid. Determine, to the extent possible, if the current strategies safely maximize the district's interest earning potential on idle cash.
- 6.A.6. Examine bank reconciliation procedures and a sample of recent bank reconciliations for all district accounts and summarize whether reconciliations are done in a timely fashion (provide detail if applicable) and whether the accounts are then reconciled to the district's accounting records.
- 6.A.7. Document the district's current cash management processes through interviews and by examining current administrative procedures as well as any recent internal or external audit reports on cash management. To the extent possible, determine the strengths and the weaknesses in the current system, any recent steps that have been taken to strengthen the process and any remaining areas of concern.

### **Questions to Ask**

#### **Management**

How does the district handle its cash management activities? A defined and formalized cash management department or function? An informal group of individuals handling some portion of the activities? What professional assistance does the district obtain, such as investment counselors, etc.?

What cash management staff members have detailed job descriptions that outline responsibilities, set up a system of accountability and clearly define performance measures? What are the qualifications of key cash management staff including necessary background, experience and knowledge necessary to perform cash management activities?

What training or continuing education opportunities have staff members attended on cash management-related activities or programs? What staff are involved in professional organizations (e.g., local cash management groups, Texas Association School Business Officials (TASBO), Government Finance Officers Association)?

How does the organization structure allow for proper segregation of duties regarding executing, accounting and reviewing cash, debt and investment transactions? Which cash management personnel are bonded or covered by an errors and omissions policy to protect the district against losses? What is the amount of the coverage? Who handles cash and is not bonded or otherwise covered? What reasons are given by district leadership for not covering these individuals?

Who has the district designated (officers or employees) as investment officers? How does the district ensure that its investment officer has disclosed any personal business relationship with a business organization offering to sell investments to the organization? How does the district ensure its investment officer has disclosed any family relationships to an individual seeking to sell an investment to the entity? If any questionable relationships have been identified, what has the district done to ensure these conflicts are resolved? (Government Code §2256.005 (f)).

What training has the designated investment officer, treasurer and/or chief investment officer received in the last year? Does the training meet statutory guidelines of at least 10 hours of instruction relating to investment responsibilities within 12 months after assuming duties and 10 hours of training every two years? (Government Code § 2256.008)

Has the board authorized the creation of a designated investment committee? How does the committee interact with the investment officer? What is the role of the committee?

### **Operations**

When was the last time that the district complied with relevant laws by placing its primary banking relationships out for competitive bid? What is the schedule for rebidding the depository contract? When does the depository contract expire? How and by whom are banking relationships managed centrally and reviewed regularly? How does the district minimize idle cash balances and facilitate monitoring and control? What process is used to limit the number of bank accounts held by the district? Are activity funds for individual schools consolidated into one master account, or are they maintained individually? Who has access to these accounts? Who reconciles these accounts, and are reconciliations current? When was the last time these activity funds were audited internally or externally?

Are all bank accounts reconciled each month? Who has central control over opening and closing bank accounts? Do written depository contract(s) exist with the district's bank(s) in addition to the required TEA contract? What are the terms and conditions of the existing depository contract? When was its last bid? Are there other depository institutions in the area that offer additional services? Are all fees and other stipulations of the contract in the best interest of the district?

Does the district perform periodic analysis of bank relationships for performance and cost? How does the district evaluate which payment method for bank services is most cost-effective (i.e., compensating balances, direct fee payments, or a combination)?

Because the Federal Deposit Insurance Corporation only ensures most bank accounts up to \$100,000, how does the district ensure sufficient collateral is pledged to cover the balances kept in the depository bank or in investment accounts, where applicable? What are the terms and conditions outlined in the depository contract on collateral? How frequently is collateral verified? Who is responsible for regularly monitoring the quality of pledged securities and for regularly monitoring to ensure that the amount of pledged securities is adequate? Review to ensure that who pledged an independent, third party safekeeping agent holds securities?

Are cash collection procedures, especially as they deal with tax collections, designed to get the money into the district's accounts as quickly as possible? What time delays, if any, exist between the collection of funds and depositing funds into the accounts? What types of deposits of any kind are held in district file cabinets, safes, etc. for longer than 24 hours? Why are those funds held?

As funds are deposited, what time lapses between the time that deposits are made and the time that excess funds are identified and moved to higher yielding investment accounts? Does the district use lockboxes when the benefit of increased availability of funds exceeds additional cost? Does the district use wire transfers or direct deposits to move of cash quickly into district bank accounts?

Who has access to cash in the central office? At the campuses? How does the district ensure cash received at the campuses is accurately reported and delivered to the central office or the bank? What other control mechanisms are in place to ensure cash is not mishandled? Do couriers or armored car services pick up and deliver large cash deposits? Does the district have a safe in which to lock all cash and negotiable securities? Does the district have documented cash handling procedures for campus staff and for booster clubs and other groups that use activity funds including principal activity funds? What procedures are used to ensure all cash receipts are deposited daily, including cafeteria receipts? What processes ensure the district is meeting all current-day bank deposit deadlines?

Does the district use sound investment techniques while adhering to the investment policy and providing adequate controls? Is excess cash always invested? Are competitive quotes obtained for investment purchases? Does the district invest in longer-term securities when the cash flows indicate that money will not be needed for a longer period of time so the district can achieve a better rate of return on its investments?

Do personnel responsible for investments understand investment instruments? Have they attended appropriate training? How do personnel making investment decisions stay in contact with the money market to keep up-to-date on market conditions? Is the investment portfolio distributed among various issuers and vehicles to diversify risks (spreading investments over a large number of securities to reduce financial risk or investing in different securities and with different maturities to reduce market and credit risk?

Are monthly reports on investments distributed to appropriate management? Do quarterly reports to the board comply with the Public Funds Investment Act?

Among staff, is there proper segregation of duties regarding placing, holding, accounting and reviewing of investment transactions?

Are the district's financing arrangements planned based on budgets and forecasts? Does all financing or borrowing comply with statutory and accounting requirements? Are all indirect costs such as fees, compensating balance requirements, restrictions, etc., included in the determination of the true cost of debt? Are financing instruments selected based on availability, cost and legal requirements?

Do cash management hardware and software systems meet the needs of the district? Can the district rapidly determine how much cash is on hand (cash position)? Does the system aid the district in preparing cash flow forecasts? Does the system support investment portfolio management activities and allow the district to readily produce the required reports to the board or administration? Does the system help the district manage its debt portfolio, particularly when bonds are involved? How is security access to the system ensured?



How frequently are internal reviews to improve cash collections, control disbursements, enhance investment returns and reduce debt costs performed?

## **6.B. Cash Management Policies and Procedures**

Clearly written and well-documented policies and procedures for cash management establish a system of internal control that can prevent or reduce the likelihood of both honest errors and intentional fraud or embezzlement.

### **Data Needs**

- Policies and procedures relating to cash management including ones governing activity funds, tax collection, petty cash, receipts from extracurricular events, food service receipts, sales tax collections, cash donations and other campus or central office cash handling.

### **People to Interview**

Superintendent

Assistant superintendent with assigned responsibility for cash management

Finance director

Athletic director, Food Service director and other department directors who regularly handle cash

Administrative staff with assigned responsibility for cash management

Internal auditor

### **Activities to Perform**

- 6.B.1. Compile a list of all cash management policies, procedures and/or practices including ones governing accounting office cash handling as well as activity funds, tax collection, petty cash, receipts from extracurricular events, food service receipts, sales tax collections, cash donations and other campus or central office cash handling and determine whether they are comprehensive and if internal operating procedures mirror board policy. Note any cash management functions that are not addressed by a formal policy or procedure.
- 6.B.2. Based upon staff interviews, prepare a flow chart for two to five major cash functions showing how cash is received, verified, deposited and reconciled, including the transport of cash by individuals or armored vehicles between locations and any storage locations where cash is held (estimating time lapse for each activity). Note strengths or weaknesses, including deposit delays, in the cash handling process.
- 6.B.3. Based upon staff interviews, documented procedures and observations, prepare a flow chart showing the process for issuing and signing checks for invoices, payroll and other miscellaneous functions. Identify who performs each task and points in the process where controls are in place that would prevent fraud or embezzlement, as well as any control weaknesses.

### **Questions to Ask**

How do policies or procedures prevent the payment of normal obligations out of petty cash funds? Who has access to petty cash funds? Who reconciles the petty cash funds and replenishes them? How often is reconciliation and replenishment performed?

What board policy or internal procedure controls the issuance of manual checks? What procedures are in place to ensure appropriate separation of powers so that a single individual does not have the authority to authorize and issue checks?

What internal control weaknesses in the cash management process have external auditors identified in the last three years? What internal control weaknesses in the cash management process has the internal auditor identified in the last three years? How are identified control deficiencies communicated to the relevant administrator in charge? How have procedures and policies been modified when control weaknesses were identified?

What internal controls exist in policy or procedures to prevent:

- Excessive drawdowns (e.g., transferring unavailable funds to another account well in excess of the amount available);
- Check kiting (e.g., covering shortfalls in one bank account with a check that itself represents uncollected funds);
- Chaining (e.g., using additional depository banks to deposit a check before final concentration occurs); and
- Check-crossing (e.g., simultaneously issuing and depositing checks for identical amounts drawn on different banks)?

Does the accounting system generate periodic alert reports? Are alert reports generated for potential violations of the district's policies and procedures, unusual accounting transactions and other critical exceptions? What are the communication procedures for various alert reports?

What controls are in place over activity funds, tax collection, petty cash, receipts from extracurricular events, food service receipts, collection of sales tax, cash donations? Are these controls sufficient to prevent willful or accidental loss of district funds?

How is the actual handling of cash controlled procedurally? Who ensures that procedures are followed? When someone is found to have violated policy or procedure, how are they dealt with?

### **6.C. Investment Policies and Procedures**

Section 2256.005 of the Government Code requires school districts to annually review and adopt local investment policy and strategies. The local investment policy must be written, primarily to emphasize the safety of principal and liquidity and also to address investment diversification, yield, maturity and the quality and capability of investment management. To support the board's policy and intent requires written procedures that will implement those directives and control risk. Administrative controls must be in place to ensure that all policies, rules and laws are followed.

#### **Data Needs**

- Policies, procedures or other documented strategies relating to investment management
- An investment portfolio showing balances held in each account, terms and conditions, and pledged securities to protect against loss, etc.
- Quarterly and annual investment reports to the board for the last two years
- The terms and conditions for each investment including interest rates, a list of pledged securities, restrictions on early withdrawal or daily liquidity, fees and the like.

### **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibility for cash management  
Finance director  
Investment officer  
Staff with assigned responsibility for cash management

### **Activities to Perform**

- 6.C.1. Compile a list of all investment policies, procedures and/strategies, and determine if they comply with VTCS Government Code §2256.005, if internal operating procedures mirror board policy and if internal procedures provide a level of detail to ensure that investment processes would continue in the event of staff turnover or sustained absences.
- 6.C.2. Prepare a list of all investments for the last two years showing the security of each investment, amounts or average annual balances, average interest rates and liquidity, restrictions or penalties for early withdrawal. Compare returns, liquidity, etc. to those possible from investment pools or other strategies to determine if the district is getting a reasonable rate of return for the risk assumed by the district. Note any instruments where risk may be unreasonable or outside of legal boundaries.

### **Questions to Ask**

#### **Polices and procedures**

What evidence exists to show the district's governing board reviews the investment policy and investment strategy at least annually? Does the written instrument stating that the board has reviewed the policy and strategy (and any corresponding board minutes) indicate serious consideration of various options that could improve interest earnings or reduce risk, as required by VTCS Government Code §2256.005 (e)?

What process did the Board of Trustees follow to facilitate the annual review of the investment policies?

Who is the district's designated investment officer? What board policy stipulates this person or persons as the district's official investment officer? When was the last that this policy was revised? Why is this the best person to handle the job?

Where is the current version of Public Funds Investment Act kept to ensure that it is readily available to the school district's investment officer(s)? When did the school district's investment officer(s) last review the act?

How does the district ensure that board-approved, written investment management policies, procedures and practices meet current legal requirements mandated by Chapters 2256 and 2257, Government Code on investments, liquidity, safety of principal, diversity, marketability and internal accounting controls? What is missing from current investment management policies, procedures and practices? Who is responsible for monitoring that procedures and practices actually reflect board policy and current law?

How did the school board use monthly cash flow projections to facilitate the annual review and actions, if any, to amend the school board's investment policies?

How frequently does the district present a written copy of the board-approved investment policy to business organizations offering to engage in investment transactions with the district, including investment pools, banks and investment management firms? When was the last time that the district received a written instrument from each business organization acknowledging that the investment policy has been received and reviewed and that procedures and controls have been implemented to preclude unauthorized transactions? What procedures are in place to ensure a qualified representative of each business organization has signed the written instrument, as defined in Government Code §2256.002 (10) and §2256.005(k)?

Who is responsible for documenting all relationships with banks, dealers, brokers and other financial institutions? Where are copies of all contracts or agreements on file? What efforts are made to ensure copies of the documents survive a disaster such as fire, flood and the like? A safe? Fireproof file cabinet? Off-site safety deposit box? If these documents are not on file, why not? What internal control procedures ensure adherence to formal investment policies and procedures?

How often are safekeeping receipts received from the bank and checked for correct information for the district name, listing par amount, maturity date, discount/coupon rate and the CUSIP (Committee on Uniform Securities Identification Procedures) number? Who is responsible for carrying out this activity? When was the last time this task was performed and what evidence exists to show that the task was performed?

#### **Investment strategies**

Who is responsible for proposing and adopting investment strategies? An investment committee? The board? An outside investment counselor or other professional?

What is the board or designated investment committee adopted policies and strategies for the investment of cash? How does the board or designated investment committee review and revise strategies at least annually? How does the committee monitor investment activities to ensure that they comply with adopted policies or procedures?

How frequently does the district require reports from investment service providers to monitor the performance of their portfolios?

How does the district's investment strategy recognize the restrictions and qualifications imposed by the Public Funds Investment Act?

What are the board-adopted, written investment strategies for each fund or group of funds under its control? In what way does the strategy describe the objectives for the fund using the priorities of suitability, preservation and safety of principal, liquidity, marketability, diversification and yield in that order, Government Code §2256.005 (d)?

In addition to the statutory requirements, how does the investment strategy define:

- Acceptable risk;
- Allowable issuers and instruments;
- Percentage of portfolio that can be invested in each allowable investment type and issuer;
- Diversification of risk;
- Measurement of performance;
- Authority and limitations for investments;
- Selection of maturities;
- Safekeeping accounts and/or acceptable collateralization of investments;
- Reporting and documentation; and
- Formal adoption and periodic revision of the policy?

What, if any, investments are not redeemable or are not generating investment income according to the terms of the investment instrument? What is being done to correct this situation?

How much interest is being earned on investments? What strategies could be employed to increase district earnings while still controlling risk? What external forces, such as local economics or a desire to keep district money in a local institution, are preventing the district from participating in other strategies? What evidence exists that these concerns are valid? If invalid, how are area taxpayers being involved in the decision-making process?

## **6.D. Cash Flow Forecasting**

Cash flow forecasting involves identifying the amount of money available each day, month and year and estimating the amount of revenue expected from each source and when it is expected, as well as the amount and date of expected expenditures. Some districts have approached cash flow forecasting with sophisticated software that will produce a wide variety of reports; others do their forecasting with a spreadsheet. Still others have no method for forecasting or only limited capabilities.

It is the job of the investment/financial officer to earn the best rate available on the district's assets and to plan for short-term loans, should the need arise. Cash flow forecasts tell the district when given amounts of cash will be needed and, therefore, the length of time that the funds can be invested or should be borrowed.

### **Data Needs**

- Cash flow forecasts for the last two years
- Information on data and systems used to prepare cash flow forecasts
- Information on short-term borrowing needed to meet cash flow needs in the last two years.

### **People to Interview**

Superintendent  
Chief Financial Officer  
Individual responsible for preparing cash flow forecasts

### **Activities to Perform**

- 6.D.1. Examine cash flow forecasts for the last year and review any documented procedures for creating the cash flow forecasts. Note the frequency of the forecasts, the level of detail captured by the forecasts, and compare a sample of the forecasts with actual data to determine the degree of accuracy.
- 6.D.2. Examine documents on short-term borrowing, and prepare a chart showing the date of borrowing and the date of repayment, the total amount of interest paid, the interest rate and the reason given by the district for the cash shortfall.

### **Questions to Ask**

#### **Forecasting**

Who is responsible for performing cashflow forecasting? How frequently does the district forecast cash flow? Daily? Weekly? Monthly? Quarterly? semi-annually? Annually? Is the frequency sufficient to accurately project the district's needs while providing the board and administration good management data, such as early warnings if borrowing is required in the future? Is the cash flow forecasting system automated?

How accurate are the forecasts? How does the district evaluate variances between actual cash flow and forecast cash flow and use this information to revise subsequent forecasts? Does the budget, key departments, board and community provide information for preparation of the forecasts as appropriate? What external sources of information are used to develop cash flow forecasts (e.g., interest rate assumptions, economic forecasts and governmental regulations)? Are short-term and long-term forecasts prepared to cover various time frames?

Does cash flow forecasting provide a systematic approach for determining and coordinating the district's cash needs? How is the cash flow forecasting process tied to an overall financing/investment plan? Does the district attempt to match the amount and maturity of investments to district's the cash flow needs?

To improve cash flow, does the process and procedure for paying bills ensure bills are paid on the latest possible date to still qualify for available discounts? Does the district have controls in place to prevent unauthorized, improper or early cash disbursements, including:

- Assuring accounts payable disbursements are made according to the due date of the obligation;
- Use of zero-balance accounts to fund disbursements for accounting reconciliation;
- Safeguarding unused check stock with access available only to designated personnel; and
- Providing control procedures over outgoing wire transfers which include:
  - Use of passwords
  - Limited number of authorized personnel
  - Dual check authorization required
  - Bank call back procedures
  - Dollar amount limitations on transfers
  - Confirmation of transfers performed by someone other than the initiator
  - Requiring authorization by top administrative personnel for all significant cash transfers.

### **Borrowing**

How frequently has the district had to borrow money to meet its cash flow needs? How much has been spent in interest for short-term borrowing? What reasons were given for the cash shortfall? Did the district have sufficient warning that a shortfall existed to shop for the best interest rates on the loan? How could the need for borrowing been avoided?

## **6.E. Risk Management Organization**

Risk management has become an essential part of school district operations the rising costs of health, property and liability insurance coverage has demanded that administrators begin cost containment programs. Successful risk management programs start with strong support from the governing board, superintendent and senior financial administrators. Commitment from the upper management to the fundamental goals of risk management is essential if risk management practices are to be effective.

This area of the district's operation is related to safety and security concerns as well as human resource management and financial management.

### **Data Needs**

- Risk management related policies and procedures
- Copies of insurance policies
- Organization charts and job descriptions for risk management related positions for the last three years
- Budgets for all risk management related functions for the last three years
- Descriptions of all risk management initiatives and any reports of results from these activities.

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility for risk management

Staff with assigned responsibility for risk management

District's insurance agent and/or third party administrator

Campus-based personnel

Safety officer

### **Activities to Perform**

- 6.E.1. Examine the organization and staffing charts and job descriptions for risk management, including staff involved in safety-related activities as well as those physically located in Human Resources, Finance and Legal Services. Interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and why. In addition, note any contract services performed by professionals or consultants in support of the risk management function and show to whom they report or who monitors their activities.
- 6.E.2. Examine staffing and budgets of risk-related operations such as safety training, insurance purchasing and the like and determine the ratio of total staff to staffing within the risk management area. Compare the budget and staffing levels to industry standards. Determine whether or not the manager and staff have appropriate and adequate professional development training each year.
- 6.E.3. Prepare a list of all policies and procedures related to risk management and determine whether internal operating procedures mirror board policy and whether internal procedures provide a level of detail to ensure that risk management processes would continue in the event of staff turnover or sustained absences.
- 6.E.4. Prepare a list of all of the district's risk management initiatives including such items as preventive loss programs, safety training, emergency preparedness training and the like. Determine the target audience for each initiative, any documented results or performance measures used to evaluate the effectiveness of the initiative and the person responsible for implementation.

### **Questions to Ask**

#### **Organization**

Are risk management activities aligned with similar activities within the district? Has the district assigned specific staff to manage risk management programs? Who is assigned to manage and control the district's property and liability insurance coverages? Who establishes rules and procedures to ensure the safety and well being of pupils, employees and the public while on district property?

Who is assigned to competitively buy insurance coverage? Is it the same person or department for all types of insurance? Who handles the selection and procurement of student insurance for extracurricular participation, for example? Life insurance? Dental Insurance? Are any outside insurance consultants or other professionals under contract to the district to provide guidance on insurance purchasing decisions? If the district is self-insured for some coverages, is an actuary used to determine appropriate contributions and estimate safe fund balances for the district? To whom do these contracted individuals report? Who monitors performance? Does the district use professional insurance consultants when an identified need exists?

What functions handled by the risk manager are duplicative or unrelated to risk management?

What campus or building administrators are responsible for identifying risks inherent to their location and operation and in making every effort to minimize such risks? Who is responsible for educating employees concerning their responsibilities and enlisting their support? Who is responsible for the safekeeping all assets? Who distributes questionnaires and survey forms and coordinates on-site inspections and analysis of physical operations? Who is responsible for maintaining records for inspection and forwarding reports to the assigned risk management administrator?

### **Policies and procedures**

Does the district have board-approved risk management policies that have been published and disseminated to all appropriate staff and the community? Do policies provide for a program of protection against and/or insurance for:

- Loss or damage or disability as mandated by federal, state or local codes;
- Loss or damage to real or personal property;
- Liability of the district and/or personal liability of members of the board and employees for damage to persons or property including injury or death;
- Losses due to employee dishonesty;
- Worker's compensation/employees liability;
- Employee health, life and other supplemental benefits such as dental, optical, or disability; and
- Environmental or pollution risks.

Has the district clearly defined the risk management program, including goals, objectives, procedures and responsibilities?

At what point in the process are insurance reimbursements accepted? Who has authority to accept a reimbursement? How does the district validate the amount of the reimbursement to ensure that the reimbursement is adequate or will cover the district's loss (i.e., fire, flood or hail damage)? How are lawyers involved in the decision-making process? When are independent experts used to estimate the actual extent of damage to be claimed? How are settlements reached?

Does the district use the latest available risk management techniques such as inspections, investigation and training to identify, analyze and minimize risks inherent in the operation of district programs? How are these techniques documented in policies and procedures?

How are decisions made regarding student or employee participation in the cost of insurance coverages? If parents are expected to pay some portion of the cost of student insurance, how does the district provide for economically disadvantaged students? How does this process provide equal access to insurance for all students? How do costs encourage or discourage employee participation in programs, claims against the policy and employee job satisfaction?



Have administrative regulations or procedures for the risk management program been developed and approved? Do procedures cover:

- Loss prevention control;
- Placement of insurance coverage;
- Property damage restitution;
- Catastrophe plan;
- Requirements for coverage by independent contractors;
- Use of facilities by outside groups;
- Driver training insurance coverage;
- Field trip and/or excursions coverage; and
- Employee/student personal property guidelines?

Does everyone who does business with the district (i.e., vendors) have insurance to pay for damage to facilities or injury to students or staff? What processes are in place to verify that the insurance is current and sufficient?

Does policy or procedures safeguard against duplicating coverages and contracts for unlawful or unauthorized coverages (See Insurance Decisions for Texas Public Schools at <http://www.tdi.state.tx.us/consumer/sdguide/splash.html>)?

### **Operations**

Has the district established a preventive loss control program including:

- Installation of sprinkler systems;
- Installation of intrusion alarms and/or security systems with direct connection to a monitored location;
- Installation of smoke alarms with direct connection to a monitored location;
- Purchase of non-toxic smoke producing materials for school furniture, walls and folding doors;
- Construction of buildings with firewalls (determined by local building and fire codes) between rooms and school facilities that are vandal proof;
- Installation of security fencing and lighting around buildings and ground;
- Employment of security personnel;
- Adjusting custodial schedules to provide greater adult coverage on school campuses;
- Requesting neighbors to contact police about any suspicious activities; and
- Crisis planning?

Find out if certain risk management strategies are not in place because of the relative lack of local building codes in certain rural areas.

Does the district maintain complete inventories of all furniture, equipment, books and materials in the district? Is a duplicate copy of inventories kept in fireproof locations or an off-site storage facility? Are “as-built” building plans and specifications in fireproof vaults or flat files?

Does the fire department have maps of school buildings indicating the location of fence gates and utility cutoffs to facilitate pre-fire planning? Does the district maintain a minimum quantity of flammable liquids that are properly stored? Does the district inspect of buildings with fire department personnel and maintain written reports of action taken on inspection tours?

Are emergency rules and procedures prepared for school personnel? Are emergency plans annually evaluated? Are the names and phone numbers of emergency personnel posted at each building in the district?

Does the district have a districtwide safety program? How is the effort organized? Does the district offer safety training for employees? Does the district have a calendar of safety workshops? How does the district measure the success of its safety training?

How does the district discourage student vandalism and encourage respect for public property? Is safety training provided to employees to reduce workers' compensation claims?

Has the district established a catastrophic preparedness checklist including:

- Notification of proper emergency organization (i.e.) Fire Department, Police Department;
- Management, supervisory and maintenance emergency response teams for coordinating of responsibilities;
- Communication (such as an emergency telephone system) for notifying of relatives and/or spouses;
- Supply of emergency power (if applicable);
- Evacuation plan;
- Information on media releases and who is authorized to speak on behalf of the district; and
- Notification of the insurance carrier?

Does the district back up critical data and store it off site?

Does the district have established claims handling procedures?

Has the district established insurance requirements for outside parties using district facilities and for contractors? Does the district provide some alternative coverage for outside organizations that use the facilities if the organization cannot provide proof of insurance? Is a certificate of insurance, a hold harmless and indemnification agreement and/or endorsement to other parties' liability policies showing the district as an addition to the insurance policy obtained from:

- Individuals or organizations using or renting facilities or equipment;
- Contractors hired by the district; and
- Joint ventures with other public entities?

Is insurance coverage required for all contractors with periodic checks to ensure policies are in force? Has the district established a formal agreement for proper coverage for leased sites and facilities that requires tenants to obtain their own insurance and include the district as part of the "named insured"? Requires periodic checks to assure policies are in force?

## **6.F. Insurance Coverage**

School district administrators say caring for their students, staff and organization is an important part of their job. That care includes obtaining and providing insurance. Yet, because of the many types of coverage a district may need, administrators often feel overwhelmed with their insurance options. The decision-making process when purchasing insurance include:

- Analyzing alternatives for insurance coverage such as self-insurance and other current industry trends;
- Analyzing current insurance plans including deductible amounts, co-insurance levels and types of coverage provided;

- Assessing hazards and implementing programs to minimize exposure to potential losses; and
- Monitoring the district's compliance with various laws and regulations.

### **Data Needs**

- Copies of insurance policies
- Copies of Requests for Proposals
- Copies of any contracts for advisory assistance
- Premiums or reimbursements made for each type of coverage for the last three years
- Claims experiences on insurance policies
- Owner Controlled Insurance Policy (OCIP) or other district-controlled coverage designed to provide lower cost, consistent insurance for major construction projects.

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility for insurance coverage

Staff with assigned responsibility for insurance coverage

District's insurance agent and/or third party administrator

Campus-based personnel

### **Activities to Perform**

- 6.F.1. Examine all insurance policies and prepare a complete list of all insurance coverage including workers' compensation as well as any insurance cooperatives, self-insurance, names of third party administrators, stop loss coverages and the like. For each category of coverage, describe the nature of the coverage, the basic limits of the coverage, requests for proposals, any advisory assistance contracts and annual premiums or contributions for the last three years.
- 6.F.2. Prepare a list of all employee benefit coverages such as health, dental, etc. and show the district's contribution to the premiums versus the employee's contributions for the variety of coverages for employee, employee and spouse, employee and dependent children and the like.

### **Questions to Ask**

Has the district identified the most cost effective insurance programs? Does the district regularly attempt to control costs by examining other options such as self-insurance. Does the district look at levels of coverage, realistic deductibles, annual request for proposals for insurance carriers and Wellness programs?

Has the district established procedures for purchasing insurance coverage? Does the district obtain insurance coverage by accepting proposals for the best and most comprehensive coverage to meet its needs? Does the district consider various combinations of insurance coverage or options, such as, self-insurance, varying levels of deductibles and multi-year coverage?

What external experts are used to help the district select the most qualified and cost effective coverages? How does the district ensure that its use of these experts complies with Attorney General Opinion JC-0205, which states that districts may not use a designated broker of record to purchase insurance contracts with premiums of an aggregate value of \$10,000 or more for each twelve-month period?

How does the district normally evaluate insurance coverage, carriers and self-insurance programs to determine the best options for the district? Which of these programs are self-funded? How are these coverages budgeted? Who helps the district determine the appropriate contribution each year? Are current reserves sufficient to cover current and prior claims? How was this reserve amount verified?

How are deductible amounts determined? How are deductibles budgeted? What, if any, provisions are in place for reimbursement of personal losses by employees, students or citizens within the deductibles amounts?

What type of services is the district receiving from the third party insurance administrator, if a third party administrator is used? How does the district use the information provided by the third party administrator?

Is the risk management program reviewed and evaluated annually with emphasis on:

- Types of claims;
- Annual losses versus premium paid;
- Changes in regulations and laws; and
- Insurance industry trends;

Does the district keep abreast of federal, state and local risk management laws and regulations? Do risk management employees attend federal, state and local organizational meetings and seminars? Is there a mechanism in place to share appropriate information on laws and regulations with all employees?

How does the district ensure coverages do not overlap with the state's tort immunity provisions? Does insurance coverage provide for defense of claims, whether or not the state's tort immunity laws protect the district? If there is overlap, how does the district justify this expenditure?

If the district is engaged in a construction program valued at more than \$50 million, how is construction insurance handled? Has the district explored owner-controlled insurance (OCIP or ROCIP)?

How is the district protected from damages arising as a result of terrorism? How is terrorism defined and how does the definition differ from vandalism or other property and casualty insurance coverage? Who is protected by this coverage?

Has the district identified areas of exposure to loss and obtained comprehensive coverage? Do property and casualty insurance cover all the district's buildings and contents at replacement value as determined through a property valuation program? How are policies updated for new construction or renovations? At what point does the construction contractor's insurance end and district policies take over?

Is comprehensive general liability, auto liability and errors and omissions protection provided covering the district, members of the board, district officers and employees while acting in the discharge of their duties within the scope of their employment and/or under the direction of the board?

How does the district provide for workers' compensation insurance to cover all employees and volunteers as prescribed by law? Has the district explored a workers' compensation pool or a self-insurance program as a way to control costs?

Does the district carry physical damage coverage on selected vehicles owned or operated by the district?

Does the district carry sufficient boiler and machinery insurance covering boilers and pressure vessels, air conditioning and refrigeration units? Are the equipment inventories current? Are coverages adjusted each year after the inventory is taken? When was the list of machinery and equipment last updated?

Is student accident insurance made available to all students and required of those students who engage in district-organized athletic events? Does the district pay for this coverage or are parents asked to pay for the coverage if they are able? If parents are asked to pay, how are the needs of economically disadvantaged students handled?

**Employee benefits**

When was the last time the district conducted an employee satisfaction survey our benefits? How does the district involve employees in insurance decisions? Is there an employee insurance committee?

What fringe benefits are provided to employees, such as hospital and medical insurance, dental insurance, optical insurance, life insurance, long-term or short-term disability insurance at limits authorized by the Board of Trustees?

How much do employees pay for their own coverage and for dependent coverages? How are part-time employees treated under the insurance programs of the district? How is the employee out-of-pocket contribution affecting participation in the program? How are cafeteria plans used? What would employees like to have for insurance that they are not currently getting?

**6.G. Capital Asset Management**

Capital asset expenditure planning and control are critical to the long-term financial health of any school district. Generally, expenditures for capital assets require significant financial resources; decisions are difficult to reverse and the investment affects the district's financial performance over a long period of time. Policies and procedures are used to ensure that capital assets are properly recorded and protected.

**Data Needs**

- Organization charts and job descriptions for capital asset-related positions
- Capital asset policies and procedures
- Summary of capital asset transactions and balances for last three years
- Capital asset inventory printout
- Physical inventory procedures and documentation for both schools and administrative facilities
- Audited financial statements and management letters related to capital assets
- A copy of most recent inventory taken
- Contracts for physical inventory services.

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility for capital asset management  
Chief Financial Officer  
Capital asset accountant  
Staff with assigned responsibility for capital asset management  
Area superintendents  
Department heads  
Campus-based personnel, such as principals  
Regional Service Center staff, as applicable

### **Activities to Perform**

- 6.G.1. Examine the organization and staffing charts and job descriptions for employees working with the capital asset, including staff involved in tagging, tracking, inventorying and reconciling capital assets. Interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and why. In addition, note any contractors used for such services as inventorying and show to whom they report or who monitors their activities.
- 6.G.2. Examine the capital asset capitalization policies and procedures and determine whether policies mirror recommendations made in the Texas Education Agency's (TEA) *Financial Accountability System Resource Guide* (FASRG). Prepare a list of the policies that do not copy with the guide, and note what is missing.
- 6.G.3. Using the district's most recent capital asset printout, test the inventory procedures. Select a sample number of assets from the list and attempt to locate them in the district. Note discrepancies and attempt to locate the reason for the differences.
- 6.G.4. Examine the most recent inventory of the district and determine the results, how overages or shortages were handled, how employees were held accountable for losses and whether known thefts were reported to the proper authorities.
- 6.G.5. Examine the external audit reports and management letters for the last few years, and note any references to capital assets as well as any district responses and corrective actions that resulted. In particular, note whether the district has fully implemented the Governmental Accounting Standards Board (GASB) 34 reporting requirement for fiscal year 2002 and thereafter.

### **Questions to Ask**

#### **Organization**

How does the current organization handling capital asset operatives contribute to effective and efficient management? How are capital asset functions aligned with similar functions within the district? Who is assigned to manage and control the district's capital assets? Who establishes rules and procedures to ensure the assets are accurately accounted for and protected from loss?

#### **Policies**

What is the district's capitalization policy? If the district is capitalizing assets with a value of less than \$5,000, why has this amount been established? How does the district account for or track items that are not considered capital assets? Does board policy stipulate the frequency of districtwide inventories? Does this policy in comply with TEA guidelines? What policies are outdated or missing? Why? What plans are there to bring policies into compliance with state guidelines?

### **Operations**

Does the Board of Trustees approve all capital asset disposal in advance? How does the district handle the disposal of assets purchased with federal funds? How does the district account for the disposal of assets with a book value greater than amount at time of disposal and when the book value is less than the amount received at time of disposal?

How are capital assets acquired with federal funds identified in the capital asset inventory?

What process ensures assets purchased and disposed of are properly accounted for? How often are capital asset reconciliations performed? Why is this frequency appropriate?

Does the school district have a receiving center to receive and tag all newly acquired capital assets equipment before distribution? How does the district differentiate assets purchased with special revenue funds (federal funds, state funds, or grants) and general funds? Does the school district have unique bar coded tags for assets acquired with general funds and special revenue funds?

Do the capital asset expenditures comply with budgetary, legal, grantor and contractual requirements? Did the district eliminate the assets from the inventory that were disposed of? Did the district record the sale proceeds properly? How does the district account for the assets that were acquired through lease purchase agreements? Did the district present the capital assets properly by major classification in the Statement of Net Assets?

Do the methodologies and processes for depreciation accounting for capital assets show evidence of consideration of factors in the district that limit the service life of capital assets?

Do the accounting systems support capital asset and depreciation reporting requirements in financial statements and notes in the Annual Financial and Compliance Report (GASB 34 format)?

Do the accounting systems separate the district's capital assets by major classes to facilitate GASB 34 reporting requirements?

Does the district have infrastructure assets? Does the district account for infrastructure assets under the modified approach instead of reporting depreciation?

Does the district have a process for archiving records involving ownership of infrastructure assets, such as title documents, plat maps, capital grant agreements, accounting records for repair and maintenance, board minutes, engineering logs, maintenance department work orders and other records?

Did the district report a positive amount in the Statement of Net Assets for "Invested in capital assets, net of related debt"?

### **Inventory**

Does the district perform a manual or automated inventory of its capital assets? How often does the district take the inventory? How does the district ensure the accuracy of its capital asset inventory? What is the district's capitalization threshold for its capital assets inventory? What are the categories of fixed assets equipment? What is the district's depreciation method for its capital assets?

What is the date of the district's last recorded capital assets inventory? How frequently are districtwide inventories conducted? What is the district's process for its capital asset inventory? How does the district value capital assets? Are all the capital asset acquisitions recorded in the inventory?

## **6.H. Bond Issuance and Indebtedness**

The largest single sum of money that most districts will receive at one time will be the proceeds from a municipal bond issuance. Bonds are authorized by the voters and sold by the district for large projects to spread the cost over time to succeeding users of the facilities. Based upon a district's needs and the state's limitations on the amount of indebtedness a school district can carry (not to exceed 10 percent of assessed property valuation), the entire authorized amount does not have to be issued immediately. A district may issue bonds in phases.

Most issues are tax exempt and in Texas are backed by the Permanent School Fund. Tens of millions of dollars are made available to pay for major construction projects when voters authorize bonds. When bonds are sold, the district is agreeing to pay interest to the buyers on a set schedule and soon after bonds are issued, the debt-service payments begin. Funds must be set aside to make payments on the debt.

### **Data Needs**

- Policies and procedures relating to bond issuance or indebtedness
- Financial reports on debt service and capital projects
- The debt service and capital projects budget
- Organization and staffing chart of positions with bond related responsibilities
- Debt payment schedules
- A list of the bonds outstanding showing original issue, current balance, interest rate and the date and particulars on any refunds
- Board minutes
- Materials distributed or produced for most recent bond proposal
- History and results of any bond votes taken in the last 10 years.

### **People to Interview**

Assistant superintendent with assigned responsibility for indebtedness  
Chief Financial Officer  
Investment Officer

### **Activities to perform**

- 6.H.1. Examine the bonded indebtedness of the district and note the amounts of all outstanding bonds, the interest rates and debt service payment schedules on each issue, the amount of any unexpended bond proceeds, any outstanding investment instruments purchased with unexpended bond proceeds and whether any of the bonds have been refunded. Examine if the district analyzed the economic costs of capital lease for real property in the context of potential economic savings for issuance of bonds.
- 6.H.2. Review recent bond election materials and planning documents, election results and the like and diagram the process used by the district and any supporting organizations to provide information about the bond to voters and compare to actual use of funds – note variances and reasons for variances.



6.H.3. Diagram the procedures and processes used to issue the bonds once voters approved them and note whether these processes conform to board policy, state law and industry best practices.

### **Questions to Ask**

#### **Accounting for and managing debt**

How does the district analyze, evaluate, monitor and report debt financing alternatives?

What procedures are in place for refunding bonds? When was the last time the district refunded bonds? What were the interest savings from the refunding? How did the district improve its cash flow position as a result of the refunding?

Who monitors the arbitrage provisions, and does the district comply with arbitrage provisions?

Does the district classify bonds payable properly between current and non-current? Does the district record the bonds in accordance with GAAP and are sufficient notes included in the financial statements?

What procedures are in place to evaluate various alternative financing methods? When evaluating alternative financing methods, how does the district match the expected life of the investment to the financing terms? For example, districts may use bonded indebtedness to purchase school buses with a useful life of approximately 10 to 15 years. How is the payoff of the debt timed to coincide with the bus's useful life? Has there been an instance when the district has applied for or obtained a Qualified Zone Academy Bond (QZAB)? If the district was not successful in obtaining a QZAB, why was the district denied?

How does the district select its independent financial advisor, who will choose the method of sale, review and evaluate the costs of issuance of debt, analyze the cost and benefits of advance refunding transactions, provide for compliance with federal arbitrage rebate and restrictions and provide timely reporting the continuing financial disclosures?

Has the district applied for and made optimum use of the instructional facilities allotment programs authorized under Chapter 42, Texas Education Code?

Does district policy require disbursement of bond proceeds to follow bond indenture guidelines? Has the district ever engaged in bond refunding? Is there any evidence that bond proceeds were used for operating capital, like payroll? Did the refunding result in an improved cash flow and/or reduced overall debt obligations? Were any bond proceeds classified as arbitrage bonds?

Did the school district request an arbitrage compliance analysis from bond counsel or the school district's financial advisors?

Did significant changes, occur to the drawdown schedule as a result of delays in the rate of completion of pending or current construction projects?

How were significant changes to the drawdown schedule, if any, considered for potential amendment of the school board's investment policies?

Did any delays in the drawdown schedule result in changes to cash flow projections for the bond issuances that were presented in the monthly financial reports to the school board?

Did the TEA refuse to approve any bond issuances for Permanent School Fund guarantee? Why?

Were any bond proceeds invested at a higher yield than the effective interest rate paid on the bonds? When and for how long? How did the district ensure that it complied with arbitrage laws?

Were any bond proceeds invested at a yield that was more than 10 percent below the effective interest rate paid on the bonds? Why?

Did the school district's investing practices comply with the school district's investment policies and specific securities authorized by bond covenants?

Was uncertainty in the drawdown schedule considered in plans to leave 10 to 20 percent in a pool or money market fund so that an unexpected draw would not force a security sale at a loss?

If the district was subject to an IRS rebate, did the district attempt to attain a positive spread or a higher rate of return on securities purchased than the rate paid to borrow the funds?

Were debt-related costs effectively controlled by one or more debt management techniques, list below:

- Implement a board policy to establish a debt ceiling that is related to the district's ratio of long-term debt to the amount of taxable property and/or the debt rate cap;
- Build projections of the district's budgetary and cash flow requirements for a three to five-year period to understand the district's total debt requirements. These projections will facilitate study of all debt options and also help avoid excessive borrowing fees as a result of repetitive debt borrowing that could have been consolidated under a single loan;
- Build and maintain a rainy day fund to avoid short-term borrowing;
- Compare debt financing options and costs under all options available in the marketplace, especially when considering lease-purchase financing, which is generally viewed as an expensive option in most instances;
- Actively monitor the economic advantages of advance refunding of long-term debt; and
- Use formal competitive procurement methods to obtain the best competitive bids or competitive proposals for financing costs?

What portion of long-term bonded indebtedness was issued to finance repairs and maintenance or other items that were not capitalized?

What has happened to retainages or any other bond proceeds that were not fully spent on the approved projects? Were these funds handled in a manner consistent with the FASRG that states that upon completion of a project, any unused bond proceeds are transferred to the Debt Service Fund and are used to retire related bond principal?

### **Bond elections**

How effective were recent bond elections? What were the voters' biggest objections to the bond? How did the district address these concerns? What were the voters' biggest areas of agreement?

What mechanisms were used to publicize the bond and provide voters information about the bond and the potential use of the money? How did the district ensure no district funds were used to promote the

bond? How were citizens involved in the decision to ask for a bond? How were parents engaged in the process?

What criticisms did the community levy after any failed bond elections? How did the district modify its approach in future bond elections to address these criticisms?

What covenants or promises were made to citizens at the time of the election? If the bond was successful, how is the district providing assurances that these promises are now being kept?

**Bond issuances**

Does the district have a board-approved policy on issuing bonds? Does the district have procedures in place for issuing bonds? How did the district present its most recent bond proposal? How was it received?

What technical assistance did the district have during the bond issuance process? Who is the district's financial advisor?

How does the district comply with restrictions/requirements in the bond indenture? What provisions were made to ensure that the timing maturity of investment would coincide with dates of debt service payment?

Does the district have board-approved policies for issuing and managing debt that recognize any federal, state or local limitations imposed on the type and amount of debt issued? How does the district's policy limit the ratio of debt to taxable property with an appropriate factor for assistance from the instructional facilities allotment?

How does the district calculate and monitor compliance with federal arbitrage regulations? Has the district employed or contracted for the services of financial advisors, bond counsel and the external auditor either in day-to-day investment activities or when evaluating and issuing debt obligations?

**6.I. Review and Evaluation of Contracting Process**

There are numerous opportunities within the asset and risk management area for contracting, not the least of which is insurance coverages. Some or all of the several other asset and risk operations such as annual inventories could be contracted for through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

***FINANCIAL  
MANAGEMENT***



## **7. *Financial Management***

School districts must practice sound financial management in order to maximize the effectiveness of limited resources and to plan for future needs. Effective financial management ensures that internal controls are in place and operating as intended, that technology is maximized to increase productivity and that timely reports help management reach its goals.

The district is required to manage its financial operations in conformity with the regulations and requirements of the Texas Education Agency's *Financial Accountability System Resource Guide* (FASRG) and to report their data to the Public Education Information Management System (PEIMS).

This chapter evaluates the effectiveness and efficiency of organization, financial management and staffing of the financial management responsibilities, planning and budgeting, accounting/internal control and payroll, internal and external auditing and tax collections in the following areas:

- 7.A. Organization, Management and Staffing
- 7.B. Financial Performance
- 7.C. Planning and Budgeting
- 7.D. Administrative Technology
- 7.E. Accounting and Payroll
- 7.F. External Audit
- 7.G. Internal Audit
- 7.H. Tax Appraisal and Collections
- 7.I. Review and Evaluation of Contracting Process

### **7.A. Organization, Management and Staffing**

Financial management is most effective when a district properly aligns its business services functions, establishes strong systems of internal control and properly allocates staff resources.

#### **Data Needs**

- Organization chart(s) and job descriptions for business services
- Any cooperative agreements, whether the district is the fiscal agent or a member, if applicable
- Summary of activities performed by business services
- Budget for the district's business services/financial management for the last three years
- Listing of the number and type of employees for each section of business services, including coaches, principals and teachers in specialized areas
- Related policies and procedures manual sections
- Resumes for key personnel
- Contracts for any contracted services

#### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility  
Board members (as appropriate)  
Finance or budget director  
Department head(s)  
Superintendent's support staff or bookkeeper  
User divisions or campuses  
Regional Education Service Center (RESC) staff as appropriate

### **Activities to Perform**

- 7.A.1. Create or examine existing organization staffing charts and job descriptions for financial management and interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department and document if it has been changed recently or repeatedly in the recent past or might change in the near future and explain the background for changes. Include any contracted individuals services or committees that oversee cash management in the organization chart and show the reporting relationship and who is responsible for monitoring the contracts.
- 7.A.2. Compile a chart showing the financial management staffing budget for the last five years and determine where and why changes have occurred within the organization.
- 7.A.3. If the district is a fiscal agent for a cooperative, such as special education, or a member of a cooperative, prepare a list of all member districts and describe in detail the organization and management of the cooperative and how funding flows to and from member districts for services. Additionally, identify key staff members who are fully or partially dedicated to the cooperative and show how the district recovers the administrative costs for this service.

### **Questions to Ask**

#### **Organization**

How are the business services organized? What is the reporting relationship between the superintendent and board? What is the board's role in financial management? How financial decisions are made? Who are the decision makers? What written documents clearly define the roles and responsibilities of the board and administration? Is the chain of command followed? If not, why not?

Are there financial standing committees of the board that regularly review the work of the finance area or specific responsibilities of the finance area? Who represents the administration on these committees? Is the administrative representation on the committee adequate and appropriate?

How has the organizational structure changed recently? Over the last five years? If so, why?

Is the organization the most effective way to carry out the responsibilities? Are staff dedicated to specific business duties?

Are there any business services jobs that could be performed by another district department? Are there any responsibilities that are centralized in the business office that would be better handled in the schools and/or departments?

Are there any responsibilities in the schools and/or departments that would be better centralized in the business office? Do the positions and titles of staff accurately describe their functions and responsibilities? How many levels of supervision exist and what is the reporting structure?

If an outside vendor or the RESC performs some or part of the business, what are those services? What are the advantages and disadvantages to this organizational arrangement?

#### **Staffing and budget**

How appropriate is the current management span of control? How has the budget for the financial management of the district changed over the last five years? What new responsibilities have been added to the division or individuals who handle these duties? Are staffing levels sufficient to get the job done in a timely manner?

Are staff cross-trained to perform different business duties? Are staff shared during peak operating times? Is there any overlap among jobs performed by one or more units? How much is allocated each

year to ensure that staff are properly trained and remain current with the most recent law and rule changes? Where does most of the training come from? What is the role of the RESC in training?

What jobs are performed in-house that could be out-sourced? What jobs are currently contracted out that might be done better in-house?

What qualifications do the individuals who perform financial management possess?

**Shared services/cooperatives**

What major cooperatives, such as special education, is the district a member of? A fiscal agent for? What staff are paid for by the cooperative? How are payments to and from the cooperative managed? How are personnel needs handled? Who in the district is responsible for oversight of the arrangement?

How does the district manage these arrangements? What types of reports are generated by the cooperative to ensure that funds are spent appropriately? That the fund balance is not inappropriately high or low? Who sits on the managing board (executive committee) of the cooperative?

Are payments to the fiscal agent for administrative services comparable to those of other, similar districts in shared services arrangements? How are the fee levels determined?

**7.B. Financial Performance**

School district financial management involves the effective use of limited resources to support student achievement. The most current financial data available for all districts is current year budgetary reports through the Academic Excellence Indicator System (AEIS) administered through the Texas Education Agency (TEA). AEIS reports provide the beginning of the year budget data and include the General Fund, Food Service Fund and Debt Service Fund. All other funds are specifically excluded because they are not legally required to have an officially adopted budget. For comparison of actual revenues and expenditures, the most current information available for all districts is the current year reports through the PEIMS administered through TEA. PEIMS information includes the audited financial reports for all funds in each district.

The 2001 Legislature enacted S.B. 218, which requires the implementation of a financial accountability rating system. In compliance with this mandate, TEA established the School Financial Integrity Rating System of Texas (School FIRST). The School FIRST rating system begins a transitional implementation for 2002-03 with preliminary and final paper reports to each district and its' regional education service center. Upon full implementation of the rating system in 2003-04, the Board of Trustees will publish an annual report describing the financial management performance of the district.

**Data Needs**

- Districtwide budget for current year and four prior years
- Audited financial statements for the last five years
- Budget planning documents
- Budget policies and procedures
- List of staff involved with the budget planning process



### **People to Interview**

Board members (as appropriate)  
Superintendent or assistant superintendent with assigned responsibility  
Finance or budget director  
Department head(s), if applicable  
Principal(s)  
Site-based decision making committee  
PEIMS coordinator  
Community leaders  
Teachers

### **Activities to Perform**

- 7.B.1. Chart, review and compare budgets of district and peer districts for the current year by fund, function and object code (possibly as per pupil expenditures to negate differences in district sizes).
- 7.B.2. Chart and review the district's budget for the last four to five years by fund, function and object code. Analyze the data to determine negative trends or specific areas where district spending is out of line with peers and TEA guidelines.
- 7.B.3. Chart the differences between budget and actual data for both revenues and expenditures for the last few years and identify significant variances. Use data from the audit schedules, taking into account policy and personnel changes that occurred during the review period. Through interviews, determine the reason for the variances and the consequences, if any, of failing to more accurately budget in these areas.
- 7.B.4. Compare the current year financial snapshot data (AEIS, PEIMS, School FIRST) and chart deviations between TEA standards, peer district performance data and school performance data and explain important deviations.
- 7.B.5. Prepare a chart comparing TEA's optimum fund balance calculations as shown on the last five years' audited financial statements with actual fund balance and show the district's variance. Determine the reason for change over time and note the reason for any significant fluctuations. If the fund balance is above the optimum level, determine if some portion of the fund balance has informally been designated for a purpose and note the amount and purpose for which those funds are intended. If the fund balance is below the optimum amount, summarize activities that the board or administration is taking to remedy the situation.
- 7.B.6. Summarize the district's fund balance management policies, procedures or practices including formal policies, board reports and other practices that would keep the board informed about the impact of decisions on the fund balance. To the extent possible, evaluate the effectiveness of these policies, procedures and practices over time.

### **Questions to Ask**

#### **Budget review and monitoring**

Is the annual adopted budget published and disseminated to the Board of Trustees, superintendent, directors and supervisors, principals, teachers, staff, site-based decision making team, budget committee (if one exists), community, employee organizations, county clerk, mayor/city offices and local libraries?

What controls are in place to ensure that expenditures do not exceed appropriated funds? Does the budget process include monthly and quarterly reviews to determine the status of the annual spending plan (income, expenditures, encumbrances and balances) with a provision for necessary adjustments?

Are monthly budgets distributed to campuses and departments? Do users trust the budget distributed from the central office or do the campuses and departments keep their own manual ledgers because they do not trust the figures distributed from the central office?

Does the budget system provide a procedure for budget amendments? Are budget amendments signed and pre-approved by appropriate administrators? Are budget amendments distributed to the board, staff and other interested parties?

Are there any informal procedures or related activities that are not documented?

What major initiatives have been undertaken to control costs or increase revenues? Were these initiatives successful and how did they affect the delivery of education within the district? Were budget reductions equitable throughout the district?

What are the major budget drivers in the district (i.e., growing or declining student enrollment, rising or declining property values, changes in program delivery procedures and the like)? What advance planning has been undertaken to lessen the impact of these situations? This question also applies to facilities planning.

When is the board brought into the planning process? How does this ensure that the board can have an impact on needed changes? What decisions are administration driven? In what way has the community been involved in helping the district deal with budget needs? Are they made aware of needs well in advance so that they can offer suggestions and participate in the decision-making process?

Are there any informal procedures or related activities that are not documented in policy or procedure manuals?

What is the Average Daily Attendance (ADA) for the district for the year under review? How is ADA going to affect state funding formulas in the future?

How accurate is the district's PEIMS data submission? Are there any missing submissions or reports? What corrected reports have been submitted?

What informal procedures or other activities for monitoring financial performance are not documented in writing?

Is revenue and expenditure information compiled for analysis, evaluation and planning purposes? Is financial data used to evaluate programs? Are revenues and expenditures tracked in a timely manner? Are disbursements made in a timely manner? Are available payment discounts used? Are penalties incurred for late payments?

### **Fund balance**

Has the board adopted a fund balance management policy? Is the policy informal or documented in writing? What is the fund balance trend? What are the major driving factors affecting the fund balance in the district?

How does the district manage its fund balance? Describe the process. Which staff members are involved in daily management?

When was the last time that the district had a negative fund balance? Why? When, if ever, has TEA become actively involved with the district's fund balance management activities? How often over the last five years has the district had to borrow money to meet current obligations?

How far is the district from achieving the optimum fund balance, as recommended by TEA? How is the district attempting to achieve this optimum level?

### **7.C. Planning and Budgeting**

Budget preparation and administration are important aspects of overall district operations. Providing adequate resources for programs within the restraints of available funding sources presents administrators with a significant challenge. Sound budgeting practices benefit the district by:

- establishing a documented method for budget development, adoption and administration;
- providing administrative controls for expenditure of funds within approved allocations; and
- assuring campus and community involvement through a “bottom-up” budget approach.

This area evaluates existing policies and procedures supporting the budget process, operational practices, expenditure control, spending plans, program budgeting and long-term budget planning.

Accurate planning and budgeting is especially critical for small districts. Because the budget target is smaller, errors are magnified.

#### **Data Needs**

- Budget planning section of policies and procedures manual
- District improvement plans (DIP) and campus (CIP) improvement plans
- Instructions provided to site-based decision-making committees for preparation of DIP, CIPs and campus budgets
- Board minutes relevant to budget planning
- Budget planning policy section of policy manual
- Previous year’s budget planning document
- Description of software and planning tools used by the district for the budget planning process
- Staffing standards used to prepare the budget
- Current year and four previous years’:
  - Budget expenditure and revenue projections
  - Actual expenditures and revenues
- Copy of guidelines or policies for performing budget revenues and expenditure projections
- List of staff typically involved in the budget process and their roles
- Internal and external audit reports
- Annual financial and compliance reports.

#### **People to Interview**

Board Members  
Superintendent  
Principal(s)  
Finance or Budget director  
Human resources director  
Budget staff  
Bookkeeper  
Department head(s)  
Coaches of major school sports  
Teachers and librarians  
Community leaders.

### **Activities to Perform**

- 7.C.1. Compile all budget planning documents including such things as budget calendars, budget training documents, staffing or other allocation formulas used to prepare campus and departmental budgets. Compare the district's process and documents with the TEA, Texas Association of School Boards (TASB) and district's Regional Education Service Center (RESC) recommended budget process and documents. Show how each document contributes to the budget development process and the target audience and discuss how, when taken together, they produce a comprehensive budget development system that complies with local policy and state law. Chart the differences and discuss the reasons for the variances.
- 7.C.2. Chart any staffing allocation formulas used by the district for the budget and compare the formulas with current staffing levels for those positions. Compare them with any TEA or industry standards and to peer districts staffing and describe differences in a chart or table. Also note who creates and updates these formulas each year.
- 7.C.3. Test the district's ability to accurately forecast revenues and expenditures by charting the variances between the original budget and actual amounts that were reported in the budget to actual schedule (Governmental Accounting Standards Board (GASB) 34 financial statement format) in the annual financial and compliance report. Note any significant variances and attempt to determine the reason for the variance through interviews with the individuals who were responsible for making the original projections.
- 7.C.4. Diagram the campus-level budgeting process, noting what areas of the budget that campuses have direct control over. Show how the site-based decision-making committees are used in the process and how the DIPs and CIPs are linked to the budget. Examine any external or internal audit reports relating to the CIPs, DIPs or budgeting process (particularly compensatory education funds) and note any major findings.
- 7.C.5. Examine the district's budget process and chart how direct costs, special activities, payroll and overtime are charged to district budgets. Note whether the processes used comply with *Financial Accountability System Resource Guide* (FASRG) standards and discuss any deviations.

### **Questions to Ask**

#### **Budget planning**

How does the district use an adopted budget development timeline or calendar? When is the budget calendar published and disseminated? How is the board alerted to ongoing activities that must be performed to create the budget?

How are budgets tied with academic performance improvement goals for all sub-populations of students, the DIP and CIPs? Do increases in annual budget allocations show a priority for activities that support academic performance goals?

What board-approved policies directly affect the budgeting process? What budget procedures are published and disseminated to appropriate staff and committee members?

Do the budgeting procedures identify roles and responsibilities in the budget process including the Board of Trustees, superintendent, directors and supervisors, principals, teachers, staff, site-based decision making team, the community and budget committee (if one exists)?

How is community input into the budget obtained? Through public hearings? Through program advisory committees and campus committees? When is this input gathered? How does the community view the budget preparation process?

How does the budget process address in the long-term (three to five years) budget implications including,:

- Enrollment and ADA projections
- Staffing requirements
- Salaries
- Facility needs
- Long-term liability requirements
- Staff development
- Debt retirement obligations
- Salary and benefit projections
- Transportation needs
- Maintenance needs
- Capital expenditures for equipment and vehicles
- Income projections
- Revenue collections

How does the district evaluate budgets and expenditures to identify inconsistencies with the district's mission, strategic plan, goals and objectives?

How are budget planning adjustments handled; specifically what is the procedure and how are key staff members involved with the process? What is the decision-making process for the mid-year budget adjustment?

What annual planning process do the administration and board use to establish priorities? To improve budgeting procedures? To determine improvement goals?

Does the district use multi-year budgeting? How could multi-year budgeting assist the board or administration realize the long-term affect of decisions?

Does the district have a memorandum of understanding or interlocal agreement for providing any planning and/or budgeting services?

What, if any, informal procedures or related activities are not documented in policy or procedure manuals?

Is there a budget advisory committee? If so, is the representation appropriate and effective? At what point does the budget advisory committee provide recommendations to the superintendent? In what form are recommendations made?

How does the district evaluate and annually update:

- procedures used to establish hardware, software and staffing needs;
- procedures used to establish training needs of budget staff and personnel involved in budget development and control; and
- budget preparation processes including the budget manual, all forms, the submittal process, the adoption schedule, public input, etc.

**Budget staff**

What budget responsibilities do staff members perform? Who is responsible for ultimately gathering budget information for various departments and campuses and compiling it into a single document? Does the district have a designated budget staff person who is comparable to districts of similar size? What services do external vendors or the RESC provide to the district during the budget preparation process?

Which staff members are responsible for making enrollment projections and generating proposed budgets for the general fund, special revenue fund, capital projects fund, debt service fund, fiduciary funds and enterprise or internal service funds.

Which departments, key staff or campus staff are responsible for verifying enrollment projections, trends, comparative analysis and multi-year planning?

**Revenue and expenditure projections**

How are projections of inflationary costs for energy (heat, electricity, etc.), insurance and other fixed expenditures included in the budget?

What formalized forecasting methods are used in the budget development process? How are these documented?

What multi-year comparisons are performed? How are these comparisons used to identify trends? To better understand the impact of certain decisions?

How do budgeting procedures provide a methodology for controlling full time equivalent (FTE) positions and part-time positions? Does the district have a position control system for budgeting and controlling staff allocations and hiring?

What trends and ratios in the growth of staff and students are prepared and presented with budget information during budget adoption hearings? How far back do these trends go back?

Are the variances reasonable between original budget and actual amounts reported in the budget to actual schedule (GASB 34 financial statement format) in the annual financial and compliance report? Do the variances indicate significant issues involving projections of revenues and expenditures?

What informal procedures or other budget-related activities are performed that are not documented?

**Campus-level budget projections**

What specific spending plan for non-salaried expenditures do all principals and other administrators have? Who at the campus level prepares the budget projections? Explain the process. What is the role of the principal site-based decision-making committee; teachers; librarians; support and auxiliary staff?

What types of expenditures does the campus have direct control over? Staff? Supplies? What flexibility is built into the system that allows the campus to allocate staff from one type of position to another? Supply and other budgets?

What happens if the projected enrollment at a campus does not materialize? What happens if enrollments are greater than expected? How often are campus projections updated? What is the update process? What areas of the budget that have a direct impact on campus performance does the campus not have control over?

What, informal procedures or related to campus-based budgeting activities are performed that are not documented?

**Budget development**

Are accurate budget reports produced from the system and provided to the board and staff members? Are budget reports simple and do they clearly explain the district's budget status?

How does the budget process address evaluating and prioritizing district needs for:

- Classroom instructional materials?
- Staffing requirements?
- Expenditure allocations?
- Facility needs?
- Staff development?
- Special services?
- Transportation requirements?
- Maintenance and operational needs?

How does the budgeting process take into account prior year budgets and expenditures? Who is trained in budget development and monitoring procedures? What other personnel might need training or be involved in budget development?

Which staff members attend state and area budget seminars?

Does the budget provide a reserve for contingencies? Does the budgeting process allow the evaluation and prioritization of the special needs of the district?

How is the budget process formally documented? Is there a budget manual? Does it contain all relevant forms, instructions and other data?

Has the district implemented program budgeting in accordance with TEA's *Financial Accountability System Resources Guide*? Are all direct costs charged directly to program/department budgets? Are special activities and other program costs charged to program/department budgets? Is overtime charged to program/department budgets? Are part-time employees charged to program/department budgets?

Do the budgeting hardware and software systems meet the needs of the district? Is budget data automated and accessible to appropriate district staff and management? Does the budget system have automated features that facilitate the budget preparation process?

Can the budget hardware and software accommodate changing budget requirements?

Does the budgeting process help train the staff to change budget requirements and procedures?

Are all funds included in the district's budgeting system with procedures clearly designating the budget manager's responsibility for all funds (general fund, special revenue funds, debt service funds, capital projects, fiduciary funds, enterprise funds (including internal service funds) and student activity funds.

## **7.D. Administrative Technology**

Although technology is a major issue for school districts, much of the emphasis centers on instructional technology, while the most basic administrative applications are left to paper, pen and pencil. The failure to invest in technology at the administrative level stunts instructional programs by diverting vital resources to labor-intensive manual processes. Fully automated and integrated administrative procedures can help districts eliminate some of the paper shuffling and save labor hours and improve the accuracy of the data.

### **Data Needs**

- Description of financial and administrative hardware and software systems
- List of functional areas of the district's operation that are served by hardware/software
- List of frequent system users
- Flow charts showing the interaction between financial, cash management and payroll systems

### **People to Interview**

Superintendent  
Business manager  
Technology/IT director  
Technology computer system liaison for hardware and software  
Principal(s)  
Purchasing supervisor  
Account maintenance supervisor  
Payroll supervisor

### **Activities to Perform**

- 7.D.1. Compile a list of the administrative hardware and software used in the business office. Compare the list to the district's needs, best practices, peer districts and TEA guidelines and discuss the strengths and weaknesses of the current system.
- 7.D.2. Diagram the process the district uses to ensure that the board-approved budget is adhered to and accounting and payroll process are carried out, including computerized systems, data entry, internal control mechanisms and the like. Identify any weaknesses that might result in errors, redundant entry or expenditures that exceed appropriated funds.

### **Questions to Ask**

Are all aspects of the district's electronic financial system used to the fullest extent possible? What components or modules are not used and why?

How and when are staff trained to make full use of the system? Are procedures reviewed to incorporate electronic means whenever possible? What training or user manuals are available to users? Who supports the administrative hardware and software? How well does this level of technical support work? How often are systems down? How long does it take for technical support to respond to a call?

Does the accounting system create the following documents: general ledger (monthly and year-to-date); subsidiary ledgers (cash disbursements, cash receipts, capital assets, payroll, etc., as appropriate); budget-to-actual expenditure reports (monthly and year-to-date); various special reports (list of expenditures for period, outstanding encumbrances, etc.)?

Is program and department accounting information readily available? Are budget detail reports, including expenditures, encumbrances and budget balances provided program managers, principals and directors each month? Do accounting hardware and software systems meet the needs of the district?

Are the district's accounting systems automated when appropriate for the district's size and are they integrated to supply consistent information? Does the district's accounting system allow for the development of required analysis and reports on a regular and as-needed basis? Do payroll hardware and software systems meet the district's needs?



Does the local RESC provide support for the district's computer systems? If not, how remote is the location of the district's support for and maintenance of accounting systems?

Are payroll systems automated when appropriate for the district's size to provide accurate and timely information on salaries and benefits? Is the payroll system automated and integrated with personnel, accounting and budget systems? Does the payroll system allow efficient adjustment to changing requirements? Does the payroll system allow efficient maintenance of historical payroll records? Is the budget system integrated with financial, cash management and payroll systems?

Does the payroll system allow efficient accounting for both 10-month and 12-month employee salaries? Are the payroll and personnel systems integrated to provide necessary financial data and reporting? Do the payroll and personnel systems share a common database with appropriate security measures?

Can the payroll and personnel systems generate management reports showing leaves, balances, overtime, special stipends, etc.? Does the accounting system allow program cost accounting as specified in the *Financial Accountability System Resource Guide*? In the accounting system, are special activities and other program costs charged to the proper program/department budgets? Are overtime, part-time, substitute and other incidental salaries and benefits charged to program/department budgets?

How are funds, capital asset records and long-term liability records integrated in the central accounting system?

Do the accounting systems support capital asset and depreciation reporting requirements in financial statements and notes in the Annual Financial and Compliance Report (GASB 34 format)? Why not? When will the feature be available?

Does the accounting system generate event and periodic alert reports? Are alert reports generated for potential violations of the district's policies and procedures, unreasonable variances between purchase order and invoiced amounts, unusual accounting transactions and other critical exceptions? What are the communication procedures for various alert reports?

What type of expenditure control system does the district use for controlling expenditures and allocations? Does the expenditure control system have an interrelationship between purchasing, accounting and the budget office?

Does the expenditure control system allow a written request and approval process for exceeding expenditure allocations? Does the financial system allow users to view the status of their budgets on-line? If not, what is preventing this from happening?

### **7.E. Accounting and Payroll**

Managing accounting and payroll are among the most important duties of a school district. Although regulations such as the *Financial Accountability System Resources Guide* and other accounting standards exist, actual practices vary widely throughout the state.

A sound accounting and payroll system can provide numerous benefits including:

- internal controls and safeguards;
- timely reporting on the status of funds; and
- systematic disbursements to maximize available funds.

Accounting and payroll policies, procedures and operations must be evaluated. Key areas include segregation of duties, integration of funds into the central accounting system, use of hardware and software systems and staff training programs to keep employees abreast of constantly changing requirements. The processes for large and small districts vary.

### **Data Needs**

- Accounting manuals and any related manuals which identify policies and procedures
- External audit reports (with management letters), including TEA's comments and the district's responses to TEA's comments, for the last five years
- Payroll records for the last year identifying position and annual salaries, organized by type of employee
- Flowchart of accounting and payroll responsibilities.

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility  
Finance director/Chief Financial Officer  
Chief accountant  
Bookkeeper or key financial staff  
Personnel or payroll director  
External auditor

### **Activities to Perform**

- 7.E.1. Compile a list of key tasks performed as part of accounting and payroll. Note if the task is supported by a documented procedure and determine if certain tasks are redundant, misplaced or misaligned in the overall organization and compare processes to documented accounting procedures. Note areas of concern.
- 7.E.2. Prepare an accounting process flowchart for each accounting responsibility, including data entry, accounts payable, accounts receivable, payroll entry, payroll disbursements and any other duties performed in this area. Show steps where controls are performed or are needed in the process and evaluate the effectiveness and efficiency of current processes.
- 7.E.3. Examine TEA's summary of finance reports for the last five years to determine and evaluate the level and type of funding received and how the funding has fluctuated from year to year. Compare the results to those of the peer districts.
- 7.E.4. Review the district's external audit reports for the last three years, including management letter comments and TEA's comments. Compile a list of findings or internal control weaknesses and determine when and how the district addressed the concern.

### **Questions to Ask**

#### **Organization and staffing**

Has the district organized the accounting and payroll departments and adequately defined each position's responsibility to ensure proper segregation of duties, which promotes internal accounting control?

Does the district have a memorandum of understanding or interlocal agreement for providing any accounting or payroll services? If so, who is it with and what services do they perform?

Has the district established staffing criteria for payroll and accounting with management staff assigned specific monitoring activities?

What training in accounting procedures is provided to the accounting staff? What training on payroll procedures is provided to the payroll staff? What training on payroll procedures is provided to new employees and new management? What training is provided to management personnel to help them understand and analyze payroll and accounting reports?

**Policies and procedures**

Does the district have an accounting procedures manual and a payroll procedures manual? What, if any, informal procedures or accounting-and payroll-related activities does the district perform that are not documented in writing? What procedures are in place for cash receipts, cash disbursements, accounts payable and payroll that prevents someone from having sole access to assets (cash, equipment, vehicles, etc.) and accounting records?

What board-approved policies affect payroll and accounting? How does the district ensure that the accounting and payroll policies are consistent with federal, state and local regulations?

How does the accounting and payroll procedures manual address required data for federal, state and local reporting requirements? TEA Chart of Accounts guidelines? Control and confidentiality of payroll records? What are roles and responsibilities of payroll and accounting personnel?

How does the accounting procedures manual describe the various levels of reporting needed for management review and evaluation for cost analysis and other purposes?

How frequently are accounting and payroll policies and procedures evaluated and revised? How does this process ensure that policies and procedures reflect changing federal, state and local requirements? Who is responsible for policy and procedure revisions?

How do the processes for depreciation accounting of capital assets treat factors that limit the service life of capital assets?

Where and when are the district's accounting and payroll policies and procedures published (or posted electronically)?

What control weaknesses has the external or internal auditor pointed out in the last three years? How have each of these items been corrected? Are payroll and disbursement checks signed by two authorized individuals? Are manual checks limited to once a week? Are automated checks limited to twice a month?

**Payroll**

Which staff members have access to direct deposit of payroll checks? What percentage of the staff is enrolled in direct deposit? What is preventing others from participating?

Are personnel and payroll performed and supervised by staff members in different departments?

Which payroll staff members are responsible for processes such as payroll calculations, preparation of payroll disbursement records (payroll ledger, individual year-to-date earnings records) and preparation of payroll checks?

Which human resources staff members are responsible for processes such as documenting employee status, compensation and benefit records, approving employee status change documents, and preparing and updating payroll master files?

### **Accounting**

Are regularly scheduled reviews, analysis and evaluation of accounting activities performed? Are periodic random internal audits of petty cash and activity funds performed?

Are reviews of compliance with changing accounting requirements conducted? Is a review and evaluation of information provided to managers conducted? Is an evaluation of the accounting reporting system in relation to federal, state and local reporting requirements conducted?

Are monthly reconciliations of all bank accounts performed? Are detailed tax receipt records reconciled to the general ledger tax revenue? Is a review of changing payroll requirements conducted in a consistent manner? Is the payroll register reconciled to the payroll general ledger?

Who is responsible for ensuring that capital assets are updated continuously or periodically for asset additions, deletions and reconciliation to capital asset inventories?

What types of accounting activities are performed for student activity funds? How are student activity funds monitored? What activity fund records are kept on the central accounting system? Does the district have a published (or electronic) student activity funds accounting procedures manual that has been disseminated to students, advisors and officers? How does the district monitor procedures for student activity funds if they are accounted for on a decentralized basis?

### **7.F. External Audit**

External audits provide a review of the district's compliance with established standards and practices. External audits are required of all Texas districts and, according to TEA, are performed by more than 300 public accounting firms. The external audit provides:

- an annual financial and compliance report;
- an examination of the expenditure of federal funds; and
- a report to management on internal accounting controls.

### **Data Needs**

- External audit reports with management letters, including TEA's comments and the district's responses to TEA's comments, for the last five years
- Current and the previous four years' external financial audits
- Related policies and procedures manual sections
- Related board and local policies
- Related federal and state requirements, if applicable
- Current year materials provided from district to external auditor
- Proof of valid certificate and good standing with state accountancy board for each audit year
- External auditor contract and any related request for proposal for services

### **People to Interview**

Selected board members (Audit committee if appropriate)  
Superintendent or assistant superintendent with assigned responsibility  
External auditor  
Bookkeeper or district liaison with External Auditor  
Finance director  
Internal auditor

### **Activities to Perform**

- 7.F.1. Review and chart the contract terms and conditions for the external auditor. Show the annual cost, the scope of services, length of time district has had the same auditor and note any policy or procedurally required rotation of the external auditor. Also, verify that all external auditors held valid certificates and were in good standing with the State Board of Accountancy while performing work for the district.
- 7.F.2. Review audit reports and chart the highlights—material weaknesses or exemplary comments and compare findings with School FIRST ratings related to audit. Discuss any highlights in a chart and show how the district has addressed specific areas of concern.
- 7.F.3. If applicable, attend an audit committee board meeting, examine the minutes of the meetings or interview board members and summarize the board’s level of involvement in the audit process. Determine how the board deals with audit findings and ensures that findings are remedied in a timely manner.

### **Questions to Ask**

Who is the district’s liaison with the external auditor? How does the board interact with the auditors? How does it oversee the process of correcting identified weaknesses? If the district has an audit committee, who is on it? How frequently does the committee meet?

What is the district’s process for selecting external auditors? Is the external auditor selected by the Board of Trustees and compensated from district funds? If not, why not? Has the process changed in the past five years? Is the process documented in writing or published and distributed? Who are the key personnel involved in the selection process?

What responsibilities other than the external audit does the external auditor perform? Do they include bookkeeping and internal audit? How does this extra work compromise the external auditor’s independence? What processes or procedures are in place to ensure the external auditor’s independence?

Are the external auditors trained to perform school district audits? Does a public accountant or certified public accountant holding a CPA license or valid permit from the Texas State Board of Public Accountancy perform the external audit? Does the district annually verify that the accountant performing the external audit is in good standing with the Texas State Board of Public Accountancy? If not, why not?

How long has the current external auditor conducted the external audit for the district? Does the district have a rotation policy? If so, compare it with TEA guideline of rotation after 10 years.

How frequently does the external auditors meet with appropriate district management and Board of Trustees to discuss the annual audit plan for the external audit at the beginning of the audit. Is a schedule of audit work and the findings and recommendations contained in the report to management at the end of the audit?

What responsibilities of the district does the external audit encompass? Does it include the entire district and all fund types? What about capital assets and long-term liabilities? How does the district ensure that a risk assessment complies with auditing standards?

How did the auditor ensure that the district was in compliance with GASB 34?

If the district receives federal funding, is the external audit performed according to the required standards (OMB Circular A-128, Audits of State and Local Governments; Standards for Audit of Governmental Organizations, Programs, Activities and Functions issued by the U.S. General Accounting Office; *Financial Accountability System Resource Guide*, “Special Program Guidelines”; OMB Circular A-133)? If not, why not?

Is the retention of the original working papers for a period of seven years included in the terms and conditions of the auditor’s contract?

Does the external audit report include an annual financial and compliance report (with minimum requirements stipulated by the *Financial Accountability System Resource Guide*) and a management report/management letter? If not, why not?

Was the annual financial and compliance report prepared, approved by the Board of Trustees and submitted to the TEA within 150 days of the close of the fiscal year? If not, why not?

Were the audit reports reviewed in public meetings and were copies distributed to appropriate users? What process or procedure is in place for monitoring the administration’s responses to external and internal audits?

Does the Board of Trustees use outside management audits to identify areas for improving the economy, efficiency and effectiveness of the district? If not, why not?

Do the external auditors meet with appropriate district management and Board of Trustees to discuss the role of the district’s participation in the external audit (i.e. internal audit and accounting personnel assistance)? If not, why not?

## **7.G. Internal Audit**

The State Auditor’s Office has said a school district with 5,000 students or an annual budget of \$20 million or more should have an internal audit procedure. An internal auditor can determine if money is spent appropriately and if it is used efficiently.

The internal auditor coordinates the internal and often the external audit activities of the district and provides a direct communication link to the board. Internal audit areas it addresses include qualifications, organization, management and staffing.

### **Data Needs**

- Organizational chart by position showing staff and management
- Organization chart by function for internal audit
- Job descriptions for internal audit positions
- Qualifications and certifications of management and staff
- Copy of internal audit plans for the last three years
- Copies of internal audit reports and any other special reports for the last three years
- Resumes of key personnel
- Staffing and budget for internal audit function for past three years

### **People to Interview**

Superintendent  
Department heads  
Internal auditor

Internal audit staff  
Management over internal audit managers  
Board members

### **Activities to Perform**

- 7.G.1. Create or examine existing organizational charts showing the current reporting structure for internal audit (including externally provided internal audit services) and summarize how the current structure addresses the Institute of Internal Auditors (IIA) Independence and Objectivity Standards. Also discuss how the internal auditor's relationship with the board does not provide board members an opportunity to inappropriately insert themselves into the day-to-day running of the district.
- 7.G.2. Prepare a chart showing the staffing and budget of internal audit for the last three years. Compare the staffing and budget to the number of schools, the number of total employees and the number of audit staff in peer districts and the budgets of other districts. Note variances and discuss the reasons for those variances.
- 7.G.3. Chart the qualifications and certifications of management and staff to determine how many hold valid certificates and are in good standing with the Texas Board of Public Accountancy. Compare the results with peer districts, the RESC industry standards.
- 7.G.4. Examine the audit plans and reports for the last three years. Chart the major areas audited and determine how the allocation of staff and time to these areas of the district's operation address the areas of greatest risk in the district. Through interviews, determine if there were areas of concern or high risk that were omitted from the plan and determine why they were left out.

### **Questions to Ask**

#### **Organization and management**

To whom does the internal auditor report? How does this arrangement ensure the independence of the auditor from departments audited? Do the board and administration have an understanding of internal auditing? If not, why not? How does this arrangement provide the internal auditor with sufficient authority to provide oversight and budgetary support? Does the Internal Audit department have access to the Board of Trustees?

What documented internal audit policies and procedures are in place in the district?

Can Internal Audit's reported findings and recommendations be made without undue influence from the audited group?

Is all or part of the internal audit performed on a contract basis? If so, what process was used to purchase the services? Does the district have a memorandum of understanding or interlocal agreement for providing any internal audit services?

What terms and conditions in the contract ensure the independence of the audit activities from the work of the external auditor?

What long-range goals has the Internal Audit department established that are defined, measurable and approved by administration and the Board of Trustees? What is the measurement criteria? How is the internal auditor meeting it's goals?

Do people independent of the organization with no conflict of interest review the Internal Audit department externally at least once every three years? Is a formal written report issued upon completion of the review?

### **Staffing**

How are staff audit assignments made? Is a rotation policy used? Is the TEA guideline of three years followed?

What operational responsibilities do any Internal Audit staff members have for any areas of the district?

Are there clearly defined minimum educational requirements or experience levels for internal audit staff members holding various levels of responsibility? What are they? How are the requirements contributing to the success of the department?

How many internal audit staff hold valid CPA licenses or certificates and how many are in good standing with the Texas Board of Public Accountancy? How often is the status of the certificates and standing with the board verified?

How much continuing education and on-the-job training is provided to ensure each audit team possesses the training appropriate for the work required? What additional training do audit supervisors receive to improve their personnel management skills?

Are internal audit staff members of professional organizations? How frequently are internal audit staff evaluated? By whom?

### **Audit plan and charter**

Does the district have an internal audit charter or an annually approved audit plan? If not, why not? How does charter define the department's purpose, authority, responsibility and scope of the audit work, preparation of audit working papers, development of audit findings and preparation of audit reports?

How does the internal audit charter and internal audit plan reflect the following:

- Assessing risk and auditing areas of greatest risk?
- Cyclically reviewing all areas of the district that are at risk on a periodic basis?
- Determining the effectiveness and efficiency of district operations?
- Assuring controls and safeguards are in place to protect the district's assets?
- Reviewing compliance with federal and state laws and regulations in cooperation with the TEA?
- Assisting with budget preparation and analysis?
- Coordinating and assisting with external audit activities?
- Reviewing the reliability of financial information?
- Suggesting policy and procedural changes, which could protect the assets of the district?

Has Internal Audit been authorized to access the records and personnel necessary for the performance of audits?

At what point does the board receive and approve a summary of the annual audit work schedule?

### **Operations**

At what point does the department review the work of the internal auditors to provide reasonable assurance that the work was performed objectively before the related audit report is released? Does the Internal Audit Department use a risk assessment to identify areas for audit?

How frequently does the board receive and review student activity reports?



How is the scope of the department's audit work defined and approved? Who is responsible for this determination? How are the divisions or areas audited informed about areas that will be audited?

Does the audit include an examination and evaluation of the adequacy and effectiveness of the system of internal control? If not, why not?

What systems are in place to ensure that internal audits are adequately planned and documented, including the objectives and scope?

Do the internal auditors appropriately identify the areas of audit risk during audit planning? How are high-risk programs and services determined? How is the risk assessment tracked and reported?

How do the internal audits address financial and operating records and reports? How do systems established by management to ensure compliance with policies, plans, procedures, laws and regulations?

What other special audits are conducted, such as investigative or other types of audits? How are the decisions made about the type and number of special audits? How do special audits affect planned audits?

Do the internal audits review the operating or program objectives and goals established by management, as well as the administrative control procedures developed and implemented by management? If not, what other area of the district's operation performs this duty?

Do the internal auditors meet periodically with the external auditors to coordinate activities—supplementing the work of the external auditor? If so, how has this process benefited the district?

What types of audit programs do internal auditors use when conducting audits?

Are concise, constructive and timely audit reports prepared that include the purpose of the audit, the scope of the audit, an expression of the auditors' opinion and recommendations for improvements?

What report follow-up procedures are in place to determine that corrective actions were taken and are achieving the desired results?

## **7.H. Tax Appraisal and Collections**

School districts develop and adopt their tax rate while county appraisal districts appraise the value of property within the district. The tax rate that school districts adopt consists of two components: (1) a maintenance and operations component for meeting operating costs; and (2) a debt service component to cover the costs of indebtedness. The combined rate is applied to the assessed property value to compute the district's total tax levy.

Property values are important determinates of school funding, at the state and local level. There is an inverse relationship between local property wealth and state aid: the greater the property wealth of the district, the greater the amount of revenue raised locally, but the lower the amount of state aid.

Some districts collect their own property taxes, while others contract with other entities, such as a city or county. Often, districts contract with an attorney to collect delinquent property taxes.

## **Data Needs**

- Audited annual financial statements prepared by external auditor (five-year history)
- Tax rates (debt service portion and maintenance and operations portion) for last five years for district and peer districts
- Current and delinquent tax collection rates (five-year history)
- Property value per student for district and peer districts (five-year history)
- Personal property tax rate and collection information (five-year history)
- TEA Summary of Finance (five-year history)
- Report from County Appraisal District with property tax statistics
- Board policies relating to tax collections
- Contracts for any tax collection services
- Staffing and budget information for the tax collection function for the last three years

## **People to Interview**

Selected board members on the Finance committee  
Superintendent or assistant superintendent with assigned responsibility  
External auditor  
Delinquent tax attorney  
District tax assessor/collector  
Chief appraiser of County Appraisal District for ISD  
Finance director  
Internal auditor

## **Activities to Perform**

- 7.H.1. Prepare a chart comparing the taxable value per pupil and tax and tax collection rates, breaking out current and delinquent taxes, of the district with peer or area districts for the last five years and discuss any remarkable differences, as well as changes in either the debt service or maintenance and operations rates.
- 7.H.2. By examining board policies, contracts and through interviews with staff and legal counsel, diagram the district's method of collecting current taxes and delinquent taxes. To the extent possible, determine and summarize the primary reasons for higher or lower collection rates at each level and compare them with best practices identified in other districts.
- 7.H.3. If taxes are collected in-house, chart the staffing and budget of the department and calculate the dollar amount spent versus the number of taxing accounts. Determine if there are other entities in the vicinity that perform similar services and are collecting taxes at about the same or a better tax collection rate, and request a price quote per account to outsource this responsibility. If the taxes are collected by an external entity, determine if there are other entities in the vicinity that perform similar services but get better tax collection rates and request a price quote per account to outsource this responsibility. Discuss the advantages or disadvantages of each method of collecting current taxes (i.e., whether district collects taxes itself or contracts with the county, city or other local taxing entity).
- 7.H.4. Review district's state Tier II funding levels for past five-years and if applicable, chart the current level of funding against the potential maximum funds available. If the district received substantially less than maximum funding, determine the reason for the difference and what would need to be done to tap additional state funds for the district.

## **Questions to Ask**

Does the district appraise its own property or collect its own property taxes? How many staff members are dedicated to appraising property or collecting property taxes? Does the district contract with the city or county to appraise or collect property taxes? If so, what is the payment arrangement?

Does the district have a personal property tax? If so, for how long and how much is it?

What board policies address the collection of delinquent taxes, including the payment schedule to the collector, goals/rates for collection of delinquent taxes? Do these policies allow aggressive tax collection? What incentives exist to encourage taxpayers to pay taxes in a timely manner? What discounts are provided to taxpayers for early payment of taxes? Does the district or its representative publish the names of the largest 10 to 25 delinquent taxpayers?

How are delinquent taxes collected? What is the current delinquent tax rate? If the district uses an attorney for collecting delinquent taxes, what does the contract specify? What does the district pay for that service? Are there constraints imposed upon the delinquent tax attorney by the board or administration that inhibit the aggressive collection of taxes? If so, what are they?

Does the district have a memorandum of understanding or interlocal agreement for providing any tax collection services? If so, what are the terms and conditions of the agreement?

Has the district received the maximum state Tier II funding the past five years? If not, why not?

Are there any informal procedures or related activities that are not documented in policy or procedure manuals?

## **7.I. Review and Evaluation of the Contracting Process**

A number of financial services such as accounting as well as internal or external audit could be purchased or contracted for through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

***PURCHASING  
AND  
CONTRACT  
MANAGEMENT***



## **8. Purchasing and Contract Management**

An effective purchasing system allows a school district to provide quality materials, supplies and equipment in the right quantity in a timely, cost-effective manner.

Purchasing includes those activities involved in the identification and purchase of supplies, equipment and services needed by the district, as well as the storage and distribution of goods. Goods and services must be obtained according to the specifications of the users; at the lowest possible cost; and within state laws and regulations including the state's General Government purchasing and bid requirements, the Texas Education Code and Federal Regulations, as they apply.

An effective organization requires clear policies, detailed procedures and coordinated planning to achieve its goals and objectives. Clear policies provide interpretation of the organization's vision and the basis for establishing goals, objectives and activities. Detailed procedures provide the specific steps to guide the organization through its daily activities and to ensure compliance with its policies. Coordinated planning is key to the organization's ability to change with its environment, budget for adequate resources and meet the needs of its users. Strong internal controls and cost-efficient practices such as bulk purchasing and price/bid solicitation provide the framework for the efficient procurement of goods and services.

The Purchasing and Contract Management chapter evaluates the effectiveness and efficiency of purchasing, contracting, warehousing and textbook management in the following areas:

- 8.A. Organization, Staffing and Budgeting
- 8.B. Policies and Procedures
- 8.C. Operations
- 8.D. Purchasing Technology
- 8.E. Warehousing Operations
- 8.F. Textbook Operations
- 8.G. Contracting Process
- 8.H. Review and Evaluation of Contracting for Goods & Services

### **8.A. Organization, Staffing and Budgeting**

Efficient and cost effective purchasing and warehouse operations are dependent upon qualified and well-trained staff whose duties are organized under a management structure that facilitates communication, problem-solving, responsibility and accountability. Budgets for operating the purchasing and warehouse functions must be adequate in order to complete required tasks but should be comparable with peer districts and not excessive so as to take funds away from instruction.

#### **Data Needs**

- Organization chart for purchasing functions for current and previous three years
- Job descriptions
- Key staff qualifications/resumes
- Peer district information
- List of training received by purchasing staff or provided to users
- Budget reports for purchasing functions, current and three years prior
- Number of purchase orders issued and total dollar amounts

## **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibility  
Purchasing director/agent  
Finance/Budget director  
Accounts Payable representative  
User division directors from Technology, Food Service, Transportation and Warehousing

## **Activities to Perform**

- 8.A.1. Create or examine existing organization and staffing charts and job descriptions for purchasing and warehousing. Interview staff to determine reporting arrangements, determine whether the organizational structure depicted on the chart reflects the actual organization of the department, expertise of purchasing staff and if adequately trained, especially management staff. Document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the reasons for changes. If some purchasing functions are decentralized to other functional areas within the district such as food services, transportation and technology, show how they report within the organization and explain how these functions interact with the purchasing division to ensure statutory compliance.
- 8.A.2. Chart the staffing and budgets for the last three years for purchasing and purchasing related functions such as warehousing, and receiving and accounts payable. Determine the ratio of purchasing and purchasing-related staff to total district staff, number of purchase orders and dollar amount of purchases. Compare ratios of purchasing and purchasing related staff to total district staff, number of purchase orders and dollar amount of purchases to industry and peer districts and note variances.

## **Questions to Ask**

Does the district have specific personnel assigned to perform the purchasing and warehousing function or is the operation primarily decentralized with purchases made by individuals or departments? Is management staff assigned specific monitoring activities for purchasing? Does the assigned management staff have the requisite knowledge of purchasing and warehousing requirements to adequately monitor the functions? Are the duties of individuals within the purchasing function sufficiently segregated to prevent abuses? Is supervision and monitoring of the purchasing and warehousing function sufficient to prevent abuses?

Are staffing levels within purchasing and warehousing based upon a district staffing formula that is comparable to districts of similar size? What is the current workload of individuals within the department, and how is productivity monitored? How is the workload distributed? Is the workload evenly distributed among staff?

Do job descriptions match the actual work being performed by the staff? Is staff compensation equitable and tied directly to the responsibility, expertise and experience needed for each position?

Do campus or departmental staff have access to purchasing manuals or handbooks that guide them through the purchasing processes? Is purchasing information available on the district's intranet site (if there is one)?

What is the budget of the purchasing and warehousing function? How does this budget compare with the purchasing budgets of peer districts? What are the cost drivers in the budget, and what has the department done to control those costs?

Does the district contract for services in support of the purchasing function such as technical advisors or consultants that assist with the purchase of specific goods or services? How did the district determine that individuals or firms outside the district could best perform these services? What documentation is available that describes the process? Was a cost-benefit analysis performed and documented?

What types of in-service training are provided for all district staff involved in the purchasing process, including principals, campus based clerks and the like?

Does the departmental budget provide funds for staff development? Are purchasing staff provided in-service training on changing requirements, laws and procedures? Is staff sent to appropriate state or regional purchasing seminars? Who is responsible for insuring that staff is notified of changing requirements and that the requirements are implemented? Who is responsible for training new staff?

### **8.B. Policies and Procedures**

Purchasing policies and operating procedures are critical for a district to comply with state laws and local requirements and to perform purchasing functions in an efficient and timely manner. Policies should clearly establish purchasing authority, what methods are required for each type of purchase and provisions for conflicts of interest and penalties for violating purchasing laws and policies. Purchasing procedures implement policies by documenting the steps to be taken by user divisions and purchasing staff when goods or services are procured. Procedures are also used to train new staff.

#### **Data Needs**

- Federal, state and local laws, policies and guidelines that pertain to purchasing
- District purchasing policies, procedures, manuals and/or handbooks
- Internal and/or external audit findings that pertain to purchasing

#### **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibilities  
Purchasing director/agent  
User divisions  
Internal or external auditor

#### **Activities to Perform**

- 8.B.1. Create a chart comparing the district's policies that relate to purchasing, to state or federal laws and note whether the policies comply with the law or are either more or less restrictive. Review any external or internal audit reports as they pertain to purchasing functions. Document purchasing levels and types of purchases that require board approval, administrative approval and the like and discuss those that may be too restrictive or lack adequate oversight.
- 8.B.2. Make a list of all departmental operating procedures relating to purchasing, including both day-to-day operating procedures and any handbooks or procedures published and disseminated to campuses and departments that initiate purchases. Describe the area of the department's operation that is addressed, note when it was last updated, whether the procedures are cross-referenced and link to district policy, and to the extent possible, show whether the procedure implements or complies with major state and federal laws and guidelines. Discuss the procedure development cycle or the process used by the district to keep operating procedures current.



## **Questions to Ask**

### **Policies**

Are board policies comprehensive as they deal with purchasing? If not, what is missing? What purchasing policies are unique to this district? Why were these policies adopted? How do these unique policies contribute to the effectiveness or efficiency of the purchasing process?

What are the board-approved policies regarding general purchasing authority? Regarding purchasing methods at various thresholds or types of purchases? Which district personnel are authorized to approve purchases at what specified spending thresholds? How does board policy address strong punitive measures for non-compliance with purchasing laws, rules and regulations? How are those policies implemented and what procedures are in place to ensure that policies are carried out? What is the district's policy on acceptance of gifts?

How does policy address written price quotations for purchases between \$10,000 and \$25,000 for non-federally funded personal property? Does policy define and control purchases that can be made outside the established purchasing system such as emergency purchases, procurement cards, petty cash, etc.? Does the policy address the financial obligation of the district for purchases made by personnel outside of the purchase approval? Does the policy address the process by which campuses or other authorized purchasers may order from non-approved vendors?

Does the district have a conflict of interest policy preventing or restricting district employees and/or relatives from selling goods or services to the district? How are board members and their families treated differently in policy, from employees and relatives of employees? Under what circumstances can board members or their families do business with the district? Who is responsible for monitoring board and employee compliance with the policy?

What board members with a substantial interest in a business have filed affidavits declaring their interest? Who is responsible for ensuring that board members refrain from voting on transactions that might involve their business or the business of a family member? How has the board removed any perception that they are benefiting financially from purchasing transactions of the district? What policies exist that would give favored treatment to local vendors? Is there any evidence that the district can obtain more advantageous terms locally?

What competitive bidding requirements are stipulated in policy? How does policy address interlocal agreements requirements, board authorization, and Memorandums of Understanding (MOUs) such as with a JJAEP? Design/build procedures and guidelines? Competitive sealed proposal/Request for Proposals requirements, including the evaluation process? Catalogue purchase procedures? Reverse auction procedures? Cooperative purchasing?

How are board policies regarding purchasing communicated to vendors? To user divisions? To purchasing staff? What evidence exists that this method of distribution is sufficient to ensure compliance?

### **Procedures**

Who is responsible for writing and disseminating procedures to staff? To user divisions? How frequently are procedures reviewed and updated? How is the policy development and update cycle linked to the procedure review and update cycle? Who is responsible for monitoring compliance with district procedures?

What checks and balances are documented in procedures to ensure that an individual cannot initiate a purchase and authorize payment without detection? What actions are taken when an employee violates a policy or procedure? What types of purchasing violations could result in immediate dismissal? How are employees informed that they are at risk of losing their jobs if they violate

purchasing policies and procedures? Is this a no tolerance procedure? If not, what are the progressive punishments outlined for violating purchasing policies or procedures?

How has the district enforced established internal and external mandated ethical requirements governing purchasing procedures?

Who maintains an updated conflict of interest statement from members of the Board of Trustees? Where are these files maintained? How are board members' compliance monitored and by whom?

How do procedures address obtaining and maintaining conflict of interest statements from key management personnel (at least the superintendent, assistant superintendents, directors and responsible purchasing personnel)? Is the policy applicable to all personnel that have delegated purchasing authority? If not, who is exempted and why?

Who performs periodic campus and departmental staff training? Who trains purchasing staff on changes in law or policy? What types of programs are presented to all appropriate personnel regarding the legal and ethical procedures in dealing with vendors?

How frequently does a person independent of the purchasing function evaluate the reasons for limited bid responses from vendors? Who is responsible for periodically monitoring the purchasing process and testing internal controls?

What procedures exist to prevent purchasing in excess of approved amounts? When the purchasing staff discover that commodity purchases are approaching the statutory aggregate amount, what procedures are followed for all subsequent purchases in that year?

What findings regarding purchasing procedures have been identified by internal or external auditors? By law enforcement officials? How have these findings been used to strengthen the purchasing procedures and practices?

How is automation documented in the procedures? What processes have been recently automated that may require new or updated procedures?

### **8.C. Operations**

Effective purchasing processes ensure that high-quality supplies, equipment and services are purchased at the best price, in the right quantity, from the right source and in accordance with local and state purchasing guidelines. These criteria must be met without sacrificing quality and timeliness.

#### **Data Needs**

- Statistical information on the number and type of purchase orders issued and requisitions filled, invoices paid or any other information that is readily available about workloads and process turnaround times
- Vendor lists
- Existing requisitions, purchase orders and contracts, particularly construction contracts
- Copies of any contracts for services that are privatized (if applicable)
- Shared service contracts
- Memorandums of Understanding (MOUs)
- Listing of purchase orders by commodity class for current and previous year
- Information about Regional Education Service Center (RES-C) assistance and agreements (if applicable)
- Recent Internal Audit Reports on purchasing activities
- Recent Texas Education Agency (TEA) Audit Reports on purchasing activities

- Procurement card policies and procedures
- Monthly billings from procurement card company for previous six months.

### **People to Interview**

Assistant superintendent with assigned responsibility  
Purchasing director, agents or buyers  
Finance/Budget director  
Accounts Receivable and Accounts Payable representative(s)  
Principals/campus-based personnel  
Other selected department head(s) as applicable  
Internal Auditor  
RESC staff, if applicable

### **Activities to Perform**

- 8.C.1. Create a process flow chart showing how purchasing and contracting needs are identified, and how purchases are initiated, scheduled, processed, ordered, received, warehoused and ultimately delivered to the originating department or campus. Show points in the process where signoffs are required, the time lapse between each step in the process, where paperwork is entered into or produced from computerized systems and how and where computer systems interact. The process flow should include orders from the supply warehouse, if one exists, as well as orders from external vendors. Note areas where processes can lead to inefficient purchasing or contacting or to failure of meeting customer needs in a timely manner.
- 8.C.2. Compile a list of the total cumulative purchases by commodity class for the last year and determine whether the district is following the appropriate bidding or solicitation procedures based on the cumulative dollar amount of each commodity. Examine the purchasing system to determine that sufficient controls exist to ensure that cumulative purchases in excess of statutory limits are appropriately bid.
- 8.C.3. Prepare a chart listing all shared or cooperative purchasing arrangements in which the district participates showing, by arrangement, the types of goods or services obtained, other participants and estimated frequency of use. Interview staff to determine what decision-making process was used to make these arrangements, what benefits they believe have been achieved as a result and what problems they have experienced, if any, with each arrangement.
- 8.C.4. Prepare a representative list of vendor purchase orders for the last two years and determine if proper competitive bidding was performed where applicable.
- 8.C.5. Determine the extent to which the district uses procurement cards, if any. Prepare a diagram of the process used by the district for procurement card purchases and payment of invoices. Review and analyze the district's procurement card policies and procedures and determine cardholder compliance and if adequate checks and balances are in place.

### **Questions to Ask**

#### **Purchase planning**

How does the department identify purchases and contracts needed by campuses and departments?  
When does the purchasing department request information from campuses and departments for the next fiscal year's materials and services needs? What procedures are used to identify the aggregate purchasing needs of the district so that competitive purchasing can be performed for pertinent items?  
How does the department provide information to campuses and departments on annual contracts established for materials and services and for those items for which competition must still be performed? How does the department track expiration dates and extension options for contracts?

What and when is information provided to campuses and departments on expiring contracts or those that have extension options?

**Purchasing processes**

Does the bidding process provide for:

- Preparing specifications in a manner that does not limit competitive procurement procedures to a specific vendor or item?
- A standardized bidding process coordinated by the Purchasing Department?
- Preparing and soliciting bids according to local policy, state and federal laws and regulations and other volume purchases where bidding is the best purchasing practice?
- Obtaining competitive prices for those items not bought by formal bid but through requested price quotations from vendors?
- Follow-up procedures with vendors not submitting bids?
- Maintenance of original competitive procurement documentation at a district facility?

Does the district periodically identify and evaluate alternative purchasing methods such as joint purchasing with the state, other districts or through Regional Education Service Centers?

How does the district evaluate competitive practices and innovative purchasing or service arrangements? How does the district evaluate whether there are goods or services that can be obtained from another public entity or the private sector at a lower cost, higher quality or both?

How do users rate the purchasing function? Is the purchasing function meeting campuses' and departments' needs? Are requisitions processed in a timely manner? Does the Purchasing Department keep the campuses and departments adequately informed of the status of requisitions? How does the Purchasing Department respond to problems encountered in processing requisitions?

How does the district monitor vendor performance and document performance problems for follow-up? Who reviews delegated purchases to determine that price is fair and reasonable for purchases that do not require/receive competition? Are there standard terms and conditions used for all purchase contracts? How are standard terms and conditions conveyed to vendors, especially those providing phone quotes?

How does the district coordinate technical purchases for user divisions? Are specifications for the bids defined by those who are responsible for using the purchased materials with review by the Purchasing Department as appropriate?

What method does the district have to determine the aggregate threshold amounts to determine what type of procurement procedure is needed?

Are files organized and easily accessible? Are all required documents included in the files? What procedures are used to make sure files are complete? Who has access to files?

**Procurement cards**

Does the district use procurement cards? If so, does the district have procedures that detail their use? Was the contract bid by the district or is it the state contract bid by TBPC? Who determines which staff can be issued cards and what criteria is used in the selection? What training is provided to staff that are issued a procurement card? How does the district determine compliance with aggregate purchasing rules when using the card? How does the district determine if the price paid for items procured using the card is fair? How does the district determine if the materials or services were actually received when procured using the card? What approvals are necessary for card purchases? Has the internal auditor reviewed the district's procurement card program recently? How does the

district ensure that the cardholder does not have a conflict of interest in making the purchase from a specific vendor (i.e. relative).

### **8.D. Purchasing Technology**

Effective purchasing technology allows for the efficient automation of manual processes, which can improve response time, control costs and enhance accountability and recordkeeping.

#### **Data Needs**

- Information on current automated purchasing systems
- Information on plans for new systems
- Pertinent recent internal audit reports
- Pertinent external auditor management letter comments

#### **People to Interview**

Purchasing director/agent  
Finance/Budget director  
Technology director  
Accounts Receivable and Accounts Payable representative(s)  
Principals/campus-based personnel  
Other selected department head(s) as applicable  
Internal Auditor

#### **Activity to Perform**

- 8.D.1. Prepare a process flow chart showing the technologies used to support the purchasing and warehousing functions, connectivity with user divisions or campuses and with the finance and accounts payable systems and the technology used to support those functions. Also review internal and external audit reports as applicable. Determine how, where and when the purchasing system interacts with budget and appropriations control mechanisms. In the process, examine and evaluate the technology used to support the purchasing system, including the supply, ordering and requisitioning systems and identify areas, if any, where improvements are needed or internal controls are weak.

#### **Questions to Ask**

How is the procurement program integrated into the budgeting/encumbrance system? Are all purchase requisitions reviewed for budget authorization before purchase orders are prepared? Are periodic (preferably monthly) budget-to-actual expenditure reports issued to all user departments and to the department responsible for purchasing? Is a periodic budget-to-actual expenditure report produced that includes an explanation of variances? Does the district's designated budget officer review this variance report and are periodic reports presented to the Board of Trustees?

Does the purchasing system (either automated or manual) provide for:

- Automatic reorder points for stock replenishment? Who sets the limits and has the authority to make changes?
- Follow-up on back orders and partial shipments to assure receipt of proper quantities?
- Monitoring open purchase orders?
- Matching purchase orders and receiving documentation for verification of receipt of material to ensure proper payment of invoices?

- Ensuring charges are made to the proper account code?
- An approved vendor file and history?

Does the district have a centralized purchasing system that:

- Provides for a requisition form that states suggested vendor, account code, delivery point and description of item(s) to be purchased with related costs?
- After approval of the requisition, ensures a purchase order is issued with appropriate copies provided to the vendor, the requesting department or campus and to accounts payable with one copy retained by purchasing (if applicable)?

Does the automated purchasing system contain specified delivery locations and who has the authority to change?

### **8.E. Warehousing Operations**

An efficient warehouse operation ensures that all purchases and deliveries to schools and administrative areas are complete and timely; inventory levels are sufficient to meet requests for supplies from individual schools and the district's property and equipment is accounted for properly and controlled; and surplus or obsolete property is disposed of properly and removed from district records.

#### **Data Needs**

- Federal, state and local rules and regulations
- District policies and procedures
- Organization chart; current and previous three years
- Job descriptions
- Inventory and equipment lists
- Inventory, economic order quantity or other management reports showing the number and type of supplies maintained in the warehouse inventory, orders issued and requisitions filled, computing reorder quantities, frequency of shelf restocking or "picking," frequency of supply delivery to users or any other information that is readily available about workloads (if using a traditional warehousing function)
- Sample of delivery tickets signed by school or department staff
- Location, size and primary use of warehouse facilities in the district
- Copies of just-in-time (JIT) delivery model agreements/contracts
- Customer satisfaction surveys or comment cards (if applicable)
- Review delivery routes and district zones to examine the efficiency of delivery routes
- Peer district information
- Physical inventory reports
- Pertinent internal audit reports

#### **People to Interview**

Assistant superintendent with assigned responsibility  
Warehouse director/supervisor  
Purchasing director/agent (if applicable)  
Principals/campus-based personnel  
Other selected department head(s) as applicable  
Internal auditor

### **Activities to Perform**

- 8.E.1. Tour the warehouse(s) and prepare a checklist evaluating the maintenance of inventories, general cleanliness, the “picking systems” that facilitate removing stock from shelves to fill orders, equipment used such as forklifts and security for high theft items and list areas that need to be improved.
- 8.E.2. Prepare a staffing chart of all warehouse, receiving and delivery personnel and determine, based on peer district comparisons and/or industry standards, whether the staffing is appropriate.
- 8.E.3. Prepare a list of vehicles, machinery and equipment used by the warehouse and determine the age; mileage (as applicable); how it is maintained, whether on contract or by district personnel; and the budgeted replacement schedule.
- 8.E.4. Diagram the paperwork and process flow within the warehouse system including the supply requisition and delivery system, the receiving system, the delivery system and the technology used to support the ordering, receiving and warehousing functions and show how the warehousing function is technologically connected to user departments. Review any internal or external audit reports pertaining to the warehouse operation. Show time lapses between processes and to the extent possible determine the average time to deliver supplies to the users from the time the order is submitted.
- 8.E.5. Examine the latest inventory records and pertinent internal or external audit reports and prepare a chart showing the inventory turnover or annual usage rates for sample items (if available). Using this information and the flow chart above, evaluate whether inventory items are being ordered in the right quantities and at the right intervals to control the amount of inventory on hand without experiencing an out of stock condition.

### **Questions to Ask**

How do users rate the warehousing function? Does the district provide users an opportunity to comment on the service provided by the warehouse and delivery operation?

What kinds of inventories are stocked in the warehouse? Are these the items that are most frequently asked for by users? Does a traditional central receiving and warehouse model for all goods serve users best or should the school district adopt a just-in-time (JIT) delivery model for some or all items?

Does the warehousing/purchasing system (either automated or manual) provide for:

- Automatic reorder points for stock replenishment?
- Follow-up on back orders and partial shipments to assure receipt of proper quantities?
- Matching purchase orders and receiving documentation for verification of receipt of material to ensure proper payment of invoices?

Are inventories physically safeguarded with fenced compounds, storerooms, cribs, or similar areas with restricted access and security? Who determines who has access? Who has after hour access?

Who handles damaged goods? Who processes freight claims? What is the process used to file freight claims and who monitors to see that claims are filed timely and that claims are completed?

Which warehouse employees are responsible for handling non-stocked items, i.e., equipment/asset transfer? How is this documented and incorporated in the budget process?

How do warehousing and inventory controls provide for:

- Receipt of incoming goods with appropriate receiving documentation?
- Timely reporting to purchasing and/or accounts payable regarding materials received?

- Notification to the requesting department and subsequent disposition or delivery?
- Inventory control to accurately account for items received and disbursed?
- Monitoring of inventory turnover with legal disposition of items that are inactive. (Items that are inactive for twelve months should be considered for disposal)?
- Warehouse space planning that uses available space efficiently (such as ten-foot aisles)?
- Proper segregation of duties of warehouse personnel that seeks to prevent sole custody of inventories (one person is not responsible for receiving, disbursement and preparation of transaction documentation)?
- Previously transferred/shipped materials and supplies that were not used by the ordering department to be returned to the warehouse inventory?
- Separate areas for receiving, storing and shipping of inventories?
- Periodic (at least annual) physical inventories as an independent means of establishing accountability for the inventories that should be on hand?
- Physical inventory adjustments to be reviewed and approved by persons who do not have sole custody of inventories?

### **8.F. Textbook Operations and Instructional Materials Allotment**

An effective textbook operation includes the timely acquisition and delivery of books and instructional materials to ensure all students have the necessary materials when school starts. An effective textbook operation also includes an inventory process to ensure that books are properly maintained and accounted for, lost textbooks are minimized, the district is reimbursed for lost textbooks and surplus books are maintained and disposed of appropriately. All textbook policies and procedures should be documented in a manner that is easily understood, and copies are made available to all participants. Instructional materials may be obtained electronically through the use of the district's instructional materials allotment.

#### **Data Needs**

- State and local rules and regulations pertaining to textbook operations
- Organization chart for current and previous three years
- Job descriptions
- District policies, practices and procedures including information on lost textbooks
- Customer satisfaction surveys (if applicable)
- Peer district information
- Pertinent internal audit reports

#### **People to Interview**

Superintendent

Assistant superintendent with assigned responsibility

Textbook Coordinator or Instructional Materials Allotment Coordinator

Warehouse director/supervisor (if applicable)

Principals/campus-based personnel

#### **Activities to Perform**

- 8.F.1. Prepare a diagram or process flow chart showing the process for ordering, distributing, warehousing, retrieving and reconciling textbooks in the district and for payment of lost textbooks. Through interviews, determine the campus administrator's and teacher's satisfaction with the textbook operation. Note and discuss any areas of strength or weakness in the process.



- 8.F.2. Prepare a chart by campus showing the textbook losses for the last three years and determine the cause for any higher than average losses by campus. Review any relevant internal or external audit reports pertaining to textbook operations and compare district losses to peer districts.
- 8.F.3. Examine or create an organization chart showing the functional organization that supports the textbook ordering and distribution process including the role and responsibility of the textbook coordinator.

### **Questions to Ask**

Are procedures established for textbook inventory, issuance and replacement including:

- Maintaining a comprehensive textbook inventory?
- Properly accounting for funds for replacement books?
- Assigning responsibility for lost textbooks?
- Accurately reporting of all textbooks to administration by campus?
- Issuing textbooks to schools?
- Issuing instructor's manuals for individual teachers?
- Assuring that students have textbooks available to take home for study purposes or to complete homework assignments?

Does the district have written policies and/or procedures for the textbook selection process? Are there written local procedures for selecting specific textbook publishers to use for each subject area? Does the district have a policy regarding the acceptance of gifts from textbook publishers generally given to encourage selection?

Does the central office or do individual campuses have automated textbook tracking systems to assist the district in maintaining its textbook inventory? How are textbook overages and shortages at given campuses handled at the beginning of each school year or semester? How long does it take for campuses to obtain the additional textbooks they need if enrollments exceed projections? Has the district ever purchased used textbooks? If so, how do they ensure that the textbooks are Texas adopted versions?

What is the procedure for ordering replacements for lost textbooks? Does the district have a policy that designates the department or fund from which textbook replacement funds will come?

Does the district have a policy for disposing of out-of-adoption textbooks?

What is the district's process for use of its instructional materials allotment funding? How does the district coordinate its use of hard copy textbooks with its use of electronic textbooks or other electronic instructional materials? Is the funding maximized and coordinated among the needs of the programs and campuses?

### **8.G. Contracting Process**

An effective contracting process continually monitors and evaluates services received from external entities. The contracting process analyzes the operations of various areas of the district and performs cost/benefit analyses to evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. The contract negotiation process ensures that bidders receive contract awards based on the best available goods and services at the best prices with terms that are favorable to the district. The negotiation process also includes a detailed review of terms and conditions by district staff and attorneys so that board members receive adequate information before voting to accept a contract. Properly assigning contract management responsibilities to district staff provides for oversight of contract

provisions so that the district receives the quantity and quality of services included in the contract and ensures compliance with all terms of the contract.

## **Data Needs**

- Copies of all service contracts
- District policies and procedures
- Status reports on services performed
- Feasibility studies
- Cost benefit analyses
- Performance data
- Copies of Memorandas of Understanding (MOUs)
- Copies of shared services or inter-local agreements
- Pertinent internal audit reports

## **People to Interview**

Assistant superintendent with assigned responsibility  
Business manager or Finance director  
Purchasing staff  
Legal counsel  
Internal auditor

## **Activities to Perform**

- 8.G.1. Diagram the bidding and contracting process used by the district for various types of contracts, such as consulting, professional services and the like. Show points in the process where signoffs are required, points where user divisions and purchasing staff confer to ensure compliance with laws and policies, points of legal compliance such as postings in newspapers, the time lapse between each step in the process, where paperwork is entered into or produced from computerized systems and how and where computer systems interact.
- 8.G.2. Compile a list of all *major* contracts with external entities including but not limited to contracts for depository banks, legal services and external auditing services; contracts for outsourced operations or management services for operations such as maintenance, food service, DAEP services, transportation, printing and the like; shared services contracts, MOUs (such as for JJAEP services) and ongoing consulting contracts. Prepare a table listing the general service provided through the contract, contract expiration date, options for contract extension, the total contract amount and/or annual payment amounts, the department or individual assigned to oversee the contract and briefly describe general terms and conditions. Note any areas of overlap or contracts that are currently under renegotiation.
- 8.G.3. Select and review a representative sample of contract files. Prepare a checklist evaluating the comprehensiveness of the information kept in each file such as feasibility studies or cost benefit analyses, copies of the original Request for Proposal (RFP), published newspaper notices, responses received and evaluation instruments used to select or score the proposals. Determine whether the appropriate bidding or solicitation procedures were followed based on the dollar amount of each contract, who is responsible for updating or maintaining the file and contract performance data and any pertinent internal or external audit reports on contracting. List and discuss any deficiencies.

## **Questions to Ask**

### **Bid process**

If any services are performed or contracted through private companies or interlocal agreements, was a cost benefit analysis and feasibility study performed prior to bidding the service and entering into the contract? If required, was a public notice (advertisement for bids) issued prior to receiving bids? What bidding process was used? Did it comply with all applicable laws? Was a written bid used? Did

face-to-face negotiation occur? Were all stakeholders in the service represented in the negotiation and in the evaluation processes? Did vendor due diligence occur as part of the evaluation process? How were bid proposals evaluated?

Were vendor references checked? Were quantitative and qualitative measures used equally in evaluating each proposal? Did vendor presentations or interviews take place and how was this information documented and used in the contract process? Did staff document the evaluation process and make written recommendations?

### **Contract negotiation**

Was a contract awarded to the lowest viable vendor? Was the contract written by the district, the vendor or collectively? Were the terms and conditions negotiated? Were the contract accountability standards and termination provisions negotiated? Was purchasing and finance involved in the evaluation and negotiation? Did a district employee or district hired attorney draft or review the final contract prior to signature? What approvals are required? Were all evaluators required to sign non-disclosure statements? Were all relevant documents referenced in the contract for future reference? What are the basic terms and conditions of the contract? Is the contract written?

Did both the district and the vendor sign the contract? Does the district have a way to shift services back in-house should in-house operations prove the most efficient way to do things? Is the contractor required to report regularly to the board? To the administration? If so, how do they report? If so, are they reporting as required? Does the contract include a contract change mechanism? Does the contract adequately explain who has authority to make changes? Did the contract include all relevant terms and conditions required by board policy, local, state and federal law and the Uniform Commercial Code? Are specific steps outlined in the contract for dispute resolution? What is the district's liability, and what is the vendor's liability? When does the contract expire? Where are original contracts and all associated documents filed? What is the process to keep files current and who has that responsibility?

### **Contract management**

Did the district dedicate correct and sufficient contract management resources to the contract? Who is responsible for managing the contract in the district? Who has authority to change contract and authorize additional work? Does this person have the authority to enforce the contract? Does the contract include the name of the contract manager and who represents the district as the final authority for contract disputes? What reports does the vendor have to provide the district, and when do they have to be provided?

What mechanisms are in the contract for providing the vendor with feedback on its performance? Does the vendor have to account for any cost changes to the district? If so, how? Does the district require the vendor to notify the district in the event the vendor changes suppliers for items included in the service agreement? Does the contract outline how the district can terminate the contract for poor performance or failure to perform without liability to the district? How are risks to the district managed by the contract? Are there provisions in the contract for the district to approve the contract manager assigned by the contractor prior to the implementation of the contract? Further, does the contract contain provisions granting the district sole power for approving any change in management during the term of the contract prior to any changes being made?

### **Vendor performance evaluation**

Does the district have procedures that provide contract managers with their specific responsibilities and authority? Is a specific individual responsible for reviewing and documenting vendor performance? Does the contract specifically outline minimum and preferred performance standards? Can the district measure the standards objectively? Does the contract describe each service to be performed in sufficient detail? Does the contract describe specific levels of performance the vendor

must meet in performing the service? Are these performance measures tracked by the district, the vendor, both or neither entity?

How is performance measured relative to payment? Does the contract include remedies in the event the vendor fails to perform the contract or fails to perform acceptably? What types of options does the district have in remedying poor performance or terminating the contract? Is payment tied to performance? Are performance measures related to quality and quantity of activities performed by the vendor? Does the contract include specific periods in which the service must be performed?

#### **Contract costs**

Are escalator clauses tied directly to changes in the market that affects the vendor's costs? Are increases in contract costs tied directly to rising labor or supply costs? Are terms of the contract favorable in comparison to market rates for services? Are cost controls part of the contract and are costs monitored for changes?

#### **Contract re-negotiation**

Are their options to renew or renegotiate the contract at the end of the performance period? Are there options to renegotiate the contract in the event of changes in district needs or market conditions? Is the cost provided in the extension reasonable? Is there a formal performance evaluation form prepared or completed that requires a favorable performance rating of previous services prior to contract extension?

### **8.H. Review and Evaluation of Contracting for Goods & Services**

Whether a district has decided to contract out the operation of some function in its entirety, contract for management services, or conduct all phases of the operation in-house, regular evaluation is necessary to ensure that the highest quality services are delivered at the lowest price. Simply put, when analyzing the operations of the various functional areas, regular cost/benefit analyses are needed to evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. The evaluation of current contracts to determine whether the district could perform these functions better in-house is addressed in **Section 8.G. Contracting Process** shown above.

#### **Data Needs**

The following critical pieces of information should be examined:

- Cost of materials
- Cost of labor including benefits
- Cost of overhead including utilities, management oversight, facilities, maintenance and custodial services and the like
- Quality of service provided in-house as evidenced by the product produced
- Quantity and type of service provided as evidenced by annual productivity reports
- Availability of staff as evidenced by turnover rates, current or ongoing vacancies and substitute needs
- Training or certification requirements of staff
- Customer satisfaction as evidenced by end user surveys
- Organizational stability

### **People to Interview**

Board members  
Assistant superintendent for the area under review  
Managers and supervisors for the area under review  
Workers in the area under review  
Users or customers  
External vendors  
Customers of vendors

### **Activities to Perform**

Before beginning to perform this evaluation, some preliminary work will need to be accomplished to determine if there are vendors capable of providing all or part of these services should the results of the analysis prove that contracting is a viable alternative. If there are no vendors available, STOP HERE.

- 8.H.1. Through interviews with board members, users and staff compile a list of the critical success factors for the area under review. These success factors will vary by area, but should be the five to 10 critical elements that must be met for this area to be deemed successful. For example, in transportation, a critical success factor might be that children arrive to school on time, that children are transported safely and so forth. In food service a critical success factor might be that food is nutritious. Based upon quantifiable and supported documentation gathered from the **Data Needs** shown above, compare the current operations of the area or department to the critical success factors and note any area where performance falls short of success.
- 8.H.2. Obtain copies of budgets and staffing information for the area under review and determine, to the extent possible, the fully loaded cost for the services being provided in-house. Where possible reduce that cost to a per unit produced number. For example, in print service, that might equate to a cost per impression. In an alternative education program it may be the annual or daily cost per student served in the program.
- 8.H.3. Contact external vendors and provide them the data compiled in 8.H.1 and 8.H.2 above and ask them for an informal, non-binding proposal for the cost of delivering similar services that addresses the following:
- Cost of services
  - Types of services available
  - Ability of the vendor to handle emergency or change orders
  - Comparable quality of service
  - Contract oversight

Ask them to note any areas where they could not do what the district is doing now, or where they could improve upon what the district is doing. Compare the results to the district's current operations and determine if contracting is a viable option.

### **Questions to Ask**

What internal conditions exist that are not necessarily financial in nature that might make it desirable for the district to examine contract opportunities for the area of district operations? What internal conditions exist that, despite the financial considerations, would make it difficult for the district to consider contract opportunities for the area of district operations?

What contracting opportunities are peer districts using that are not being used by this district? Are these arrangements working well in those districts? What elements of the peer contracting arrangements are difficult?

Has the district attempted to contract for these specific services in the past? If so, what caused the district to reverse the decision?

If a decision is reached that contracting is a viable option, how will the district ensure that current employees are treated appropriately in the transition? What processes would be necessary to bring employee organizations and community groups into the decision-making process? What information will the board need to help them understand the issues and make a fact-based decision?

### **Steps in the Process**

#### **Step 1: Clearly define the component activity.**

A clear definition of the component activity should include a description of its current budget and staffing, existing performance measurements, if they exist, the location of the function on the district's organizational chart and a description of the product or service delivery standards that are currently demanded.

This step also should include the determination of specifications to be required of potential vendors, based on the expected levels of service needed to meet or exceed the district's standards.

#### **Step 2: Determine total in-house costs.**

In determining in-house costs, the district should use generally accepted accounting principles; maintain extensive documentation of all calculations and assumptions; include anticipated increases or decreases in future costs; and include all costs, regardless of where they are located for budgeting or appropriation purposes and whether or not the cost would be avoided if the service was outsourced.

In addition, an analytical framework for comparing costs can be enhanced by including a cost analysis of the past fiscal year and estimated (or budgeted, if available) costs for the next two years.

The following formula, which borrows heavily from the Texas Council on Competitive Government (TCCG) cost methodology, illustrates the methodology to use for determining total in-house costs:

$$\text{Total In-House Costs} = \text{Direct Costs} + \text{Department Indirect Costs} + \text{District Indirect Costs}$$

Direct costs, as defined by the TCCG, include salaries and wages (including overtime pay), fringe benefits and allowances, supplies and materials, rent, telecommunications, utilities, equipment maintenance and repair and the depreciation of assets.

Indirect costs include appropriate percentages of costs for items such as district central support activities, personnel and legal services, as well as equipment and TAFR services. In addition, any administrative services provided by the department that contains the component activity also should be considered, such as the percentage of costs for a department director with direct oversight of the staff performing the function.

Indirect costs can be allocated using one of several approaches, including the simplified method, a multiple base method, a single step-down method or a multiple step-down method. Again, the state's competitive cost methodology should be consulted for further direction on the appropriate approach to use.

**Step 3: Request proposals for alternative providers of service.**

After the determination of in-house costs, the district should make additional determinations of factors such as its ability to step in quickly if a vendor fails to perform and reasonable yet substantive liquidated damages for such failures. At that point, the component activities to be put up for competitive bidding should be advertised to the general public and the community of vendors identified on the Ameritech web site. While the district should create appropriate standards for the sake of fair evaluation, a reasonable amount of creativity should be allowed so that vendors can propose creative new methods for service delivery that meet or exceed current standards. In addition, existing employees should be allowed time and access to internal resources to prepare bids for alternate, more efficient and effective methods of delivering services.

**Step 4: Determine total cost to contract.**

The formula given in the TCCG methodology for determining the total cost to contract is:

Total Cost to Contract = Contractor Cost + Contract Administration Cost +  
One-Time Conversion Costs + Unavoidable District Costs + Loss on Assets – Gain on Assets

Contractor costs are, of course, the fees and expenses proposed by a qualified vendor to provide the service being considered. Administration costs are the expenses involved in negotiating, executing, monitoring and evaluating the contract, including personnel costs, facility and equipment charges, maintenance and other costs.

Unavoidable costs are those that will continue to be borne by the district even if a particular component activity has been outsourced. An example might be the costs of a divisional supervisor who oversees a specific component activity. If that particular activity is outsourced, the services and therefore costs of the supervisor may still be required to continue other functions.

The gain or loss on assets, such as building space or equipment that is unnecessary after a successful outsourcing, also should be included in the final cost determination.

**Step 5: Request proposals from vendors.**

RFPs should be prepared for component activities offering significant potential for savings and/or service improvements. Both private and public potential vendors should be solicited. All competitive cost review information about the specific service should be made public. Vendors should be allowed a large degree of flexibility in providing creative solutions towards accomplishing the recognized performance standards for the particular service and asked to create performance measurements that can be developed into eventual contractual obligations should the service be outsourced.

**Step 6: Determine savings.**

Savings are the difference between total in-house costs, both direct and indirect and the total cost to contract, which is determined if and when a qualified vendor is selected and the service is performed for at least one year.

**Additional Resources:**

National Association of Purchasing Management <<http://www.napm.org/>>

Texas Education Agency's Financial Accountability System Resource Guide - Purchasing



***FOOD  
SERVICES***



## **9. Food Services**

The food services review category examines the efficiency and effectiveness of school districts food services programs. Effectiveness in this area is measured by the level of service provided to school children and compliance with federal, state and local policies. Efficiency is measured by the district's cost per meal and staff productivity performance measures. The main goal of a successful food services operation is to provide nutritious and delicious meals to students each day school is in session and to do so at a breakeven cost.

Food service programs are funded by revenues from the sale of meals, a la carte sales and by federal funding for free and reduced-price meals. Districts must subsidize the food service operation through their operating budget if revenues fail to cover costs. Factors contributing to operating deficits can include poor operational decisions, competition from outside food sales or low economies of scale. The Food Services chapter evaluates the effectiveness and efficiency of this function in the following areas:

- 9.A. Organization and Staffing
- 9.B. Policies and Procedures
- 9.C. Planning and Budgeting
- 9.D. Employee Development, Evaluation and Recognition
- 9.E. Management and Operations
- 9.F. Qualifying Students for Free and Reduced-Price Meals
- 9.G. Student Participation
- 9.H. Nutrition and Nutrition Education Programs
- 9.I. Purchasing, Warehousing and Contracting
- 9.J. Catering
- 9.K. Review and Evaluation of Contracting Process

### **9.A. Organization and Staffing**

Labor efficiency is a product of employing people with the right skills to do an assigned job, or the ability to learn that skill and having the right number of workers to do the job when it needs to be done. To achieve full productivity, managers must have a plan for handling employee absences, adequately supervising the activities of the kitchen and creatively filling all necessary positions for the hours needed.

#### **Data Needs**

- Organization and staffing charts, that include number of departmental employees by category
- Injury and accident statistics by cafeteria
- Safety training plans or a description of the district's efforts to improve the safety of kitchens and cafeterias
- District staffing standards
- Job descriptions
- Management reports used to measure productivity, such as meals served per labor hour
- Employee salary schedules and hourly wages
- Employee turnover and hiring statistics for the last three years
- List of kitchen facilities showing the meal preparation type and serving capabilities by location

#### **People to Interview**

Assistant superintendent with assigned responsibility

Food Service director  
Business manager (particularly in small district)  
Cafeteria manager/s  
Principals/campus-based personnel  
Cafeteria staff

**Activities to Perform**

- 9.A.1. Create and/or examine existing organizational charts and job descriptions for the food service operations, including specific counts of employees by category and total employees at each cafeteria. Interview staff to determine reporting arrangements, determine whether the organizational structure depicted on the chart reflects the actual organization of the department and whether job descriptions accurately reflect the actual duties performed. Document if the organization has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the reasons for changes. Note any contracted services or employees, as well as any advisory committees and show to whom they report in the overall management structure.
- 9.A.2. Chart the average number of meals served and the average number of labor hours used, by job category, at each campus. From this information calculate the meals per labor hour (MPLH) by campus and compare the result to any district standard or to peer districts and industry standards, taking into account the type of meal preparation and delivery system used in the district and the age and condition of kitchens and equipment. Discuss the method used by the district to account for a la carte meals (\$2 versus \$3). Note deviations and determine the cause.
- 9.A.3. Compile a list of salary rates and ranges for each position within the food service function. Compare salary rates to peers and local business competitors. Determine the turnover rate among employees in each category and note areas where the salary range is helping or deterring employee recruitment and retention efforts.
- 9.A.4. Diagram hiring practices and recruiting methods. Identify those programs or practices that are being successful and those where improvement may be necessary.
- 9.A.5. Chart the absentee rates and vacancies over the last year. Note whether substitute workers are meeting the district's needs and through interviews, determine what actions the district has taken to reduce absenteeism and promote staff retention. If results are available from these efforts, provide an analysis of the effectiveness of these programs.
- 9.A.6. Examine safety records for food service staff and prepare a chart comparing the injury or accident rate for food service staff with those of other categories of employees within the district and with peer districts, as applicable. Through interviews, determine what efforts are made formally or informally to reduce the number of employee injuries or accidents and discuss the effectiveness of these activities.

**Questions to Ask**

**Organization structure**

Who heads the food service organization in the district? How involved and supportive is upper management of the food service function of the district? What is the role of the board in food service operations of the district? How does the current organizational structure contribute to the effectiveness and efficiency of the food service function? Is the organization structure basically centralized or decentralized? Why is this the best approach for the district?

How autonomous are the kitchens? How does management provide appropriate controls and supervision? Does management understand the food service function and have high expectations of the food service department? How does the board make decisions for major contracts or policies impacting food service? Do they rely on the recommendations of the food service director or staff?

What opportunities exist for improving the management of food service? How does the current structure ensure that employees are adequately supervised to ensure productivity standards are met?

**Staffing and productivity**

How does the district allocate staff to each kitchen? How are the number of supervisors or cafeteria managers determined? How many people does it take to prepare the meal, wash the dishes, serve the meals and track and monitor the meals served and collect money for paid meals? Are there times during the day when all the people are not kept busy?

Are food service staff assigned specific duties and responsibilities that:  
Are supported by current, accurate and approved job descriptions?  
Provide essential specialization in areas such as nutrition, sanitation, menu preparation, automation, etc.?  
Given operating procedures that detail daily functions of their respective job duties?

Who covers for absent employees? Is there a pool of substitutes in-house or on-call? Or are substitutes available through a temporary service? Are substitutes trained and productive? Do absences cause other employees to work overtime, delay meal service or affect the quality of food served?

Is supervision provided during all of these hours? Who has keys to open the facility and lock it up? Who provides maintenance and custodial services in the cafeterias? Who repairs kitchen equipment when it breaks down?

How does the current level of staffing compare to the district's staffing standards? To peer districts? To industry standards? What factors contribute to lower than average productivity? What campuses are less productive than others? Why? How could productivity be improved?

**Salaries and wages**

Have there been any recent changes in wages and salaries in the department, such as a change in salary schedule? Any change in hours paid? How does the current wage or salary range impact recruitment and retention of employees?

How many hours a week are cafeteria workers guaranteed? What is the average number of hours actually worked? What staff can earn overtime? How much overtime is typical? What is the source of overtime? Absenteeism? Other?

**Absenteeism**

On an average day, how many cafeteria workers are absent? Does the district have an incentive program to encourage attendance? Can the district quantify the success of any incentive programs? What are the procedures in the event there are not enough workers to cover the cafeterias?

How does the employee handbook address the topic of absenteeism? Who is responsible for counseling employees with excessive absences? Do leave policies contribute to excessive absences? If so, how?

**Overtime**

Is scheduling done so as to minimize overtime costs? How does the food service employee handbook address the topic of overtime?

Who is authorized to approve overtime? How is this individual held accountable for keeping overtime costs to a minimum? Who monitors the total amount of overtime paid out each week? What types of overtime

reports are given to the board or key administrators? What strategies are being employed by the district to control overtime costs?

**Employee safety**

How many workers' compensation claims have been filed in the last three years because of injury or accidents in district kitchens? How much have these claims cost the district? What efforts have been made to address employee safety in kitchens and cafeterias?

When equipment or facility conditions are observed that could cause accidents or injuries, how are they reported? Who is responsible for correcting the problem? What kinds of awareness training are provided to employees? How effective have the safety programs been in reducing injuries or accidents?

**9.B. Policies and Procedures**

The board adopts policies governing the operations of school cafeterias as well as policies that are directed at other programs but have an indirect impact on the delivery of food services. For example, closed or open campuses, vending machines and even school start times are often set in policy, yet the impact is felt directly by the district's cafeterias. Procedures guide district employees on how to carry out the policies in their individual departments.

**Data Needs**

- District policies and procedures, as they pertain to foods service operations
- Compliance/audit reports (TEA)
- Health department inspection reports

**People to Interview**

Assistant superintendent with assigned responsibility  
Food service director  
Business manager (particularly in small district)  
Cafeteria manager/s  
Principals/campus-based personnel  
Cafeteria staff

**Activities to Perform**

- 9.B.1. Make a list of all board policies relating to food service. Summarize briefly the impact of each policy on the operation and note any policies that have a detrimental impact on the operation's profitability or management processes, note when it was last updated, whether the policy is tied to a departmental procedure and to the extent possible, show whether the policy implements or complies with major federal guidelines for the National School Lunch and School Breakfast Program.. Discuss how the food service management team is involved in policy development and in costing out the impact of decisions being considered by the board.
- 9.B.2. Make a list of all departmental operating procedures relating to food service. Describe the area of the department's operation that is addressed, note when it was last updated, whether the procedures are in the language of the food service workers and cross-reference any link to district policy. To the extent possible, show whether policies implement or comply with major federal NSLP and SBP guidelines

## **Questions to Ask**

### **Policies**

How do district board-approved policies address the following components of the food service operation:

- Student and adult meal prices?
- Open or closed campuses?
- Nutrition education programs?
- Competitive food sales?
- Concessions?
- Catering services?
- Exclusive beverage/vending contracts?
- Others?

How do these policies impact the way that food service does business? How do policies impact the profitability of the food service operation? Who is responsible for reporting the fiscal and nutritional impact of policy options to the board? Are policies with regards to pay, benefits and leave fair and competitive with the market and other districts in the region?

### **Procedures**

How are internal operating procedures developed for the department? When was the last time that the food service procedure manual was updated? Who is responsible for verifying that procedures are consistent and reflect daily operations? How does the department ensure that procedures reflect validated industry best practices? Are all practices defensible if a question is asked by a school board member or a key administrator? By a parent?

How are staff kept knowledgeable about changes in procedures? How are new employees trained or oriented to departmental procedures? Who is responsible for training and orientation? What procedures are written in other languages, if necessary, for non-English speaking food service workers?

Would the current practices and procedures protect the district or place it at risk in the event of an accident or legal action? If not, why not? What should be changed?

How are procedures that implement board-approved policies published and disseminated to appropriate staff and committees?

How do procedures address:

- a la carte menus and prices?
- food preparation, centralization or decentralization?
- define roles of food service personnel and building principals?
- monitoring competitive food regulation?
- assigning costs to the food service operation?

### **Compliance monitoring**

What is the history of Health Department inspections in the department? What schools or cafeterias are regularly found to be out of compliance? How is the district addressing identified deficiencies, if any?

What challenges has the State identified during its compliance/program review visits and audits?  
How has the district addressed deficiencies, if any?

## **9.C. Planning and Budgeting**

Effective management is built upon sound planning and budgeting practices. This section evaluates the various planning documents used by the food service operation and discusses the budget process and the links between plans and budgets.

### **Data Needs**

- Food Service strategic plan, mission and goals
- Facility plans as they pertain to kitchens and cafeterias
- Department preventative maintenance schedule or plan
- Cafeteria capital improvement plans
- Budget planning documents
- Budgets for food service for the last five years
- List of student and staff meal prices
- Paid and reduced price meal participation rates for the last three years
- Standard operating and management reports for the last two years, including profit and loss statements, budget variance reports and other financial reports used regularly for financial management
- Annual budgets and financial records showing budgeted and actual costs and revenues for food service for the last three years and showing the fund balance
- Any recent Food Service Department customer survey instruments and results
- School Performance Review parent and campus staff survey results as they pertain to food service

### **People to Interview**

Superintendent

Area superintendent with assigned responsibility

Food Service Director

Business manager

### **Activities to Perform**

- 9.C.1. Review the food service department's planning (long and short-range) documents and create an exhibit that documents whether the plans are comprehensive in nature; contain clearly defined goals, objectives and strategies for accomplishing those goals; are tied to the departmental or district budgets; assigns responsibility for implementation of strategies; and is annually updated and modified based upon some performance criteria.
- 9.C.2. Chart the district's food service goals, strategies and performance measures against actual performance and financial data and discuss the reasons for variances.
- 9.C.3. Chart campus-level profit and loss reports by cafeteria and create a table that shows which are operating at a profit, loss or break-even. Through interviews with management and staff, determine what conditions are impacting profitability at both profitable and unprofitable schools.
- 9.C.4. Prepare a list of current and historic meal prices for paid and reduced price student meals by grade level and paid staff meals. Compare the current cost per meal served to the current prices and discuss the methodology used by the district to monitor costs and set meal prices at all levels.
- 9.C.5. If the food service department surveys their customers, make an exhibit that shows general survey results and a sample of responses to key questions asked by the department. Through interviews, determine how the survey results are being used to improve service delivery and the types of meal items offered and discuss any changes that have been made in response.



- 9.C.6. Prepare a diagram of the department's planning and budgeting processes, both long and short-range. Note the approximate timeframe for major activities, points in the process where decisions are made and by whom, where performance is monitored and when and if adjustments are made to improve overall performance. If there are points in the process where communication or decision-making breakdown, through interviews determine the reason for the breakdown.
- 9.C.7. Prepare a table showing the food service revenue and expenditure budgets for the last three to five years showing sufficient detail to determine what cost and revenue drivers in the operation. Through interviews, determine the reasons for significant variances.
- 9.C.8. Create a chart showing the food service department's fund balance for the last three years and compare the fund balance to three months average operating expenditures for that year. If the district has been operating at a deficit, determine the cost drivers that are affecting the operation adversely. If the district has a fund balance, determine if the balance exceeds the three month maximum and if so, the district's plan for reducing the fund balance to levels that meet federal guidelines.

### **Questions to Ask**

#### **Planning and budgeting process**

Does the department have a mission statement or have an understanding about how the department fits into the overall district mission and goals? Does the department have a five-year capital expenditure plan? How does the department monitor and measure success, such as quality of service? How does the department know they are meeting their customers' needs? Who are their customers? Interview some of the students.

How frequently are management planning sessions held to:

- Review evaluation reports?
- Review menus?
- Review cost control procedures?
- Plan training sessions?
- Review staff assignments (hours and costs)?
- Review inventory levels?
- Review profit/loss statements for the previous month?
- Review maintenance plans and capital plans?

How does the district begin its annual planning and budgeting process? How are goals established for the coming year? For the next five years? How is progress toward these goals measured? Who is responsible for tracking and reporting progress toward these goals? Who is responsible for drafting the original plan?

How does the district establish equipment needs? How does the department plan for training? Budget for training?

How are revenues projected? How accurate have revenue projections been over the last few years? Who sets the meal prices for students and staff? How are a la carte meal prices set? How do meal and a la carte prices compare to total costs for providing the meals?

How are facility repairs and renovations planned for? Budgeted? What process is used to project enrollment and participation trends in the coming year? How are enrollment and participation rates used to determine staff and equipment needs by campus?

How are food preparation techniques factored into the budget for the food service operation? How are nutrition needs factored in to the budget and planning processes?

### **Performance measures**

How does the district measure the performance of the food service operations? How does the department monitor and measure its own performance? What types of regular reports are given to the food service management? To cafeteria management? How and when are plans modified when goals and objectives are not being met?

How are profit and loss statements and reports used to identify areas of concern in the food service operation? How are they used to pinpoint cafeterias that are not operating profitably? What measures are taken to improve the performance of unprofitable kitchens? What are the physical or operational barriers to correcting the problems in these locations? What are the long and short-range solutions that could make the cafeterias more profitable? Better equipment? Improved serving lines? Etc.?

How do students perceive the food being served in the cafeterias? How do students perceive the food service staff in the cafeterias? How do parents perceive the food being served in the cafeterias? How do parents perceive the food service staff in the cafeterias? How do teachers perceive the food being served in the cafeterias? How do teachers perceive the food service staff in the cafeterias?

What on-site observations, evaluations or surveys are conducted to gather information on the:

Quality of product?

- Product acceptance by students?
- Product acceptance by staff?
- Product acceptance by parents?

- Service acceptance by students?
- Service acceptance by staff?
- Service acceptance by parents?
- Adherence to dietary guidelines?

How does the food service function measure up to each of these components? What is being done in the district to improve each of these components? How are these areas addressed in planning documents? In budgets?

### **Budgeting**

How are budgets prepared? How much input does the food service management team have into the food service budget? How are staffing allocation made during the budget cycle? Who makes the final staffing decisions? What flexibility is contained in the staffing budget for differences in facilities, grades being served, equipment and serving conditions?

What method is used to allocate overhead to the food service budget? How much is the allocation for overhead? How does this allocation method compare to federal and state guidelines for overhead allocation?

How are participation rates projected during the budget and planning cycle? Who makes these projections? What strategies are used to project the costs and revenues associated with increases or decreases in participation?

How are commodities treated during the budget and planning process?

### **Fund balance**

Is the district's food service operation operating at a profit or loss? How much of the district's general operating budget is being used to supplement the food service program? If a fund balance exists, how much has been accumulated over time? What precautions or measures have been taken to ensure that the total fund balance does not exceed the three-month maximum?

## **9.D. Employee Development, Evaluation and Recognition**

As the name implies, food services is a service organization that is responsible for delivering quality meals to district students and staff. On average, food service departments expend 40 percent or more of their budget on employees. Consequently, employee productivity and job satisfaction are in great part dependent upon a strong staff development, evaluation and employee recognition program.

### **Data Needs**

- Copies of employee training programs and a list of attendees by job category for the last year
- Sample of employee evaluations
- Description of department incentive programs
- Copies of newsletters or a list of communication tools used to keep employees informed about training opportunities, changes in policies and procedures incentives
- Food service employee handbook or a description of the timekeeping, leave accounting and payroll process for the department, if it differs from what is used for other district employees

### **People to Interview**

Area superintendent with assigned responsibility  
Food service director  
Cafeteria manager(s)  
Business manager

**Activities to Perform**

- 9.D.1. Prepare a list of all training classes provided to food service staff and management during the last year. Show the number of attendees by employee classification, the number of hours attended and the purpose or content of the material covered in the class. Note whether the training was mandatory or if it was training that would lead to some type of certification. Discuss whether this list of training opportunities is comprehensive and meets the needs of food service staff and management.
- 9.D.2. Compile a list of department's communication tools such as weekly or monthly meetings, newsletters, status reports, calendars, etc. and note the frequency of the publication or communication, which publications are multi-lingual and whether they are available to staff on the Internet or in hard copy. From this list determine if these publications are sufficient to keep staff in the communication loop and notified of policy or procedure changes that may affect production in the kitchens.
- 9.D.3. Diagram the employee evaluation cycle for food service management and staff showing who is responsible for the evaluations, how goals and expectations are set for each level of employee and what steps are taken to remediate poorly performing employees or reward high performing employees.
- 9.D.4. Diagram the process for employee timekeeping, leave accounting and payroll. Note if the Food Service department is using the same time reporting system as the rest of the district, how this process ensures that the records reflect actual hours worked and taken. Show points in the process where a strong system of controls are in place and where improvements might be necessary.

**Questions to Ask**

**Staff development and recognition**

How does the employee incentive, staff development and appraisal process promote employee development and encourage high performance? What type of in-service training program do food service personnel receive? What type of orientation session is provided for entry level employees to familiarize them with district personnel policies, food service operational policies, operation of food service equipment and information contained in the food service employee handbook?

What types of training are provided to all staff on new and updated policies and procedures, cooking techniques, sanitation and customer service?

What type of training sessions are held on hygienic food preparation and food handling procedures? On control of serving portions and cost control procedures? On baking and cooking methods for preparing new food offerings? On care and cleaning of food preparation and serving equipment? On serving the district's customers with proper service methods—courtesy, professionalism, etc.?

What regional and state food service seminars are attended? State conferences of a state professional organization or TEA? Regional meetings of food service personnel? Certification training by local, state or national food service organizations?

What types of incentive and recognition programs does the district offer employees to encourage attendance. Does the district reward employee performance or certification achievement?

If the district has its own food service association or belongs to a state or national association, how are opportunities to join made affordable and available to all kitchen staff? How does participation in these organizations improve the overall job satisfaction of the employees? How does participation impact productivity? What special services or training opportunities are provided by the association?

How does the district encourage kitchen staff to gain statewide and national certifications? How much is budgeted for supplementing any costs for gaining certification? What additional pay or recognition do fully certified staff receive as a result of their certification?

### **Communication tools**

How frequently do food service staff meet to discuss procedural and operational issues? How frequently do cafeteria managers meet to discuss common problems and food service and preparation techniques?

What kinds of written communication is distributed to food service staff such as newsletters, procedural flip charts, menus and recipes? Are all of these written communications done in English and Spanish, or the primary language of food service staff?

### **Employee evaluations**

What procedures are in place to address and remediate poor performance?

How frequently are food service staff evaluated? Who performs evaluations at each level within the organization?

### **Timekeeping, leave accounting and payroll**

Is the Food Service Department using the district-approved method for time keeping? If not, why not?

## **9.E. Management and Operations**

This section includes review and evaluation of productivity standards, such as meals per labor hours; staffing patterns; food and labor costs; cash management policies and procedures; inventorying and warehousing of food products (cold and dry); and revenue and expenditures controls including the management and use of the fund balance.

### **Data Needs**

- Health Department or other kitchen inspection reports for the last two years
- Current monthly profit and loss reports
- Breakfast and lunch serving times by campus
- Data on average number of students served per breakfast and lunch period by campus
- Latest audits, including the latest Coordinated Review Effort (CRE) audit
- Inventory of vending machines by campus and physical location, the group or organization benefiting from the sales and the type of snacks or beverages offered
- Policies or procedures addressing vending machines or nutrition content of items offered for sale to students
- Copy of any exclusive vendor contracts
- Menus showing nutritional content, cost and any instructions for preparation
- Pre- and post-costing data for menus
- Information on how meal costs are calculated for the district and the average cost per meal
- District's meal equivalent calculation standard
- Description of Point of Sale (POS) or other software programs used by the food services operation

- Description or inventory of computer equipment, wiring and communication infrastructure for food service

### **People to Interview**

Assistant superintendent with assigned responsibility  
Food service director  
Business or finance director or manager  
Purchasing department  
Technology director  
Cafeteria managers

### **Activities to Perform**

- 9.E.1. Tour the kitchen and cafeteria facilities during meal preparation and service, examine recent inspections done by local health departments and prepare a chart by campus showing any areas where processes or equipment are not in compliance with state or federal guidelines or health codes. Also note areas where efficiencies could be achieved and what specific changes would be necessary, such as automation, improved equipment or procedural changes. Keep in mind that codes may be different in different counties.
- 9.E.2. Chart the number of students served and the serving times at each campus, both for breakfast and for lunch. Note if there is some uniformity of serving times in the district or whether each principal sets serving times or if specific policies or procedures impact serving times. Discuss the implications of very early or very late serving times or the absence of or overuse of staggered times on the flow of children through the serving lines.
- 9.E.3. Observe a sample of serving lines at multiple campuses (at least one school at each grade level). Chart if servers and cashiers are courteous to students, the speed of the serving lines or the wait times, the method used to record meal equivalents, observed acceptance or waste of various menu choices by students and the like. Discuss these general observations and note any areas of high quality service or possible areas for improvement.
- 9.E.4. Review the latest audits, including the latest Coordinated Review Effort (CRE) audit, make a table showing the department's strengths and weaknesses and discuss any areas where the district is out of compliance.
- 9.E.5. Prepare a chart showing, by category of beverage or snack machine, the number and location of vending machines, the group or organization benefiting from the sales and the type of snacks or beverages offered. Discuss district policies associated with the operation of these machines and any controls or requirements are placed on the time of operation, the nutrition content of the items offered for sale and the like.
- 9.E.6. If an exclusive vendor contract exists for vending machines, prepare a list of all key terms and conditions of the contract and chart the process used to negotiate the contract. To the extent possible, show how these terms and conditions and the general manner in which the contract was procured meet TEA's purchasing and Child Nutrition Department guidelines.
- 9.E.7. Prepare a list of all software programs used by the food service department describing the purpose of each system or module, the date when it was first implemented or the date when full implementation is expected and discussing any modules or components of the system that are available but have not been implemented and why. Also examine the manual processes being carried out by the department and determine whether the current or another automated system could streamline or enhance the process.
- 9.E.8. Diagram or chart the technology equipment and infrastructure in place in the food service operation showing current links between individual cafeterias and between cafeterias and the central office. Discuss how the current structure supports the food service operations and through

interviews, determine what efforts are currently underway to remedy any weaknesses in the current structure.

- 9.E.9. Examine menus and related costs, nutrition and preparation instructions or recipes and through interviews, diagram the process used for menu planning, pre- and post-costing of menus, nutritional analysis, dissemination of preparation instructions and monitoring of meal preparation processes. Note areas of strength and weakness and discuss areas for improvement, if applicable.

### **Questions to Ask**

#### **Facilities and equipment**

What type of kitchen facilities (i.e., centralized/decentralized; central warehouses, freezers, baking centers; dishwashers) exist in the district? How are facilities and equipment maintained? What conditions exist that are not in compliance with health standards? How is the district attempting to correct any deficiencies? How are food temperatures tested to ensure compliance with health standards?

What records are kept on equipment purchases and repairs that assist in future equipment purchases? Are equipment repairs and replacements made part of the annual budget? If not, why not? Are kitchen facilities in compliance with OSHA and health department standards? If not, why not?

What procedures exist for the use of cafeteria facilities including:  
use of cafeteria facilities by student and parent organizations?  
use of cafeteria facilities by community groups?  
centralized accounting for funds received from special activities relating to the food service operations?

Are freezer units or outside storage facilities secured against vandalism, spoilage and theft? If not, why not? Who tracks the assignment of keys to cafeteria/kitchen personnel?

What future kitchen construction and renovation projects will impact food service management in the near future? How was the food service department involved in decisions that would impact the delivery and preparation of food in the cafeteria and kitchens?

How are work orders for maintenance and equipment repairs tracked? Are repairs made quickly and efficiently? If not, why not?

#### **Serving lines and scheduling**

How are serving lines configured? How long do students have to stand in line before they get their meals? How long does this leave for them to eat during the lunch period?

What times do the lunch periods begin and end at each campus? Are lunch periods sufficiently staggered to allow cafeteria staff time to replenish food supplies? If not, what could be done to expedite the process?

How many lunch periods are offered each day at each campus? How many breakfast periods? How long are each of the lunch periods? Is this sufficient time for students to get their meals and eat, without rushing? How do the number of lunch periods contribute to the efficient operation of the serving lines?

How are a la carte lines handled? What special serving situations are used to improving serving conditions? Food court concept? Kiosks?

How are meals recorded in the system as students process through the serving lines? What elements of the serving process prevent students from being identified as receiving free or reduced price meals?

**Compliance reporting monitoring**

How accurate are reports sent to the state? What systems are in place to ensure the accuracy of meal counts? How does the department calculate meal equivalencies? Does this methodology comply with standards? If not, why not?

What controls are in place to ensure that all Type A meals served are accounted for but are not over counted? That all paid meals are accounted for but are not over counted? That all a la carte items that can be grouped together to form a Type A meal equivalent are accounted for but are not over counted?

What reportable conditions were identified in recent CRE audits of the district? How has the district addressed the areas of concern?

How frequently are review and evaluation sessions conducted with:

- Food service supervisors?
- Site managers?
- Cafeteria managers?
- Principals?

What, if any deficiencies were noted in the way the district is qualifying children for the free and reduced price program? When, if ever, has the district had to pay back the reimbursements for meals because of poor reporting or accounting practices? How much was the pay back? What has been done since that time to prevent this situation from recurring?

What types of strategies such as the use of convenience foods, alternative types of dishware, kitchen equipment and facilities to control staffing costs?

What monitoring activities are done to ensure that the food service delivery system:

- Meets the nutritional needs of students?
- Meets the special medical needs of students?
- Considers the age of students?
- Considers customer service needs?

**Vending machines and competitive food sales**

Are campus administrators adhering to federal guidelines regarding placement of vending machines, vending machine items and other competitive food sales? If not what consequences are there for administration that violate the policy?

How much money is being lost to food service operations from vending and competitive food sales? How frequently are competitive food sales held in or near cafeterias? Who approves these sales? What effort is made to coordinate sales with food service staff?

How were the exclusive vendor contracts entered into? What financial benefits did the district receive as a result of the contract? What control does the district have in the contract over the nutrition content of the items offered for sale in the vending machines?

What is the food service department's role in the vending contract? What benefits does food services derive from the vending machines? What organizations or groups benefit from the vending sales? What is the average annual profit obtained from each vending machine, on average, in the district?



**Cash and financial management**

How is cash accounted for and deposited? What written policies and procedures exist for the counting and depositing money? Are there sufficient controls in place to prevent theft or embezzlement? How is cash accounted for by individual food service site?

Who audits cash on a periodic basis? How frequently are these audits performed? What security measures are in place to protect cash and personnel such as courier services or other types of security such as cash counting machines and security cameras?

How does the current process ensure consistent record-keeping for each site?

Are individuals that handle and prepare cash for deposit bonded for theft? If not, why not?

How are food service costs maintained and analyzed on a daily, monthly and annual basis including:

- The cost per meal served?
- The cost of food per meal as a percentage of the cost of the meal?
- The cost of labor per meal as a percentage of the cost of the meal?
- The indirect cost per meal as a percentage of the cost of the meal?
- Overhead costs charged to the program for benefits, utilities, custodial support, maintenance, etc.?
- Profitability of the overall operation?
- Size of campus and participation?
- Menu pre-costing and post-costing?
- Variety of menu?

**Technology**

Does the food service department have the technology infrastructure in place to support all cafeterias? Which cafeterias are wired and networked for computerized management information systems including POS and which are not? How does this affect the quality and timeliness of reporting and protection of student confidentiality?

How does the district's information system (POS, child nutrition software, other software program):

- Track meal eligibility?
- Track meal receipts?
- Track student information?
- Create a menu history used to forecast future food purchases?
- Determine the amount of food served versus the amount prepared?
- Assist in the purchase of food and supplies?
- Track inventory?
- Process free and reduced-price applications?
- Assist with menu planning?
- Perform nutritional analysis of menus?

If the district has a POS system, do the students enter a PIN number, use a swipe card or scan their thumb print? What are the pros and cons of this type system?

Does the district use a free and reduced-price application processing software? Are food service staff properly trained on new programs and the use of technology?

If the district does not have a complete technology solution, what findings resulted in their last Coordinated Review Effort (CRE) audit? What was the CRE assessment of the food services financial program?

### **Meal planning and preparation**

Who is responsible for menu preparation? How are the costs for food and labor factored in to the menu planning process? What pre and post-costing is done to ensure that cost projections for menus is accurate?

How are menus tested? Who prepares the recipes for the menu items? How are preparation instructions and recipes disseminated to kitchens? Who monitors preparation process to ensure that the menus are being followed and food is being prepared according to original recipes?

How are special dietary needs or students being met? How do management staff evaluate menu compliance? Food serving size and temperature? Proper sanitation of kitchen facilities? Student and staff acceptance? Verification of serving portions?

### **9.F. Qualifying Students for Free and Reduced-Price Meals**

Identifying those students who are eligible for free and reduced-price lunches and breakfasts through the National School Lunch and Breakfast Program is a tedious and time-consuming process. Some parents are reluctant to fill out the necessary forms.

What many school district officials forget, however, is that federal Compensatory and Title I funding flows to a school district based on their number of economically disadvantaged students. And, economically disadvantaged is defined as students identified as eligible for free or reduced-price meals. These funds are funneled to districts so that they can provide additional services to students at risk of dropping out of school. While not all economically disadvantaged students are considered at risk, the number of economically disadvantaged students closely tracks the number of at-risk students. The federal government, therefore, uses this figure as its criteria.

#### **Data Needs**

- Procedures for qualifying families (district and campus)
- Software programs used to qualify
- Point of Sale (POS) reports

#### **People to Interview**

Assistant superintendent with assigned responsibility  
Food service director  
Business or finance director or manager  
Technology director  
Cafeteria managers

#### **Activities to Perform**

- 9.F.1. Diagram the process for qualifying students and siblings for the free and reduced-price meal program. Identify who is responsible for each step in the process and note areas where follow-up is done to ensure that non-responsive parents are contacted or where incentives are used to encourage applications and where family identification, direct certification or other methods are used to qualify students who might not otherwise be identified. Discuss the strengths and weaknesses in the current system.
- 9.F.2. Calculate the amount of Compensatory Education funding the district receives for each student identified as economically disadvantaged over the last three years and if the identification

processes diagramed above show signs of weakness, create an exhibit showing the impact on funding by increasing the number of students qualified by 1, 2 or 3 percent.

**Questions to Ask**

What is the district’s process for identifying families (student and their siblings) who are eligible to participate in free and reduced-price meal programs? Does the district use direct certification through Texas Department of Human Services? What safeguards are in place so that no child falls through the cracks?

What follow-up is done for non-responsive students or families? How are principals involved in the identification process? What incentives exist for principals to help identify qualified students? What efforts are ensured that the identity of students participating in free and reduced-price meals is kept confidential? What mid-year activities occur to ensure continual eligibility?

What incentives does the district employ to encourage families to submit applications for free and reduced-price meal programs? What advertising campaigns does the district use to encourage participation? What is the district’s approach to getting non-English speaking or illiterate parents to apply for the free and reduced-price meal programs?

**9.G. Student Participation**

Students will eat in the cafeterias if the food looks and tastes good, it is easy and convenient to get food, the price is right and their peers also eat in the cafeteria. Participation rates can directly impact the profitability of the food service operation.

**Data Needs**

- Student meal participation rates by campus and breakfast or lunch (free, reduced-price, paid and overall)
- Information about special meal programs (breakfast carts, grab-and-go bags, etc.), Catering programs, or other revenue generating endeavors.
- Menus and recipes
- Survey results

**People to Interview**

Food Service director  
Cafeteria managers  
Teachers  
Principals  
Students

**Activities to Perform**

- 9.G.1. Chart meal participation over the last 3 school years by campus to determine participation trends versus enrollment trends. Determine if participation rates are low or high at some campuses or grade levels. Through interviews and observations, identify factors contributing to low or high participation such as menu choices and recipes, benchmark best practices against the districts’ current efforts and discuss the results.
- 9.G.2. Examine existing student surveys, interview students and staff and conduct a taste test at various cafeterias. Evaluate the taste, presentation, amount and variety of the food being served and chart

the results. Note variances among campuses and discuss how the current food preparation, presentation or serving sizes impact overall participation.

### **Questions to Ask**

#### **General**

What type of meal programs does the district offer to students? If 80 percent of the students are eligible for the free and reduced-price meals, does the district participate in the federal Provision 1, 2 or 3 (universal feeding) programs? If not, has the district conducted a feasibility study?

How do meal participation rates compare to state, regional or comparable districts' averages? Does the food service department track daily participation for each menu to determine if:

Certain menus are more appealing to students than others?

Have food courts or other methods to gain older students attention been implemented or examined in secondary schools?

Have the lunch and breakfast participation percentages remained stable or increased over a five-year period? What special occurrences have affected (positively and negatively) participation? What obstacles have the cafeteria staff encountered that negatively affected meal service? What special occurrences have affected (positively and negatively) participation? What obstacles have the cafeteria staff encountered that negatively affected meal service? Has the enrollment count fluctuated up, down or remained static in the district? How have nutritional standards affected students' participation? Have outside sales from student organizations, booster clubs or the PTA affected participation in the Child Nutrition Program and if so is there a policy prohibiting this in the district? What suggestions does the Food Services Department have to eliminate barriers to participation?

#### **Customer satisfaction**

What kinds of student taste testing has been successful? Are surveys administered to students, faculty and/or parents to gauge customer satisfaction and tastes? What meal programs or campaigns to increase participation have been successful?

What types of breakfast programs have proven successful in elementary schools? Secondary schools? What type of cafeteria surroundings have been implemented that encourage students to eat in school? Are plants, posters, artwork and any elements of school spirit used? What special events have been implemented to encourage nutrition and meal participation?

#### **Policies**

Does the district have an open or closed campus policy? What other policies might impact student participation in the breakfast program? In the lunch program? How is food service involved in the policy-making process?

### **9.H. Nutrition and Nutrition Education Programs**

The most successful districts and their supporting communities understand the intimate relationship between adequate nutrition and student performance. It is important that school district food services serve nutritious food, perform nutritional analysis on recipes to ensure the nutritional content of food and educate students and staff to the importance of good nutrition in their lives. To get the nutrition message out often involves educating teachers, principals, administrators, parents and students. Some school districts have nutrition education programs to help students and parents understand why they need foods from the basic food groups and the effects of excessive fats and sugar in the diet.

**Data Needs**

- Menus
- Nutritional analysis of menus
- Nutrition education plans used by the district for student instruction
- Nutrition curricula
- USDA Nutrition Education and Training support programs
- Materials used to promote nutrition and special events

**People to Interview**

Food service director  
Cafeteria managers  
Teachers  
Principals  
Students

**Activities to Perform**

- 9.H.1. Diagram the nutritional analysis and monitoring process used by the food service department, noting who is responsible for each step in the process and at what points in the process controls are in place to ensure compliance with federal and state nutrition standards. Discuss any concerns or strengths in the current system.
- 9.H.2. Identify and chart all nutrition education efforts in the district, show the nature of each effort, the target audience, the people involved in delivery of the program, if applicable, the frequency of the effort and judged effectiveness. Determine, to the extent possible, how the current programs have impacted the nutrition awareness of teachers, principals, administrators, parents and students.

## **Questions to Ask**

### **Nutrition analysis**

How does the district gauge the quality and nutritional content of its food to its menus?

Who performs nutrition analysis for the district? Is this person a full-time nutritionist or registered dietician? If not, why not? If analysis is done on a contract basis, what does this service cost the district?

How do the current nutrition analysis procedures ensure compliance with federal requirements for nutrition analysis?

Where are nutrition analyses stored? How are these analyses used to improve recipes and menus? Who is responsible for monitoring the menus and recipes to ensure nutritional content is consistent and maintained? What happens when kitchens or employees deviate from the menus and adversely impact nutritional content?

How are students involved in special meal planning and taste-testing to ensure that nutritional meals are also tasty and address student's preferences?

### **Nutrition education**

What type of nutrition education efforts are currently being used by the district? What posters, brochures or other printed materials are distributed to students? Staff? Parents?

Does the food service operation provide support of the educational program by providing nutritional education to teachers and students when called upon? If not, why not?

## **9.I. Purchasing, Warehousing and Contracting**

This section involves the evaluation of the food service purchasing process including the use of inter-local agreements and purchasing cooperatives; processing and storage of food, supplies and commodities; and product specification, price and quality.

### **Data Needs**

- Copies of all service contracts
- Status reports on services performed
- Feasibility studies
- Inventory of USDA Foods
- Cost benefit analyses
- Performance data
- Procedures and specifications for purchasing or cooperative purchasing

### **People to Interview**

Assistant superintendent with assigned responsibility

Food service director

Business or finance director or manager

Purchasing department

Legal counsel

Region Education Service Center (RESC)

Cooperative administrator (if the district belongs to a food purchasing co-op)

### **Activities to Perform**

- 9.I.1. Diagram the food service department's purchasing practices both for regular and emergency purchases and compare the food service purchasing process with the district's central purchasing process and determine how compliance with purchasing laws and district procedures is maintained and followed. Note both strengths and weaknesses in the current process and discuss any actions planned or implemented to improve the process.
- 9.I.2. Prepare a list of all contracts and inter-local agreements for cooperative purchasing, service and maintenance, management or total outsourcing of all or part of the food service operation. Note the effective dates of the contracts, the type of agreement or contract, the procurement method used to enter into this contract, the types of goods or services being provided, the annual cost of the contract and major terms and conditions.
- 9.I.3. Through interviews with neighboring districts, RESCs and others, prepare a list of opportunities for cooperative food service purchasing or commodity processing or pre-processing and compare the list to the district's current practices to determine whether the district is missing any possible opportunities for savings or improved services. If possible, create an exhibit that shows a sample of what the district actually pays for various product services versus what they would pay from a cooperative and determine if the district could benefit from joining other cooperatives.
- 9.I.4. Conduct a site visit of the food service warehouse(s) and prepare a chart showing the total square footage, general condition of the facility and the inventory, any amenities such as cold storage or built in freezers, staffing levels and major equipment such as forklifts and delivery trucks used to support the facility. To the extent possible, discuss inventory tracking and rotation methods used in the facility, the adequacy of the space and any factors that might impact the total cost of food and supplies.

### **Questions to Ask**

#### **General purchasing practices and procedures**

What purchasing practices or strategies do food service staff currently use to ensure that food and supplies are purchased at the best price and highest quality:

- Competitive bidding?
- Provision of adequate dry and freezer storage space to facilitate bulk purchasing?
- Adherence to all district central purchasing practices and procedures?

How are purchases initiated at each campus? What published guidelines or procedures are available to staff at the campus level to ensure compliance with all state and local purchasing laws and policies?

What procedures and specifications have been standardized that have led to increased quality of purchased goods or services or lower costs? How do vendors handle emergency and/or special orders?

How are products routinely evaluated for quality and cost?

#### **Contracting**

What major contracts are in place for the food service operation? How frequently are the contracts renegotiated to ensure that the district is getting the best price and highest quality goods and services? Who is responsible for ensuring that contract files are properly maintained?

What system is in place to monitor the terms and conditions of the contract? Performance standards established in the contracts? Who is responsible for monitoring contracts? For paying invoices?

What procurement methods were used to secure the contracts? How did the process ensure high value at the lowest possible cost?

**Cooperative purchasing**

What type of cooperative purchasing arrangements does the district use for food service? How does the Regional Education Service Center support cooperative purchasing? If the food service department has entered into cooperative purchasing agreements, what does it buy cooperatively through each arrangement? How does the district track its savings?

How has cooperative purchasing increased the district's buying power? Does the district make all of its purchases with the Cooperative or just a percentage? If so what is the breakdown? What, if any, difficulties has the department had in dealing with the cooperative? Do the number of deliveries and delivery locations satisfy participating districts? If not, why not? Have participating districts collectively tested products for taste, quality, nutritional analysis, cost, volume, etc. before the contracting process?

Where does the district store its USDA Foods? What, if any, of the USDA Foods are processed or preprocessed? If USDA Foods are processed or preprocessed, who does this? How was this service obtained? Through a cooperative arrangement? Is it a private company that does processing and preprocessing of commodities? Or is it a cooperative?

**Warehousing, delivery and inventory management**

What type of storage facilities does the district have for food and supplies? How much does it cost the district to maintain these storage facilities? If the district used just in time delivery what portion of the storage space could be eliminated? When, if ever, has the district put out a bid for food or supplies to be delivered on a just in time basis? What additional food and supply costs would be incurred if the district went to a just in time delivery system?

Do food vendors make just-in-time deliveries to individual campuses? Or, does the district make its own deliveries? If so, how are deliveries made? Does the district have its own delivery trucks and enough drivers to make timely deliveries?

Which food and serving products are maintained in pantry stock, warehouse stock or are freezer items? How is inventory secured for control purposes to avoid pilferage? What items are centrally received for control and accounting purposes? When items are delivered to the kitchens, how are items received and properly reported? Monitored through production sheets detailing food prepared and food served? How frequently are inventories physically counted? How does this frequency prevent pilferage?

What written procedures exist on how to deal with food waste, leftovers and expired food products?

How does the department use other types of controls such as bar code readers, security cameras, spot check inventories to control inventories?

Does the district participate in the USDA's Foods Program? If so, how does the district: Ensure compliance with federal guidelines for ordering, receiving and storing of USDA Foods products?

Provide for inventory controls consistent with other food service inventory?

Provide for efficient and cost-effective use of a majority of items received?

**9.J. Catering**



Food service operations frequently offer catering services as a way to supplement the food services budget or provide career and technology education (CATE) training for students interested in pursuing a career in the food service industry.

### **Data Needs**

- List of catering activities for the last year
- Budget and actual revenues and expenditures for catering activities
- List of special equipment or vehicles used in catering activities
- Analysis of labor hours required for catered meals
- Advertising materials used to promote the catering activities
- Price lists for catering services
- CATE program description, if applicable

### **People to Interview**

Food Service Director

Cafeteria manager

Business manager

Area superintendent with assigned responsibility

### **Activities to Perform**

- 9.J.1. Create a list of catered events for the last year showing the function, date, number of meals served and the revenues generated from each event, if known. Examine advertising materials used to publicize the catering function and through interviews determine how the catering events might be expanded, if the district has the capacity for expansion and it would be profitable.
- 9.J.2. Prepare a table showing the budgeted and actual catering revenues and expenditures for the last three years, including but not limited to revenue sources, food costs, labor and transportation costs.
- 9.J.3. If the catering function is tied in any way to the CATE program, prepare a summary of the program, the number of students participating in the program and the judged success of the program in preparing students for future careers.

### **Questions to Ask**

Are the full costs of catering activities recovered with the current price structure? Are catering activities scheduled to avoid the need for staff overtime? What cost control measures are used to ensure that costs remain low and quality of service high?

Are there policies or facility management restrictions that inhibit the ability of the catering function to provide quality services? Expand the number or frequency of catering activities?

How is the catering and regular food service operation coordinated? What staff is shared by catering and regular food service functions? Are there points where the catering and regular food service operation appears to be in competition with each other? In what way could the catering and regular food service function be better coordinated?

How are profits from catering used? What incentives exist to broaden the catering operation? What incentives exist to make the catering operation more efficient?

What policies and procedures are in place to restrict or allow catering by groups other than the district's dining service? What problems or benefits are derived from this approach?

How are career and technology education food service programs coordinated with the catering function? How do the two programs compliment one another? Detract from one another? How successful has the CATE program been in preparing students for careers in food service? How is success measured?

### **9.K. Review and Evaluation of Contracting Process**

Food services or components of the food services operation such as nutrition analysis or maintenance of equipment could be purchased or contracted for through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement. This evaluation process is discussed in great detail in the **Purchasing Protocol, Section 8.G. Contracting Process** and **Section 8.H. Yellow Pages Test**.

#### **Additional Resources:**

*Food for Thought: Ideas for Improving School Food Service Operations*, Texas Comptroller's Office.  
<<http://www.window.state.tx.us/tpr/tspr/food/>>

Texas School Food Service Association  
<<http://www.tsfsa.org/>>

The Food and Nutrition Information Center (FNIC), part of the U.S. Department of Agriculture (USDA) and the Agricultural Research Service (ARS) <<http://www.nal.usda.gov/fnic/index.html>>

# ***TRANSPORTATION***



## **10. Transportation**

Transportation is a vital support service that requires sound management. Capital investments in bus fleets and annual expenditures required for maintenance and operation are substantial. But, the goal of any school transportation operation is to timely transport students safely to and from school and other school related activities. Although numerous state regulations govern transportation services, districts have the flexibility of establishing procedures that can enhance operations such as setting bell schedules, designing efficient routes and establishing sound maintenance procedures.

This module examines the transportation program focusing and evaluates factors affecting transportation, bus replacement and vehicle maintenance programs, driver recruitment and training, driver and passenger safety, service evaluation and purchasing procedures. This chapter reviews the effectiveness and efficiency of the district's transportation services in the following areas:

- 10.A. Organization and Staffing
- 10.B. Planning, Policies and Procedures
- 10.C. Routing and Scheduling
- 10.D. Supplemental Transportation
- 10.E. State Reporting and Funding
- 10.F. Safety and Training
- 10.G. Vehicle Maintenance and Bus Replacement Schedules
- 10.H. Review and Evaluation of Contracting Process

### **10.A. Organization and Staffing**

Of paramount importance to a school district's transportation function is safety and timeliness. The manner in which the department is organized and staffed can and will have a direct impact on the effectiveness and efficiency of the operation and its ability to meet these primary goals.

#### **Data Needs**

- Organization chart showing number of positions by job category
- Position control report showing filled and vacant positions and personnel on leave of absences
- Job descriptions for each job category
- Number of regular and special, extracurricular and other routes driven daily and information pertaining to other transportation services provided on a non-routine basis that would impact staffing needs
- Salary/wage range for each grade/job category including exempt employees
- Wages and annual hours worked for hourly employees
- Minimum hour guarantee and number of days per year by job category
- Benefits, including paid days off
- Pay and benefit studies conducted to confirm competitive salary and benefits
- Documentation on methods used to recruit drivers and attendants over the last three years and the effectiveness of the methods
- Number of personnel by job category hired during previous school year
- Copy of transportation department employee handbook and departmental procedures
- Statistics on job turnover for drivers and attendants over the last three years
- Findings of exit interviews
- Overtime hours and dollars by job category for the last three years
- Spreadsheet of drivers' absences or vacancies during latest school year by morning and afternoon
- Number and frequency of use of substitute bus drivers for the last school year

- Copy of written procedures when there are not enough bus drivers to cover all routes
- Programs or initiatives to measure and improve employee morale, job satisfaction and productivity
- Annual transportation report
- District budget for transportation for current year, district expenses for transportation for last five years

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility  
Transportation director  
Assistant director, if applicable  
Routing and scheduling coordinator for regular transportation  
Special transportation coordinator  
Field trip coordinator  
Dispatchers  
Operations supervisors  
Lead drivers, if applicable  
Vehicle maintenance supervisor  
Training coordinators  
Safety officer, if applicable  
Private service providers, if applicable

### **Activities to Perform**

- 10.A.1. Create or examine existing organization and staffing charts and review job descriptions for all transportation related functions including vehicle maintenance and parts ordering and warehousing. Show the actual number of staff in each position including substitute drivers. Interview staff to determine reporting arrangements, whether the organizational structure depicted on the chart reflects the actual organization of the department and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future. Explain the reasons for any changes.
- 10.A.2. Use the information compiled above, as well as ridership and fleet information, to develop a chart showing the staffing ratios within the function, such as mechanics to total buses in the fleet, drivers to supervisory staff, etc. Compare the district's ratios to those of peer districts or to publish industry standards. Through interviews, determine the reason for any variances.
- 10.A.3. Prepare a chart showing the budgets of transportation and transportation related functions for the last five years. Include enough detail to identify budgeted overtime expenditures, extracurricular travel and expenditures for regular, special education, career and technology transportation. Calculate the percent of change in budgets and determine through interviews the reason for budget growth above the average student enrollment or ridership rates over the same time period.
- 10.A.4. Prepare a chart showing actual overtime worked by each position type stated in hours and dollars and if available, show trends for the last three years. Calculate whether overtime is increasing or decreasing and identify any areas where consistent, excessive overtime is being worked and why.
- 10.A.5. Compile a list of salary rates and ranges and a list of benefits for each position within the transportation function. Compare salary rates and benefits to peers and local business competitors. Determine the turnover rate among employees in each category and note areas where the salary range is helping or deterring employee recruitment and retention efforts.
- 10.A.6. Diagram hiring practices and recruiting methods. Identify those programs or practices that are being successful and those where improvement may be necessary.

10.A.7. Chart the driver and mechanic absentee rates and vacancies over the last year. Note whether substitute drivers are meeting the district's needs and through interviews, determine what actions the district has taken to reduce absenteeism and promote driver and mechanic retention. If results are available from these efforts, provide an analysis of the effectiveness of these programs.

### **Questions to Ask**

#### **Organization and staffing**

Who are the key staff members who manage the department? What is the delegation of authority? Who is in charge in absence of the director?

Is the district's staffing level comparable to districts of similar size and linear density? What staffing formulas does the district use to ensure the efficiency of staff?

How many substitute drivers are there? Are they guaranteed a certain number of hours per week? How many? Are they considered full-time or part-time? Receive benefits?

How many filled driver positions does the district currently have? What is the peak requirement for drivers? Does the district have an adequate number of drivers to run regular routes? Is the number of backup drivers sufficient to cover the average number of absent drivers? What other staff are licensed to drive buses and how often are they called upon to run routes? How does that impact their ability to do their normal work? How does this practice impact overtime rates?

Do drivers and mechanics receive adequate supervision? What is the span of control? Who is responsible for evaluating drivers? Do the evaluators ride with the drivers to assess performance? How often? Are surveillance cameras used in buses to observe driver performance? Does the supervisor follow drivers periodically to observe driving skills and adherence to district policies and procedures? How often? When drivers are having problems, whom do they turn to for help? When a mechanic is uncertain of how to proceed with a repair, to whom can they turn for assistance?

Who drives for extracurricular trips? Who schedules extracurricular trips? If a trip requires a driver to drive more than ten hours or be at work for more than 15 hours total in a day, does the district allow for eight hours of sleep? Do drivers earn the same wage for driving extracurricular trips? Are drivers paid for "wait time" during the extracurricular event or just for the time they are driving?

What measures does the district use to determine whether it has enough mechanics? Are mechanics required to drive buses? Why? How often (on average)? How has this practice impacted the district's ability to adequately maintain the buses? Who supervises the mechanics?

#### **Salaries and wages**

Have there been any recent changes in wages and salaries in the department, such as a change in salary schedule? Any change in hours paid? How does the current wage or salary range impact recruitment and retention of employees?

How many hours a week are drivers guaranteed? What is the average number of hours actually worked? What staff can earn overtime? How much overtime is typical? What is the source of overtime? Absenteeism? Extracurricular travel? Other?

#### **Absenteeism**

On an average day, how many drivers are absent? Do the district have an incentive program to encourage attendance? Can the district quantify the success of any incentive programs? What are the procedures in the event there are not enough drivers/substitutes to cover the day's routes?

How does the employee handbook address the topic of absenteeism? Who is responsible for counseling employees with excessive absences? Do leave policies contribute to excessive absences? If so, how?

### **Overtime**

Is scheduling done so as to minimize overtime costs? Does scheduling take into account drivers' hours of duty to minimize driver fatigue and driver overtime? How does the transportation employee handbook address the topic of overtime?

Who is authorized to approve overtime? How is this individual held accountable for keeping overtime costs to a minimum? Who monitors the total amount of overtime paid out each week? What types of overtime reports are given to the board or key administrators? What strategies are being employed by the district to control overtime costs?

### **Hiring and recruiting practices**

How are staffing needs projected? What training is provided to employees responsible for interviewing and selecting drivers? Is the interview process standardized? What screening tools are used to ensure that only those candidates with a pro-safety attitude are hired? How are drivers and mechanics recruited? Are these recruitment activities tracked to determine which are most successful? How is the human resources office involved in the recruitment process? In the hiring process?

How does the district ensure driver qualifications are up-to-date (CDL, MVR, etc.)?

What processes are in place to ensure that criminal history checks are done before drivers come in contact with students? How frequently are criminal history checks done to determine continued eligibility for student contact? What process is used to check the motor vehicle records of prospective employees? What types and number of violations are considered acceptable if any?

### **Employee retention**

How do employee turnover rates compare to peer districts, regional and state averages? Are employee compensation rates competitive with peer districts, regional and state averages? Does the district provide a benefits program that is comparable with other districts, particularly surrounding/area districts? Is there a relationship between compensation package and turnover rates? How does the district track the reasons employees leave the district? What other factors are affecting turnover rates?

When are transportation employees evaluated? How are employees provided feedback about their work in a constructive and systematic basis? What kinds of training and career advancement opportunities exist in the department? How frequently does the district conduct drug and alcohol testing? Is this done randomly? How does the district deal with drivers that are found to be using alcohol or drugs?

## **10.B. Planning, Policies and Procedures**

Effective management is built upon sound planning and clearly written and legally valid policies. The department implements plans and policies that the board adopts governing the operations of school transportation functions as well as policies that are directed at other programs but have an indirect impact on the delivery of student transportation services. For example, school start and end times that are set in policy impact the transportation function. An effectively managed department will have procedures that show district employees how to carry out the policies in their various functional areas.

### **Data Needs**

- Copy of transportation planning documents, budget development schedules and goals and objectives for transportation program



- Copy of an annual “report card” on the transportation department’s performance for the last school year
- Results of student and parent surveys to measure customer satisfaction or solicit information
- Documentation for performance monitoring system; performance and cost-efficiency measures and benchmarks
- Copy of board policies impacting or directly related to transportation such as bell times and waiver days, school bus fleet procurement and replacement, courtesy transportation for hazardous conditions or other transportation within the two mile limit for reimbursement, ride time limitations, co-curricular and extracurricular transportation, use of bus attendants (monitors), security or discipline management on buses
- Internal operating procedures

### **People to Interview**

Board members

Superintendent or assistant superintendent with assigned responsibility, if applicable

Transportation director

Principals/campus based personnel

Vehicle maintenance supervisor

Private service providers, if applicable

### **Activities to Perform**

- 10.B.1. Diagram the planning and budgeting cycle used by the transportation office. Note approximate timeframe for major activities, points in the process where decisions are made and by whom, where performance is monitored and when and if adjustments are made to improve overall performance. If there are points in the process where communication or decision-making breakdown, through interviews determine the reason for the breakdown.
- 10.B.2. Prepare a list of a performance measures used by the department and the actual performance levels achieved as of the last point of measurement. Include the results of any recent customer or parent surveys. Determine if the measures provide a sufficient system of monitoring and, through interviews, determine if the process contributes to a system of continual improvement.
- 10.B.3. Compile a list of all board-approved transportation policies or policies that relate to transportation, transportation personnel or transportation routes and schedules. Show the basic content of each policy and determine if they are comprehensive and, to the extent possible, discuss what impact these policies have on the department’s effectiveness and efficiency.
- 10.B.4. Compile a list of all formally documented operating procedures used by transportation staff. Compare the list to key functions in the transportation area and determine what procedures are complete, partially complete, missing or outdated. By those functions where a documented procedure is not available or is only partially complete or outdated, through interviews note how the department ensures that the work is completed in a consistent manner and how this practice has impacted the effectiveness or efficiency of the operation.

### **Questions to Ask**

#### **Planning, budgeting and program evaluation**

Does the department have a mission statement? Goals and objectives? How are these goals linked to primary district planning documents? How are the transportation plans linked to the budget? How are these goals communicated to staff?

How are transportation services evaluated to determine overall effectiveness and efficiency? Does the district review routing, loading and scheduling annually looking for ways of increasing efficiency and cost effectiveness?

Does the district formally monitor and report on performance indicators like on-time performance, accidents per 100,000 miles, breakdowns per 100,000 miles, preventive maintenance or safety inspections performed on-time, cost per mile, cost per student rider by program? If you do not track performance measures, how does the district know if you are doing a good job? How does the district measure service quality and safety? When was the last time that the transportation office conducted a user survey to determine rider satisfaction? Parent satisfaction? Campus staff satisfaction?

How does the district plan for and monitor factors affecting transportation costs such as increases in enrollment? Decreases in enrollment? Closure of schools? Opening of school(s) in new attendance area(s)? Number of new students in a geographic area without a school? Boundary changes? Organizational changes (i.e., addition of middle schools)? School-to-school transportation due to over enrollment in a building?

Is the transportation budget reported in a format that allows for cost analysis? If not, how does the district accurately determine the costs of the services you provide? Does the department receive funding from any unique sources, such as Medicaid for special program students?

Does the district ever conduct cost comparisons with other districts or the private sector to evaluate performance?

Do attendance zones change frequently? How is the transportation department involved in planning for attendance zones?

### **Policies**

When new policies are being considered, who performs an analysis of costs? How were transportation costs considered when choosing sites for new schools? When redrawing attendance zone boundaries? When setting bell times for schools? When opening magnet school programs? When considering open enrollment or school choice policies? When setting or changing extracurricular trip budgets?

By policy, what children are transported to and from school in the district? What are the transportation policies or arrangements for DAEP or JJAEP students? What types of service by category are not reimbursed by the state?

Are any students in the district charged for transportation costs? If so, who? Under what circumstances? What is the charge? Does the charge match the cost of transportation? Is this process documented in district policy?

Does the district allow external groups, such as non-profit organizations, to use or charter school buses? If so, who? Under what circumstances? What is the charge? Does the charge match the cost of transportation? Is this process documented in district policy?

How does policy treat charges for special services? Are department or program budgets assessed for special trips? Are campuses allowed to charter special buses from external entities if the cost is lower than the district's cost from providing those services? When there are no district buses available to handle the trip? If so, how much has the district spent on private charters per year for the past three years? Who is responsible for hiring the services of a charter bus company? Is there a pre-approved list of vendors?

Has the district established policies governing the use of private vehicles for transporting students on district business including proof of insurance? Guidelines for use which are outlined and provided to drivers? Verification of qualifications to drive?

Does the district have magnet school programs? What is the transportation policy for students who attend magnet school programs? Does the district analyze the cost of magnet routes as compared to regular or special program routes?

Does the district have a policy that allows drivers to take buses home? What are the benefits of letting drivers take buses home?

What locally developed and approved policies does the district use for handling student or parent complaints? How many complaints are received per week or month?

### **Procedures**

How are internal operating procedures developed for the department? When was the last time that the transportation procedure manual was updated? Who is responsible for verifying that procedures are consistent and reflect daily operations? How does the department ensure that transportation procedures reflect validated industry best practices? Are all practices defensible if a school board member or a key administrator asks a question? By a parent? How does your school district's transportation policy and procedure manual measure up to industry recommendations?

How is staff kept knowledgeable about changes in procedures? How are new employees trained or oriented to departmental procedures? Who is responsible for training and orientation?

Would the current practices and procedures protect the district or place it at risk in the event of an accident or legal action? If not, why not? What should be changed?

What procedures are in place for children with special needs? How are procedures for dealing with children with special needs agreed to by the special education department? Have all transportation procedures and written manuals for students with special needs been reviewed by risk management personnel in your school district prior to providing in-service training and disseminating materials?

What emergency procedures are in place in the district? How does the district ensure that drivers have access to procedures on the road? Who monitors drivers to ensure that they are following procedures? For example, who monitors whether school bus drivers stop at all railroad tracks? Who monitors that discipline management procedures are followed on school buses? Who monitors that mechanics are following preventive maintenance procedures?

### **10.C. Routing and Scheduling**

For the regular program, the state reimburses districts for qualifying transportation expenses based on linear density, which is the ratio of the average number of regular program students transported daily on standard routes to the number of route miles traveled daily for those standard routes. Standard miles and riders do not include miles or riders for alternative, bilingual, desegregation, magnet, parenting, pre-kindergarten regular transportation or hazardous area service. TEA uses this ratio to assign each school district to one of seven linear density groups. Each group is eligible to receive a maximum per mile allotment and allotment rates are based on the previous year's linear density. Consequently and effective routing and scheduling system not only will help the district to control costs, but can maximize the state's reimbursement rate for miles driven.

## **Data Needs**

- School bell times
- Board policies regarding student eligibility, hazardous routes, ride times and the like that could impact routing and scheduling requirements
- List of bus routes (regular, special, career and technology, extracurricular) showing average number of riders and grade level of students or campus served
- List of bus and/or driver assignment by route
- Copies of annual reports and supporting documentation as submitted to TEA
- Description of automated routing and scheduling program, if applicable
- Description of extracurricular trip scheduling program, if applicable
- Procedures for reviewing and modifying routes as student enter and leave the system
- Sample reports from the routing and scheduling software
- Copy of routing and scheduling software handbook
- Copy of any contracts with routing and scheduling software vendors, such as maintenance contracts.
- Price paid for routing and scheduling software
- Route schedules or average rider trip time per bus route
- Records to report and measure on-time performance

## **People to Interview**

Transportation director  
Assistant director, if applicable  
Principals/campus based personnel  
Routing and scheduling coordinator for regular transportation  
Special transportation coordinator  
Field trip coordinator  
Dispatchers  
Operations supervisors  
Lead drivers, if applicable  
Bus drivers  
Private service providers, if applicable

## **Activities to Perform**

- 10.C.1. Prepare a chart showing the school start and end times by grade level or by campus if bell times are not coordinated. Note any special circumstances are individual campuses that impact schedules, such as magnet campuses that draw students from across the district, campuses with a zero hour or after hour schedule that require special activity routes and the like.
- 10.C.2. Compile a list of all routes showing the average ridership and the number of miles driven per route. Note where a single bus and driver make second or third runs in the same period and where opportunities exist for a driver and bus to make multiple runs.
- 10.C.3. Provide a written summary of key components of the district's routing and scheduling software and briefly discuss how the district is using each module or component to maximize revenues from the state and control costs. If certain components of the system are not currently being used, determine why.
- 10.C.4. If the district is not using routing software, diagram the current routing process and show how routes are established and continually modified as a result of changes in ridership. Discuss how the district uses this manual system to maximize revenues from the state and control costs.

- 10.C.5. Based upon route sheets and interviews, chart the ride time for regular program and special program students. If the district has a special programs, such as a magnet program, determine the average ride time for magnet students. Note specific routes or campuses where ride times are long and determine why and what measures have been taken to decrease ride time, if possible.
- 10.C.6. Prepare a series of charts using transportation data reported to the Texas Education Agency (TEA) to determine the efficiency and effective of regular routes, including, but not limited to linear density and reimbursement rates, cost per regular program rider, cost per regular program mile, regular program riders per mile, regular program riders per bus and regular program per bus. Compare against peer data for the same period and show performance trends over five years within the district. Note areas of improvement or concern and through interviews, determine the reason(s) for both.
- 10.C.7. Prepare a series of charts using transportation data reported to the Texas Education Agency (TEA) to determine the efficiency and effective of special education routes, including, but not limited to cost per special program rider, cost per special program mile, special program riders per mile, special program riders per bus and special program per bus. Compare against peer data for the same period and show performance trends over five years within the district. Note areas of improvement or concern and through interviews, determine the reason(s) for both.

### **Questions to Ask**

#### **School schedules**

Who controls bell times? Are the bell times staggered? Is each bus and driver dual or triple routed? Are bell schedules staggered sufficiently to provide for multiple uses of buses and drivers? What activities has the district used to improve its linear density group for regular routes and thereby increase the state's reimbursement rates?

#### **Routing**

Does the district do its routing manually or with an automated system? How does the system in use by the district improve efficiency and cost effectiveness?

If the district has uses a computerized routing and scheduling system, has it been fully implemented? How long has the district had it? What training have the routing and schedule personnel received to operate the automated system? Does the district use the automated system to conduct any type of route efficiency analysis? How much did the system cost? How was the system procured – were multiple bids accepted? Does the district have a maintenance contract for the system? If so, how much is the contract and what does it include? Who is trained to use the system? What does the vendor say the system is capable of providing? Is the district making use of all of those capabilities? If not, why not?

How does the district assure safe bus stops, waiting areas and transfer areas? Who is responsible for the crossing guard program?

On average, how many students ride the bus per trip? What is the largest route currently run? Does the district have any policies on limiting number of students per trip?

Does the district mix students of different ages (elementary, middle, high school) on the bus?

How does the current system of routing impact on time arrivals? What situations have caused buses to be late to school or in bringing children home? What is being done to correct those situations?

Who is responsible for designing new routes/modifying existing routes? Does the district periodically review routes for efficiency? How are changes decided? How often are changes made?

How are buses assigned to routes? Any effort to keep the number of miles balanced among buses?

How are bus stops determined? Does the district use cluster stops or any other routing tool to improve operating efficiency?

What special routes are provided on a regular schedule, such as activity routes? Why?

How does the district group special program routes to achieve efficiency?

Does the district provide transportation to students that face hazardous walking conditions? If so, how many students are bused? How does the district determine if a student faces hazardous walking conditions? Compare the district policy on determining student eligibility to state guidelines. What hazardous miles are not eligible for reimbursement from TEA?

Does the district use a system of bus transfers to improve efficiency? Where are students transferred from and to? Who makes the decision to transfer students, rather than busing them straight through to their school? How does the district support the transfer program as being effective and efficient? How do parents feel about the transfer program? What changes could be made to improve the program?

### **Ride times**

How long are average travel times, including waiting and transferring?

Do any policies or procedures establish a maximum amount of time that regular education students should be on a bus? Special program students? Does policy or procedure prescribe when an aide is provided on a bus?

### **Special education**

Describe the process for determining the eligibility of special program students to receive special transportation. Who determines eligibility? What policies are in place to guide the decision-making process?

With regards to special education transportation services how does the Transportation Department communicate with ARD committees? How does the district apply least restrictive environment rules to transportation? What efforts are made to mainstream special program students onto regular program routes?

What procedures exist in order to ensure the safety of special education children?  
If bus attendants (monitors, aides) are employed, which department compensates them?

How does the district provide transportation of special program students to and from locations where they receive special services, such as transportation to and from physical therapy?

Are drivers of special education students receiving training in the needs of the special students? Bus attendants (monitors, aides)?

## **10.D. Supplemental Transportation**

There are a number of supplemental transportation services provided in a typical school district, over and above transporting students to and from school. These include extracurricular travel, transportation for students with disabilities to receive special education services, transportation to

Career and Technology Education (CATE) classes or programs and private programs. Of these, only extracurricular costs are not reimbursed by the state.

The federal Individuals with Disabilities Education Act (IDEA) requires a school district to provide transportation if students with disabilities require transportation to receive special education services. All transportation for special program students, except certain extracurricular trips, is eligible for state reimbursement at \$1.08 each route mile.

The reimbursement per mile for the Career and Technology Education (CATE) program is based on the cost for regular program miles for the previous fiscal year as reported by the district in the TEA Operations Report.

Under TEA guidelines, a school district may also reimburse eligible students for transportation provided by a parent or public transit. To be eligible for private transportation reimbursement, students must live in geographically isolated areas two or more miles from their home school and from the nearest available school bus route. The TEA Handbook on School Transportation Allotments says that determination should be made on a case-by-case basis and only approved in extreme hardship cases. TEA reimburses private transportation at a rate of 25 cents per mile, up to a maximum of \$816 per student.

Additionally, some districts contract for services from a transit authority or private companies for certain types of transportation, such as transportation to magnet schools or juvenile justice alternative centers (JJAEPs). In some cases the cost for these services is shared between the city, county and/or transit authority.

### **Data Needs**

- District policies, procedures or guidelines concerning extracurricular travel including zero hour and after hour routes, transportation to and from sporting events, field trips and the like
- District policies, procedures or guidelines for supplemental transportation of students with disabilities to receive special education services
- District policies, procedures or guidelines for supplemental career and technology transportation
- Information on the budgets, routes, number of riders, schedule of operation and the like for supplemental special education services and career and technology transportation
- Budgets, budget allocation methodologies and cost containment activities dealing with extracurricular travel
- Documentation of filing and reimbursements for Medicaid reimbursements for special education service routes
- District policies or guidelines for private transportation (i.e., transportation provided by a parent or public transit)
- Budget and any cost benefit analyses done on the private transportation being used by the district, as appropriate

### **People to Interview**

Transportation director  
Principals/campus based personnel  
Special transportation coordinator  
Dispatchers  
Operations supervisors  
Private service providers, if applicable  
Special education personnel

### **Activities to Perform**

- 10.D.1. Compile the extracurricular mileage, ridership, costs and reimbursements for the last three years. By examining policies and procedures as well as reimbursement or charge back information and by interviewing key staff, analyze the trends the reasons for the trends. Further, determine how the policies and procedures are contributing to the overall cost of the program.
- 10.D.2. Chart the process for budgeting, scheduling, routing and costing of extracurricular trips and show points in the process where the process is working effectively and efficiently and through interviews determine the how the process might be improved.
- 10.D.3. Compile the career and technology mileage, ridership, costs and reimbursements for the last three years. By examining policies and procedures as well as reimbursement information, determine if the district has claimed and is obtaining full reimbursement for career and technology travel.
- 10.D.4. Chart the process for scheduling, routing and claiming Medicaid reimbursement for transporting special education students to or from services and show points in the process where the process is working effectively and efficiently and through interviews determine the how the process might be improved.
- 10.D.5. Prepare a summary of all private transportation used in the district and the process used for claiming reimbursement from the state. Show, to the extent possible, how the use of private transportation is the most cost effective and efficient method for the district to use. If no private transportation is used in the district, consider what current transportation services might be best provided by parents or a private vendor.

### **Questions to Ask**

#### **Extracurricular routes**

What special computer software does the district use for scheduling extracurricular trips?

How does the district charge for extracurricular trips and who is responsible for the cost? How does the district charge users for overnight extracurricular trips?

Are there different types of buses used for extracurricular trips? Explain. Provide cost-benefit analysis for how the district determined to use a different type of bus.

Are there any personnel devoted to extracurricular trips? Drivers? Coordinator?

How are trips scheduled and billed? Does the department have any controls in place to ensure extracurricular trips do not interfere with daily routes or do not create excessive overtime? How are requests that will take place during peak bus hours handled?

Do outside groups use buses for extracurricular trips? How are they charged? What percent of total extracurricular trips are made by outside organizations?

#### **Special education**

What processes are used for determining the types of services and the travel schedule for supplemental special education services? Who determines the time and location of the services provided? What policies are in place to guide the decision-making process?

At what point in the process is the Transportation Department informed of the need for these services? What input does the Transportation Department have in the process? What efforts are made to schedule these trips during non-peak periods? What efforts are made to transport multiple children



to a single service provider to reduce transportation costs? Are monitors or aids required to travel with the students who are receiving services?

What consideration has been given to bringing the provider to the school rather than transporting the children?

### **Career and technology**

Why does the district need supplemental career and technology transportation? What classes or programs are located away from the main campuses? How did the district determine that transporting students to the classes or programs was the most efficient and effective way to offer these classes? What evidence exists to show that this method of delivery is best for the students?

How does the district track or record the actual career and technology miles driven? How does this tracking method ensure that all miles driven are claimed?

Over the last three years, how much has the district received in reimbursements from the state? Did this amount cover the full cost of transporting the students? If not, what is the reason for the difference? Because career and technology travel is suppose to be fully paid by the state, was the difference a result of not claiming enough miles or misreporting the total cost of transportation? Has the district filed an amended report with TEA to correct the error and ask for full reimbursement? If not, why not?

### **Private program transportation**

Under what circumstances does the district reimburse parents for transporting students to and from school? What evidence exists that this is the most cost effective way to provide these transportation services?

What contracts exist for private transportation? Does the district have any private contracts providing transportation for DAEP and JJAEP students? What do private services cost the district? What city, county or metropolitan transit authorities are party to these contracts? How are costs shared in these arrangements? What evidence exists to show that this arrangement benefits the district? Benefits the students? Benefits the parents?

How is the district reimbursed for the expenses incurred with these private transportation services? What private transportation does the district provide that is not reimbursed by the state? Why is the non-reimbursed service provided?

How is safety maintained with private transportation services? What terms and conditions of contracts address safety and security?

At what point and for what reasons can private transportation services be terminated?

## **10.E. State Reporting and Funding**

The transportation department of the Texas Education Agency requires each independent school district to submit certain transportation reports each year. From these reports, TEA determines the appropriate funding for the ISD in question. Districts must submit these reports on a timely basis and with accurate information to ensure that they are reimbursed at the correct level.

### **Data Needs**

- Policies and procedures that direct or impact state reporting and funding, including policies for hazardous routes.

- Methodology for collecting and reporting data to the state
- Forms and procedures used to collect student count information
- TEA Transportation Route Services and Transportation Operation Reports for past five years
- Copy of any internal or external audits pertaining to transportation reporting or funding

### **People to Interview**

Transportation director  
Routing and scheduling coordinators  
Individual responsible for tracking and reporting TEA data  
Drivers  
Private service providers, if applicable

### **Activities to Perform**

- 10.E.1. Diagram the tracking and reporting process used by the district including compiling riders and miles, how counts are taken, how data is verified before reporting and the like. Examine operating procedures and internal or external audit reports that pertain to transportation and note points in the process where controls ensure the accuracy of reports or where there are identified weaknesses.
- 10.E.2. Prepare a chart to show the district's linear density and state reimbursement rates for the past five years to identify if linear density is increasing or decreasing. Compare linear density to peers to determine if peer districts are truly comparable for transportation purposes and whether a different set of peers should be used for transportation comparison purposes. Also, determine the trend in linear density and the projected impact of the trend on future funding from the state.
- 10.E.3. Prepare an exhibit charting the district's total transportation miles driven, ridership and costs for regular, special education, career and technology, hazardous miles and the like, compared to the state reimbursement for each category of expense. Show the percent reimbursed by category. Then, chart the districts statistics against peers to determine if the district is recovering a higher, lower, or similar percent of its costs through the state. Note areas of deviation and determine the reason for the differences.
- 10.E.4. Chart the percent of hazardous routes provided compared to two-mile route miles operated. In the exhibit also compare the districts route information with peers to determine if the amount of hazardous miles operated is reasonable. Examine district policy and hazardous route designations to determine if state guidelines are being met or if opportunities exist for improvement.

### **Questions to Ask**

#### **Counting, tracking and reporting**

Who is responsible for submitting the district's transportation data to the State? Is the data always submitted on time? If not, why not? Who verifies that the data is accurate before it is submitted to the state?

How do procedures document the counting, tracking and reporting process used by the district? How does the student count process used by the district ensure compliance with TEA requirements? Ensure that the district accurately captures information on ridership? What is the procedure to calculate and report miles for regular program routes? For special program routes? What is the procedure to count and report student riders for regular program transportation? For special program transportation?

If TEA has identified any mistakes with TEA reporting, how have the data collection and reporting methods been changed to avoid problems in the future? If TEA determined the district was overpaid, how did the district manage receiving a lower reimbursement the next year?

Similarly, has the district ever identified and received any retroactive payments for correcting TEA data?

What steps in the data collection process are automated? How are manually gathered statistics or information verified?

### **Reimbursements**

What evidence exists to show that the district is claiming and receiving maximum reimbursements for transportation services provided? When the gap between reimbursements and costs is widening, what measures have been taken by the district to maximize reimbursements? Control costs?

### **Linear density**

Is linear density rising or falling in the district? What is the reason given by the district for this change? If the district is in danger of falling to a lower reimbursement rate, are they aware of the potential impact on state reimbursements? What decisions or events have contributed to the fall in linear density? What steps has the district taken to increase linear density?

### **Hazardous routes**

Does board policy clearly define hazardous routes that would not otherwise be eligible for reimbursement from the state? What procedure is in place to ensure that routes are reviewed regularly to identify hazardous routes?

## **10.F. Training and Safety**

The goal of any school transportation function is to safely transport student to and from school. To achieve this simple goal requires training and a strong safety awareness program.

### **Data Needs**

- Staff development schedules for the last three years
- List of staff development participants, by position, for each offering in the last three years
- Copies of training evaluation forms completed by participants, as applicable
- Driver training curriculum
- Training requirements by staff category, including any mandatory requirements before a driver is allowed to take a route
- Incentive programs to encourage staff development by drivers and mechanics and summary of participants
- Documents showing current vehicle maintenance certifications by vehicle maintenance staff
- Personnel records indicating vehicle maintenance certification incentive pay currently being received by vehicle maintenance staff
- Accident and disciplinary incident records for the last three years
- Documentation on frequency, content of district safety meetings for bus drivers and mechanics
- District procedures covering student discipline on school buses
- Safety programs outside of employee training (for example student training)
- Copy of transportation department employee handbook

### **People to Interview**

Transportation director  
Principals  
Dispatchers  
Operations supervisors  
Lead drivers, if applicable  
Bus drivers  
Bus monitors  
Mechanics  
Training coordinators  
Safety officer, if applicable  
Individual responsible for receiving and monitoring reports on student discipline on school buses  
Private service providers, if applicable

### **Activities to Perform**

- 10.F.1. Prepare a list of all transportation-related staff development offered by the district or by external providers (differentiate) and the participation rates for drivers, mechanics, dispatchers and the like for the last three years. Show the frequency of the offerings, the cost, employee satisfaction with the training, whether these offerings are required by law, are part of a general orientation and/or contribute to some form of certification. Note pay differentials, if any, for certified employees.
- 10.F.2. Chart the type and frequency of disciplinary incidents on buses and summarize the discipline management process used by drivers and monitors. Discuss the role of the driver, principal and other staff in the discipline management process as well as how the incidents are recorded and documented, including how surveillance equipment is used in discipline management.
- 10.F.3. Chart all school bus or other district vehicle accident reports for the three years and determine whether trends exist. If trends are discovered, interview staff to determine what action the district has taken to reverse those trends.
- 10.F.4. Prepare a chart comparing training and safety programs to historical accident and incident patterns and list any correlation between the two factors.

### **Questions to Ask**

#### **Training**

How many hours of initial training do newly hired bus drivers receive? How many hours of ongoing training do established bus drivers receive per year? What types of training are provided and how does it compare to that suggested in the Texas Administrative Code? Describe the training curriculum for new drivers. How frequently do drivers undergo retraining? How does the training schedule comply with state minimum guidelines? How often and under what circumstances does supplemental training occur?

What training is provided for all transportation staff on an annual basis? When is transportation staff provided in-service training on changing laws, requirements and procedures? Who provides the training? How does the district use the staff development services of the Regional Education Service Center? Other larger districts in the vicinity? Local community colleges?

What training does the district provide to mechanics? How does the district encourage mechanics to obtain ASE certification? What benefits do mechanics receive for being ASE certified? Certified school bus inspector? Other?

How frequently does the district provide student management training to drivers and bus attendants (monitors, aides)? Are there driver-training classes to learn how to deal with student discipline problems? How much, how often, what is the curriculum?

What is the ratio of classroom trainers and behind the wheel trainers to the number of buses in the fleet? What is the selection and training process for classroom and behind the wheel trainers?

Does the district offer any awards to drivers to encourage good performance?

### **Student discipline**

How does the district track student incidents to monitor trends? Is the process automated? If not, why not?

Are students and parents required to sign a transportation agreement acknowledging acceptable behavior guidelines? What due process is provided if parents protest the district's disciplinary actions?

Are surveillance cameras used in buses? Black boxes? Describe the procedure to review and archive tapes. How are the videotapes used to help ensure safety for student transportation?

Does the district have any programs to improve discipline on school buses?

### **Accidents**

What is the district's post accident drug and alcohol testing policy?

With regards to safety, how many accidents have district buses been involved with during the previous school year? What percentage of these accidents did the district classify as preventable and/or non-preventable? How does the district track and monitor accidents? What procedures exist for dealing with drivers involved in preventable accidents? Are drivers with multiple accidents terminated or retrained?

What are the procedures for reporting an accident? An accident with injuries? How does the administration monitor compliance with these procedures? Do mechanics note unreported damage to buses when they are conducting preventive maintenance?

In the event of an accident, are parents/school notified if students are on board? How and when? How often does the district train drivers in evacuation procedures? What does the training consist of? How are school principals or administrators involved?

What is the accident rate per 100,000 miles?

How does the district use the accident and incident statistics to adjust processes or procedures? How is the information used to define the type of training needed by staff and drivers?

### **10.G. Vehicle Maintenance and Bus Replacement Schedules**

School bus replacement is expensive and inevitable for districts. As a result, keeping a given district's existing fleet in superb operating condition is a paramount component of an effective transportation department. Routine and preventive maintenance, accurate records and qualified mechanics are just some of the factors to consider when examining a district's maintenance department.

## **Data Needs**

- Preventive maintenance schedules
- Preventive maintenance inspection forms
- Sample of work orders or repair orders for school buses and general service fleet
- Sample of daily driver bus pre-trip inspection logs
- Summary of roadcalls (where a mechanic is dispatched to repair a bus) during last school year
- Fuel purchase and usage reports
- Procedures for controlling access to fuel
- Equipment/parts inventory
- Copy of parts inventory audits for most recent three years
- Information on methods used to purchase parts and services (state contracts, telephone bids, sealed bides, etc.)
- Description of automated vehicle maintenance information systems (VMIS) records (if applicable)
- Samples of reports from VMIS records, if applicable
- Documentation on warranty repair tracking system
- Description of all transportation operations and maintenance facilities including number of maintenance bays at each and special function bays (tire, battery storage, upholstery, inspection pit)
- Inventory of school bus fleet including date of purchase, vehicle manufacturer, model, size (number of student seats), service miles to date, average miles per year, fuel type, auxiliary equipment (air-conditioning, cameras, radios, lifts, etc.)
- Inventory of general service fleet (non-school bus), including description of primary use of vehicle, departmental assignment, date of purchase, vehicle manufacturer, model, service miles to date, average miles per year, average miles on business per year
- Copy of board policy on the replacement of school buses; fleet procurement and replacement plan
- Five-year history of school bus purchases for regular and special transportation, including year of purchase, manufacturer, model, size (number of student seats), price paid and source or basis for purchase (state contract, district)
- Documentation on all vehicles disposed of in last three school years and revenues gained at sale

## **People to Interview**

Transportation director (if appropriate reporting line)

Vehicle Maintenance director or supervisor

Mechanics and service workers

Bus drivers

Parts room supervisor

Safety officer and if applicable, Training coordinators

Maintenance Vendors, if applicable

## **Activities to Perform**

- 10.G.1. Inspect repair and parts storage facilities and prepare a written assessment of the adequacy of space, tools and equipment, physical layout, security, safety and environmental compliance.
- 10.G.2. Prepare a table showing the current fleet inventory by year, make and model; fuel use type; capacity; date of purchase; purchase price (if available); and current mileage. This should include all vehicles owned by the district including buses, police vehicles, maintenance vehicles and the like.

- 10.G.3. Physically inspect a sample of school buses and, if applicable, other vehicles maintained by the department and document the condition of the fleet. Examine district documentation to see if it matches the actual condition of the fleet and through interviews determine efforts underway to improve performance and repair processes.
- 10.G.4. Chart the average number of buses purchased each year and the average amount budgeted for bus replacement. Also chart the bus replacement schedule in practice and compare it to any stated policies for bus replacement in the district and/or state recommended guidelines for replacement. Based on annual mileage data, determine an appropriate replacement cycle for the district and compare to the actual cycle.
- 10.G.5. By examining vehicle maintenance workorders and interviewing staff, prepare a list of all preventive and major maintenance task categories for vehicles stipulating the type of maintenance performed, the frequency of the maintenance, who performs the maintenance whether in-house or by some external entity and the timeliness of each category of repairs including driver requested bus repairs.
- 10.G.6. Examine the fleet maintenance and/or workorder tracking system and prepare a list of the systems capabilities, which modules are in use and which, if any, are not. Determine if the systems capability meets the district's needs and whether the system is integrated with other appropriate systems to eliminate redundant data entry and possible errors.
- 10.G.7. Prepare a table showing the department's maintenance hours, vehicle mileage and fleet mix to assess whether mechanic staffing levels and the number of maintenance bays are adequate.
- 10.G.8. Chart the budget for fuel for the last three years by type of fuel purchased. Discuss the purchasing and fuel use programs used by the district and how these processes or procedures help the district to control costs.

### **Questions to Ask**

#### **Parts and inventory**

How does the district hold down the cost of parts, including tires? Does the district following purchasing laws and guidelines in competitively bidding parts? What alternatives exist for purchasing parts and supplies at a reduced cost? Is maintaining a parts inventory the best way to ensure the availability of regularly needed parts? How is the parts inventory maintained? Is there any obsolete inventory that should be disposed of?

Does the district have a system in place for warranty recovery and control? If so please describe?  
How much annual parts recovery?

What alternative purchasing methods does the district use for purchasing parts and supplies to reduce costs? Does the district annually review the types of vehicles needed and purchase the most efficient and effective type for the district? Smaller sizes? Larger sizes? Specific fuel types? Are supplies efficiently acquired and appropriately distributed?

#### **General services fleet**

How large is the general services fleet? Is the transportation department responsible for maintaining the general services fleet? If not, does the district assist another department? Does the district include budgeted funds specifically for the general services fleet? If not, how does the district recover the cost of parts and labor for maintenance for the general services fleet? What percent of mechanic labor is dedicated to maintaining the general services fleet?

#### **Fleet and equipment replacement schedule**

Does district policy establish a replacement policy for school buses? How often, or at what intervals are buses to be replaced in the district?

How does the district decide on the types of vehicles needed and purchased annually to determine the most efficient and effective type for the district? What purchasing process is used when purchasing buses that ensure that the district is getting the best price? Does the district purchase buses through the General Services Commission contract?

How does the district determine which buses should be retired? Is the decision based solely on age? On cost to maintain? On mileage? What analyses are conducted to choose buses for retirement or replacement?

At what age or miles of service does the district retire buses? What does the district do with retired buses? If they are sold, who sells them and how much does the district get for them? Are there any buses in an inactive (surplus) fleet?

Does the district have a program for rehabilitating buses instead of replacing them?

What is your peak bus requirement? What is the spare ratio for the fleet and why at this level? How do extracurricular trips affect this bus requirement?

Does the district maintain a bus replacement schedule with:

- future needs for transportation identified in relationship to available equipment?
- bus replacements meeting existing federal and state codes?
- a set schedule and methodology for bus replacement?

### **Maintenance and inspections**

How many district vehicles other than buses does the district own? How many miles does each vehicle log each year?

Describe your preventive maintenance program. Who handles preventive maintenance on vehicles? How does the district ensure preventive maintenance is performed on time?

What method is used to record, monitor and evaluate maintenance costs for each vehicle, each year? Are maintenance costs used to determine when to retire buses? When to refurbish buses? Has the district used bus-refurbishing opportunities provided through the Texas Department of Corrections?

What procedures are in place for drivers to check the vehicle (including fluid levels) daily and report status to maintenance personnel? What is reviewed during pre-trip inspections? Post-trip inspections? How are needed repairs communicated to the mechanics? What is the average downtime for a bus that needs repairs?

Is there a planned program of equipment and tool replacement within the transportation maintenance function? Do mechanics own their own tools, or are they the property of the district? What equipment does the district own and maintain? What system of controls prevents the theft of district-owned tools and equipment?

How many maintenance facilities? How long have they been open? Location? How many bays for maintenance and repair of vehicles? How many vehicles per maintenance bay?

### **Vehicle maintenance information system**

Does the department have a vehicle maintenance information system (VMIS)? If so, how long has the district had it? What is the information captured? Labor hours, labor cost, parts, fuel? What is the process for entering the data in the system? Who is responsible? Is data entered in a timely manner? Is the system used to produce maintenance or fleet performance reports? If so, explain.



How are parts managed? Does the district use the VMIS system to help manage parts? If not, how does the district keep track of inventory?

**Fuel usage**

What fuels are used in buses? When does fueling occur? How is fuel use tracked? How are fuel sources selected? How are prices established?

How has the district sought to reduce fuel costs? Has the district evaluated the use of alternative fuels such as propane? Does the district purchase fuel cooperatively with other school districts or governmental entities in the area? Does the district maintain its own fuel tanks and purchase fuel in bulk? Or, does the district purchase fuel at local service stations? If credit cards are used to purchase fuel, how are charges controlled? Does the district buy new buses that use less fuel or less expensive fuel? How much fuel does the district purchase monthly, annually, or by another schedule?

**10.H. Review and Evaluation of Contracting Process**

There are numerous opportunities within the transportation area for contracting, not the least of which is outsourcing the entire operation to a private vendor. But, some or all of other transportation operations such as maintenance, bus washing and extracurricular transportation could be contracted for through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

**Additional Resources:**

National Highway Traffic Safety Administration  
<<http://www.nhtsa.dot.gov>>

Texas Department of Transportation  
<<http://www.dot.state.tx.us>>

Texas Education Agency School Transportation department



***COMPUTERS  
AND  
TECHNOLOGY***



## ***11. Computers and Technology***

Use of automation has enabled school districts to enhance operational, instructional and business programs. Technological advances in hardware and software, combined with affordable pricing, allow districts of all sizes to use information systems to perform vital functions.

An information technology system provides a number of benefits including more efficient operations through speed of processing and increased information; integration of programs; and communication networks.

This module assesses all aspects of information technology including information system planning, operational and organizational controls, system applications, system acquisition, user input and program evaluation. The Computers and Technology chapter evaluates the effectiveness and efficiency of this function in the following areas:

- 11.A. Organization and Staffing
- 11.B. Staff Development
- 11.C. Technology Planning and Budgeting
- 11.D. Technology Policies and Procedures
- 11.E. Inventory and Control
- 11.F. Systems Infrastructure and Integration
- 11.G. Technical Support and Help Desk Operations
- 11.H. PEIMS Data Collections and Submissions
- 11.I. Technology Acquisition Practices
- 11.J. Review and Evaluation of Contracting Process

### **11.A. Organization and Staffing**

To achieve its technology-related goals, a school district must have an organizational structure that creates an environment for using and supporting new technologies.

#### **Data Needs**

- Organization charts for all information technology operations, including instructional and administrative technology
- Technology staffing by position
- Job descriptions for all technology-related positions
- Contracts for services or technical support
- Technology salary schedule or compensation plan
- Turnover rates by employee class
- Exit interview or employee satisfaction survey results
- Technology budget for the last three years

#### **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibility  
Chief information officer or director  
Chief financial officer or business manager  
Human Resources director  
Instructional Technology director  
Curriculum and Instruction director  
Technical Support Staff (administrative and instructional)

Teachers  
Principals

**Activities to Perform**

- 11.A.1. Create or examine the existing organization and staffing charts and job descriptions for technology and interview staff to determine reporting arrangements, determine whether the organizational structure depicted on the chart reflects the actual organization of the department. (Include district committee members—TEC §11.251) If instructional and administrative technology are organized separately, prepare charts for both functions and show any interactions or staffing shared by both groups. Document if the organization has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the reasons for changes. Note any contracted services or employees, as well as any stakeholder technology committees and show to whom they report in the overall management structure.
- 11.A.2. Chart the staffing of instructional and administrative technology and technology-related functions. Determine the ratio of total staff to staffing within the technology function. Compare the budget and staffing levels to levels in peer districts and to industry standards. Compare staff/tech, computer/tech and user/tech ratios to better determine total technology effort in the district.
- 11.A.3. Prepare a table comparing the salaries of technology staff in the district by employment category to salaries in peer districts, regional averages and/or industry competitors. Note variances by category. Examine turnover rates by employment category as well as exit interview reasons or employee satisfaction surveys to determine if salary is a key to retaining highly qualified staff.

**Questions to Ask**

**Organization structure**

Who heads the technology organization in the district? How involved and supportive is upper management of the technology function in the district? What is the role of the board in technology operations of the district? How does the current organizational structure contribute to the effectiveness and efficiency of the technology function? Is the organization structure basically centralized or decentralized? Why is this the best approach for the district?

How autonomous is the technology department? How does upper management provide appropriate controls and supervision? Do they understand the technology function and have high expectations of the technology department? How does the board make contractual decisions for major contracts for technology? Do they rely on the recommendations of district technical staff?

Are instructional and administrative technology support handled in one department or are the technical support functions decentralized? What opportunities exist for improving the management of the functions?

**Communication flow**

How does the current organization structure promote communication? What are the primary means of communication between technology staff and users? Verbal? Memos? via email? How is the district Web site or intranet used for communication? How does the current arrangement provide support to users?

How does communication flow to upper management? Stakeholders? Lower-level employees?

### **Instructional technology**

How are educational technology staffing linked to enrollment, program needs, number of users to support, number of computers to support, average resolution response times and comparative district data? Who heads the educational technology division? Are functions that relate to instructional technology efficiently aligned within the overall district organization? What is the staffing pattern of the educational technology division? What are the functions supported by the educational technology division?

How are related functions coordinated within the district? How does the district use its user committees to assist in determining needs and establishing system priorities? How is communication assured between educational technology staff, teaching staff, library staff to determine overall needs of campus and district? How does the current organization structure ensure that technology is integrated into all areas of curriculum?

How does the board interact with the educational technology department? Formally? Informally? How does the administration interact with the technology? Formally? Informally? What is the relationship between purchasing and educational technology? How are technology standards communicated to support organization such as parent organization, for purchasing technology? Is there an approval process in place for the purchase technology? Who is responsible for coordinating the purchasing of instructional technology?

How does the educational technology department meet the curriculum and instructional needs of the district? What evidence is provided that ensures that educational technology and curriculum staff members work together to meet the curriculum and instructional needs of students?

What is the relationship between the educational technology department and campus staff? How are the needs of individual campuses met? Are there teams of campus-based staff that support technology? What are their specific responsibilities? What is their reporting relationship within the technology function? What is the communication link with technology?

### **Technology advisory or user committees**

Where does the technology committee fit into the overall district organization? What advisory or decision-making authority does the committee have? How does the district technology committee have adequate representation from various stakeholder groups [See TEC §11.251]? Explain. How does the committee meet on a regularly scheduled basis with a well-planned agenda and activities? Are parents and community members aware of technology plans, expenditures and benefits of use?

Has the district developed a segregation of functions between the Information Technology Department and user departments and internally within the Information Technology Department as possible? How does the district's central information technology/data processing staff function separately from technology staff in accounting, payroll, educational technology and other departments? Why? Are the duties and responsibilities of the district's information technology staff clearly separated to ensure checks and balances on input and output data? Why? What is the percent of staff time spent on such functions as user support, hardware or software installation, network or infrastructure support, telecommunications, administrative support, Public Education Information Management System (PEIMS) coordination, planning and the like. How effective is this approach? How does the district's size impact the division of time?

### **Recruitment and retention**

What is the turnover rate among educational technology and information technology staff? How is turnover of employees tracked? Do employees complete a survey or structured exit interview when they leave the district? How is this information used to improve employee satisfaction? Is district compensation for technology employees competitive? Does the district or department have performance pay plan? How are employees recognized? Are there retention bonuses for people who

agree to stay past certain critical years or in certain critical functions? How are employee grievances handled?

How is absenteeism managed? Who covers for absent employees? Who evaluates employees and on what schedule? What are the evaluation criteria? How are poorly-performing employees documented and provided with an improvement plan? Remediation? Appraisal? Grievances? Board involvement? Administrative involvement?

How are organizational “values” communicated and reinforced? How are performance expectations communicated and reinforced? How is commitment to improvement demonstrated? How are changing needs and expectations of future students anticipated? How does staff communicate, cooperate, share skills and knowledge, across work functions, units and locations? How is on the job knowledge and skills reinforced? How is a safe and healthy work environment assured? How does the work environment promote staff satisfaction and productivity?

### **11.B. Staff Development**

According to Texas Education Code (TEC) Section 21.451, staff development provided by a school district must be conducted in accordance with minimum standards developed by the commissioner for program planning, preparation and improvement. And, more specifically, staff development must include training in technology.

Regional Education Service Centers (RESCs) are also specifically assigned responsibility for providing certain types of staff development to school districts within the region, some of which is provided at no charge to the participating districts.

#### **Data Needs**

- Policies and procedures related to optional or required technology-related staff development
- Information technology training goals or plans for technology staff, support staff, teachers and administrators
- List of technology-related training offered in the last year
- List of planned training opportunities in the next three to six months
- Staff development evaluation forms or results gathered from participants
- Technology training manuals
- Completed Texas Campus STaR Charts
- Campus/District Improvement Plan that include technology goals and objectives (TEC §21.451 Staff Development Requirements and §11.252 District-Level Planning and Decision-Making)
- Long-Range plans/goals addressing technology integration in classroom, library and administration
- Technology training budget for the last three years

#### **People to Interview**

Superintendent  
Assistant superintendent with assigned responsibility  
Chief information officer or director  
Staff development coordinator  
Director of Instructional Technology  
Director of Curriculum and Instruction



Technical Support Staff (administrative and instructional)  
Teachers  
Principals

### Activities to Perform

- 11.B.1. Examine policies and procedures pertaining to required or optional technology-related staff development. Create a chart by position classification showing the training requirements and to the extent possible, determine whether the requirements are being met and note who in the organization is responsible for monitoring compliance.
- 11.B.2. Prepare a list of technology-related staff development opportunities and show the target audience; the provider, whether internal or external; the frequency of the training; the length of the staff development sessions; the ongoing follow-up opportunities; the format of the staff development (face to face, videoconferencing; video programming; online staff development, etc.); organization of the sessions (train the trainer, end user training, one-on-one mentoring, etc.); the number of attendees; the collaborative efforts to plan and implement staff development across curriculum areas and grade levels; and the summary results of any evaluations received concerning the effectiveness of the staff development on classroom practices.
- 11.B.3. Chart the staff development budget for technology training for technology staff and for user departments or campuses for the last three years. Determine what percent training is of the total technology budget for the district and compare that percentage to peer districts and to the federal No Child Left Behind recommendation of at least 25 percent of total budget.
- 11.B.4. Examine district and campus improvement plans and other planning documents and list the goals and objectives pertinent to technology-related staff development. Compare the identified goals and objectives to the types of staff development courses offered and note how identified needs are being met. If not all needs are being met, through interviews with individuals who coordinate staff development, determine the reason.
- 11.B.5. Examine Texas Campus StaR charts and compare the types of staff development to the needs identified in the chart. Through interviews, note how identified needs are being met or the reason that some needs have gone unmet.

### Questions to Ask

#### Staff development requirements

What, if any, staff development is mandatory for staff, including teachers? Which training is routinely required for new staff regarding the educational technology program and system? What is the basic structure of the district training plan and how are required training programs addressed in the plan?

#### Staff development offerings

Which training is routinely given to teachers and non-management staff? How often? Which training is routinely given to administrative or management staff? How often? Which training is routinely given to technical support staff? How often?

Is the district Web site used as a source of training? How does staff development fit with the needs identified through the Texas STaR Chart? What types of training delivery options are available?

How does staff development address the State Board for Educator Certification Standards for all teachers:

- All teachers use technology-related terms, concepts, data input strategies and ethical practices to make informed decisions about current technologies and their applications?
- All teachers identify task requirements, apply search strategies and use current technology to efficiently acquire, analyze and evaluate a variety of electronic information?

- All teachers use task-appropriate tools to synthesize knowledge, create and modify solutions and evaluate results in a way that supports the work of individuals and groups in problem-solving situations?
- All teachers communicate information in different formats and for diverse audiences?
- All teachers know how to plan, organize, deliver and evaluate instruction for all students that incorporates the effective use of current technology for teaching and integrating the Technology Applications Texas Essential Knowledge and Skills (TEKS) into the curriculum?

How does staff development offered in the district address the stages of Professional Development in the CEO Forum STaR Chart:

- Entry/Adoption Stage. Educators move from the initial struggles to learn the basics of using technology to successful use of technology on a basic level (e.g., integration of drill and practice software into instruction)?
- Adaptation Stage. Educators move from basic use of technology to discovery of its potential for increased productivity (e.g., use of word processors for student writing and research on the Internet)?
- Appropriation Stage. Having achieved complete mastery over the technology, educators use it effortlessly as a tool to accomplish a variety of instructional and management goals?
- Invention Stage. Educators are prepared to develop entirely new learning environments that utilize technology as a flexible tool. Learning becomes more collaborative, interactive and customized?

How does staff development offered in the district address the National Staff Development Council Standards:

- The teacher designs instruction appropriate for all students that reflects an understanding of relevant content and is based on continuous and appropriate assessment?
- The teacher creates a classroom environment of respect and rapport that fosters a positive climate for learning, equity and excellence?
- The teacher promotes student learning by providing responsive instruction that makes use of effective communication techniques, instructional strategies that actively engage students in the learning process and timely, high-quality feedback?
- The teacher fulfills professional roles and responsibilities and adheres to legal and ethical requirements of the profession?

Is the district using state educational technology resources including the Texas Library Connection and T-STAR? Are the Texas Library Connection resources (reference materials, journals, newspapers, encyclopedias and primary documents) used at the school in the classroom, administrative office and used at home? Are teachers getting CPE credit hours through T-STAR?

### **Training need assessments**

How are users consulted about the needs of new staff development? How often? What are the training requirements for teachers and for technical support staff? How are training needs linked to the SBEC, STaR and national standards? What is the level of commitment to meet these technology literacy standards? Is documentation collected to ensure that educators are technology literate as specified in No Child Left Behind? Is staff development provided in isolation or integrated as an important part of improving teaching and learning, research, etc.? How often are the training sessions evaluated?

How are the technology training needs for administrator identified? What courses are specifically designed to help administrators become more technologically proficient?

### **Training technology staff**

What training does staff in the technology division receive to better understand current and emerging developments in technology? How do technology staff members serve as resources to other district administrators in technology matters? Are employees in the division cross-trained? To what extent

does technology staff members participate in workshops, conferences, seminars, read professional literature and interact with technology administrators in both public and private sectors to improve job performance? How is this documented, reported and/or disseminated to district staff?

How are organizational training plans monitored? Are educational delivery methods available after work hours? Are needed technology skills identified for all job categories? Are technology competencies defined?

Are there local incentives for educators to take advantage of continuing education and to pursue additional teaching certificates (such as the Master Technology Teacher Certificate) or other credentials? Are there local incentives for certified Master Technology Teachers, advanced degrees in educational technology, etc.?

How were these competencies defined, e.g. research based on other educators, business, support personnel? What reward/compensation system is in place for reinforcing training? Are technology certifications considered as part of the staff development plan? Is training “just in case” or “just in time” – is training available at anytime, anywhere, at the moment of need?

### **11.C. Technology Planning and Budgeting**

The Texas Education Code requires school districts to prepare improvement plans that include provisions for the integration of technology into instructional and administrative programs. The most effective technology plans contain clear goals, objectives and action plans for technology projects. They assign individual responsibility for implementation steps and set deadlines.

The Texas STaR Chart is a tool for technology planning, budgeting for resources and evaluation of progress in integrating technology into the school curriculum and infrastructure. Beginning in 2002-03, district and charter school applicants for state and federal technology grants are required to file campus level STaR Chart profiles along with the application.

#### **Data Needs**

- Long-range technology plan
- District and campus improvement plans
- Disaster recovery plan
- Completed Texas Campus STaR Charts
- New school facilities plans (what is being installed as the schools are built)
- Technology equipment maintenance and replacement plans, if separate from other plans
- Strategic plan
- Any district analysis or evaluation report of current equipment and future hardware needs (including assistive technology)
- List of grants and external technology funding sources and amounts for the last five years including such things as E-rate, Technology Infrastructure Fund (TIF) and Technology Integration in Education (TIE) grants
- Information regarding the amount of technology allotments for the last five years and its uses
- Administrative and technology-related budgets for the last five years.

### **People to Interview**

Board members  
Superintendent  
Administrator(s) with responsibility for instructional technology  
Administrator(s) with responsibility for administrative technology  
Curriculum and Instruction director  
Chief information officer  
User departments  
Regional Education Service Center personnel  
Technology Staff

### **Activities to Perform**

- 11.C.1. Compile copies of all plans that relate to technology including but not limited to the district's long-range technology plan, Texas STaR Charts, strategic plan, disaster recovery plan, campus and district improvement plans as they relate to technology and the district's budget. Prepare a list of the plans, briefly describe the scope of the plan, the individuals or groups involved in creating the plan, the dates covered by the plan, the frequency of the plan's update, who is responsible for monitoring progress and state whether the goals and objectives of the plan are linked to other plans and the budget. Note any inconsistencies between the plans. Provide documentation that planning is based on meeting the TARGET level of the Texas STaR Chart.
- 11.C.2. Prepare a list of a performance measures used by the department and the actual performance levels achieved as of the last point of measurement. Determine if the measures provide a sufficient system of monitoring and, through interviews, determine if the process contributes to a system of continual improvement.
- 11.C.3. Prepare a list of all grants and other external funding obtained by the district for technology. Determine how this funding is directly related to implementing the technology plans of the district and discuss the decision-making process used to determine which grants to apply for and who applies for and monitors compliance with the grant terms and conditions.
- 11.C.4. Create a table showing the instructional and administrative technology budgets including hardware and software budgets for the last five years. Include both revenue sources as well as expenditure budgets and to the extent possible, include campus-based budgets for technology in the mix. Identify trends and by examining the district's technology plan and interviewing staff, show how the budget addresses the goals and objectives for technology in the district.
- 11.C.5. Examine the campus profiles prepared as part of the Texas STaR Chart and chart the identified strengths and weaknesses by campus and for the district as a whole. Show how the goals and budgets of the district are targeting identified areas of weakness.
- 11.C.6. Examine the disaster recovery plan and any other documents that show how the district has prepared for the event of a disaster. List the major components of the plan and how the plan ensures business continuity following a disaster. In the absence of a formal plan, determine what elements of a plan are in place and what still remains to be done.

### **Questions to Ask**

#### **Technology planning**

How is the technology department's mission statement or understanding about how the department works, linked to the overall district mission and goals? How does the department monitor and measure success? Are the campuses/district using the Texas STaR Chart for that documentation? How does the department know they are meeting their customers' needs? Who are their customers? How is quality of services ensured? How is this reported and to whom?

What is the date of the most recent revision to the district's technology plan? When did TEA or the RESC approve the plan? Is it tied to the recommendations in the Texas Long-Range Plan for Technology, 1996-2010? Is an equipment and software replacement schedule a part of the technology plan? If not, why not? How are the goals tied to the Texas Campus STaR Charts?

What are your campus' and district's current educational technology profiles Texas Campus STaR Charts? What evidence can be provided to demonstrate their progress in meeting the goals of the Long Range Plan for Technology? What areas should your campus and district focus on to improve their level of technology integration to ensure the best possible teaching and learning? How does the district align the technology plan to state, TEA and federal plans for educational technology?

How does the district's long-range technology planning process include input from representatives of the district administration, campus-based personnel and support personnel? Is the district's current and future technology requirements considered when planning for system upgrades or replacements?

### **Performance evaluations**

Does the district formally monitor and report on performance indicators like on-time maintenance and repairs, cost per computer, cost per student and the like? If the district does not track performance measures, how does the district know if you are doing a good job? How does the district measure service quality? When was the last time that the technology office conducted a user survey to determine user satisfaction? Student satisfaction? Campus staff satisfaction?

Are performance standards in place for each technology support area? For example? Are customer follow-up to service requests sent after the service is performed? Are customer surveys sent to customers periodically? Are performance standards in place to regularly monitor performance and methods in place to collect information about performance?

How often do user groups attend regular review and planning sessions? How often does the management personnel attend regular review and planning sessions? How is technology staff involved in user division planning that relates to technology?

How does the district provide a system for determining accounting, instructional, student records, curriculum, budgeting and other departmental information needs? How does the district provide a formal prioritization process for analyzing districtwide needs?

How and when does the district conduct scheduled reviews, analysis and evaluation of educational technology software/hardware? Do these scheduled reviews consider changing user requirements? Are any user committees involved in conducting reviews, analysis and evaluation of information technology software? Explain. How does the district regularly review current equipment and future hardware needs on an annual basis? Explain. How does the district have an obsolescence plan?

### **Budgeting**

Has the board adopted an annual spending plan for educational technology with use of operating funds and bond funds as appropriate? Are spending plans tied into technology plans? Do technology plans have detailed implementation schedules and timelines? Is information on progress reported to the board?

Has the board approved multi-year spending plan to provide hardware, software and all peripheral requirements? Funding for use of outside consultants to assist regular staff with system planning, requirement definition or system implementation if the need exists?

How aggressively has the district sought grant funding to support the technology plans of the district? Who is responsible for grant writing? What goals, objectives or strategies are being met through grant funding or other external funding sources? How is this funding strategy reflected in the district's plans? Is there a sustainability plan after the grant funds end?

### **Disaster recovery planning**

How is disaster and recovery planned? Evaluated? Tested? Is data regularly stored offsite in the event of disasters involving flood, tornado and fire? Has the district developed appropriate physical safeguards and backup provisions? What off-site storage is used? Has the district developed a disaster recovery plan? How does the district maintain its backup schedule? Are there other areas that should be backed up? Has the recovery procedures been tested?

How does the current disaster recovery plan address:

- Immediate Response?
- Incident control/evaluation?
- Notifications?
- Environmental Restoration?
- Functional Restoration?
- Resumption of Critical Business Functions?

How does the immediate response section of the plan address evacuation, missing/damage reports, calls for official help? How does incident control/evaluation section of the plan address establishing a command center, security of physical plant and data and damage assessment? How will staff, students, vendors and other customers be notified of the disaster?

What pre-planning measures have been taken to restore critical business functions? Where will the administration establish its new location if the administration building were destroyed or unusable? Where will supplies and office equipment come from?

How does the district intend to restore lost transactions or recreate critical paper documents such as student records? How will the remaining data be validated?

## **11.D. Technology Policies and Procedures**

Policies, procedures and standards are the bedrock of effective technological change. Districts need clear policies and procedures for the purchase of technology, its acceptable use, the application of copyright laws and the control of software and hardware inventories.

### **Data Needs**

- Board policies impacting technology, both instructional and administrative
- District acceptable use policies
- Internal operating procedures

### **People to Interview**

Superintendent  
Chief Information officer  
Technology Staff

**Private sector providers**

User departments

Internal auditor, if applicable

**Activities to Perform**

11.D.1. Compile a list of all board-approved technology policies or policies that relate to technology, technology personnel or technology standards, Internet or other technology use policies for students and/or staff and security policies to protect the privacy of student data. Show the basic content of each policy and determine if they are comprehensive and, to the extent possible, discuss what impact these policies have on the department's effectiveness and efficiency.

11.D.2. Compile a list of all formally documented operating procedures used by technology staff. Compare the list to key functions in the technology area and determine what procedures are complete, partially complete, missing or outdated. By those functions where a documented procedure is not available or is only partially complete or outdated, through interviews note how the department ensures that the work is completed in a consistent manner and how this practice has impacted the effectiveness or efficiency of the operation.

**Questions to Ask**

**Policies**

Are technology policies published and disseminated to appropriate staff and committee members and updated on a scheduled basis?

How does the board approve an Acceptable Use Policy? How does the board policy include copyright/appropriate use of resources? How does the district provide procedures for establishing user committees for system planning and feedback? Are accounting and other user department personnel actively involved in the design of new systems and selection of administrative software packages?

How does the district provide standards for technology that promote acquisition of some technology while discouraging or preventing the purchase of other technology? Are these standards distributed to campuses? How does the district ensure compliance with standards? How does the technology department support unauthorized hardware or software? Have standards improved the district's ability to support the software or hardware purchased? Are software purchases tied to curriculum integration plans?

What district policies are in place to restrict access to data files, programs and documentation to authorized personnel?

How does the district comply with Children's Internet Protection Act (CIPA)? How does the district's policies address the following issues:

- access by minors to inappropriate matter on the Internet and World Wide Web?
- the safety and security of minors when using electronic mail, chat rooms and other forms of direct electronic communications?
- unauthorized access, including so-called "hacking," and other unlawful activities by minors online?
- unauthorized disclosure, use and dissemination of personal information regarding minors?
- measures designed to restrict minors' access to materials harmful to minors?

How frequently are policies and procedures reviewed and updated? Are policies available in an electronic portal, with searchable selection criteria? If not, why not?

**Procedures**

How are internal operating procedures developed for the department? When was the last time that the technology procedure manual was updated? Who is responsible for verifying that procedures are consistent and reflect daily operations? How does the department ensure that technology procedures reflect validated industry best practices? Are all practices defensible if a school board member or a key administrator asks a question? By a parent? How does your school district's technology policy and procedure manual measure up to industry recommendations?



How are staff kept knowledgeable about changes in procedures? How are new employees trained or oriented to departmental procedures? Who is responsible for training and orientation?

Would the current practices and procedures protect the district or place it at risk in the event of an accident or legal action? If not, why not? What should be changed?

Are technology procedures that implement board-approved policies published and disseminated to appropriate staff and committees?

Does the district have published guidelines (procedures) for application system development and acquisition and maintenance controls? Are there policies or procedures in place to ensure that information technology and user department personnel adequately test new application systems before they are acquired?

What district procedures or practices are in place to restrict access to data files, programs and documentation to authorized personnel? How is access restricted? How does the district restrict access to hardware to authorized personnel?

What input controls ensure that only properly authorized and approved input data is accepted for processing? What significant codes are used to record data to be verified (e.g., employee numbers or vendor numbers)?

What procedures ensure that maintenance (updating and changing) of application programs is adequately controlled? What standards are in place for system documentation? Who is responsible for ensuring that standards for documentation are followed? Which programs are fully documented? How does the district fully use control features that are built into the hardware and operating system?

What procedure are in place to select appropriate instructional software that is aligned with the state curriculum standards—the TEKS? What procedures are used to ensure that educators and students use the software/hardware?

What procedure is in place for purchasing software/hardware? Has Department of Information resources (DIR) pricing or special pricing through the RESC been considered?

What virus protection measures are taken? How does the district use firewalls? How does the district secure desktop computers to prevent unauthorized changes? How are online resources from the Texas Education Agency being used (financial information, accountability, curriculum resources, etc.)?

### **11.E. Inventory and Control**

Technology hardware and software inventories can be extensive in a school district, yet ensuring that these tools are available to the right staff and at the right location is challenging. Protecting the assets of the district by accurately accounting for both the hardware and software of the district is a primary responsibility of the technology department.

#### **Data Needs**

- Policies and procedures pertaining to inventory control
- Inventory of instructional computers and other hardware by campus showing date purchased and a general description of the equipment such as the type of processor, RAM and hard drive
- Inventory of administrative computers and other hardware by location or campus showing date purchased and a general description of the equipment such as the type of processor, RAM and hard drive

- Inventory of specialized software being used in the district and highlights of instructional programs being used by the district. (For example, the district might use Edulog in transportation or Bon Appetit in food services, etc. For instructional programs list major programs. Common word processing and spreadsheet packages are not required.)

### **People to Interview**

Chief information officer  
Purchasing and other business office staff responsible for inventory and capital assets  
User departments  
RESC personnel  
Technical staff

### **Activities to Perform**

- 11.E.1. Obtain or create a summary list of computers, other hardware and specialized software for all campuses and programs by facility, type and capacity of computer and location (whether classroom, lab, office, etc.). Establish a student to computer ratio by campus and program based upon computers that can support grade-appropriate programs and Internet access (exclude unusable equipment). Establish a staff to computer ratio for administrative computers and teacher computers.
- 11.E.2. Diagram the inventory control systems for hardware and software and compare the documented policies and procedures with practices to determine the effectiveness of the controls.

### **Questions to Ask**

#### **Availability of computers**

How does the district compare to state and national goals in the number of computers available to students? How does the district allocate computers to administrative staff in the district? What areas of the district, or classes of employees do not have adequate access to computers, but should have? To the Internet? To email?

How old are these computers? What is the capability of the computers? Can they run, for example, complex programs and software? How many of the computers can access the Internet? How does the district ensure that the computers placed in the classrooms can support the technology needs at each grade level and for specific courses? How do parents, students and teachers feel about the availability of computers? How do administrators feel about the availability of computers?

What types of configurations, such as learning labs and portable computer stations, are used to provide computer access, without having to buy as many computers?

#### **Availability of other hardware**

What additional technological capabilities are available in the district (i.e., distance learning equipment, teleconferencing equipment, wide area networks, local area networks, servers) that are designed to support instruction in the district? How is the district using these capabilities? Are the capabilities of each of these systems being used to full capacity? If not, why not? What is missing that would improve the overall infrastructure and add value to instruction?

#### **Availability of software**

What instructional software is available to teachers and instructional staff? What would they like to have and can't get? Why can't they get it?

What software is used to run major administrative systems? How were these systems chosen? What pieces or modules of these systems are not being fully used? Why?

**Inventory control**

How does the district control hardware inventories? How frequently does the district inventory technology assets? How does the district ensure the accuracy of its technology inventory? How are computers and components treated when the value is below the district's capitalization threshold for capital assets? What is the district's depreciation methodology for its technology assets?

How does the district value technology assets? At what point are acquisitions recorded in the inventory? When are donations recorded in the inventory?

Does the Board of Trustees approve all capital asset disposal in advance? How does the district handle the disposal of assets purchased with federal funds? How are capital assets acquired with federal project funds identified in the capital asset inventory?

Does the school district have a central receiving service center to receive and tag all newly acquired technology equipment before distribution or installation?

Is each piece of hardware tagged with an inventory number? Are computers/hardware physically locked/secured either by cabling/lock systems or secured rooms? Are computers virtually protected by theft deterrent/tracking software?

Are computers and other items of technology included in the capital asset inventory or are they kept on a control ledger for inventory purposes? Is an annual inventory conducted? How does the district deal with discrepancies in the inventory? Are individuals held accountable for lost or stolen items? Are individuals assigned responsibility for every item of inventory? Are the police or proper authorities notified when equipment is missing? Are insurance claims filed for stolen equipment? Are insurance coverages adjusted to reflect the current inventory?

What standard does the district use to determine what is unusable/end of life cycle? Is this standard updated yearly? How does the district remove an item from inventory when it becomes obsolete or damaged? How does the district dispose of obsolete equipment?

How does the district ensure that all software on all computers is properly licensed? That copyrights are honored? How does the district view "shareware"? When unauthorized software is found on a computer, how does the district deal with the problem? How does the district use site-licenses for software that is used on multiple machines? Who is responsible for maintaining the software inventories? Is there a school board approved policy for software licenses, copyright and acceptable use?

**11.F. Systems Infrastructure and Integration**

Technology infrastructure is the underlying system of cabling, phone lines, hubs, switches, routers and other devices that connect the various parts of an organization through a wide area network (WAN) and through a series of local area networks (LANs). Maintaining a strong infrastructure and integrating these systems is critical to increased staff productivity, fewer costly data errors and better customer service to the students, parents and the community served by the district.

**Data Needs**

- List of specialize administrative and instructional software
- Description of the system architecture of the district (platforms, documentation on WANs, LANs, operating systems, etc)

- List of system documentation, operational manuals and reports
- List of external infrastructure system or technical providers

### **People to Interview**

Educational Technology director  
Information Technology director (Data Processing Management/Technical Services)  
Purchasing staff  
User departments  
Help desk supervisor and staff  
Webmaster  
Regional Education Service Center personnel  
Technical staff

### **Activities to Perform**

- 11.F.1. Prepare a list, or diagram the district's telecommunications infrastructure including routers, servers, the mainframe, WANs, LANs as well as the wiring (such as T1 lines) that connect the sites showing the type and capacity of each and the location, where applicable. Show any external providers that contribute to the infrastructure such as RESC that sometimes provide mainframe support to smaller districts. Note any areas where the infrastructure is lacking and determine if the district's plans are addressing these issues.
- 11.F.2. Compile a list of specialized administrative software and major instructional programs being used by the district. Determine when these systems were installed and/or upgraded, whether they are standalone or integrated with other systems, whether the districts or departments are experiencing any major problems with the system and if any are scheduled for replacement or upgrade in the near future.

### **Questions to Ask**

What are the campuses reporting on the Texas STaR Chart for infrastructure? Are all schools in the district connected to the Internet? Are the connections in every classroom, or are connections only to certain computers or certain locations within the campus? Has the district applied for E-Rate? Has E-Rate funding produced discernable results? Can library resources be accessed from the classrooms? Are the campus offices connected to the business office? How does the current level of technology allow for electronic communication between campuses and among campuses and the central administration? Are there videoconferencing capabilities at the campus and district level?

Are there nonstandard or limited use instructional software programs being used in the district? How do nonstandard or limited use instructional software programs impact overall support requirements?

How does the current infrastructure impact backbone throughput? Client computers throughput (i.e. 100MB switched, 100MB shared, 10MB shared, GB switched)? Server throughput to backbone?

Are administrative systems integrated to allow for exchange of information? Is the exchange of information immediate, or does information update periodically, such as over night? What processes are not integrated? How does this lack of integration contribute to redundant data entry? To errors or omissions?

How is student information such as attendance and grade data collected and transmitted to the central office? Can teachers enter the data directly into the system from the classroom? Are attendance clerks used to enter data that teachers pass to them manually? Is manual data collected at the campus level and entered at the central office? How is the accuracy of manually compiled data ensured? What improvements would be possible if these systems were better integrated or connected?

What form of communication exists between the classrooms and the campus offices? Between campuses and the central office? How can a teacher or campus administrator call for help? Are there phones in every classroom? Are there opportunities for using existing lines to improve communication with the classrooms?

What is the district's relationship to RESCs as it relates to technology? Are there opportunities to expand the current capabilities of the district through an improvement relationship with the RESC? Are there other external entities such as businesses, colleges or universities that have or could, through a partnership arrangement, help the district to expand its current capabilities?

### **11.G. Technical Support and Help Desk Operations**

Technical support significantly influences how effectively technology is used in the classroom or the business office. Teachers, students and administrators, even those who are experienced computer users, may encounter technology-related difficulties that interrupt their planning or activities. Unless they receive quick responses to their questions, their effectiveness can be diminished.

#### **Data Needs**

- Equipment maintenance/replacement plans
- List of technical services currently supported by the RESC
- List of technical services currently supported by the private sector
- Staffing chart showing all of the levels of technical support provided within the district
- Work orders and completion statistics reports
- Diagram of the troubleshooting process

#### **People to Interview**

Chief information officer  
Data Processing Management/Technical Services  
User departments  
Help desk supervisor and staff  
Webmaster  
RESC personnel  
Technical staff

#### **Activities to Perform**

- 11.G.1. Prepare a staffing chart showing all of the levels of technical support provided within the districts including support provided by campuses-based personnel, central office personnel, external entities including service contracts, maintenance agreements, warranty services and the like. Define the number of employees within each group, the role of each group, the type of technology that is supported such as MACs, PCs, software, etc., and attempt to the extent possible, to determine the ratio of technician to users or the ratio of technicians to usable computers. Compare to industry or peer district standards.

- 11.G.2. Review work orders and completion statistics for a period and determine whether responses meet customer expectations and needs. Compare the statistics to industry standards and note areas where improvements might be needed. What product would you expect from this?
- 11.G.3. Diagram the troubleshooting process, including the help desk operations and determine if the levels of technical support are appropriate and effective.

### **Questions to Ask**

Do customers feel that they are getting the level of technical support they need to get their jobs done? Are there times when the productivity of staff is impaired due to major breakdowns? What activities has the district performed to reduce productivity losses?

Are the information technology operations performed in a controlled, orderly manner that provides good customer service? Who is responsible for prioritizing requests and scheduling of work assigned to designated staff? Are technical staff required to document how and where they have spent their time?

Are campus and administrative user staff that have an interest in technology used effectively to train and troubleshoot for fellow employees?

Is there a centralized support structure where help desk calls are channeled? Are help desk/support calls analyzed and plans set forth to provide training where needed, based on the type of help desk/support calls submitted/processed. Is there a mechanism to assure problem resolution?

### **11.H. PEIMS Data Collections and Submissions**

Nearly 50 percent of the funds appropriated to school districts each biennium are allocated by funding formulas. Consequently, accurate and timely reporting of data is critical if the institution is to receive the appropriate amount of funds. Further, accurate and timely management reports are needed to ensure that departments and schools are running as effectively and efficiently as possible.

School districts submit the data required in accordance with TEA's Public Education Information Management System (PEIMS) Data Standards to their RESC. There are four submissions each year. Submission 1 is due in December and reports a snapshot of all students served and staff employed on a given date in October. Submission 2 is a report of actual financial data for the prior year and is due to TEA in February. Submission 3 includes year-long student attendance, high school course completions and disciplinary actions and is due to TEA in June. Submission 4 is a report of extended year services student data for the preceding school year and is due to TEA in September.

In order to meet TEA deadlines, RESCs establish due dates to allow sufficient time for technical assistance related to each specific collection. The data is validated/edited by the district and RESCs prior to submission to TEA.

### **Data Needs**

- Diagram of the PEIMS data collection and compilation process
- Leaver District and Campus Procedures Manual required by dropout audit
- List of operational manuals and management reports
- Copy of the exception reports from the external auditor that performed the audit of PEIMS financial data and dropout audit

### **People to Interview**

Superintendent  
Chief financial officer  
RESC personnel  
PEIMS coordinator(s)  
PEIMS support staff  
Internal or external auditor

### **Activities to Perform**

- 11.H.1. Diagram the PEIMS data collection and compilation process, including drop out and leaver data, starting at the campus level through the final submission and re-verification process. Determine what quality assurance steps are in the system and where there are points of redundant manual data entry and identify any areas of weakness.
- 11.H.2. Sample a set of reported data and compare the reported data to the source documentation to ascertain the accuracy of the data. Samples should concentrate on areas with greatest potential for error and/or areas that have the most significant impact on funding.

### **Questions to Ask**

Are policies and procedures in place to ensure the accurate collection and reporting of PEIMS, TAKS and dropout data? What data reporting problems has the district experienced in the last three years and how has the district dealt with those issues? What attendance and other campus-level administrative tasks are automated? What redundant data entry must be done either from manual forms to the computer or from one computerized system to another? Are systems integrated to allow for easy transfer of data? How does the districts computer system store data in a form and format that can be easily extracted and submitted for PEIMS?

How does the district work closely with the RESC's PEIMS coordinators or specialists? What other entities provide support to the district in the PEIMS data collection and reporting process? How does the PEIMS coordinator fit into the overall information technology organization?

How does the district ensure the accuracy of data reported to the state through PEIMS? What systematic checks and controls are in place to prevent entry errors, detect errors or data manipulation, ensure the logic of the compiled data and correct data errors when detected? What controls are in place to ensure that student identification codes and other identifier data is accurate and consistent? Are campus level personnel required to verify and confirm the accuracy of data? Did the PEIMS resubmission process require significant data correction? If so, extensive review of the accuracy of management reports and the district's use of data. Do executive level administrators examine the data submissions and perform logic checks? Who is held accountable for data accuracy? What were the frequencies of PEIMS errors detected by Reports Plus testing routines? Compare PID Error rates to comparable districts. Compare total number of warnings to comparable districts. If error rates or warnings are higher than norm, then this denotes a lack of data integrity.

How many PEIMS clerks does the district employ? PEIMS coordinators? What training is provided to PEIMS clerks and PEIMS coordinators receive? What are the district's policies for mandatory PEIMS training for all individuals responsible for data input and reporting functions?

## **11.I. Technology Acquisition Practices**

TEA has developed a Financial Accountability System Resource Guide (FASRG) outlining purchasing and reporting requirements for Texas schools. These standards apply to the technology acquisitions as well, however, the need for both technical and purchasing expertise means that more coordination is often necessary when acquiring technology to not only ensure compliance with the purchasing laws, but also to ensure that the district gets what it needs in terms of technology.

### **Data Needs**

- Purchasing policies or guidelines as they pertain to technology purchasing
- Published standards for technology purchases
- Internal operating procedures as they deal with technology purchases
- Donation guidelines for technology hardware and software
- Long-range technology plan concerning technology acquisitions
- Technology-related purchasing records for the last year and any recently released requests for proposal

### **People to Interview**

Chief information officer  
Purchasing director  
Information Technology project leaders  
RESC personnel  
Grant writers

### **Activities to Perform**

- 11.I.1. Prepare a list of a sample of purchases made in the last year or currently pending and determine the amount of the purchase, the funding source for the purchase, purchasing process used, compliance with state purchasing laws and, to the extent possible, whether prices were competitive.
- 11.I.2. Diagram to the process used to acquire technology including the initial needs assessment, stated goals for the acquisition, planning for installation or implementation, authorization of purchases, competitive procurement process, receipt of goods, installation or implementation.

### **Questions to Ask**

When making a decision to buy technology does the district first assess its current programs and systems? Are user divisions asked what they need and what they hope to achieve with the new technology? How does the district or department develop a vision for the future that anticipates how the new technology will improve the way the district does business? How does the district quantify the improvements it expects to achieve with the purchase? How does the district write specifications for meeting needs or have vendor products been allowed to dictate the district's processes? How does the board monitor the benefits achieved through the purchase of technology to determine if the decisions to purchase were appropriate?

How does the district acquire new technology? How does the district obtain hardware or software through state or local purchasing cooperatives or catalog purchasing arrangements? Do they use DIR for hardware, software or other services? How does the district use purchasing cooperatives and/or the Qualified Information Systems Vendors (QISV) program administered through the Texas General Services Commission? Are formal bids used to acquire technology? How is the purchasing department involved in the purchasing of technology?



How are expenditures controlled? How does the district ensure that all technology purchases are made following state purchasing guidelines? How does the district competitively bid technology purchases? What purchasing cooperatives or catalog purchasing arrangements does the district use when purchasing technology? How does the district consider the financial stability of potential vendors? For each technology project, does the district perform a feasibility study and cost benefit analysis that evaluates costs, risks and benefit of each project? What are the major challenges to overcome in performing feasibility studies in this district?

How does the district attempt to locate alternative funding sources such as grants, donations and the like to pay for or defray the costs of anticipated purchases? How does the district use lease purchase arrangements to acquire technology? When making decisions to lease or purchase technology outright does the district factor in the cost of implied interest? Do the terms and conditions of the lease purchase agreement allow the district to upgrade technology at appropriate intervals?

How does the district negotiate on purchases and software licenses? How does the district have teams used to negotiate software licenses? Is software tested prior to purchase?

How does the district involve community members to assist in the analysis of appropriate technology? Has total cost of ownership (initial purchase cost, maintenance, service and support costs) been considered prior to the actual purchase?

### **11.J. Review and Evaluation of Contracting Process**

Technology equipment and support services could be purchased or contracted through private companies or interlocal agreements with neighboring districts, RESCs or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

#### **Additional Resources:**

Texas STaR Chart  
<<http://www.tea.state.tx.us>>

***SAFETY  
AND  
SECURITY***



## ***12. Safety and Security***

The safety of students and school district personnel and the security of facilities and physical assets are of vital concern to school districts and their patrons. A good safety and security program provides for a balanced approach of prevention, intervention enforcement and recovery. Proper safeguards must be in place, which include hardware and equipment, security personnel and plans for preventative measures to deter crime. The Safety and Security chapter evaluates the effectiveness and efficiency of this function in the following areas:

- 12.A. Security Organization and Staffing
- 12.B. Policies and Procedures
- 12.C. Planning, Budgeting and Performance Measurement
- 12.D. Operations Management
- 12.E. Review and Evaluation of Contracting Process

### **12.A. Security Organization and Staffing**

In a safe district, schools identify potential threats or hazards and have mechanisms to respond as necessary. Some districts employ police departments to assist in the security of the district and its stakeholders, as well as use security equipment for the monitoring of potential security hazards. Other districts use contract officers or district staff to implement safety and security measures. Reporting relationships and position expectations provide the framework for a successful safety and security program.

#### **Data Needs**

- Historical crime and violence incident statistics by campus and type (PEIMS 425 Record)
- Statistics for mandatory and discretionary referrals to the JJAEP and recidivism rates
- Statistics for placements into the DAEP and recidivism rates
- Organization and staffing charts
- Job descriptions
- Full-time equivalent (FTE) staffing and shift assignments by functional area and location
- Budget for all security-related functions, including grant revenues, training expenditures and the amount of overtime budgeted and paid for the last three years
- Overtime hours worked and dollars paid by location and type of employee
- Compensation plans and actual salary rates and ranges for safety and security personnel by area and type of employee
- Copies of all security-related contracts such as those for security guards, patrol officers or drug sniffing dogs
- Memorandums of understanding (MOU) and inter-local agreements with other service providers/agencies (e.g., MOU for JJAEP)
- Copy of the Student Code of Conduct
- Copy of the expulsion process, list of who is involved and attends meetings, and scripts used to conduct the expulsion meetings
- List of classes offered or required for security personnel including those offered by the district and from external organizations such as the Regional Education Service Center and Texas Commission on Law Enforcement Officer Standards and Education (TCLEOSE)
- Documents showing completed training, including that required by TEA rules (TAC 89.1053 & TAC 37.0021)

## **People to Interview**

Superintendent or assistant superintendent with assigned responsibility for security programs  
Safety director or police chief  
School resource officers (SROs)/security guards/police officers  
Principals/assistant principals/campus-based personnel  
Staff development coordinator or others involved in training safety and security staff  
Staff development providers, either in-house or external  
External organizations that provide contracted or volunteer security-related services to the district  
Attendance officers  
School counselor or psychologist  
District staff member serving as JJAEP liaison  
DAEP director

## **Activities to Perform**

- 12.A.1 Create and/or examine organizational charts for all safety and security functions in the district including the police department, security, disciplinary alternative education programs, JJAEP, truancy, counselors, school resource officers, hall monitors, crossing guards and the like as well as contracted services or providers and show how the campus principals and central office administrators with oversight responsibility for these functions fit into the organizational scheme. For contracted services, discuss the general terms, conditions and services provided.
- 12.A.2 Prepare a table showing what district or contract staff are involved in each aspect of the district's prevention, intervention and enforcement activities as well as any special programs or activities that the district uses to address prevention, intervention and enforcement. For example, police officers may be used primarily for enforcement, SROs used for prevention, truancy and attendance officers used for intervention, assistant superintendents with responsibility for discipline management may be used for prevention and intervention, etc.
- 12.A.3 Compare the organization and staffing charts with job descriptions and interview staff to determine reporting arrangements, authority of staff to make decisions necessary to position responsibilities and if communication processes function adequately. From interviews determine whether the organizational structure depicted on the chart reflects the actual organization of the department and the job descriptions and document if it has been changed recently or repeatedly in the recent past or is anticipated to change in the near future and explain the reasons for changes.
- 12.A.4 Create a table showing the staffing and budgets of safety and security and related functions and determine the ratio of total students to staffing within each function. Compare the budget and staffing levels to industry standards or peer averages as appropriate.
- 12.A.5 Create a table showing police or security full-time equivalents (FTEs) assignments by campus, location (if applicable) or patrol area and hours and days worked per week and show how schedules ensure adequate coverage based upon incident reports at each campus. Include information about extracurricular or other special assignments.
- 12.A.6 Prepare a chart showing the salary rates and ranges for each position type within the safety and security function, the budgeted or actual overtime worked by each position type stated in hours and/or dollars, as appropriate. Compare salary rates to peer groups or local competitors and note any areas where consistent excessive overtime is being used.
- 12.A.7 Provide a list of safety and security personnel by group showing all staff development provided and/or required at orientation, annually and at other intervals by group or class of safety or security personnel. Show whether that training is provided in-house or by contract and the approximate cost for external training per person trained.
- 12.A.8 Diagram the expulsion process. Note areas where the process does not meet statutory timelines for compliance, where communication breaks down, or where the process is inefficient or ineffective. Show how parents are informed and included in the expulsion

process and their rights under the law. Also show how the JJAEP representative is informed in the case of a referral and included in the expulsion process.

- 12.A.9 Show what and how behavioral and academic records are exchanged between the district and the JJAEP for both mandatory and discretionary students for the transition to and return from the JJAEP. Show what process is in place to reintegrate returning JJAEP students back to their home campus.

### **Questions to Ask**

Who leads the safety and security function in the district? How are functions that relate to safety and security such as attendance or truancy officers and hall monitors efficiently aligned within the overall district organization? How are staffing patterns for the safety and security divisions modified to address the areas of greatest need? What are the functions supported by the safety and security division? How are incident reports used to determine the amount and type of security staff needed on a campus?

How are related functions coordinated within the district? What campus-based or districtwide programs require special staffing (e.g., DAEP, DARE programs)? How are these special programs funded and staffed? Is staffing adequate to meet program needs and objectives?

Who is in charge of building security? What is the role of the principal and assistant principals in the safety and security function? Are there organizational obstacles that prevent the safety and security function from operating smoothly?

Who hires security staff? Are there any unique security checks performed for security personnel that are not done for the rest of the district's employees? How does the district ensure that individuals performing security activities are capable of dealing with the needs of children? What special certifications are required at each level of security staffing? How does the district recruit or train individuals to fill positions requiring special certifications?

How is overtime controlled? Who must approve overtime before it is worked? What situations would have to exist to prevent the need for overtime?

How is security provided at extracurricular events? Is security at extracurricular events conducted as part of the regular security operations of the district or is there a separate contract for these services? Does the staffing pattern for extracurricular events typically result in overtime payments to security personnel? How does the district control costs for extracurricular security? Is the cost for extracurricular security charged to the safety and security budget or to the cost of extracurricular activities?

What training does staff in the safety and security division receive to better understand current and emerging developments in the security function? How does security staff serve as resources to other administrators in safety and security matters? Are employees in the division cross-trained? To what extent does security staff participate in workshops, conferences, seminars, read professional literature and interact with safety and security administrators in both public and private sectors to improve job performance?

If the district uses a drug detection dog, who is responsible for training the handlers and the dogs? Is it a contracted service? Is there an educational component to the K-9 program?

What policies or procedures address training staff such as hall monitors bus drivers, SRO's, police officers, principals and teachers regarding safety and security issues? Who trains new personnel accessing security equipment such as cell phones, safety locks and police radios? Who trains

personnel on safety activities such as identifying and reporting suspicious activity, facility hazards or other potential threats?

Are response times for safety or security related calls for service adequate? What are the response time goals for each department providing service? Are there gaps in service? Are safety and security issues quickly resolved? Who monitors the performance of staff with safety and security related duties? How are performance deficiencies handled?

Who is the district's liaison for handling expulsions to the JJAEP? How does the district coordinate the expulsion process? Who monitors the expulsion process, number/type of expulsions, and recidivism? How is the transition process assessed for expelled students? Who is involved in the reintegration of JJAEP students back to their home campus? How are student performance deficiencies addressed?

## **12.B. Policies and Procedures**

Policies reflect the attitude of the district toward safety and security concerns by providing guiding principles for daily decision-making. Procedures provide steps for performance of daily tasks, ensuring policies are correctly followed. Both are necessary for effective and legally compliant safety and security programs. Clear policies and procedures can also reduce a district's liability and risk.

### **Data Needs**

- Policies regarding safety and security such as policies for building access and security, emergency operations, bullying, and security equipment maintenance and replacement
- Departmental procedures or guidelines
- Process used to develop internal operating procedures
- Discipline related records for violation of safety or security related policies and procedures
- Training records for safety and security related topics
- Incident records for injury or damage for the last three years
- Policies or Procedures on truancy process

### **People to Interview**

Legal counsel  
Superintendent or assistant superintendent with assigned responsibility  
Safety director or police chief  
Principals/assistant principals/campus-based personnel  
Facilities or Maintenance director  
Transportation director  
Food Service director  
Risk manager  
Truancy or attendance officer

### **Activities to Perform**

- 12.B.1. Compile copies of and prepare a list of all safety and security related board policies. Explain the area covered by the policy, and how the policy impacts safety and security in the district.
- 12.B.2. Compile copies of and prepare a list of all safety and security related procedural manuals including any student discipline or employee handbooks that contain policy or procedural information related to safety and security. Also review the district's Education Specifications that guide facility construction to determine if that guide is consistent with other related

documents regarding safety features. Examine the content to determine if they are consistent and comprehensive; note any discrepancies.

12.B.3. Prepare a chart showing food service, facility and transportation safety or security injury or accident incidents for the past three years. Compare with procedures and discipline and training records to determine if a procedure was provided but not followed, or if adequate training was provided for an existing procedure and if follow-up was adequate to correct the situation by changing procedures or adding additional safety features.

12.B.4. Document the process for developing and implementing a new policy and/or procedure. Note approval points, methods of dissemination and frequency of review and update.

### **Questions to Ask**

Does the district have board approved policies for the operations of the safety and security program regarding:

- student discipline
- truancy and student attendance programs
- 'open' or 'closed' campuses
- building access
- zero tolerance programs
- data reporting/reporting of threats, crime statistics, drugs, gangs, weapons
- safety plans/goals and objectives
- identification of bullying and treatment of victims of bullies
- multihazard emergency operations

How are day-to-day operating procedures linked to these policies to ensure compliance? Who monitors these policies and procedures? Who reports violations or provides feedback to those individuals or campuses that are not in compliance?

What day-to-day operating procedures are in place for the safety and security function? How do procedures define the roles of safety and security personnel, building principals, assistant principals, teachers and other district staff? How do district procedures address:

- safety during natural or operational disasters?
- safety due to criminal behavior occurring on school property?
- evacuation plans for all types of emergencies including checklists?
- deployment and guidelines for crisis teams?
- counseling procedures for posttraumatic stress?
- debriefing and media guidelines?
- working with school support community specialists such as local law enforcement, hotline centers, poison centers and fire departments?
- documenting searches, seizures, detentions and use of force?
- reporting safety hazards, security problems or incidents involving damage to persons or property?
- security and safety audits of facilities and equipment?
- tracking and securing district assets?
- assignment and use of district vehicles?

Are there separate policies and procedures for district-commissioned officers and non-commissioned officers? Who is allowed to carry a gun and why? How do policies and procedures address:

- Who can and should carry firearms?
- Who, other than security staff, can carry weapons?
- When and where weapons are inappropriate?
- When can non-commissioned officers make arrests?
- When is the use of deadly force justified?



- What ‘police or security’ action can be taken when off duty?
- Under what circumstances can commissioned officers work non-district security or enforcement jobs?
- When can an officer run ‘code’ in responding to a call for service in a district vehicle?
- What types of weapons and ammunition are authorized for use?
- Under what circumstances will commissioned officers make traffic stops?
- If the district has it’s own K-9 program, how and when will training occur, where will training materials be obtained and secured, what records will be maintained, etc.?

Are there established procedures for the annual evaluation of the safety and security programs? Who monitors evaluations to ensure that they are done in a timely manner? Do meaningful and accurate statements describe the conduct of the individuals being evaluated?

How is district policy developed, implemented and enforced? How are district procedures developed, implemented and enforced?

Does the district have procedures for building security? Is there a key control system? Who issues keys? Who has master keys? How often does the district issue new alarm codes? Who is issued access codes?

Are there established procedures for the annual evaluation of the safety and security programs? Are there established policies or procedures in dealing with other safety and security related organizations in the community such as local law enforcement; hotline centers for child abuse, rape, run away, suicide prevention; poison control centers; and fire departments.

## **12.C. Planning, Budget and Performance Measurement**

For planning to be effective, strategies must be tied to budgets and performance must be continually monitored.

### **Data Needs**

- Safety and security related budgets for the last three years
- Safety and security related revenue sources, collections and expenditures for past three years
- Security equipment planning documents
- Security and safety surveys conducted by the district or other sources
- State-mandated reports such as the uniform crime report and/or racial profiling report required for districts with police departments
- Incident statistics reported as part of the Safe and Drug Free Schools program, collected locally as part of the district’s internal programs and/or maintained in cooperation with local law enforcement offices or Regional Service Centers
- District annual report to the board relating to safety or security programs
- District strategic plan, district improvement plan and campus improvement plan sections relating to safety and security with related progress reports evaluating the effectiveness of the strategies outlined in the plan
- Safety or security program evaluations or other related reports
- Copies of crisis or disaster plans
- Performance goals and measures related to safety and security planning and budgeting if other than those discussed in the district or campus improvement plans

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility

Principals  
Advisory committee members  
Budget or business office manager  
Security director or police chief

**Activities to Perform**

- 12.C.1. Prepare a table of security and safety-related budgets for the last three years and show the percent change from the base year. To the extent possible break out information regarding the purchase or systematic replacement of equipment; overtime expenditures; and contracted services. Where larger variances are found, through interviews determine the reason for the variances and evaluate whether the change was a sound and well-thought-out management decision.
- 12.C.2. Compile copies of all safety and security related planning documents or documents containing security strategies such as a long-range security master plan or elements of the district's strategic plan or the district and campus improvement plans. Determine the nature and scope of each plan, the time frame of the plan and the process by which the plan was developed. In addition, evaluate how the goals, objectives and strategies of each plan are linked to each other and the budget, the assignment of responsibility for implementation and the process by which the plan's implementation is monitored.
- 12.C.3. Examine the last three years of incident statistics reported as part of the Safe and Drug Free Schools program, collected locally as part of the district's internal programs and/or maintained in cooperation with local law enforcement offices. Prepare a table by campus showing the type and frequency of incidents. Note any major or defining incidents, giving a brief description of the event, date, location and show how programs have evolved as a result of the events. For example, the injury of a child exiting a bus may result in all buses being equipped with stopping arms.
- 12.C.4. Develop a chart showing the make-up, meeting frequency and reporting structures of all planning or advisory groups or committees with responsibility for safety or security related issues or programs. Show the committees' purpose or mission and identify any work products that have come from each committee.
- 12.C.5. Review district crisis/safety management plans as it relates to the city/county. Check other agencies documents guiding how emergency service providers interact with the district during an emergency.
- 12.C.6. Prepare a chart showing the performance goals and the evaluative measures used to gauge the productivity and success of district safety and security initiatives. Show how these measures are reported to the board or upper levels of administration or are used by management to modify programs to achieve greater levels of success.

**Questions to Ask**

How does the district use incident statistics to plan for the allocation of resources to campuses? What other methods are used to determine appropriate staffing levels at each campus or district location? How are the needs of the safety and security function determined? Are the budgets for the safety and security programs allocated based upon identified need? How has district planning been guided by single events rather than documented need?

How are the concepts of prevention, intervention and enforcement reflected in planning? How does the staffing of the district's safety and security program reflect a balanced approach of prevention, intervention and enforcement?

How does the district evaluate the effectiveness of the safety and security function? What performance measures are attached to the planning documents to ensure that goals and objectives are met? How are decisions reached to dedicate additional budget funds to expanding or enhancing the safety or security programs?

How are teachers, administrators, the community or site-based decision-making committees involved in the planning of safety or security programs? How are parents and students involved in planning?

What types of prevention and intervention programs does the district provide? How are these strategies addressed in the campus improvement plans, as required in state law?

How frequently does the district survey its stakeholders (i.e. teachers, administrators, students community support staff, contracted services) to receive feedback on current programs and practices in place that address safety and security for staff and students?

### **Crisis management**

Does the district have an established Crisis Management Plan: emergency procedures focusing on safety for students and school personnel that can be implemented on short notice? Does the district have a parent liaison/volunteer to be a connection with the community during crisis situations? What are their duties?

Are plans in effect for the following: Evacuation Procedures, Lockdown Procedures, Fire Drills, School Emergency Shelter Disaster Plan, Severe Weather, Crowd Control Policy, Gang Policy, Searches Policy, Traffic Control and various operational emergencies?

Does the district include the community in planning for disasters? Does the district have any prevention or intervention programs currently in place regarding crisis management? Describe the programs. When are they used? By who? How are students made aware of these programs or processes?

How does the district ensure that crisis plans are regularly reviewed, updated and tested? Who is responsible for this? How Often?

Does the district have representation at the city/county Emergency Operations Center during emergencies?

What does the regional service center provide in the way of training for administration or staff in the area of crisis management? What staff attends these sessions? Who covers their fees?

What recovery plans does the district have in place for resuming operations after an emergency event? How does the plan address location of business operations, communications, information systems, document retrieval, continued financial services, etc.?

How does the district address crime prevention and safety as they work through environmental designs for new and renovated schools? What safety or security staff is involved routinely in building design and redesign?

### **12.D. Operations Management**

Day-to-day operations of the safety and security function often include interactions with staff at all levels of the district as well as with local law enforcement and other community organizations.

### **Data Needs**

- List of known sex offenders in and around the schools
- List of fleet vehicles used in safety and security functions by year of purchase, amount of purchase, current mileage and current operating cost
- Inventory of major safety and security-related equipment such as alarm systems, security surveillance and communication equipment, showing the year purchased, cost of installation, maintenance and monitoring and test schedule
- List of external services provided by local governments or vendors
- Security equipment purchase orders
- List of various safety and security related programs such as visitor policies, student dress codes, playground equipment inspections, safety related signs or markings, etc.

### **People to Interview**

Superintendent or assistant superintendent with assigned responsibility

Principals

Advisory committee members

Budget or business office manager

Security director or chief of police

Fleet maintenance personnel

External service providers

Local law enforcement officials

### **Activities to Perform**

- 12.D.1. Identify and chart external services provided by local governments in the community such as fire, police, sheriff, etc. and show how the district interacts with each. Note any areas where there is an overlap or gap.
- 12.D.2. Prepare a table showing the current safety and security fleet inventory by year, make and model; date of purchase; purchase price (if available); and current mileage. Note who is responsible for the maintenance of the vehicles.
- 12.D.3. Prepare a table showing all major equipment used in the safety and security function such as communication devices, alarm systems and the like. Show the date of purchase, condition and type and source of maintenance required. For example, the district may do routine maintenance or the district could have a maintenance contract.
- 12.D.4. Compile a list of various safety and security related programs such as visitor policies, student dress codes, playground equipment inspections, safety related signs or markings, etc., and field test a sample to determine compliance as well as the comprehensiveness of the efforts and the district's overall commitment to safety and security efforts.
- 12.D.5. Examine the list of known sex offenders, particularly pedophiles, within the neighborhoods near schools and interview a sample of principals with the most exposure to determine what actions they have taken to ensure that these individuals do not have access to children in their school. Note areas of concern and show how practice, policies or procedures have been adapted to mitigate risk.

### **Questions to Ask**

Is the district in compliance with all current state laws regarding reporting of violence incidents in their Annual District report to the board? How does the district gather and report their violence incident statistics to the state to access Safe and Drug Free Communities Act funding for programs such as DARE? Is the district compliant with current law on reporting certain criminal incidents to local law enforcement agencies (each district is required by law to report their suspensions/expulsions

by incident type. That data is pulled to complete the SDFSC Annual Evaluation )? If the district has a police department, do they file Uniform Crime Reports? Racial Profiling Data Report?

What if any national drug prevention programs such as DARE, does the district participate in? How are students involved? How are the district's deployment of security guards, officers, drug dogs and drug searches linked to district or campus needs? Does the district do any shared services with the local law enforcement entities (i.e. city police departments, county sheriff departments)? If so, how are these arrangement documented? How effective are the arrangements?

How often does the district conduct searches for drugs, bombs and weapons? How does it accomplish this? Does the district own its own dog or contract for the services of a drug dog? Or, does the district obtain dogs through other local law enforcement groups? How has the district determined that whichever method is used is the most cost effective and efficient way to handle drug detection?

How does the district secure its buildings? How does the district use hall monitors? Are visitors required to sign in or wear a visitor badge? How are visitor sign in rules enforced? Are surveillance cameras used in key locations? Who monitors the surveillance cameras? Are exterior doors locked after the beginning of school to control entry? Are doors equipped with panic hardware so that individuals inside the building can leave, in the event of an emergency, but visitors cannot enter? What other mechanisms are in place to prevent intrusions by unauthorized individuals? What is the role of the local law enforcement or emergency response groups in responding to alarms? What is the role or district staff when responding to alarms? How does the district handle after hours calls?

What system of communication is used to connect security personnel with other security personnel? With local law enforcement? With teachers and administrators? What communication gaps exist and how is the district addressing these gaps?

Do students and staff wear identification badges so that non-students are easy to identify? Are student uniforms used to improve security? Are there any identification cards issued to staff or students? Is there a sign in policy at all campuses? Who monitors entryways, bathrooms and hallways?

How are playgrounds, portable buildings and other peripheral facilities secured? When and where are fences used to deter unauthorized access to children? What areas in and around the schools are unsecured? What locations could provide a hiding place for unauthorized individuals?

What kinds of plans are in place for the provision of safety equipment (i.e. surveillance cameras, radios, monitors, safety locks and special access cards...)? Who orders this equipment, services it, pays for it? Does the district contract out for the repair and maintenance of security equipment (i.e. surveillance cameras, monitors, safety locks, police vehicles, guns, radios, cell phones?)

Are vehicles replaced on a cycle that takes into account the age, mileage and condition of the vehicles? Does the district transportation function service these vehicles regularly? Are employees allowed to take vehicles home? What types of insurance coverages are carried on district vehicles?

Who is responsible for purchasing or leasing safety equipment? Does the attorney review contracts for lease equipment? Does the purchasing department ensure that all leases and purchases are made in compliance with purchasing laws and district policies?

Does the district evaluate the effectiveness of alarm system equipment, cameras and monitors?

What training does the district provide regarding safety and security to students and staff? How does this training reinforce the district's goals and objectives for safety and security? Are there any notable results that have occurred because of these training activities?

Does the district provide for different levels of security operations when the national threat level warning system reaches certain levels? Does the district participate in community evacuation or sheltering activities? Are crisis management procedures regularly reviewed or periodically tested?

**12.E. Review and Evaluation of Contracting Process**

Safety and security functions as well as some components such as the use of drug dogs could be purchased or contracted for through private companies or interlocal agreements with neighboring districts or other governmental entities. It is important to regularly evaluate whether there are goods or services that can be obtained from the private sector at a lower cost, higher quality or both. It is equally important to continually evaluate existing contracts to determine if the district is getting the best value possible through the contracting arrangement.

**Additional Resources:**

**Emergency Planning—Office of Safe and Drug-Free Schools**

<<http://www.ed.gov>>

**National Education Association – Crisis Communication Guide and Toolkit**

< <http://www.nea.org>>