

LEGISLATIVE BUDGET BOARD

Dilley Independent School District

Management and Performance Review

**LEGISLATIVE BUDGET BOARD STAFF
PVH CONSULTANTS**

JUNE 2016

Dilley Independent School District
Management and Performance Review

LEGISLATIVE BUDGET BOARD STAFF
PVH CONSULTANTS

JUNE 2016



LEGISLATIVE BUDGET BOARD

Robert E. Johnson Bldg.
1501 N. Congress Ave. - 5th Floor
Austin, TX 78701

512/463-1200
Fax: 512/475-2902
<http://www.lbb.state.tx.us>

June 15, 2016

Dr. Clint McLain
Superintendent
Dilley Independent School District

Dear Dr. McLain:

The attached report reviews the management and performance of Dilley Independent School District's (ISD) educational, financial, and operational functions.

The report's recommendations will help Dilley ISD improve its overall performance as it provides services to students, staff, and community members. The report also highlights model practices and programs being provided by Dilley ISD.

Some of the recommendations provided in this report are based on state or federal laws, rules or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board engaged PVH Consultants to conduct and produce this review, with LBB staff working in a contract oversight role.

The report is available on the LBB website at <http://www.lbb.state.tx.us>.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ursula Parks".

Ursula Parks
Director
Legislative Budget Board

/bw

cc: Aida Chapa
Kay Smith
Juanita Alvarez

Frank Torres
Rene Alvarez
Gracy Silva
Ernie Guzman

TABLE OF CONTENTS

Executive Summary	1
Chapter 1. District Management and Community Engagement.....	7
Chapter 2. Educational Service Delivery	21
Chapter 3. Business Services	35
Chapter 4. Human Resources	49
Chapter 5. Facilities and Safety Management.....	67
Chapter 6. Transportation.....	83
Chapter 7. Computers and Technology	95
Chapter 8. Food Service.....	101

EXECUTIVE SUMMARY

The Texas Legislature established the Texas School Performance Review in 1990 to “periodically review the effectiveness and efficiency of the budgets and operations of school districts” as stated in the Texas Government Code, Section 322.016. The Legislative Budget Board’s (LBB) School Performance Review team conducts comprehensive and targeted reviews of school districts’ and charter schools’ educational, financial, and operational services and programs. The review team produces reports that identify accomplishments, findings, and recommendations based upon the analysis of data and onsite study of each district’s operations. A comprehensive review examines 12 functional areas and recommends ways to cut costs, increase revenues, reduce overhead, streamline operations, and improve the delivery of educational, financial, and operational services. School districts are typically selected for management and performance reviews based on a risk analysis of multiple educational and financial indicators.

To gain an understanding of the school district’s operations before conducting the onsite review, the LBB review team requests data from both the district and multiple state agencies, including the Texas Education Agency, the Texas Department of Agriculture, and the Texas School Safety Center. In addition, LBB staff may implement other methods for obtaining feedback on district operations, including surveys of parents, community members, and district and campus staff. While onsite in the district, information is gathered through multiple interviews and focus groups with district and campus administrators, staff, and board members.

Dilley is located in Frio County, about 73 miles southwest of San Antonio. The state legislators for the district include Senator Carlos I. Uresti, Senator Judith Zaffirini, Representative Ryan Guillen, and Representative Tracy O. King. Dilley had an estimated population of 3,900 in 2010, which represents an increase of 6.0 percent since 2000. The school-age population of Dilley (persons ages five to 17) is 15.1 percent. As of school year 2013–14, Dilley Independent School District (ISD) served 1,006 students across three campuses: Dilley Elementary School, grades prekindergarten to five; Mary Harper Middle School, grades six to eight; and Dilley High School, grades nine to 12. The district also operates the Dilley ISD Alternative Center to serve students

removed from the regular education program for behavioral reasons. Among Dilley ISD students, 91.0 percent are Hispanic, 8.0 percent are White, and 1.0 percent are of other ethnic backgrounds. According to information reported to the Texas Education Agency (TEA), 80.0 percent of the students in the district are classified as economically disadvantaged, and 68.0 percent are deemed at risk.

Dr. Clint McLain has served as superintendent since 2013. Previously, he served as assistant superintendent for one year and high school principal for five years in Westwood ISD in Palestine.

Each school is led by a principal and assistant principal and supported by a counselor. In addition, the district employs three staff in the Business Office; three staff in curriculum and testing; two staff in human resources; one staff in special programs; and three staff in technology. In addition to the principals of the three campuses, the superintendent supervises the business manager, the administrative facilitator, the athletic, facilities, and transportation directors, and two administrative secretaries.

Dilley ISD is governed by a seven-member board, elected by position through single-member districts. Board members are elected for four-year terms, with the elections conducted biennially. The board meets monthly on the third Monday of each month.

EDUCATIONAL OVERVIEW

From school years 2009–10 to 2010–11, TEA rated Texas public schools as Academically Unacceptable, Academically Acceptable, Recognized, or Exemplary. In school year 2011–12, TEA did not issue accountability ratings because of a change in the state assessment instrument from the Texas Assessment of Knowledge and Skills (TAKS) to the State of Texas Assessments of Academic Readiness (STAAR). Beginning in school year 2012–13, TEA rated public schools as Improvement Required or Met Standard. **Figure 1** shows state accountability rating data for Dilley ISD from school years 2009–10 to 2013–14.

In school year 2012–13, Dilley ISD earned an accountability rating of Improvement Required. The district received this rating because all three campuses were rated Improvement Required due to poor student performance on the STAAR.

**FIGURE 1
DILLEY ISD STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2009–10 TO 2013–14**

YEAR	RATING	ASSESSMENT
2009–10	Academically Acceptable	TAKS
2010–11	Academically Acceptable	TAKS
2011–12	No Academic Rating Assigned	STAAR
2012–13	Improvement Required	STAAR
2013–14	Improvement Required	STAAR

NOTES: TAKS = Texas Assessment of Knowledge and Skills; STAAR = State of Texas Assessments of Academic Readiness.
SOURCES: Texas Education Agency, Texas Education Agency Snapshots, school years 2008–09 to 2011–12; Texas Academic Performance Report, school years 2012–13 and 2013–14.

In school year 2013–14, Dilley ISD also earned a rating of Improvement Required; however the middle school earned a Met Standard rating. After the onsite review, Dilley ISD was given an accreditation status of Accredited–Warned by TEA. School districts may be awarded one of four accreditation ratings: Accredited, Accredited–Warned, Accredited–Probation, and Not Accredited–Revoked. Dilley ISD received the Accredited–Warned status because it failed to make acceptable improvement following the Improvement Required status in school years 2012–13 and 2013–14.

FINANCIAL OVERVIEW

Dilley ISD receives 40.0 percent of its revenue from the state, 44.0 percent from local sources, 12.0 percent from federal sources, and 4.0 percent from investment and other earnings. Local revenues are derived primarily from property taxes. The district’s 2014 tax rate is \$1.25. The tax rate is composed of \$1.04 maintenance and operations and \$0.21 debt service (interest and sinking). In 2014, the district voted to decrease the tax rate, which had previously been \$1.42 (\$1.08 maintenance and operations and \$0.34 debt service). The district was able to generate sufficient revenue at this lower tax rate due to a large increase in the district’s property value. The district’s top three budgeted expenditures are for instruction, operational expenditures, and instructional leadership and school leadership. **Figure 2** shows Dilley ISD’s General Fund activity for fiscal years 2013 and 2014.

**FIGURE 2
DILLEY ISD REVENUE AND EXPENDITURES
FISCAL YEARS 2013 AND 2014**

CATEGORY	2013	2014
Revenue		
Local Revenue	\$3,383,015	\$6,991,147
State Program Revenue	\$7,391,330	\$6,364,119
Federal Aid	\$2,114,940	\$1,821,363
Investment Earnings	\$10,654	\$40,735
Other	\$452,119	\$613,046
Total Revenue	\$13,352,058	\$15,830,410
Expenditures		
Instruction and instruction-related	\$5,732,892	\$6,042,448
Instructional leadership and school leadership	\$1,011,471	\$1,083,813
Guidance, social work, health, and transportation	\$651,364	\$629,927
Food services	\$717,241	\$713,463
Extracurricular activities	\$521,517	\$532,501
General administration	\$646,724	\$715,682
Plant maintenance and security	\$1,189,362	\$1,139,153
Data processing services	\$48,878	\$55,863
Community services	\$61,486	\$128,553
Debt services	\$396,564	\$1,340,084
Capital outlay	\$17,173	\$0
Payments to fiscal agent and member districts—shared service	\$294,626	\$334,829
Total Expenditures	\$11,289,298	\$12,716,316
Change in Net Position	\$2,062,760	\$3,114,094

SOURCE: Dilley ISD Annual Financial Report, August 31, 2014.

ACCOMPLISHMENTS

Dilley ISD has implemented multiple strategies to support employees. Examples include using technology through direct deposit for monthly paychecks and implementing a new human resources system that enables the district to electronically issue employment contracts. Additionally, the district has implemented a program to help staff continue their higher education through its Grow Our Own Program where the district pays a portion of the employees’ tuition and fees.

FINDINGS AND RECOMMENDATIONS

The LBB's school performance review team identified significant findings and recommendations based upon the analysis of data and onsite review of the district's operations. Some of the recommendations provided in the review are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards or accepted best practices, and should be reviewed by the school district to determine the level of priority, appropriate timeline, and method of implementation.

PROCEDURES AND PROCESSES

Dilley ISD lacks documented operating procedures and processes for efficient implementation of district policies. Consistent operating procedures and processes enable a district to effectively complete activities, maintain clear communication, and ensure compliance in all educational, financial, and operational functions.

The district does not have formalized, detailed, operational procedures or operating manuals in facilities, purchasing, information technology, food services, human resources, transportation, and educational service delivery. The lack of comprehensive operating procedures, combined with limited communication across departments, results in ineffective, inefficient, and inconsistent district operations. High staff turnover further increases the risk that operational practices will not be consistent with district policy.

One significant process that the district lacks is to align the budget with its educational improvement plans and to ensure consistency across its multiple improvement plans. Different staff teams develop the improvement plans without a process for coordination across teams vertically between campus- and district-level plans. The district has not assigned responsibility to specific staff to ensure plan consistency. Additionally, the district does not make budget decisions driven by strategy, and the board adopts the budget before the development of improvement plans. The failure to align resources and improvement planning limits the improvement strategies that can be implemented. As a result, resources may not align with needs.

In its human resources function, Dilley ISD lacks structured management and formal, documented policies and procedures to efficiently and effectively manage human resources tasks. The human resources function is managed by multiple staff in the district, including both district-level and campus-level staff. The district's human resources functions

operate independently of one another, with little accountability. Without documented policies and procedures, district staff could receive inconsistent communication regarding human resources-related operations.

Having a comprehensive plan to recruit and retain staff is a critical function of an effective school district, but Dilley ISD lacks a comprehensive plan. The district participates in job fairs and pays some education stipends for staff, but its ability to pay salaries consistent with nearby larger urban districts and economic activity related to the Eagle Ford Shale Play present significant challenges to attracting and keeping qualified staff. During school year 2013–14, the district replaced 41 of its 161 total staff. Campus principal leadership has not been stable, as none of the existing principals during the onsite review remained in the same positions for school year 2015–16. The high school will have its fifth principal since 2011–12. Furthermore, during school years 2012–13 to 2014–15, the district replaced the counselors at all three campuses, and no high school counselor was in place at the time of the onsite review. In addition, the lead administrators, including the superintendent, administrative facilitator (similar to an assistant superintendent in other districts), and the business manager, have all been in their positions for less than two years.

Dilley ISD lacks an effective curriculum management system. During onsite interviews, the administrative facilitator, campus principals, and instructional staff reported that the district has no written procedures and lacks a systematic approach for implementing, monitoring, or evaluating curriculum. Dilley ISD's school year 2014–15 District Improvement Plan states that the district uses the Texas Essential Knowledge and Skills (TEKS) Resource System as the curriculum. However, instructional and administrative staff have a lack of understanding regarding which components of the system are to be used and how the system is to be implemented in the classroom. Each campus is responsible for meeting its own curriculum needs, and the curriculum is not effectively aligned vertically between grade levels or horizontally within grade levels.

In its financial functions, Dilley ISD has not established a policy or guidelines for managing and controlling its fund balance. A fund balance represents resources the district holds in reserve to address unforeseen financial events or delays in the receipt of state and local revenue sources. Without a fund balance management policy, the district risks being unable to meet its financial obligations if the reserves

in the General Fund, from which the district supports daily operations, drop below levels necessary to provide adequate protection against unexpected increases in normal operating costs or unforeseen financial crises. The lack of a fund balance management policy could result in the district having difficulty maintaining programs in the event of decreasing revenue or unexpected costs.

Finally, complete operational procedures, guidelines, and policies to guide the delivery of transportation services help to ensure compliance with rules and regulations and supports safe student transportation. Dilley ISD has not developed specific local policies and procedures that clearly define the level of services to be provided nor how those services will be delivered. The district's policy manual, required of every school district to ensure compliance with state and federal statute, contains only two locally developed transportation policies. A result of the lack of departmental procedures is that transportation is provided without a clear departmental or organizational structure.

To improve procedures and processes, the district should:

- develop and implement clear operating procedures and processes across each functional area of the district;
- align campus-level improvement plans with the district improvement plan and ensure that the annual budget reinforces both plans;
- assign district-level staff the responsibility to coordinate and oversee all aspects of the district's human resources function, and develop written human resources policies and procedures consistent with industry standards;
- establish a comprehensive recruitment and retention plan that explores sustainable, innovative options and incentives for recruitment and retention of teachers and staff in small rural districts;
- develop a comprehensive plan to implement and regularly evaluate and revise the district's curriculum;
- establish a board policy to identify the level of fund balance the district will maintain in the General Fund and how the district will use it; and
- develop and document departmental operational procedures to support safe and effective transportation and to ensure compliance with state and federal rules and regulations pertaining to student transportation.

OPERATIONS

Several of Dilley ISD's operational areas are not properly organized to ensure efficiency and effectiveness. Deficient areas include security monitoring, safety planning, and transportation services related to the overall program and communications.

The district lacks controls to ensure that designated personnel monitor safety and security functions and enforce the visitor management policy during the school day. The district has video cameras located on the interior and exterior of instructional and noninstructional buildings for safety purposes. The Dilley ISD Student Handbook states that the campus principals will review video and audio recordings routinely and document student misconduct. Campus secretaries are responsible for monitoring security cameras through a live feed on a dedicated desktop computer monitor near their work areas, but some secretaries do not turn on the surveillance monitors and do not monitor campus activity. Video data is recorded on servers located on campus and kept for approximately two to three weeks. Campus administrators can review video footage as needed, but the district does not routinely monitor security camera footage to immediately alert staff to student misconduct or other safety and security risks. The district also lacks a standard process for managing visitors, and visitor management practices vary across the district. Failure to monitor building entrances, inconsistent enforcement of visitor policies, and inconsistent monitoring of security cameras increase the district's vulnerability to potential security threats.

Dilley ISD does not evaluate and address safety and security issues identified in district safety assessments and audit reports. Many safety and security issues were reported in the district's 2014 safety and security audit and in the 2012 Texas Association of School Boards facility assessment. Some of the safety and security issues identified in the audit and assessment that were still unresolved at the time of the onsite review included:

- fire code violations;
- perimeter fencing;
- exterior door locks; and
- unsecured entrances.

Dilley ISD's Transportation Department lacks an efficient way to communicate with its drivers for daily operational information or during an emergency. The buses and other vehicles used to transport students do not have two-way

radios or other types of communication devices, so all on-road communications rely on the use of personal cellular telephones. Although the district's policy prohibits the use of a wireless communication device while operating a passenger bus with a minor passenger on the bus unless the bus is stopped, the district lacks departmental or district policies or guidelines for the use of cellular telephones by school bus drivers. A radio tower located behind the district's administration building is not in use, although it has the capability to support two-way communications. Two-way communications between dispatchers or management and bus drivers supports school bus safety and efficient school bus operations. This communication is important during a bus accident or incident and during a weather-related or other emergency within the community. Cell phones might be necessary for communication in some areas of a district or for buses that are on extended-distance or extracurricular trips. However, the use of cell phones in lieu of installed two-way communication devices limits drivers' ability to communicate in a timely manner because they may use these devices only when the buses are stopped or when no students are on board. Additionally, because the law allows the use of cell phones while the bus is in motion absent students being on board, this use could become a distraction and present a safety risk for the driver and other vehicles on the road.

To improve operations, the district should:

- establish procedures to monitor safety functions during the school day and to implement and enforce the district's visitor management policy;
- establish a process to evaluate and implement the results of district safety assessments; and
- investigate the cost and benefits of a two-way radio system to ensure bus-to-base communications for daily operations and during an emergency.

The chapters that follow contain a summary of the district's accomplishments, findings, and numbered recommendations. Detailed explanations for accomplishments and recommendations follow the summary and include fiscal impacts.

Each chapter concludes with a fiscal chart listing the chapter's recommendations and associated savings or costs for school years 2015–16 through 2019–20. The following figure summarizes the fiscal impact of all 38 recommendations in the performance review.

FISCAL IMPACT

	2015–16	2016–17	2017–18	2018–19	2019–20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
Gross Savings	\$23,940	\$23,940	\$23,940	\$23,940	\$23,940	\$119,700	\$0
Gross Costs	(\$855)	(\$855)	(\$855)	(\$855)	(\$855)	(\$4,275)	\$0
Total	\$23,085	\$23,085	\$23,085	\$23,085	\$23,085	\$115,425	\$0

CHAPTER 1. DISTRICT MANAGEMENT AND COMMUNITY ENGAGEMENT

An independent school district's governance structure, staff management, and planning process provide the foundation for effective and efficient education of students. Each school district in Texas is governed by an elected seven-member board of trustees (board). The board focuses on decision making, planning, and providing resources for achieving goals. The board sets goals, objectives, and policies and approves plans and funding necessary for school district operations. The superintendent is responsible for implementing policy, managing district operations, recommending staffing levels, and allocating the resources to implement district priorities. The board and superintendent collaborate as a leadership team to meet district stakeholder needs.

As of school year 2013–14, Dilley Independent School District (ISD) served 1,006 students across three campuses: Dilley Elementary School, grades prekindergarten (pre-K) to 5; Mary Harper Middle School, grades 6 to 8; and Dilley High School, grades 9 to 12. The district also operates the Dilley ISD Alternative Center to serve students removed from the regular education program for behavioral reasons. The student population in school year 2013–14 was 90.9 percent Hispanic; 8.4 percent White; 0.5 percent Asian; and 0.7 percent African American, American Indian, Asian, Pacific Islander, or two or more races. Students classified as economically disadvantaged represented 79.5 percent of the district population. Approximately 67.5 percent of the student population was identified as at risk.

Dr. Clint McLain has served as superintendent since 2013. Previously, he served as assistant superintendent for one year and high school principal for five years in Westwood ISD in Palestine.

Each school is led by a principal and assistant principal and supported by a counselor. In addition, the district employs three staff in the business office; three staff in curriculum and testing; two staff in human resources; one staff in special programs; and three staff in technology. The superintendent directly supervises 10 staff members. In addition to the principals of the three campuses, the superintendent supervises the business manager, the administrative facilitator, the athletic, facilities, and transportation directors, and two administrative secretaries.

Dilley ISD is governed by a seven-member board, elected by position through single-member districts. Board members are elected for four-year terms with the elections conducted biennially. The board meets monthly on the third Monday of each month.

Figure 1–1 lists the current members of the Dilley ISD board. There were three members elected during the 2014 election. Most board members have been in office for more than one term, with the newest board members having served three years.

Figure 1–2 shows Dilley ISD's organizational chart and reporting structure as of the date of the onsite review.

**FIGURE 1–1
DILLEY ISD BOARD OF TRUSTEES
SCHOOL YEAR 2014–15**

OFFICE	ELECTED	TERM EXPIRES	PROFESSION
Aida Chapa, President	2010	2018	Business owner
Kay Smith, Vice President	2004	2016	Retired school teacher
Juanita Alvarez, Secretary	2009	2018	Program facilitator
Frank Torres, Board Member	2012	2016	Construction
Rene Alvarez, Board Member	2010	2018	Retired correctional officer
Gracy Silva, Board Member	2012	2016	Correctional officer
Ernie Guzman, Board Member	2012	2016	Correctional officer

SOURCE: Dilley ISD Board of Trustees, May 2015.

**FIGURE 1–2
DILLEY ISD’S ORGANIZATION
MAY 2015**



NOTES: PEIMS=Texas Education Agency, Public Education Information Management System; TTIPS=Texas Title I Priority School; DES=Dilley Elementary School; MHMS=Mary Harper Middle School; HS=High School.
SOURCE: Dilley ISD Administration, May 2015.

An independent school district's community involvement function requires communicating and engaging stakeholders in district decisions and operations. District stakeholders include students, staff, guardians, residents, and businesses. Stakeholders must be aware of issues facing the district, support its priorities, and respond to its challenges. Communication tools include public meetings, the district's website, campus-to-home communications, extracurricular activities, and local media.

A successful community involvement program addresses both the unique characteristics of the school district and the community. A critical component of school improvement and accountability systems is a high level of community involvement. Community members and volunteers provide valuable resources that can enrich and enhance the educational system. In turn, community members directly benefit because they ultimately supply an informed citizenry, an educated workforce, and future community leaders.

Dilley ISD's parental and community involvement is primarily handled by the individual campuses. The middle school has the most parental engagement as a result of the Texas Title I Priority School (TTIPS) grant held by the district for three years. The elementary school has the next highest level of engagement, with the high school having the least amount of parental involvement among the three schools. The district's school year 2014–15 District Improvement Plan (DIP) and the corresponding Campus Improvement Plan (CIP) each include parental involvement as one of the 10 schoolwide program components. The reference to parental or community involvement is listed in the third goal: "Dilley ISD will foster, construct and maintain safe and supportive environments for students." The strategy is to "promote positive student and community interaction."

FINDINGS

- ◆ Dilley ISD has not established measurable objectives to hold the superintendent accountable for advancing student achievement and ensuring the district's efficient operation.
- ◆ Dilley ISD lacks processes for aligning the district's budget with improvement plans and for ensuring consistency across multiple plans.
- ◆ Dilley ISD lacks documented operating procedures and processes for efficient implementation of district policies.

- ◆ Dilley ISD does not have an effective districtwide approach for engaging parents at the campus level and does not maintain regular outreach and communication with the local community.
- ◆ Dilley ISD does not have partnerships to maximize external financial contributions and support opportunities for the district.

RECOMMENDATIONS

- ◆ **Recommendation 1: Develop annual objectives and an aligned evaluation instrument for managing the district superintendent's performance.**
- ◆ **Recommendation 2: Align campus-level improvement plans with the district improvement plan and ensure that the annual budget reinforces both plans.**
- ◆ **Recommendation 3: Develop and implement clear operating procedures and processes across each functional area of the district.**
- ◆ **Recommendation 4: Establish a process to improve communications and stakeholder involvement with parents and community residents and assign the function to a district-level staff.**
- ◆ **Recommendation 5: Establish an education foundation to coordinate contributions to the district.**

DETAILED FINDINGS

SUPERINTENDENT ACCOUNTABILITY (REC. 1)

Dilley ISD has not established measurable objectives to hold the superintendent accountable for advancing student achievement and ensuring the district's efficient operation.

Board Policy BJA (LOCAL), regarding the superintendent's qualifications and duties, requires that the superintendent be evaluated by performance goals. The board has not, however, specified measurable performance goals by which to evaluate the superintendent's performance. Neither the superintendent's contract nor the evaluation instrument used by the Dilley ISD board establishes such goals.

The board has adopted four high-level goals to guide the district:

- Dilley ISD shall prepare students for college and career readiness through challenging academic experiences that maximize their knowledge, technological skills, and personal experiences;

- Dilley ISD will recruit, develop, and retain exceptional staff who are committed to student excellence;
- Dilley ISD will foster, construct, and maintain safe and supportive environments for students; and
- Dilley ISD will make fiscally sound decisions that support student achievement, promote a safe learning environment, and maintain a strong financial position.

These goals are not sufficiently specific to enable the board to determine whether the superintendent is taking the actions necessary to achieve adequate progress toward their completion. Although the goals set a broad vision for the district, the board has not articulated these goals into measurable objectives for purposes of performance management.

The Texas Education Code (TEC), Section 11.1511, specifies the powers and duties of the board. Among other responsibilities, the board must “ensure that the superintendent...is accountable for achieving performance results.” Without clear objectives, neither the board nor the superintendent is able to determine whether adequate results are being achieved. Furthermore, the Texas Administrative Code (TAC), Title 19, Sections 150.1021 and 150.1022, require that the board establish specific objectives for a superintendent’s performance that compares student performance results to state accountability standards and to the previous year’s performance to judge whether improvements are being made. The expectation that evaluations of a superintendent address specific performance goals is also reflected in the responsibilities of a superintendent found in TEC, Section 11.201. For example, the statute specifies that the superintendent is responsible “for providing leadership for the attainment and, if necessary, improvement of student performance in the district based on the indicators adopted under Sections 39.0053 and 39.301 and other indicators adopted by the commissioner or the district’s board of trustees.”

As provided in TEC, Section 21.354, the board may use the commissioner’s recommended performance rubric or may develop its own. Dilley ISD adopted its own evaluation that neither specifies student performance objectives nor includes measurable performance objectives for the district or superintendent. The tool provides an opportunity for board members to rate the superintendent on each of the four high-level district goals, but it lacks any reference points to guide determinations of whether progress toward those goals has

been sufficient. The remainder of the evaluation instrument includes prompts for board members to rate the superintendent on indicators such as “monitors new programs” and “monitors existing programs” on a scale of 1 to 5.

Interviews with board members indicate that the board is not planning to establish measurable performance objectives for the superintendent. Rather, board members expect the superintendent to determine and meet performance milestones independently. When interviewed, the superintendent recognized that it is the board’s role to set specific performance objectives to guide his evaluation. However, the superintendent was not aware of any measurable criteria the board uses to evaluate his performance.

The lack of specific performance objectives to evaluate the superintendent deprives the board of a way to determine if the district is progressing in a manner consistent with their expectations. Without this information, the board is unable to hold the superintendent accountable for his responsibility to improve student performance and to require that he make adjustments when progress is insufficient or performance decreases.

By relying on the superintendent to set his own performance objectives, the board deprives itself of the ability to sustain any progress achieved during one superintendent’s tenure when the next comes into office. If the district’s path changes with each administration, the district risks inconsistent progress toward success.

The Texas Association of School Boards (TASB) has developed a template for superintendent evaluation with guidance to identify specific performance objectives. This template provides guidance to help boards define and evaluate measurable performance objectives. For example, the template suggests, among other indicators, that the board evaluate the superintendent based on a “trend of ongoing improvement as reflected in longitudinal data on student scores.” The template further suggests that the board “may want to include its specific target for student achievement” and that if the board has chosen to monitor specific subjects, in addition to state test scores, “the board should indicate the data that will be used to measure achievement in those subjects.”

TASB’s template also provides examples of ways in which a board may set specific performance objectives in domains outside student performance. For example, for facilities management and operations, the tool recommends that the

board determine whether the superintendent “maintains a management system designed to produce ongoing efficiencies in major district operations, including transportation, food services, and building maintenance and operations” by reviewing “goals, targets and benchmarks” set by the superintendent as well as longitudinal data indicating success in meeting annual goals.

Dilley ISD should develop annual objectives and an aligned evaluation instrument for managing the district superintendent’s performance.

The board and superintendent should collaborate in the development of measurable objectives aligned with board goals. The TASB template should be used as guidance. As the first step in this process, the superintendent and the board should jointly review the domains and indicators included in the TASB template to determine whether the tool adequately addresses key dimensions of the district’s four goals, adjusting the use of the template to fully address the goals.

The superintendent should present to the board data documenting the status of the district’s performance with respect to indicators specified in the template. The board and superintendent should jointly review this baseline data and establish mid and end-of-year objectives. The end-of-year objectives should be incorporated into the TASB template for summative evaluation purposes, and the midyear objectives should be included for informal midyear review. The superintendent should then finalize the evaluation tool for adoption by the board.

This recommendation could be implemented with existing resources.

IMPROVEMENT PLANS (REC. 2)

Dilley ISD lacks processes for aligning the district’s budget with improvement plans and for ensuring consistency across multiple plans.

TEC, Sections 11.252 and 11.253, requires each campus in a school district to develop annual campus DIP and CIP. Additionally, when Mary Harper Middle School received an Improvement Required rating from the Texas Education Agency (TEA) for school year 2013–14, the campus was required by TAC, Section 97.1063, and TEC, Section 39.106, to submit a district targeted improvement plan (DTIP) addressing areas of low performance.

Staff acknowledges that its annual budget is determined in advance of the campus and district improvement planning

processes. If funds to support an improvement strategy are not already included in the budget, the strategy is not adopted in the plan. The failure to align resource allocation with improvement planning limits the improvement strategies that can be implemented. The district does not make budget decisions driven by strategy, and the board adopts the budget before the development of improvement plans. Consequently, resources are not directed where most needed.

Furthermore, different staff teams develop improvement plans without a process for coordination across teams. Site-based decision-making committees develop campus and district-level plans as required by TEC, Sections 11.252 and 11.253. Central office staff separately develop the targeted improvement plans required to address areas of low performance. These processes are not coordinated and the teams do not align their respective plans.

For example, the district’s plans include different recommendations regarding discipline. The District Targeted Improvement Plan (DTIP) includes the finding that “absence, tardy and disciplinary referral rates effect [sic] overall performance” and recommends the use of discretion in enforcing the Student Code of Conduct. The DIP, however, recommends “strict enforcement” of the Code of Conduct, a practice that may increase disciplinary removals and decrease instructional time. According to the superintendent, subsequent to the onsite review the district has begun implementing a system that allows them to better coordinate and align implementation steps across the two plans.

Figure 1–3 shows a comparison of the DIP and the DTIP, and the discrepancy between the plans’ recommendations related to the Student Code of Conduct.

District staff, including the superintendent, acknowledge that the various improvement plans are developed without reference to one another. Just as the DTIP and DIP can be inconsistent at the district level, campus- and district-level plans are not coordinated vertically. No one in the district is assigned responsibility for ensuring that the campus plans are consistent with the overall DIP, or reinforce one another.

Furthermore, implementation of improvement plans is not coordinated among staff at individual campuses. No procedures are in place to ensure that plans are shared with relevant staff. After the plans are prepared, they are implemented on an ad hoc basis. For example, a high school teacher who is a member of the District and Campus

**FIGURE 1–3
DILLEY ISD DISTRICT AND TARGETED IMPROVEMENT PLANS
SCHOOL YEAR 2014–15**

CATEGORY	ANNUAL DISTRICT IMPROVEMENT PLAN	DISTRICT TARGETED IMPROVEMENT PLAN
Team composition	District-level, site-based, decision-making committee	Central office assigned based on issue
Recommendation regarding disciplinary referrals	Strict enforcement of Student Code of Conduct to reduce disciplinary referrals.	Use discretion to enforce the Student Code of Conduct.

SOURCE: Dilley ISD District Improvement Plan and District Targeted Improvement Plan, May 2015.

Improvement Plan team stated in an interview that the team is not aware of ongoing monitoring or implementation of strategies.

The district’s practices with respect to planning stand in contrast to board policies addressing district planning. According to Board Policy BJA (LOCAL), the board charges the superintendent with the following responsibilities:

- oversee annual planning for instructional improvement and monitor for effectiveness;
- ensure that key planning activities within the district are coordinated and are consistent with board policy and applicable law and that goals and results are communicated to staff, students, and the public as appropriate; and
- ensure effective mechanisms for communication to and from staff in instructional evaluation, planning, and decision making.

The board policies also define the board’s own responsibilities with respect to the development and implementation of district plans. Specifically, Board Policy BQ (LOCAL), regarding the board’s planning and decision-making process, requires the board to ensure that “administrative procedures meet legal requirements in the areas of planning, budgeting, curriculum, staffing patterns, staff development, and school organization; adequately reflect the district’s planning process; and include implementation guidelines, time frames, and necessary resources.” The policy further requires that the superintendent “report periodically to the board on the status of the planning process, including a review of the related administrative procedures, any revisions to improve the process, and progress on implementation of identified strategies.”

The lack of coordination in the district’s improvement planning impedes its progress in improving student achievement. Inconsistent strategies across the plans do not enable the targeted and intensive efforts required to accelerate learning. Because campus improvement plans are not consistently shared with

campus staff with relevant responsibilities, the plans are not fully implemented at the campus level.

Additionally, the district’s improvement plans are disconnected from its budget process. Because the budget is adopted before improvement planning and is not revisited afterward, resources are not aligned with needs.

TEA has developed research-based guidance addressing the general district and campus improvement planning required of all districts, and the targeted planning required for districts identified as low-performing in one or more areas.

Regarding the general planning required of all districts, TEA has provided guidance in the Financial Accountability System Resource Guide (FASRG), codified in TAC, Title 19, Section 109.41. The TEA has required site-based decision making since 1992. The FASRG, Module 5, addresses campus and district improvement planning in the context of this requirement and identifies critical success factors, including training in collaborative decision making, campus-driven budgeting, and systematic communication. Citing the statutory requirement, the FASRG also directs that each district evaluate the effectiveness of the district’s decision-making and planning policies, along with related procedures, to ensure that they are structured effectively.

TEA’s Guidance for the Texas Accountability Intervention System provides guidance focused on targeted improvement planning required of districts with performance issues. This document provides a five-step process for improvement planning:

- assessing readiness for planning;
- establishing priorities aligned to core values;
- backward planning and setting annual goals;
- assessing annual goals to determine strategies and interventions; and
- evaluating and making adjustments to the plan.

TEA additionally provides resources for implementing and monitoring an improvement plan on its website in the category accountability monitoring.

The core tenets of these guidance documents are evident in the districtwide improvement initiative undertaken by Galena Park ISD. By conducting a comprehensive needs assessment and then developing and implementing a unified plan with strong support from its board, that district achieved an Exemplary accountability rating. The district and individual campus improvement plans were aligned around clear performance goals and strategies. Similarly, Tatum ISD, a smaller district closer in size to Dilley ISD, employed a continuous improvement cycle and reporting format to ensure the district's strategic plan and CIPs were globally developed and aligned.

Dilley ISD should align campus-level improvement plans with the district improvement plan and ensure that the annual budget reinforces both plans.

The district board, administration and campus principals should coordinate to align the plans to the budget. The superintendent should lead the staff in developing processes and procedures for annual district and campus improvement planning in accordance with FASRG, Module 5. When these processes and procedures are in place, campus and district teams should begin coordinated implementation. The superintendent should collaborate with the board president in preparing and scheduling a working session in which the board reviews board policies concerning improvement planning to ensure awareness of the policies and determine if amendments are in order.

If targeted improvement plans are required for school year 2015–16, the superintendent should subsequently convene the district improvement planning committee to review TEA guidance regarding improvement planning and begin implementing the recommended five-step planning process for required targeted improvement planning. Concurrently, principals should support campus improvement planning teams in the application of the same process at the campus level. The superintendent should assign a senior level staff to coordinate communication across the campus and district-level planning teams to ensure alignment.

This recommendation could be implemented with existing resources.

PROCESS DOCUMENTATION (REC. 3)

Dilley ISD lacks documented operating procedures and processes for efficient implementation of district policies.

The lack of operating procedures is pervasive across the district. The district does not have formalized, detailed, operational procedures or operating manuals in the following functional areas: facilities, purchasing, information technology, food services, human resources, transportation, and educational service delivery. According to the superintendent, since the time of the onsite review the district has taken steps to develop procedures and policies in a number of the above mentioned areas.

Without procedures to guide staff in performing their job duties, important activities may not be completed. For instance:

- the district entered into a contract for construction management, although district staff reports that there are no processes for quality assurance or contract performance evaluation;
- the district lacks operating procedures guiding human resource management;
- the district has a lack of clarity in responsibility for the evaluation of custodial staff; it is unclear whether this responsibility belongs to campus principals or the facilities director;
- the lack of a formalized recruitment and retention plan has led to confusion and inefficiency in principals' recruitment efforts; and
- interviews with staff reporting directly to the superintendent indicate a lack of clarity regarding how the superintendent evaluates their performance.

The lack of operating procedures is also evident in both the district's internal and external communications. During interviews with the superintendent and staff the review team noted the following:

- the superintendent does not promulgate a schedule for regular meetings with department heads;
- no processes for communication and coordination are in place among department heads; and
- the district also lacks procedures for communication between district staff and city officials.

The lack of comprehensive operating procedures or individual department manuals, combined with the lack of communication across departments, results in ineffective, inefficient, inconsistent practices, and a risk of noncompliance in district operations. As a consequence, student achievement could be hindered and student safety possibly threatened if, for instance, procedure manuals do not guide staff in complying with transportation-related regulations.

The risks incurred with the lack of operating procedures are exacerbated by the high turnover of staff in the district. When policies are implemented effectively by virtue of informal procedures and institutional knowledge, the practices cannot be sustained over time without adequate documentation.

Texas school districts routinely develop and publish operating procedures that translate board policies and state law into guidance for the day-to-day operation of the district. These procedures are compiled either as a comprehensive manual covering all functional areas or individually as departmental manuals.

Bandera ISD offers an example of a comprehensive model designed for a relatively small district. The district's manual provides a guide for business office activities in all areas of responsibility. Effective districts use the model as a more comprehensive Administrative Procedures Manual for all functional areas in a school district. There are other examples available as districts often publish operating procedures on their websites.

The FASRG is another resource available to inform district procedures. The guide provides nine modules that explain sector standards across a range of functional areas, including budgeting, purchasing, site-based decision making, and management (including governance and communications). With respect to purchasing, the Texas Association of School Business Officials annually selects districts with outstanding purchasing systems for awards of merit. The procedures developed by these districts serve as models for consideration.

Dilley ISD should develop and implement clear operating procedures and processes across each functional area of the district.

The responsibility for developing and communicating administrative procedures belongs to the superintendent. Accordingly, the superintendent should assign responsibility for coordinating development of procedures to a cabinet-level leader and, if necessary, contract for external support to

ensure that the procedures are thorough and fully compliant with state and federal laws and policies. The development process should include opportunities for review and comment by staff with responsibility for each area and also staff whose responsibilities intersect with that area. The procedures should identify staff responsible for updating the procedures in response to changes in law, board policy, and feedback from staff and other stakeholders. When they are finalized, the procedures should be published on the district's intranet site.

This recommendation could be implemented with existing resources.

STAKEHOLDER ENGAGEMENT (REC. 4)

Dilley ISD does not have an effective districtwide approach for engaging parents at the campus level and does not maintain regular outreach and communication with the local community.

The district notes in its Title I Parent Involvement Policy that the district staff will engage in positive communication activities to build capacity with parents, students, and community members. The district and the campuses utilize School Messenger (a notification system for parents and the community), awards assemblies, school events, and the local newspaper as additional avenues to communicate. The policy also states that the campuses and/or grade levels will send out a newsletter and update the school's website, www.dilleyisd.net, as often as needed in an effort to keep parents, students, and the community informed about announcements, special events, and available resources. The district posts on its website for school year 2014–15 a brochure regarding Title I, Part A, which includes the following Parental Involvement Policy statement:

“Dilley ISD is committed to the goal of providing quality education for every child. In order to achieve this goal, we would like to establish partnerships with family and community members. Everyone gains if Dilley ISD and the community work together to increase student achievement for all children. Support for children and for the school is critical to a child's success at every step along the way. Dilley ISD staff intend to include family members in all aspects of the school's mission to help students achieve, and that includes how we operate the Dilley ISD Title I program. The goal is a school and home partnership that will help all children succeed. We thank you in

advance for all of your help and assistance in working together with your child to help him/her succeed in school.”

The policy establishes a goal for parental engagement but does not state how parental involvement will be addressed in the district. Although the district identifies a variety of methods to share information with stakeholders, the communication pathway from the district to the community and parents is inconsistent. The newsletter provided by the district to the review team was dated January 10, 2014, and primarily was full of pictures of a host of events from across the district. The newsletter did not have a clear theme, and it was unclear to which audience (the community at large, students, or parents) the newsletter was directed. Staff, parents, and community members all noted that newsletters (internal and external) are not distributed on a regular basis.

Instability in the leadership at the district and campus levels makes consistent communication more critical. Since school year 2010–11, the leadership at every level has transitioned, with principals at all campuses changing again since the time of the review.

The superintendent stated that he is the primary communication contact for the district. However, with the leadership of the district as his primary responsibility, he confirmed that he is not able to effectively identify opportunities to engage with the community at large.

During onsite interviews, community members who are supportive of the district noted that they do not receive regular communication about the school district and campus activities unless they receive it from a friend or a spouse who works for the district. No one from the community mentioned use of the website as the primary source of

information for the district. The district receptionist has responsibility for maintaining posts to social media sites. According to the superintendent, the district receptionist has also been given the responsibility of informing the local newspaper of district related news as of the 2015–16 school year.

Figure 1–4 shows the results of the campus staff survey administered as part of the review. When staff was asked if they believed that the district has a sufficient number of volunteers to help with student and school programs, 43.5 percent disagreed and 15.2 percent strongly disagreed.

The lack of a consistent mechanism or strategy to engage both parents and the local community has resulted in low engagement of both constituencies. Parents do not typically stay for board meetings after student awards ceremonies and are not engaged in the business of the school district. In discussions with both board members and teachers, each expressed the desire for more involvement from parents and the community. However, with the high degree of turnover among district staff and the lack of a consistent application of engagement strategies, community involvement will not likely increase. Furthermore, the lack of clarity in the district’s parental involvement policy results in inconsistent communication with both parents and community members who could be a potential resource in the form of volunteers or community advocates.

Among the barriers identified as hindering parent engagement, Dilley ISD parents, board, and staff have identified several issues in the district. Some of the noted issues include:

- lack of relationship building between school officials and parents;

**FIGURE 1–4
DILLEY ISD CAMPUS STAFF SURVEY RESULTS
FALL 2014**

STATEMENT	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
The school board allows sufficient time for public input at meetings	2.1%	40.4%	51.1%	4.3%	2.1%
The district communicates with parents in a timely manner.	8.5%	61.7%	14.9%	8.5%	6.4%
Schools have a sufficient number of volunteers to help with student and school programs.	2.2%	17.4%	21.7%	43.5%	15.2%
District facilities are available for community use.	4.4%	45.7%	37.0%	10.9%	2.1%

NOTE: Totals may not sum to due to rounding.
SOURCE: Legislative Budget Board, Review Team Survey, Fall 2014.

- lack of cultural competency creates unwelcoming environments for ethnic minority parents;
- lack of understanding of the roles and responsibilities of the local school board and school districts;
- lack of funding and coordination of resources to provide services to parents; and
- failure to prioritize parent engagement.

In its report *Minority Parent and Community Engagement: Best Practices and Policy Recommendations for Closing the Gaps in Student Achievement*, the Mexican American Legal Defense and Educational Fund notes that the adversarial relationship that often develops between parents, community residents and school districts is based on distrust. The absence of trust results in a lack of clear two-way communication, or infrequent and ineffective communication between families and school officials. Additionally, the report states that parents sometimes fear retaliation against themselves or their children if they are too opinionated or ask too many questions about school-related policies and procedures.

A majority of Dilley ISD students are classified as economically disadvantaged (79.5 percent), and a majority are deemed at risk (67.5 percent). To overcome these barriers, effective school districts strive to build a sense of community in the district and on each campus. This feeling can be encouraged by ensuring effective two-way communication, ensuring that language barriers have been addressed by translating materials whenever possible so that information is easily accessible, and fostering a culture of quality customer service during interactions between district staff and parents and community representatives. Although the Dilley ISD website has a translation feature for Spanish speakers, the review team noted that a lack of materials or newsletters translated for Spanish speakers.

Cushing ISD maximizes its resources by involving its high school students in its communications strategy. *Bearkat News* is researched, written, and published by high school business students at A.W. Clemons High School. The *Bearkat News* contains information about the school's recent activities or planned events and is mailed monthly to all residents in the district. Community members and district staff believe the publication serves as an information resource in a community that does not have a local paper. Senior citizens in particular appreciate *Bearkat News* because most do not have children in the schools and are often unaware of the activities in the district. The inaugural publication included a

message from the superintendent that stated, "We would like to communicate our plans and future happenings to you (the students, staff, parents, community, and business owners). We as a district feel it is vital to have each of these groups informed as much as possible to create a democratic learning community for our District which will enable us to have optimum success. This newsletter is one of many ideas we have to make our school better for you."

Another innovative community outreach strategy implemented by Cushing ISD occurs at the elementary school. A fall communications initiative by the principal and staff at Cushing Elementary School is a teacher-to-parent contact effort known as *Fabulous Five*. The *Fabulous Five* is a commitment by elementary teachers to contact a minimum of five parents each week to commend actions by their children. Teachers began this practice after results from an elementary parent survey showed that parents appreciated teachers who communicated with them regularly. The contact may also be accomplished by email. The efforts have received positive feedback from students, parents, and teachers alike.

Dilley ISD should establish a process to improve communications and stakeholder involvement with parents and community residents and assign the function to a district-level staff.

The district should develop and implement a comprehensive strategy to improve communication between the district and stakeholders. The superintendent should assign the function of communications outreach to staff in the administration office. The superintendent should remain the primary spokesperson for the district, particularly on issues of importance affecting the district in the media. However, the everyday communications and outreach efforts and coordination should be assigned to another staff.

As the leader for the district, the superintendent is one of the most visible positions in the district. The superintendent should initiate strategic opportunities to engage in the community that maximize visibility for the district. Across the district and the campuses, visibility in and with community events should be increased and communicated. The district should initiate regular communications with internal and external stakeholders as well as develop pathways for soliciting public input and participation for both business and academic matters.

The district should consider other creative and innovative messaging and tools. Examples include involving student

groups in the communication strategy. Additionally, the district should explore ways to engage the community in a positive way, for example, by initiating a Friends of Dilley ISD campaign that communicates the positive contributions that education and involvement provide to the community.

This recommendation could be implemented with existing resources.

EXTERNAL SUPPORT (REC. 5)

Dilley ISD does not have partnerships to maximize external financial contributions and support opportunities for the district.

Although the district has several loyal contributors, it does not have information on the capacity of these individuals and businesses to fully support the district, and may not be pursuing all available opportunities for external financial contributions. Additionally, groups and organizations across all campuses do not know the primary donors for the district who are repeatedly asked for donations as there is not a strategic plan for maximizing their gifts and support.

The district has a number of informal partnerships and relationships that are known to individuals primarily at the campus level. The district does not coordinate or track the relationships or the resources provided across campuses. The district could not provide a comprehensive list of all partnerships in the district or the types of resources provided.

Faith-based partners are active within the district and have sponsored some school. For example, two local church congregations have hosted a luncheon for new teachers for more than 30 years. Other activities have included:

- food bank;
- hosting cheerleading squad barbecues;
- baccalaureate programs;
- senior suppers;
- Friday Feeds;
- teacher break room snacks during the holidays; and
- mentoring.

Business community members also provide support to the district, campuses and students. Business partners have given thousands of dollars to support athletics, band, agriculture, cheerleading, and baseball. Efforts to sponsor to academic programs have not been as successful. Donors noted that there is not a clear process for giving to academic programs.

For example, a donor contacted the district about sponsoring a scholarship for students, but the district did not follow up on the request. As a result, the donor established a separate scholarship program for Dilley High School students. Donors and community leaders who spoke with the review team were enthusiastic about the possibility of establishing a vehicle such as an education foundation to give to the district a more structured process. Several donors noted that they would potentially give more to the district if an avenue existed for donating to academic programs.

Dilley ISD is located in the oil-producing portion of the Eagle Ford Shale Play, a driver in the local economy, which affects property values, employment opportunities, and housing availability. The district has experienced negative and positive financial effects from the Eagle Ford Shale oil boom. However, the district has not identified an effective plan of action to engage the oil companies to contribute to Dilley ISD. No partnerships exist with businesses involved in the Eagle Ford Shale oil activity. The superintendent acknowledged the untapped potential resource, but lacked a plan or strategy for reaching the necessary parties.

The lack of a coordinated effort to identify and support district donors reduces opportunities for the district to increase resources that could benefit students. There are numerous missed opportunities for new partnerships and support from existing donors as well as new ones. Additionally, there are missed opportunities to support existing needs. For example, local churches and businesses are willing to support academic and support services programming, but the district has not asked them to do so in a sustainable manner.

The National School Foundation Association's (NSFA) website (www.schoolfoundations.org) states that education foundations are "privately operated, nonprofit organizations established to assist public schools" and who qualify as charitable organizations "different from school districts, public institutions or local governments." A public school foundation "is designed to augment, supplement, or complement programs and activities currently being provided by the district." Education foundations have their own board of directors and their own staff, both paid and volunteer. Most school foundations operate as "an independent entity, with no formal, legal relationship to the school district." The NSFA website contains the Foundation Start-Up Guide, which includes sections delineating the following:

- planning stage;
- board of directors;

- developing a timeline;
- legal issues;
- ethical consideration; and
- forms.

The NSFA website also includes a list of education foundations in existence in each state, with a list of foundations located in Texas that effective districts use as resources. Additional sources of information about establishing education foundations include the American Schools Foundation Alliance, www.asalliance.org.

In 2014, Diboll ISD allocated nearly \$25,000 to purchase school supplies from local vendors for the 2,000 students enrolled in the district. The initiative was a result of parents and guardians expressing concern about the growing length of the school supply lists and the associated costs. The superintendent inquired with vendors about bulk school supply purchasing and consulted with several families about what the district could actually provide. Working with local vendors, parents, and the campus leadership, the district revised the school supply lists and lowered the number of items required for parents to purchase, thereby lowering their costs.

Clear Creek ISD has an active education foundation and community partnership program. Clear Creek ISD conducts an annual assessment to determine the needs of schools and how to address those needs through community partnerships. These partnerships help schools obtain funds, materials, volunteers, and tutors. The partnerships also provide schools with volunteers from community organizations or local businesses for speaking engagements. At the end of each school year, the director of the Community Partnership Office (CPO) sends a survey to each of the school liaisons to determine needs for the upcoming year. During the summer, the CPO aligns the surveyed needs of the respondent schools to the resources of existing community partners. In addition, the survey helps the CPO determine which new community partners to approach as well as how to structure a mutually beneficial relationship between identified schools and the organization.

The assessment process also helps the CPO prioritize school needs based on the number of identified economically disadvantaged students. The CPO uses the number of economically disadvantaged students at a particular school to help determine priorities. Exceptions to this process occur if

a potential corporate sponsor requests to partner with a particular school for reasons such as proximity.

At each school, Clear Creek ISD has a high overall level of community participation that includes members of the business community and civic organizations. In addition to the monetary value of services and time donated to the district, Clear Creek ISD has established a multitude of programs with business, government and community partners to enhance students' educational experience. The partnerships have helped to establish supplementary educational programs, provide professional speakers and give students exposure to learning opportunities outside of the classroom. To maintain and foster relationships with the business and civic community, the district assigns staff at each intermediate and elementary school to serve as community liaisons. With the districts' liaisons acting as single points of contact with their partners, coordination efforts are streamlined between the CPO and its clients. The liaisons:

- coordinate distribution of entertainment and restaurant coupons and other recognition items;
- work with corporate and agency representatives to establish and maintain school partnership programs;
- receive and review community partnership correspondence to share with staff;
- communicate with CPO director any ideas to improve or areas of concern; and
- coordinate the Gramps-n-Granny Kids Reader Program.

The Clear Creek Education Foundation supports district schools needing additional funds and community participation. Clear Creek ISD uses the funds the foundation generates to fund non-athletic initiatives that target teacher-driven initiatives to improve instruction. The foundation raises funds to provide teacher grants that allow innovative programs to be implemented in the classroom. For example, the Clear Creek Education Foundation helped develop the career labs at Space Center and League City ISD intermediate schools. These labs educate intermediate students about available career opportunities so they can make informed decisions when choosing high school courses. During a five-year period, the Clear Creek Education Foundation raised \$10,000 in commitments from companies including Boeing, Nova Chemical, and Barrios Technology to completely fund the construction and continued operations of the learning

labs. Remaining funds from these commitments will be combined with future grant awards to fund construction of labs at other intermediate schools. In addition, the Clear Creek Education Foundation directs funds to schools for defined projects. Teachers receive grants annually through a proposal and evaluation process from the Clear Creek Education Foundation. Clear Creek ISD has successfully collaborated with the Clear Creek Education Foundation to provide additional educational opportunities for the district's students.

Dilley ISD should establish an education foundation to coordinate contributions to the district.

A committee of board members and senior district staff should coordinate with members of the community to establish an education foundation that benefits the district. The district should seek input and/or participation from current donors and supporters of the district. The committee should conduct the research to begin the planning process and consult with an attorney as needed. Development of an education foundation could assist with the district's efforts to pursue additional private grant funding for academic and support services programming.

The cost of implementing this recommendation would depend on the structure and legal status of the foundation that the district decides best meets its needs. The board should work with its legal counsel to pursue the best approach. After the necessary research has been conducted, the district will be able to determine the fiscal impact.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015-16	2016-17	2017-18	2018-19	2019-20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 1. DISTRICT MANAGEMENT AND COMMUNITY ENGAGEMENT							
1. Develop annual objectives and an aligned evaluation instrument for managing the district superintendent's performance.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2. Align campus-level improvement plans with the district improvement plan and ensure that the annual budget reinforces both plans.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3. Develop and implement clear operating procedures and processes across each functional area of the district.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4. Establish a process to improve communications and stakeholder involvement with parents and community residents and assign the function to a district-level staff.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
5. Establish an education foundation to coordinate contributions to the district.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 2. EDUCATIONAL SERVICE DELIVERY

An independent school district's educational service delivery function is responsible for providing instructional services to Texas students based on state standards and assessments. A school district should identify students' educational needs, provide instruction, and measure academic performance. Educational service delivery can encompass a variety of student groups and requires adherence to state and federal regulations related to standards, assessments, and program requirements.

Managing educational services is dependent on a district's organizational structure. Larger districts typically have multiple staff dedicated to educational functions, while smaller districts have staff assigned to multiple education-related tasks. Educational service delivery identifies district and campus priorities, establishes high expectations for students, and addresses student behavior. The system should provide instructional support services such as teacher training, technology support, and curriculum resources. To adhere to state and federal requirements, an educational program must evaluate student achievement across all content areas, grade levels, and demographic groups.

Dilley is located in Frio County, about 73 miles southwest of San Antonio. Dilley had an estimated population of 3,894 in 2010, which represents an increase of 6.0 percent since 2000. The school-age population of Dilley (persons ages 5 to 17) is 15.1 percent.

Dilley Independent School District (ISD) includes three campuses: one elementary school, one middle school, and one high school. The district also has a Disciplinary Alternative Education Program (DAEP) campus. In school year 2013–14, the total enrollment in Dilley ISD was 1,006 students. The student population in school year 2013–14 was 90.9 percent Hispanic; 8.4 percent White; 0.5 percent Asian; and 0.7 percent African American, American Indian, Asian, Pacific Islander, or two or more races. Students classified as economically disadvantaged represented 79.5 percent of the district population and 4.8 percent of students were identified as English Language Learners. Approximately 67.5 percent of the student population was identified as at risk.

Figure 2–1 shows the demographics of Dilley ISD compared to statewide demographics. Dilley ISD has a larger population of economically disadvantaged and at risk students than the state as a whole.

**FIGURE 2–1
DILLEY ISD DEMOGRAPHICS COMPARED TO STATE
SCHOOL YEAR 2013–14**

STUDENTS	DILLEY ISD	STATE
Hispanic	90.9%	51.8%
White	8.4%	29.4%
African American, American Indian, Asian, Pacific Islander, Two or More Races	0.7%	18.8%
Economically Disadvantaged	79.5%	60.2%
English Language Learners	4.8%	17.5%
At Risk	67.5%	49.9%

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2013–14.

Figure 2–2 shows state accountability rating data for Dilley ISD from school years 2008–09 to 2013–14. From school years 2008–09 to 2010–11, the Texas Education Agency (TEA) rated Texas public schools as Academically Unacceptable, Academically Acceptable, Recognized, or Exemplary. In school year 2011–12, TEA did not issue accountability ratings because of a change in the state assessment instrument from the Texas Assessment of Knowledge and Skills (TAKS) to the State of Texas Assessments of Academic Readiness (STAAR). Beginning in school year 2012–13, TEA rated public schools as Improvement Required or Met Standard.

**FIGURE 2–2
DILLEY ISD STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2008–09 TO 2013–14**

YEAR	RATING	ASSESSMENT
2008–09	Academically Acceptable	TAKS
2009–10	Academically Acceptable	TAKS
2010–11	Academically Acceptable	TAKS
2011–12	No Academic Rating Assigned	STAAR
2012–13	Improvement Required	STAAR
2013–14	Improvement Required	STAAR

NOTES: TAKS=Texas Assessment of Knowledge and Skills; STAAR=State of Texas Assessments of Academic Readiness. SOURCES: Texas Education Agency, Texas Education Agency Snapshots, school years 2008–09 to 2011–12; Texas Academic Performance Report, school years 2012–13 and 2013–14.

In school year 2012–13, Dilley ISD earned an accountability rating of Improvement Required. The district received this rating because all three campuses were rated Improvement Required due to poor student performance on the STAAR. In school year 2013–14, Dilley ISD also earned a rating of Improvement Required; however the middle school earned a Met Standard rating. After the onsite review, Dilley ISD was given an accreditation status of Accredited–Warned by TEA. School districts may be awarded one of four accreditation ratings: Accredited, Accredited–Warned, Accredited–Probation and Not Accredited–Revoked. Dilley ISD received the Accredited–Warned status because it failed to make acceptable improvement following the Improvement Required status in school years 2012–13 and 2013–14.

Figure 2–3 shows the organizational structure of Dilley ISD’s educational service delivery function. The formal structure is relatively flat with all senior-level administrators reporting directly to the superintendent. The school nurse formally reports to the district administrative facilitator; however, on a day-to-day basis the nurse reports to the elementary principal. Each of Dilley ISD’s three campuses has a principal who reports directly to the superintendent and an assistant principal who reports to the campus principal. Staff indicated that the superintendent directs the work associated with the delivery of educational services through the administrative facilitator. The administrative facilitator has several responsibilities within the district related to curriculum, assessment, and staff development. Additionally, the administrative facilitator has additional informal responsibilities related to supporting processes and programs throughout the district.

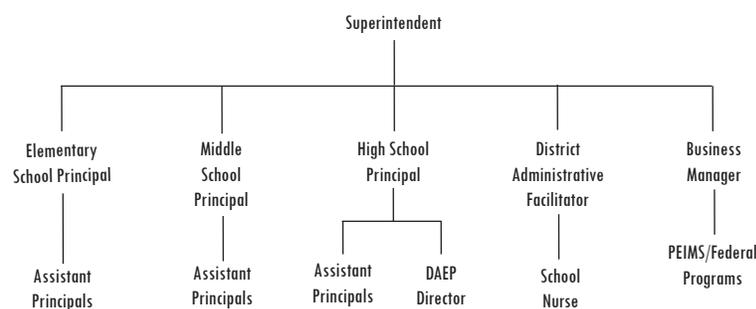
FINDINGS

- ◆ Dilley ISD lacks an effective curriculum management system.
- ◆ Dilley ISD does not have an established Response to Intervention process and lacks a method for evaluating intervention programs used to assist students.
- ◆ Dilley ISD does not offer a comprehensive program to meet the instructional needs of students who have been identified as English Language Learners.
- ◆ Dilley ISD lacks an effective districtwide behavior management system.
- ◆ Dilley ISD does not evaluate the level of support services the district provides to students to determine if they are sufficient to meet student needs.

RECOMMENDATIONS

- ◆ **Recommendation 6: Develop a comprehensive plan to implement and regularly evaluate and revise the district’s curriculum.**
- ◆ **Recommendation 7: Establish a Response to Intervention process that is implemented districtwide with fidelity and regularly evaluate instructional programs used for student interventions for effectiveness.**
- ◆ **Recommendation 8: Develop and implement a process for continuous evaluation of the district’s English as a Second Language program to ensure that the instructional delivery, staff allocation, and funding methods effectively meet the needs of English Language Learner students.**

**FIGURE 2–3
DILLEY ISD ORGANIZATION FOR EDUCATIONAL SERVICE DELIVERY
SCHOOL YEAR 2014–15**



SOURCE: Dilley ISD, May 2015.

- ◆ **Recommendation 9: Regularly evaluate the district's behavior management system to ensure that the system is being implemented with fidelity and meets the district's disciplinary needs.**
- ◆ **Recommendation 10: Assess the quality of the counseling, library, and nursing services the district provides, and develop a plan to align the services with industry standards to optimally support student needs.**

DETAILED FINDINGS

CURRICULUM REVIEW AND REVISION (REC. 6)

Dilley ISD lacks an effective curriculum management system.

During onsite interviews, the administrative facilitator, campus principals, and instructional staff reported that the district has no written procedures and lacks a systematic approach for implementing, monitoring, or evaluating curriculum. Dilley ISD's school year 2014–15 District Improvement Plan (DIP) states that the district uses the Texas Essential Knowledge and Skills (TEKS) Resource System (TRS) as the curriculum. However, instructional and administrative staff have a lack of understanding regarding which components of the system are to be used and how the system is to be implemented in the classroom. Each campus is responsible for meeting its own curriculum needs, and the curriculum is not effectively aligned vertically between grade levels or horizontally within grade levels.

During onsite interviews, the superintendent acknowledged that Dilley ISD has had difficulties implementing TRS effectively districtwide. The superintendent reported that the district is using the TRS scope and sequence; however, he stated that staff has struggled to fully address the curriculum needs of the district. TEA assigned a professional service provider (PSP) to Dilley ISD when the district earned the Improvement Required rating in school year 2012–13. The role of the PSP is to provide guidance to the district as Dilley ISD works toward improving student academic outcomes. The superintendent stated that the PSP has been working with staff to develop pacing for curriculum and instruction and that curriculum specialists from Regional Education Service Center XX (Region 20) have visited the district multiple times to work with teachers on implementing core subject curriculum.

During review team interviews, staff stated that the elementary school began collaborative lesson planning based

on the TEKS in school year 2014–15; however, there is no documentation describing the planning process, explaining how lessons plans are implemented, or stating how lessons are evaluated.

Both administrative and instructional staff reported to the review team that teachers are supposed to use the Year at a Glance (YAG) to develop lesson plans which they submit to the campus principals. The YAG, which is the TRS scope and sequence document, provides a snapshot overview of the instructional plan for the year. It is a guide that teachers can use to pace units of study throughout the year. Principals reported that they are supposed to monitor the implementation of the lesson plans by conducting classroom walkthroughs. The administrative facilitator is also responsible for conducting walkthroughs in classrooms. The district does not have any additional processes or procedures to monitor adherence to the approved curriculum or to review or revise the curriculum.

After the onsite review, Dilley ISD reported that the district uses the TRS Vertical Alignment Document to ensure that the curriculum is vertically aligned. The district reported that it ensures that the curriculum is horizontally aligned through professional learning community (PLC), grade-level, and department meetings. PLCs are groups of teachers that work collaboratively to improve instruction and student performance.

Curriculum management plans specify the expectations for everyone involved in the educational process: students, teachers, aides, administrators, and parents. The Association for Supervision and Curriculum Development provides guidance for establishing a curriculum management plan and sample operating procedures in the 2008 report *Developing Curriculum Leadership and Design*. The Department of Education for the state of Alaska and the Montana Office of Public Instruction both offer models for curriculum development, review, and revision, as well as guidance for implementation and evaluation of curriculum.

A district that effectively manages its curriculum closely ties its curriculum planning process to program evaluation and has a process in place for annual review and revision of the curriculum. For example, some districts have established processes that incorporate staff involvement in curriculum review and revision throughout a six-year cycle. In these districts each task is explicitly defined and the district implements processes with fidelity. In the first year, the district establishes evaluation teams and begins to evaluate

the current curriculum by following a well-defined evaluation plan. During the second year, the district develops curriculum plans and long-range budgets. The second year also includes planning for implementation and training staff. The district may begin small-scale implementation of the curriculum in the second year. In the third year, the district fully implements the new curriculum. During the fourth through sixth years, the district monitors performance and makes adjustments to the curriculum as needed.

Dilley ISD should develop a comprehensive plan to implement and regularly evaluate and revise the district's curriculum. The district should start by developing written standard operating procedures (SOP) for curriculum management to ensure transparency and to standardize the curriculum management process. To develop a curriculum management plan with written SOPs, Dilley ISD should establish a district curriculum committee. The committee should include administrators and teachers from the elementary, middle, and high school campuses. The committee should identify best practices in curriculum management to adopt in Dilley ISD. The committee members should develop formal steps and a timeline for reviewing and revising the district's curriculum to meet student needs. The curriculum management plan should include processes for evaluating TRS and determining if this curriculum meets the district's academic needs.

This recommendation could be implemented with existing resources.

RESPONSE TO INTERVENTION (REC. 7)

Dilley ISD does not have an established Response to Intervention (RtI) process and lacks a method for evaluating intervention programs used to assist students.

Although Dilley ISD's school year 2014–15 DIP lists RtI as a strategy to improve student college and career readiness, RtI has not been implemented consistently throughout the district. RtI provides a process for:

- making accurate decisions about the effectiveness of general and remedial education instruction and interventions;
- undertaking early identification and intervention with students demonstrating academic and/or behavioral problems;
- preventing unnecessary and excessive identification of students with disabilities;

- making decisions about eligibility for special programs;
- determining individual education programs; and
- delivering and evaluating special education services.

RtI is a three-tiered system used to provide increasingly intense, research-based interventions and supports to all students. Tier I provides all students high-quality curriculum, instruction, and behavioral supports in their regular classroom. Tier II provides for additional targeted, supplemental instruction and interventions in small group settings with other students who require similar supports. The final level, Tier III, includes more intensive and individualized interventions. At Tier III, the school provides interventions and supports to meet the unique and individual needs of a student; these services are often provided in a one-on-one setting. The RtI process provides schools with a system for regularly monitoring student progress to determine if instruction and interventions are effective in meeting student needs. The RtI process also includes follow-up to ensure that instruction and interventions were implemented with fidelity.

Middle school administrators reported that they have partially implemented RtI at their campus; however, they did not provide the review team with sufficient details to describe the implementation process. Likewise, staff also indicated that the elementary school is beginning to implement RtI, but they could not describe the process. RtI is not implemented at the high school. All staff interviewed agreed that campuses have not received guidance from the district regarding implementation of RtI.

Additionally, the district shows a lack of understanding of the actual purpose and use of RtI. The school year 2014–15 DIP states that the district will “utilize all available data in the implementation of RtI in order to identify, serve, and monitor special population groups.” However, RtI is a process that is implemented to provide intervention and educational supports to all students. It provides a tiered structure of increasingly more intense and individual supports based on student needs so that problems can be identified, prevented, and addressed early.

Although the district lacks a standard RtI process to guide the progressive use of intervention strategies and programs, each of the three campuses in Dilley ISD has purchased programs to provide academic interventions and supplemental supports to students who are struggling

academically and perform below standard on state assessments. However, the district does not have a systematic process for determining the outcomes or efficacy of these intervention programs.

Staff indicated that each campus principal is responsible for making decisions related to the selection of the programs and interventions used on their campus. Although both the DIP and the Campus Improvement Plans (CIP) state that the district and campuses will use evidence-based decision-making, there is no description of the decision-making process or what types of data should be used to inform decisions. During onsite interviews, staff indicated that historically campus administrators did not regularly access disaggregated data to analyze student progress. However, after the district was designated as Improvement Required in school year 2012–13, each campus began to collect test score and student demographic information and established a “war room” in which campus leadership reviews student performance data. Although campuses collect data, district staff could not describe how it is used to inform decisions related to instructional programs and interventions.

Figure 2–4 shows the programs and resources available to support student learning at each of Dilley ISD’s campuses.

During onsite interviews, staff indicated that Dilley ISD lacks a process for surveying teachers and students regarding what programs work best. Additionally, the district does not perform any data analysis to see how the use of these programs has affected state test scores or student academic achievement. Also, no written procedures detail how each program or intervention is applied as part of the overall plan for the delivery of instruction within the district.

Dilley ISD struggles with student academic performance as measured by the state accountability system. Because RtI has not been implemented adequately or with fidelity, staff cannot ensure that each student is receiving the instruction and supplemental supports they need to be successful. Failure to implement a consistent and appropriate RtI process may continue to result in poor academic performance, especially for students who are struggling or who are considered at-risk, as individual needs may not be addressed or properly supported.

In addition, the absence of formal program evaluations leaves the district without evidence regarding the efficacy of intervention programs. Without this information, the district cannot make informed decisions regarding the continuation or modification of these programs.

FIGURE 2–4
DISTRICT PROGRAMS AND RESOURCES
SCHOOL YEAR 2014–15

ELEMENTARY SCHOOL	MIDDLE SCHOOL	HIGH SCHOOL	DISTRICTWIDE
I-Station	I-Station	Ernest Educational Concepts Program	TEKS Resource System
Think Through Math	Think Through Math	Blue Pelican Math Program	Study Island
Mentoring Minds	A Plus	CPO Science	
Reading Counts	EduSmart	Glencoe Economics Principles and Practices Power Point System	
	Reading Counts	Magruder’s American Government Power Point System	
	Rosetta Stone	SRI Testing	
	Discovery Ed		
	Reading Plus		
	Spark		
	STEM Scope		
	Ignite		
	STAAR Reading		

SOURCE: Dilley ISD, May 2015.

Midland ISD has developed and implemented a comprehensive RtI program throughout the district. Additionally, Midland ISD has developed a detailed RtI district plan that provides guidance to district and school staff and fully describes the RtI program so that parents can understand the program and how it will be used to support all aspects of instruction and behavior. The Midland ISD RtI district plan is available at <http://www.midlandisd.net>.

Formal evaluation of educational programs serves a number of purposes as noted in *Designing Schoolwide Programs, Non-Regulatory Guidance*, a U.S. Department of Education report published for Title I schools. This report discusses how program assessment strategies for Title I schools can be adapted as a process for a districtwide evaluation that can serve a range of valuable purposes. Results from an evaluation can support districts in the following ways:

- inform internal program management and help school leaders make informed decisions to improve the quality of their program;
- answer stakeholder questions and help them better understand how effectively the school is meeting its stated goals;
- increase understanding of specific strategies and help the school determine the usefulness of the activities to increase student achievement; and
- promote interest in and support of a program or activity by illustrating certain strategies, determine whether their outcomes improve student achievement, and increase support for their use.

Austin ISD has a dedicated research department that evaluates the district’s programs. Although such scope is beyond the resources of small districts such as Dilley ISD, Austin ISD’s evaluation resources and processes provide samples of best practices in school program evaluation. For example, Austin ISD’s school year 2013–14 district evaluation plan lists a summary of planned evaluations for the year, and it includes a short description of the targeted evaluation activities. **Figure 2–5** shows the components of Austin ISD’s evaluation plan.

Additionally, the nonprofit research and assessment service Educational Testing Service (ETS) has developed a resource guide that has been used throughout all levels of the education system as a basis for developing formal processes for evaluating educational programs. In the 2011 publication *Evaluating Educational Programs*, ETS outlines the phases of program evaluation. These phases include: goal setting, measurement selection, implementation in the field setting, analysis, and interpretation and presentation of evidence. This document provides guidance for developing formal processes for evaluating programs and advocates for beginning the evaluation process prior to implementation of programs and interventions.

Dilley ISD should establish a Response to Intervention process that is implemented districtwide with fidelity and regularly evaluate instructional programs used for student interventions for effectiveness. To begin developing an effective RtI process, Dilley ISD should establish district-level and campus-level RtI teams. These teams should consist of selected district and campus administrators, teachers, and counselors. The teams should establish long- and short-term goals for establishing a new RtI process to use at all campuses.

**FIGURE 2–5
AUSTIN ISD EVALUATION COMPONENTS
SCHOOL YEAR 2013–14**

SECTION	CONTENTS
Program Description	Description of the program being implemented in the schools.
Purpose of Evaluation	Description of the purpose for evaluating the program.
Evaluation Questions	Questions that will help the district determine whether the program is effective.
Fiscal Considerations	Any factors related to money that may affect the evaluation.
Data Collection	Description of the data that will be used to measure effectiveness of the program.
Data Analyses	Explanation of how the data will be analyzed.
Timeline	Listing of important dates in the evaluation.
Required Reporting	Description of any stakeholders (such as federal government) in addition to the board of trustees.
Program Support	Description of staff who will be involved in the evaluation.

SOURCE: Austin Independent School District, Department of Research and Evaluation Plan of Work, school year 2013–14.

The team should research successful RtI programs at other districts and seek the assistance of Region 20 to help establish these goals. As part of developing this new process, Dilley ISD should define the roles and responsibilities of staff with regard to RtI and develop processes, systems, and forms for collecting, documenting, and analyzing student outcomes. The district should revise the DIP and the CIPs to include a description of the types of data that will be used to inform decisions regarding interventions used with students.

When these steps are in place, Dilley ISD should develop and implement a process to evaluate the district's intervention programs and determine if they should be incorporated into the district's new RtI process. The RtI teams should prioritize intervention programs being implemented and develop evaluation plans for each program, perhaps using the Austin ISD model shown in **Figure 2–5**. Each evaluation plan should include the following components:

- stated purpose;
- evaluation questions;
- data sources and data collection procedures;
- established timeline;
- methodology for analysis; and
- reporting structure/requirements.

An annual report summarizing the evaluations being performed in the district each year should be published to provide data to stakeholders, including the board, staff, and community. Finally, the teams should present the campus-level and district-level RtI processes to the board.

This recommendation could be implemented with existing resources.

ENGLISH AS A SECOND LANGUAGE (REC. 8)

Dilley ISD does not offer a comprehensive program to meet the instructional needs of students who have been identified as English Language Learners.

In school year 2013–14, 4.8 percent of Dilley ISD students were identified as English Language Learners (ELL). The Texas Education Code (TEC), Section 89.1203 defines an ELL as “a person who is in the process of acquiring English and has another language as the first native language.” The administrative facilitator and other instructional staff noted a need for renewed focus on the process for identifying and serving ELLs.

Dilley ISD's school year 2014–15 DIP contains two strategies related to the English as a Second Language (ESL) program. The goal of an ESL program is to provide ELLs with instructional support that will enable them to participate fully in their educational experience in schools and in their communities. The first strategy in the DIP states that staff will be provided with training on identifying, supporting, and monitoring student groups, including dyslexia and related disorders, Section 504, ELLs, special education, gifted and talented, and at-risk. The second strategy states that the district will pay stipends to teachers in high need areas such as math, science, special education, and ESL. However, neither of the strategies in the DIP outline how the ESL program is to be implemented in the district.

Dilley ISD has not dedicated sufficient staff or resources to meet the educational needs of ELL students who qualify for ESL services. The administrative facilitator stated that responsibility for the district's ESL services was added to her job responsibilities in school year 2014–15. Previously, the district did not have a district-level employee responsible for overseeing ESL services or the Language Proficiency Assessment Committee (LPAC) process. The administrative facilitator stated that she wants to establish standard LPAC procedures for all campuses in Dilley ISD and that she plans to schedule a meeting with Region 20 to discuss possible membership in the Region 20 Bilingual/ESL Cooperative for school year 2015–16, however these actions had not occurred as of the time of the onsite review.

The LPAC reviews all pertinent information on each ELL student at the time of initial enrollment, throughout the school year, and at the end of each school year. The LPAC places students in the appropriate program, and monitors the progress of ELL and former ELL students, and recommends their exit from the ESL program. However, at the time of the onsite review, Dilley ISD had not assembled a functioning LPAC. The ELL population in Dilley ISD is significantly lower than the state average of 17.5 percent. It is also significantly lower than the three peer districts: Lytle ISD with 8.1 percent, Keene ISD with 19.8 percent, and Carlisle ISD with 29.5 percent. Peer districts are Texas school districts similar to Dilley ISD used for comparison purposes. The lack of a functioning LPAC to review home language surveys and identify ELL students as they enroll in school could result in the district's lower ELL student population compared to peer districts and the state average.

Additionally, the information Dilley ISD provided to the review team on the actual number of teachers who are assigned to provide ESL services differed from the numbers reported to TEA in the Public Education Information Management System (PEIMS). For school year 2014–15, Dilley ISD reported to the review team that the district employs a total of 10 teachers who provide ESL services. This total includes seven teachers at the elementary school, two teachers at the middle school, and one teacher at the high school. In contrast, the data submitted to PEIMS for school year 2014–15 indicated that only three teachers were assigned to teach ESL throughout the district and all three were assigned to the elementary school. Each of the three teachers was assigned as 0.14 full-time-equivalent (FTE) position; this allocation represents 0.42 percent of a position—meaning that the district had the equivalent of less than half of one full-time staff member dedicated to ESL.

During onsite interviews, staff indicated that some teachers are charged with serving multiple populations of students with special learning needs. For example, the two special education inclusion teachers at the middle school are also responsible for providing services for students with dyslexia and who are ELLs.

Dilley ISD also allocates a limited amount of instructional spending on its ESL program. According to PEIMS, the percentage of actual instructional expenditures allocated to bilingual/ESL education was 0.0 percent in school year 2011–12, 0.0 percent in school year 2012–13, and 0.1 percent in school year 2013–14. This lack of dedicated funding to support ESL services, along with the lack of dedicated staff suggests that Dilley ISD does not have a formally structured and administered ESL program operational within the district.

Dilley ISD staff also have differing opinions about the district’s ESL services as shown in the responses that district- and campus-level staff provided on a review team survey question about the effectiveness of supplemental programs. At the district level, 69.0 percent of staff agreed or strongly agreed that the ESL program was effective compared to 38.0 percent of campus-level staff.

The performance of ELL students on state assessments in Dilley ISD is lower than that of the overall student population. **Figure 2–6** shows school year 2013–14 STAAR test performance results for ELL students compared to Dilley ISD’s overall student population.

**FIGURE 2–6
DILLEY ISD STATE OF TEXAS ASSESSMENTS OF ACADEMIC
READINESS TEST PERFORMANCE
SCHOOL YEAR 2013–14**

METRIC	ALL DILLEY ISD STUDENTS	ELL STUDENTS
Satisfactory or Above, All Subjects	57%	39%
Satisfactory or Above, Reading	56%	34%
Satisfactory or Above, Mathematics	53%	30%
Met or Exceeded Progress, Reading	62%	(1)
Met or Exceeded Progress, Mathematics	59%	(1)

NOTES:
 (1) Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Part 99.1 and Texas Education Agency procedure OP 10-03.
 (2) ELL=English Language Learners.
 SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2013–14.

TEA provides a variety of resources, tools, and guidance documents for the delivery of ESL services. Much of this information can be obtained from the TEA website (www.tea.texas.gov). Additionally, TEA has another website specific to ELL education (elltx.org). This website contains more concise and clearly stated guidance for meeting the educational needs of ELLs, students in bilingual education programs, and students receiving ESL services. It includes resources such as the Language Proficiency Assessment Committee Framework Manual, Limited English Proficient Training Flowchart, English Language Learner Instructional Accommodations Checklist, and additional resources for accessing data and implementing programs for ELL students.

The Office for Improving Second Language Achievement, a research program at Texas A&M University–Corpus Christi, also provides various resources for teachers and administrators administering ESL and bilingual programs. Its 2006 publication *Best Practices for English Language Learners* profiles programs, policies, and instructional practices of schools in Texas that have demonstrated success with ELLs based on state and/or national assessments.

Dilley ISD should develop and implement a process for continuous evaluation of the district’s English as a Second Language program to ensure that the instructional delivery, staff allocation, and funding methods effectively meet the needs of English Language Learner students. The administrative facilitator should convene a committee of

campus administrators and ESL teachers. The committee should analyze Dilley ISD's ESL program. The committee should begin by developing and implementing procedures for identifying ELL students. To assist with the identification process, the committee should establish LPACs at each campus. The committee should then develop and implement a set of guidelines for the ESL program including the services the program will provide and what is expected of ESL teachers in the classroom. After determining the level of service teachers should provide, the committee should establish a staffing model to ensure that staffing levels are adequate to meet student needs. The committee should then evaluate the district's available ESL resources and determine which resources are useful and which resources are still needed. The committee should establish a method for providing funds to purchase materials to support the educational needs of students in the ESL program. Finally, the committee should compile and present its recommendations for improving the ELL identification process and the ESL program to the superintendent and the board.

In completing this process, the district committee should also obtain assistance from an outside resource such as Region 20. The bilingual/ESL team at Region 20 can provide assistance in ESL program administration, developing effective language programs, guidance on instructional strategies for ESL students, curriculum modifications for ESL programs, and additional services as needed.

After the onsite review, Dilley ISD reported that the district established LPACs at all campuses and held LPAC meetings. In addition, the district reported that it provided LPAC trainings and joined the Region 20 ESL cooperative for school year 2015–16.

This recommendation could be implemented with existing resources.

BEHAVIOR MANAGEMENT (REC. 9)

Dilley ISD lacks an effective districtwide behavior management system.

Dilley ISD staff reported disciplinary issues within the district related to student behavior and inconsistencies in district and campus responses to student behavior. Additionally, the district has not adopted, or implemented with fidelity, a districtwide behavior management program. Each campus functions autonomously with behavior and

disciplinary decisions at the discretion of campus-level administration.

Figure 2–7 shows Dilley ISD's school year 2013–14 disciplinary data submitted to PEIMS.

**FIGURE 2–7
DILLEY ISD DISCIPLINARY DATA
SCHOOL YEAR 2013–14**

ALTERNATIVE DISCIPLINARY PLACEMENTS	PLACEMENTS	STUDENTS SENT TO ALTERNATIVE DISCIPLINARY PLACEMENTS	PERCENTAGE OF TOTAL STUDENT POPULATION
In-School Suspension	187	110	9.7%
Out-of-School Suspension	56	35	3.1%
Disciplinary Alternative Education Program	22	18	1.6%

SOURCES: Legislative Budget Board Review Team, May 2015; Public Education Information Management System Data, school year 2013–14.

The Dilley ISD Student Code of Conduct outlines the behavioral expectations for all students in the district and allowable discipline management techniques that may be used by district staff. However, the list of discipline management techniques is actually a list of allowable consequences as opposed to a list of techniques for managing behavior. It includes actions such as time-out, withdrawal of privileges, and sending students to the office. The Student Handbook contains the district's Code of Conduct and provides specific guidance for understanding the consequences that may be associated with certain behaviors. Additionally, the Student Handbook states that, ultimately, decisions regarding student behavior and discipline are at the discretion of the principal.

In interviews with the review team, staff identified Positive Behavioral Intervention and Support (PBIS) as the district's behavior initiative. However, PBIS has not been identified in the DIP, nor has PBIS been implemented with fidelity throughout the district. PBIS is a decision-making framework for guiding the selection, integration, and implementation of evidence-based academic and behavioral practices to improve behavioral and academic outcomes for all students. PBIS is structured around the following three tiers of support:

- Tier I – Universal support for all students;

- Tier II – Targeted support that is more intensive for students who are non-responsive to universal support; and
- Tier III – Individual support that is intensive and personalized for individual students.

PBIS is based on the following six driving principles:

- using evidence-based practices;
- using data to make decisions and to solve problems;
- arranging the physical environment to prevent problem behaviors;
- teaching and reinforcing pro-social skills and behaviors;
- implementing evidence-based practices with fidelity and accountability; and
- screening and monitoring student behavior, performance, and progress continually.

During onsite interviews, Dilley ISD staff stated that inconsistencies exist among campuses regarding expectations for student behavior. The behavior management practices at each campus include:

- the elementary school does not use a specific behavior model but does incorporate some components of PBIS such as schoolwide rules for common areas; campus administrators reported that they have not fully integrated PBIS, a PBIS team as prescribed by the model is not in place, nor has training been provided to all staff;
- the middle school uses PBIS and has taken steps to incorporate restorative discipline; restorative discipline is a systems intervention that emphasizes the importance of relationships in education, and its goal is to improve school climate instead of simply responding to student behaviors; and
- the high school does not use a specific behavior model and relies on the Standards for Student Conduct outlined in the district's Student Code of Conduct.

Staff indicated that there is a lack of agreement between campus and district staff regarding appropriate repercussions for negative student behavior. During onsite interviews, staff consistently stated they would like the district to formalize progressive sanctions for behavior. Furthermore, staff believe that the autonomy afforded to each principal has resulted in

a perception that all students are not treated the same and that discipline is not equitable. Teachers stated that some students face no repercussions for poor behaviors. Staff believes that this lack of repercussions has made some students become belligerent because they will not face consequences for bad behavior. This makes other students lose respect for both rules and their teachers.

Failure to equitably address behavior management consistently throughout the district could result in the loss of instructional effectiveness. In addition, the lack of consistency in behavior management could result in a loss of instructional time for all students as teachers address behavioral issues within the classroom.

Student behavior and discipline management have a direct effect on and are affected by the climate within campuses across the district. Effective campuses establish clear expectations regarding student behavior and consistently enforce consequences for undesirable behaviors, resulting in climates that are supportive of instruction. Campuses and students benefit when districts establish clear and concise behavior management and disciplinary procedures that are: (1) aligned to the Student Code of Conduct and student handbooks; and (2) are reinforced in other student-related district services, such as transportation and extracurricular activities.

Many districts have adopted and implemented PBIS for behavior management. An example of successful implementation of PBIS is Simon Middle School, one of five middle schools in the Hays Consolidated ISD. Simon Middle School has fully implemented PBIS since the campus first opened and reports significant outcomes related to the number of disciplinary referrals and placements in disciplinary settings. Additionally, the instructional staff state that they are able to spend more time on instruction and the district has seen a corresponding increase in student performance on state assessments as the PBIS has become more fully implemented in the school.

Dilley ISD should regularly evaluate the district's behavior management system to ensure that the system is being implemented with fidelity and meets the district's disciplinary needs. Dilley ISD should establish a committee composed of district- and campus-level administrators and teachers to determine how PBIS can be consistently implemented throughout the district. The committee should meet annually to determine if the behavior management system is adequately meeting the district's needs. If not, the committee

should consider alerting how the program is implemented. The behavior management system the district uses should be documented as a strategy in the annual DIP. The committee should also revise the Student Handbook and Student Code of Conduct. The revisions should clearly articulate behavioral expectations for students as well as corresponding disciplinary consequences for undesired behaviors. After the initial revision, the Student Code of Conduct should be reviewed annually by all staff and reviewed and approved by the board. Moreover, the Student Code of Conduct should be discussed with students and parents annually at the beginning of each school year.

After revising the Student Code of Conduct, Dilley ISD staff should develop SOPs for evaluating student behavior. Appropriate disciplinary consequences should be developed and applied along with districtwide implementation of the behavior management system. The steps for implementation should include:

- establishing PBIS teams at the district level and at each campus;
- clearly stating the mission and purpose of the PBIS team;
- establishing a schedule for teams to meet at least one hour per month;
- training all staff in PBIS and facilitating commitment by undertaking the following activities:
 - sharing behavior data with all staff on a quarterly basis;
 - involving instructional staff in establishing and reviewing goals; and
 - developing a process with staff for gathering data and feedback throughout the year;
- developing procedures for defining behaviors and differentiating between behaviors that warrant an office referral versus those that can be managed by staff;
- developing a discipline matrix that contains a menu of corrective consequences aligned to behaviors;
- creating forms to document referral decisions and to assure fidelity to the process;

- developing a process and data system to allow for the collection and analysis of data that should be reviewed by the PBIS team each month;
- developing three to five positively worded schoolwide expectations at each campus which are posted throughout the school and apply to both students and staff;
- posting all rules for common areas and individual classrooms and ensure they have been aligned to the schoolwide expectations;
- developing and implementing a schoolwide rewards and recognition program that provides for a variety of rewards for desired behaviors and that is linked to schoolwide expectations;
- embedding lessons for teaching students behavioral expectations and rules in content instruction and share them with parents and the community;
- establishing a schedule for teaching behavioral expectations and rules to both students and staff on an ongoing basis throughout the year (a minimum of 15 times per school year) and a plan for including students who are new to the school; and
- developing a plan for evaluating the outcomes of PBIS that includes an annual survey of both students and staff to determine the following:
 - students and staff can identify behavioral expectations and rules;
 - students have received some type of reward on a quarterly basis; and
 - staff are consistently and appropriately documenting student behaviors and discipline.

After the onsite review, Dilley ISD reported that in school year 2015–16, all campuses have PBIS teams that attend training at Region 20. The PBIS teams work with campus staff to develop school rules and track student discipline data. Dilley ISD also reported that the district has implemented a leveled system of infractions and consequences in school year 2015–16.

This recommendation could be implemented with existing resources.

SUPPORT SERVICES (REC. 10)

Dilley ISD does not evaluate the level of support services the district provides to students to determine if they are sufficient to meet student needs.

Counseling services, library services, and nursing services are not adequate to meet the needs of the district's students. At the time of the onsite review, the high school did not have a counselor, which is of particular concern due to the role of the school counselor in assisting students with college and career readiness. Also, the district does not employ a certified librarian; each of the three libraries is staffed by a paraprofessional. Additionally, the district employs only one nurse and one nurse's aide who are assigned to the elementary campus, presenting a safety issue as students walk from the middle and high schools to the elementary school when they need to see the nurse. In addition, the aide is often left alone when the nurse is not available.

COUNSELING SERVICES

The number of counseling professionals employed by Dilley ISD is not sufficient to meet the needs of the students enrolled in the district. No state requirements establish the ratio of school counselors to students; however, the National School Counselor Association recommends a counselor to student ratio of 1:250. During school year 2014–15, the district employed only two counselors making the ratio more than 1:500. The counselor at each campus prepared the following short descriptions of the services they provided and the corresponding percentage of time they estimated they spend on each service. This information helps to understand the scope and broad range of responsibilities of the counselors at each campus:

- Dilley Elementary School:
 - Responsive Services – 40 percent;
 - Individual Planning – 10 percent;
 - System Support – 15 percent;
 - Guidance Curriculum – 35 percent
- Mary Harper Middle School:
 - Responsive Services – 35 percent;
 - Individual Planning – 15 percent;
 - System Support – 15 percent;
 - Curriculum – 35 percent

Furthermore, Dilley ISD Early College High School (ECHS) will open with the start of school year 2015–16. ECHSs blend high school and college curricula simultaneously to give students the chance to earn up to two years of college credit (60 hours) while they finish high school. Without the guidance of a school counselor, Dilley ISD students may not be able to successfully navigate requirements for high school graduation, concurrent enrollment in college-level courses, and the college application process.

LIBRARY SERVICES

The Texas State Library and Archives Commission (TSLAC) and the State Board of Education have established a set of standards for school libraries in Texas. Based on information provided by Dilley ISD, the overall condition of the library collections at each of the three campuses meets TSLAC standards. The average publication date of the collection for all campuses is 2001. The libraries also have access to online research and digital materials through Digital Knowledge Central. However, Dilley ISD does not comply with recommendations for staffing established by TSLAC in the areas of library program management and curriculum integration.

TSLAC Standard 1.1 addresses staffing of school libraries. The standards divide schools into six categories based on the number of students enrolled. Library staff in schools with an enrollment of up to 350 students, which applies to all three campuses in Dilley ISD, should range from one certified librarian to one certified librarian and one paraprofessional. Dilley ISD has three libraries, one at each campus in the district. All three libraries are staffed by one paraprofessional who serves as the librarian. Organizationally, there is no head librarian although functionally the middle school librarian serves in this capacity. Because the district does not employ a professional librarian, it does not conform to the standards for school library services.

The lack of professional library staff has placed students at a disadvantage. During onsite interviews, instructional staff stated that the library staff was not integrated into instruction. Collaboration between library and instructional staff provides a means for the district to identify resources that can be added to the library to support the instructional needs of students. This collaboration also allows library staff to provide guidance and support to instructional staff and provides opportunities for library staff to interact with students to teach them effective research skills. Additionally, each library paraprofessional said that they did not plan with

the campus principals regarding budget development or selection of library materials. Library staff also stated that there had been no outside evaluation of the district's library resources. The lack of certified, professional librarians in the district coupled with the absence of a formal evaluation of the libraries' resources may result in libraries that are not appropriately designed or stocked to meet the needs of the students.

NURSES AND SCHOOL HEALTH SERVICES

During onsite interviews, Dilley ISD staff reported that the district does not provide sufficient numbers of professional nursing staff to meet the health and wellness needs of the students enrolled in the district. Currently, the district employs one registered nurse and one nurse's aide who are both housed at the elementary school. They are responsible for providing nursing services to all students across the three campuses as well as the DAEP.

No state recommendations establish the ratio of nurses to students; however, the Texas Department of State Health Services estimates that for school year 2012–13, the ratio of nurses to students statewide was 1:676. The National Association of School Nurses (NASN) recommends a ratio of one full-time registered nurse for every 750 healthy students. Dilley ISD has one registered nurse for 1,006 students. However, she does have the assistance of a nurse's aide, so the district is within the industry standards. However, the nurse's aide is assigned to daily lunch duty and may be out of the office up to 1.5 hours per day. When the nurse gets called to another campus while the aide is on lunch duty, elementary students who are in the nurse's office may be left unattended by trained staff. Furthermore, staff reported that students from the middle and high schools are often required to walk unsupervised to the elementary school to see the nurse, unless it is an emergency and they are unable to walk by themselves. The distance between campuses is one to two city blocks. Regardless of distance, allowing students to walk between campuses while ill risks the safety of the student and can potentially be a liability to the district. Students should not be required to leave the school facility or the care and supervision of adults to seek care from the school nurse.

Additionally, the determination of adequate nurse staffing is a complex decision-making process, and the nurse-to-student ratio will change based upon the specific medical needs of students within a district. For example, the numbers of economically disadvantaged students should be factored in to student–nurse ratios because these students are more likely

to depend on the school nurse as a primary health care provider than other students. Dilley ISD's student population is 79.5 percent economically disadvantaged. Dilley ISD has never conducted a community health needs assessment to identify the social determinants that affect the health of their students so that school nurses and administrators can plan to address those needs.

Dilley ISD should assess the quality of the counseling, library, and nursing services the district provides, and develop a plan to align the services with industry standards to optimally support student needs. The district should develop adequate and equitable district staffing guidelines for counseling, library, and nursing services. In this development of guidelines, district leadership should determine staffing decisions not solely by ratios but by the unique needs of district students, with state and national guidelines used as examples. To provide equitable services to Dilley ISD students, district leaders should prioritize these needs and develop a plan to achieve the identified goals. The district should examine enrollment data, examine existing fiscal and human resources, and conduct a community health needs assessment to determine student needs. Suggested actions include the following:

- establishing an additional high school counselor position;
- establishing an additional professional librarian position ; and
- establishing an additional registered nurse position, and locating this position at the high school to avoid students having to walk across a highly trafficked road to see the nurse.

A fiscal impact is not assumed for this recommendation. The district should first develop staffing guidelines and conduct needs assessments for student services. After these are completed, these results should be assessed and Dilley ISD should determine if staffing changes are required.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015-16	2016-17	2017-18	2018-19	2019-20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 2. EDUCATIONAL SERVICE DELIVERY							
6. Develop a comprehensive plan to implement and regularly evaluate and revise the district's curriculum.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7. Establish a Response to Intervention process that is implemented districtwide with fidelity and regularly evaluate instructional programs used for student interventions for effectiveness.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
8. Develop and implement a process for continuous evaluation of the district's English as a Second Language program to ensure that the instructional delivery, staff allocation, and funding methods effectively meet the needs of English Language Learner students.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9. Regularly evaluate the district's behavior management system to ensure that the system is being implemented with fidelity and meets the district's disciplinary needs.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
10. Assess the quality of the counseling, library, and nursing services the district provides, and develop a plan to align the services with industry standards to optimally support student needs.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 3. BUSINESS SERVICES

An independent school district's business services functions includes financial management, asset and risk management, and purchasing. Appropriate implementation of these financial-related services is dependent on a district's organizational structure. Larger districts typically have staff specifically dedicated to these functions, while smaller districts have staff with multiple responsibilities. Financial management includes budget development and adoption; oversight of expenditure of funds; and involvement of campus and community stakeholders in the budget process. Managing accounting and payroll includes developing internal controls and safeguards; reporting account balances; and scheduling disbursements to maximize funds. Management of this area includes segregation of duties, use of school administration software systems, and providing staff training.

The Texas Education Code (TEC), Section 44.008(a), requires a financial audit to be performed annually by a certified public accountant holding a firm license from the Texas State Board of Public Accountancy. The audit provides an annual financial and compliance report; an examination of the expenditure of federal funding; and a report to management on internal accounting controls.

Asset and risk management functions control costs by ensuring that the district is adequately protected against significant losses at the lowest possible cost. This protection includes the identification of risks and methods to minimize their effects. Areas where districts need to manage risk include investments, revenue and cash flow, capital assets, and insurance.

An independent school district's purchasing function is responsible for providing quality materials, supplies, and equipment in a timely, cost-effective manner. Purchasing includes identification and purchase of supplies, equipment, and services needed by the district, as well as the storage and distribution of goods.

School districts in Texas are required to follow federal and state laws and procedures applicable to purchasing. The purpose of competitive bidding requirements found in the Texas Education Code, Section 44.031, is to stimulate competition, prevent favoritism, and secure the best goods and services needed for district operations at the lowest

possible price. The Texas Education Agency (TEA) developed a comprehensive purchasing module in the Financial Accountability System Resource Guide (FASRG), which is available as a resource for district purchasing.

Dilley Independent School District (ISD) receives 40.0 percent of its revenue from the state, 44.0 percent from local sources, 12.0 percent from federal sources, and 4.0 percent from investment and other earnings. Local revenues are primarily from property taxes. The district's 2014 tax rate is \$1.25. The tax rate is composed of \$1.04 maintenance and operations and \$0.21 debt service (interest and sinking). In 2014, the board voted to decrease the tax rate, which had previously been \$1.42 (\$1.08 maintenance and operations and \$0.34 debt service). The district was able to recoup sufficient revenue at this lower tax rate due to a large increase in the district's property value.

Due to increased activity in the Eagle Ford Shale Play, an area rich in oil and gas that encompasses the district, the business manager told the review team that the district will become subject to recapture in school year 2015–16. Recapture requires property rich districts to pay property poor districts as a means to equalize funding per student across the state, pursuant to TEC Chapter 41. Each year, TEA provides notice to school districts that are likely to be subject to recapture. According to TEA's school year 2015–16 preliminary status notification list, Dilley ISD will be subject to recapture of between \$919,772 and \$947,300.

The district's top three budgeted expenditures are for instruction; plant maintenance and security; and instructional leadership and school leadership. **Figure 3–1** shows Dilley ISD's General Fund activity for fiscal years 2013 and 2014.

Dilley ISD's business manager is responsible for the financial management functions of the district. The business manager reports directly to the superintendent. The superintendent reports to the Board of Trustees, which is also responsible for ensuring that Dilley ISD's funds are managed properly. The business manager handles cash, investments, and the district's risk management program. Reporting to the business manager are the Public Education Information Management System (PEIMS) coordinator, a payroll clerk, an accounts payable clerk, and an accounts payable, payroll and activity fund clerk. The business manager is responsible for monthly

**FIGURE 3–1
DILLEY ISD REVENUE AND EXPENDITURES
FISCAL YEARS 2013 AND 2014**

CATEGORY	2013	2014
REVENUE		
Local Revenue	\$3,383,015	\$6,991,147
State Program Revenue	\$7,391,330	\$6,364,119
Federal Aid	\$2,114,940	\$1,821,363
Investment Earnings	\$10,654	\$40,735
Other	\$452,119	\$613,046
Total Revenue	\$13,352,058	\$15,830,410
Expenditures		
Instruction and instructional related	\$5,732,892	\$6,042,448
Instructional leadership/school leadership	\$1,011,471	\$1,083,813
Guidance, social work, health, transportation	\$651,364	\$629,927
Food services	\$717,241	\$713,463
Extracurricular activities	\$521,517	\$532,501
General administration	\$646,724	\$715,682
Plant maintenance and security	\$1,189,362	\$1,139,153
Data processing services	\$48,878	\$55,863
Community services	\$61,486	\$128,553
Debt services	\$396,564	\$1,340,084
Capital outlay	\$17,173	
Payments to fiscal agent/member districts—shared service	\$294,626	\$334,829
Total Expenditures	\$11,289,298	\$12,716,316
Change in Net Position	\$2,062,760	\$3,114,094

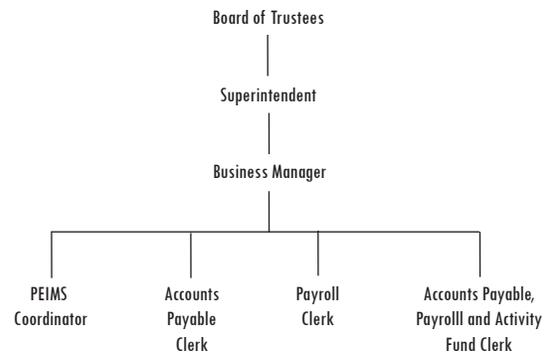
SOURCE: Dilley ISD Annual Financial Report, August 31, 2014.

financial reporting, budget preparation and control, and preparation of all reports for approval by the board.

The payroll clerk is responsible for paying employees, and payment of related withholdings, including taxes, retirement, and medical insurance. The payroll clerk is also responsible for preparation of payroll tax reports, federal W-2 wage and tax forms, and retirement plan contribution reports. The accounts payable clerk is responsible for proper payment and coding of all expenditures, including appropriate authorization and maintaining documentation. The accounts payable, payroll and activity fund clerk provides support to accounts payable and accounts for the district’s student and

campus activity funds. The PEIMS coordinator is responsible for submitting all PEIMS and electronic reports to TEA and managing access to the district’s accounting software system. **Figure 3–2** shows the organizational structure of Dilley ISD’s business services functions.

**FIGURE 3–2
DILLEY ISD BUSINESS SERVICES ORGANIZATION
SCHOOL YEAR 2014–15**



NOTE: PEIMS=Public Education Information Management System. SOURCE: Legislative Budget Board School Review Team, May 2015; Dilley ISD May 2015.

As the investment officers for the district, the business manager and superintendent must, within 12 months after coming into office and every two years thereafter, attend at least 10 hours of investment training relating to responsibilities pursuant to the Public Funds Investment Act. The business manager and the superintendent have completed the required investment training.

Each year, school districts are assessed based on the state’s financial indicators, known as the School Financial Integrity Rating System of Texas (School FIRST). School FIRST is authorized by the Texas Administrative Code, Title 19, Section 109.1001. School FIRST’s purpose is to hold Texas public school districts accountable for the quality of their financial management practices and for improving those practices. The system is intended to encourage Texas public schools to better manage their financial resources to provide the maximum allocation possible for direct instructional purposes. The four primary levels of ratings (Superior Achievement, Above Standard Achievement, Standard Achievement, and Substandard Achievement) are based on the points received for indicators by each school district. The rating system assesses school districts on 20 indicators of financial health and accountability in five areas: critical indicators, fiscal responsibility, budgeting indicators, staff

indicators, and cash management indicators. **Figure 3–3** shows the rating categories for School FIRST.

**FIGURE 3–3
FINANCIAL INTEGRITY RATING SYSTEM OF TEXAS
MAY 2015**

RATING	SCORE
Superior Achievement	64–70
Above Standard Achievement	58–63
Standard Achievement	52–57
Substandard Achievement	Less than 52

SOURCE: Texas Education Agency, Financial Integrity Rating System of Texas, May2015.

Figure 3–4 shows Dilley ISD’s School FIRST ratings for school years 2011–12 to 2013–14 compared with peer districts. Peer districts are Texas school districts similar to Dilley ISD that are used for comparison purposes. Dilley ISD had similar scores to its peer districts, and received a rating of superior achievement each year.

**FIGURE 3–4
DILLEY ISD AND PEER FINANCIAL INTEGRITY RATING
SYSTEM OF TEXAS SCORES
SCHOOL YEARS 2011–12 TO 2013–14**

DISTRICT	2011–12	2012–13	2013–14
Dilley ISD	68	70	70
Carlisle ISD	70	70	64
Keene ISD	66	68	70
Lytte ISD	69	68	69

SOURCE: Texas Education Agency, Financial Integrity Rating System of Texas, May2015.

The district maintains its operating funds at a local bank. The Business Office has online access to the district’s accounts and can verify balances at any time. Dilley ISD maintains its cash and short-term investment records in the district’s accounting system.

As of February 2015, the district had approximately \$2.2 million in bank deposits. **Figure 3–5** shows the district’s bank balances in its six checking accounts.

As of August 2014, Dilley ISD had invested \$30.1 million in the Local Government Investment Cooperative and Lone Star investment pools. In 2013, voters approved a bond of \$25.0 million for the construction of a new high school and the renovation of the middle and elementary schools. In fall 2013, the district engaged a third-party construction manager-at-risk, architect, and engineers to complete the

**FIGURE 3–5
DILLEY ISD CHECKING ACCOUNTS
FEBRUARY 2015**

ACCOUNT	INTEREST BEARING	ENDING BALANCE
General Fund Operating Account	Yes	\$1,143,219
General Fund Payroll Account	Yes	\$28,044
Student Activity Account	Yes	\$91,058
I & S Dilley State Bank Account	Yes	\$965,766
Bond Construction Checking	No	\$12,219
Workers Compensation	No	\$572
Total		\$2,240,878

SOURCE: Dilley ISD, February 2015.

projects. A committee consisting of the construction manager-at-risk, architect, engineers, superintendent, and facilities director evaluated bids and meet regularly to ensure project milestones are completed and presented to the board. At the time of the onsite review, the construction and renovation projects were in progress.

DILLEY ISD BUDGETING PROCESS

The board adopts a budget for Dilley ISD’s General Fund, Debt Service Fund, and Food Services Fund, which is included in the Special Revenue Funds. The district is required to present the adopted and final amended budgeted revenues and expenditures for each of these funds to the TEA. The district compares the final amended budget to actual revenues and expenditures.

The district follows these procedures in establishing the budget:

- In February, the district begins holding budget development meetings. The meetings include department directors, campus administrators and other stakeholders.
- Throughout the summer, the business manager and other staff make budget presentations to the board and the budget is developed.
- In August, the board meets to adopt the proposed budget; the district is required to provide at least 10 days’ advanced notice to the public of the meeting;
- Before September 1, the board passes the budget through a resolution; after the board approves the budget, it can only be amended at the function and fund level by approval of a majority of the members of the board. Amendments are presented to the board

at its regular meetings; each amendment must have board approval. Because Dilley ISD has a practice of careful budgetary control, several amendments are typically necessary during the year; however, the business manager reported that none of these is usually significant; and

- Each department and campus controls the budget at the function and object code level. All unused budget appropriations lapse at year's end.

ACCOMPLISHMENT

- ◆ Dilley ISD requires all employees to participate in direct deposit.

FINDINGS

- ◆ Dilley ISD has not established a policy or guidelines for managing and controlling its fund balance.
- ◆ Dilley ISD does not regularly evaluate its banking needs to ensure the depository bank contract includes the appropriate collateralization level.
- ◆ Dilley ISD does not have a process to record and track fixed assets.
- ◆ Dilley ISD does not have documented procedures to guide the Business Office operations.

RECOMMENDATIONS

- ◆ **Recommendation 11: Establish a board policy to identify the level of fund balance the district will maintain in the General Fund and how the district will use it.**
- ◆ **Recommendation 12: Assess the district's appropriate banking collateralization level and amend the depository contract to address those needs.**
- ◆ **Recommendation 13: Implement a comprehensive asset management process to guide the recording, inventorying, tracking, and disposal of the district's assets.**
- ◆ **Recommendation 14: Develop written procedures that provide a detailed guide for the daily operations of the Business Office.**

DETAILED ACCOMPLISHMENT

Dilley ISD requires all employees to participate in direct deposit.

In September 2014, Dilley ISD required all employees to participate in direct deposit. In previous years, employees had the choice of utilizing direct deposit or receiving a check.

To implement the new policy, the business manager and the superintendent selected a date and sent a memo requiring all employees to start direct deposit. Direct deposit of an employee's paycheck is a benefit to the employee and the employer. Employees benefit from direct deposit because it saves time by eliminating trips to the bank. It also eliminates the risk of check fraud, and eliminates check-cashing fees. Additionally, employees receive their pay even if they are absent from work. It is a benefit to the school district because it is less expensive and time consuming to process a direct deposit transaction as opposed to processing paper checks.

DETAILED FINDINGS

FUND BALANCE (REC. 11)

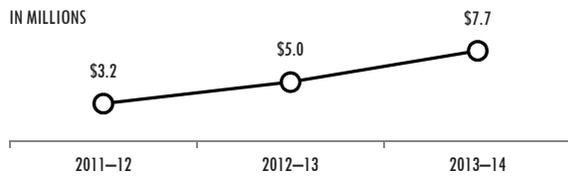
Dilley ISD has not established a policy or guidelines for managing and controlling its fund balance.

Dilley ISD lacks a local, board-adopted fund balance policy to guide the district in short-term and long-term planning. A fund balance represents resources the district holds in reserve to address unforeseen financial events or delays in the receipt of state and local revenue sources. Without such a policy, the reserves in the General Fund, from which the district supports daily operations, could drop below levels necessary to provide adequate protection against those unexpected increases in normal operating costs or unforeseen financial crises. Without planning, the district might be unable to meet its financial obligations.

The General Fund is the primary fund through which most school district functions are financed. Most state aid and local property tax revenue is deposited in the General Fund. **Figure 3–6** shows Dilley ISD's General Fund balance for school years 2011–12 to 2013–14. The fund balance has increased 239.0 percent during this period. This increase is due largely to increases in property values. The total taxable value of all property in the district increased from \$471.4 million in tax year 2013 to \$1.5 billion in tax year 2014.

Dilley ISD's superintendent and business manager work together to make decisions about how to use the fund balance and the amount to keep in the fund balance. During

**FIGURE 3-6
DILLEY ISD GENERAL FUND BALANCE
FISCAL YEAR 2011-12 TO 2013-14**



SOURCE: Dilley ISD Annual Financial Report, August 31, 2014.

interviews, board members indicated that they provide input in discussions about the fund balance, but typically defer to the superintendent to make decisions.

School districts’ general fund balances have received more scrutiny since the issuance of the Governmental Accounting Standards Board (GASB) statement 54 and TEA’s FASRG. Statement 54, effective in 2011, relates to enhancing the usefulness of fund balance information. This pronouncement identified the following fund balance categories:

- nonspendable fund balance—reserves for inventory, long-term receivables, endowment principal, and endowment items;
- restricted fund balance—general fund obligations associated with federal programs, retirement of long-term debt, and construction;
- committed by board action—construction, claims and judgments, retirement of loans/notes payable/capital expenditures, and self-insurance;
- assigned—by designee action, construction, claims and judgments, retirement of loans/notes payable, capital expenditures, and self-insurance; and
- unassigned—available for any legal expenditure.

Dilley ISD has designated funds in two of these categories. **Figure 3-7** shows the district’s fund balance for each category for fiscal years 2013 and 2014 as reported in the district’s annual financial reports. In the reports, the district notes that the committed funds are for construction purposes.

The FASRG provides information on the reporting of fund balances and states that “prudent financial management requires accumulating undesignated unreserved fund balance in the General Fund in an amount that is adequate to cover net cash outflows that occur in virtually all schools during most of the fiscal year.” TEA has set a rule of thumb to

**FIGURE 3-7
DILLEY ISD FUND BALANCE
FISCAL YEARS 2013 AND 2014**

CATEGORY	2013	2014
Committed	\$1,000,000	\$2,000,000
Unassigned	\$4,016,942	\$5,656,329
Total	\$5,016,942	\$7,656,329

SOURCES: Dilley ISD Annual Financial Reports, August 31, 2013, and August 31, 2014.

compute the optimum fund balance in the General Fund. The rule of thumb states that the optimum fund balance should be the sum of the estimated amount needed to cover cash flow deficits in the General Fund for the fall period in the following fiscal year and the estimated average monthly cash disbursements of the General Fund for the following fiscal year. An appendix to FASRG includes the Fund Balance and Cash Flow Worksheet and the Instructions for Completion of Fund Balance and Cash Flow Worksheet for the General Fund. Although the worksheet is not mandatory, districts can use it to calculate the optimum unassigned fund balance for the general fund. Dilley ISD has included this worksheet in its Annual Financial Report for fiscal year 2014. The district calculated that its optimum fund balance is \$3.9 million. Based on this, the district has a fund balance that is more than twice its optimum fund balance. On the worksheet, the district provides the following explanation of the need and projected use of the fund balance: “The district prefers to maintain an additional one month operating reserve in addition to significant construction projects in the future.” In interviews, staff reported that the district is holding \$4.0 million in reserve for construction. However, these funds have not been assigned to the committed category in full, indicating that the district’s priorities may not align with the actions the district has taken.

The lack of a fund balance management policy could result in the district having difficulty maintaining programs in the event of decreasing revenue. Without a fund balance management policy, the district may not be adequately reserving funds to achieve district goals and responsibilities. The district could also have difficulty addressing unexpected costs.

The Government Finance Officers Association (GFOA) also recommends that governments, including school districts, establish a formal policy on the level of unassigned fund balance the government should maintain in the General Fund. GFOA notes that the government should assess the

adequacy of unassigned fund balance in the General Fund based upon a government's own specific circumstances. GFOA also recommends at a minimum, that general purpose governments, regardless of size, maintain an unassigned fund balance in their general fund of no less than two months of regular general fund operating revenues or regular general fund operating expenditures. The GFOA recommendation references the factors that the government should consider when establishing a policy. These factors include the following:

- Predictability of revenues and volatility of expenditures;
- Perceived exposure to possible one-time outlays for things such as disasters or state budget reductions; and
- Liquidity, the disparity between when financial resources become available to make payments.

Dilley ISD should establish a board policy to identify the level of fund balance the district will maintain in the General Fund and how the district will use it.

The business manager with the help of the superintendent should review the fund balance levels by month for the most recent three fiscal years and determine the necessary level of fund balance to meet the needs of the district. The superintendent and business manager should also consider any district goals, including construction plans. This process should also include a review of the TEA optimal fund balance worksheets for the same period to determine if the data contained in these worksheets are pertinent to Dilley ISD fund balance requirements. The recommended policy should also address acceptable uses of any unassigned fund balance in excess of the minimum included in the policy. The policy should also include a plan to restore the fund balance if it decreases below the identified level.

This recommendation could be implemented with existing resources.

DEPOSITORY BANKING CONTRACT (REC. 12)

Dilley ISD does not regularly evaluate its banking needs to ensure the depository bank contract includes the appropriate collateralization level.

School districts in Texas are required to renew their depository contract every two years. The district can complete this requirement either through a request for proposals or competitive bidding. The school district and the bank it

contracts with may opt to extend a depository contract for two additional two year terms without soliciting bids or proposals.

Dilley ISD awarded its depository contract to Dilley State Bank through competitive bidding in May 2013. The contract began on September 1, 2013, and will end on August 31, 2015. During the bidding process, the district also sent bid notices to the three other banks in the district, in accordance with TEC, Section 45.206, although it did not receive bid applications from any of the other banks. Since the time of the onsite review, Dilley ISD opted to extend the depository contract with its existing depository bank for two years. This new contract began on September 1, 2015, and will end on August 21, 2017.

The depository contract stipulates that the bank will collateralize up to \$3.0 million, the upper limit of the amount of funds the district expects to have in the bank from day to day.

In fiscal year 2014, Dilley ISD received property tax receipts of \$7.2 million. The depository bank was unable to collateralize this large deposit. This inability resulted in the funds being out of the banking system for 10 days until the district determined that the funds could be deposited into its investment pool. The superintendent contacted the bank, which indicated that it had about \$4.2 million in securities pledged to collateralize the district's accounts as of August 31, 2014, and would be willing to increase the amount to \$5.0 million. The superintendent noted that this type of problem has occurred only once, and the district had not expected to receive such large tax revenues. However, the district did not request to adjust its \$3.0 million collateralization level in its renewed depository contract with the same bank, despite needing a higher level in the past.

TEA has a document that answers frequently asked questions about depository contracts. This document notes that "the TEC does not provide a guideline for evaluating a bank depository. However, your district should develop criteria in order of importance to be used in the evaluation process. The criteria developed should be based on your district's specific needs and concerns." TEA provides another document that assists districts to assess their banking needs and provide this information to banks. The document also enables banks to provide the district with information on the services the banks can provide. The document enables districts to compare bids from different banks, and to compare the bids

against the district's banking needs. The information includes several categories, such as:

- services provided by the bank;
- district historical information, including average ledger balances, average collected balances, and information on any credit or purchasing cards the district used for the past year; and
- bank historical information, including earnings credit rate, interest-bearing accounts rate, money market accounts rate, and sweep accounts rate.

Dilley ISD should assess the district's appropriate banking collateralization level and amend the depository contract to address those needs.

The superintendent and the business manager should conduct an assessment of the district's banking needs, including the level of collateralization, and propose amending the contract with the bank. This amendment should reflect the level of collateralization needed to adequately cover all potential deposits. The district should conduct this assessment every two years when the district is required to enter into a new depository contract.

This recommendation could be implemented with existing resources.

FIXED ASSET MANAGEMENT (REC. 13)

Dilley ISD does not have an effective process to record and track assets.

Dilley ISD has established a process to tag and track capital assets, but this process is not consistently followed. Capital assets are:

- tangible in nature;
- long-lived (have a life of longer than one year);
- of a significant value at purchase or acquisition time; and
- reasonably identified and controlled through a physical inventory system

Capital assets may include land, improvements to land, easements, buildings, building improvements, vehicles, machinery, works of art and historical treasures, furniture, and other equipment which are intended to be held or used during a long period.

The FASRG requires capital assets costing \$5,000 or more to be recorded in the fixed asset group of accounts in a district's annual financial report. Items costing less than \$5,000 are recorded as operating expenses of the appropriate fund in accordance with TEA guidelines.

While the district has a process in place to record newly acquired capital assets, it does not have an effective process to manage the acquisition of non-capitalized assets or assets the district acquires through donations or to track the disposition of assets and remove them from district records when necessary.

Dilley ISD follows the guidelines in the FASRG by capitalizing newly acquired assets with per unit cost of more than \$5,000. The district determines at the purchase order stage whether an item needs to be capitalized and included in the fixed asset record because it is valued at more than the \$5,000 threshold. When the item arrives in the accounts payable office, the business manager logs it in the fixed asset record in the accounting system as a capitalized asset.

During onsite interviews, the superintendent stated that the district has acquired capital assets in the last few years that were not captured in the district's fixed assets records. He recently conducted a review of the district's fixed asset records by printing a list of fixed assets from the accounting system. In his review, he found that some items valued at less than \$5,000 were included in the fixed asset record, and some items valued at more than \$5,000 were not included. Examples of the discrepancies the superintendent found include:

- an old cafeteria was demolished, but the furniture and other equipment in it were not removed from Dilley ISD accounting records;
- an old elementary school was demolished, but the furniture and other equipment in it were not removed from Dilley ISD accounting records;
- a play yard was donated to the elementary school by the parent-teacher association, but this donation has not been accounted for in Dilley ISD accounting records;
- Dilley ISD had a surplus sale, but the items sold were not removed from Dilley ISD accounting records; and
- a new cafeteria was built and furnished, but the assets in the new cafeteria are not accounted for in Dilley ISD accounting records.

For assets that are valued at less than \$5,000 and therefore not capitalized, Dilley ISD uses an inventory management software system by Wasp Barcode Technologies. According to the technology director, this system can tag, track, and inventory all of the district's assets when fully implemented. However, the district does not have a process to ensure that all assets are tagged and recorded, and the district lacks a consistent annual inventory process. The inventory management system could be integrated with the accounting system, but the district has not linked the two systems.

The Dilley ISD technology director is responsible for tagging assets that are not capitalized using the inventory management system. The technology director noted that all new technology items are sent through his office so that he can approve, tag, and record them. These items include tablet computers and calculators. The technology director is also responsible for tagging nontechnology assets, including textbooks, although these items are not sent through his office after purchase. The technology director noted that he does not have adequate time to tag these items, in addition to items the district purchased before the implementation of the inventory management system. The review team reviewed some of the assets in the district, including computers, tablets, and textbooks. The review team found that some tagging is taking place, but it is not complete. For example, the review team observed computers located in the technology director's office that did not have tags. The review team observed that all the tablets purchased for teachers and students had tags. The technology director noted that maintaining the tablets is a high priority for the district, and the adoption of tablet use in the district was a major factor for the implementation of the inventory management system. In addition to tagging the tablets to establish ownership, Dilley ISD has placed insurance on the student tablets and requires parents to pay a deposit to have their children use a tablet. If the tablet is lost or broken, the parent may be required to reimburse the district. The review team found that the majority of the textbooks in the district do not have tags. The only campus where textbooks have tags is the middle school, where an assistant principal borrowed the inventory management system from the technology director to ensure all textbooks are tagged and tracked.

The district does not conduct periodic inventories of its assets or determine the condition of the assets, although the inventory management system has the ability to facilitate inventories. The superintendent noted that while he has already reviewed the district's fixed asset record, he plans to conduct a complete inventory and reconcile the physical inventory to the

accounting records, account for any discrepancies, and adjust the inventory records as needed.

The lack of an effective asset management process has led to inconsistencies in the fixed asset records, which may cause errors in the district's accounting records. In addition, inconsistent implementation of the process limits the district's ability to track the cost, useful life, location, movement, and disposition of each asset.

Karnack ISD keeps a comprehensive list of assets and performs annual physical inventories to help ensure accountability for district property. By keeping an updated and accurate listing of assets owned by the district, Karnack ISD can ensure it has adequate insurance coverage, has complete information necessary to file a claim in the event of a loss, and provides an internal control mechanism to reduce the risk of loss. The district uses \$5,000 as the threshold for capitalization of fixed assets. The district uses \$500 as the threshold for other assets to be included in the inventory, except for technology equipment that is included regardless of cost.

To assist local governments with managing fixed assets, the Texas Comptroller of Public Accounts (CPA) established fixed-asset best practices. In *Getting a Fix on Fixed Assets*, 1999 the CPA identified several steps to help local governments develop and maintain effective fixed-assets management systems. **Figure 3–8** shows these steps compared with the process in Dilley ISD.

Dilley ISD should implement a comprehensive asset management process to guide the recording, inventorying, tracking, and disposal of the district's assets.

The superintendent or business manager should reconcile the assets in the fixed asset records with the assets the district actually has to update the records. The superintendent and the business managers should determine which assets the district will tag and develop written inventorying, tracking and disposal procedures.

The procedures should include the following areas:

- acquisition of fixed assets—the district should purchase fixed assets using a purchase order; code the purchased items to a specific account code, which the district has designated to identify a fixed asset; and record all donations of assets by outside entities on a donation form at their fair market value at the time of receipt;
- tagging fixed assets and inventory items—the district should tag all fixed assets within three business

FIGURE 3–8
DILLEY ISD FIXED ASSET MANAGEMENT COMPARED TO BEST PRACTICES
SCHOOL YEAR 2014–15

CATEGORY	BEST PRACTICE	DILLEY ISD
Preliminary	Identify individuals in the district who will have key fixed-asset responsibilities and establish the nature of such responsibilities.	The superintendent and business manager have key fixed-asset responsibilities. They approve purchase orders and determine the appropriateness of the accounting code that determines if assets should be capitalized.
	Devise policies and procedures governing capitalization thresholds, inventory, accounting, employee accountability, transfers, disposals, surplus and obsolescence, and asset sale and disposition.	The district has informal policies and procedures governing capitalization thresholds, inventory, accounting, employee accountability, transfers, disposals, surplus and obsolescence, and asset sale and disposition.
	Determine district fixed-asset information needs and constraints.	The district does not conduct a periodic physical inventory of fixed assets.
Establishing the Fixed-Asset Management System	Determine the hardware and software necessary to effectively manage the system.	Dilley ISD has the hardware and software necessary to effectively manage the system.
	Adopt a proposal setting up the fixed-asset system, including adoption of formal policies and procedures.	Dilley ISD has informal policies and procedures on fixed assets.
	Establish positions and job descriptions for staff with fixed-asset responsibilities.	The superintendent and business manager have fixed-asset responsibilities.
	Determine the structure of the fixed-asset inventory database and develop standard forms to match the format of computerized records.	Dilley ISD has not developed a fixed-asset inventory database or standard forms to capture physical inventory counts.
	Provide training as necessary.	The district does not provide adequate training.
	Identify specific assets below the capitalization threshold that should be tracked for information purposes and safeguarding.	Some assets (e.g., tablet computers) below the capitalization threshold are tracked for information purposes and safeguarding.
Implementing the Fixed-Asset Management System	Budget the amount necessary to operate the fixed-assets management system adequately.	The fixed-assets management system is part of the district's accounting system.
	Inform all departments of the requirements, policies, and procedures of the fixed-assets system.	The process of informing all departments of the requirements, policies, and procedures of the fixed-assets system is informal.
	Ensure that assets to be tracked on the system have been identified and tagged.	The district has not identified and tagged all assets that should be tracked.
	Enter information into the fixed-assets database.	At the time of purchase, if the item falls above the capitalization threshold, the business manager enters it into the fixed assets TxEIS module.
	Assign appropriate values to the assets in the database.	The district has not fully implemented the procedure for assigning appropriate values to the assets.
	Establish location codes and custodial responsibility for fixed assets.	The district has not fully implemented the procedure for establishing location codes and custodial responsibility for fixed assets.

FIGURE 3–8 (CONTINUED)
DILLEY ISD FIXED ASSET MANAGEMENT COMPARED TO BEST PRACTICES
SCHOOL YEAR 2014–15

CATEGORY	BEST PRACTICE	DILLEY ISD
Maintaining the Fixed-Asset Management System	Enter all inventory information into the automated fixed-asset system as fixed assets are received.	Dilley ISD has a process for entering all inventory information into the accounting system as fixed assets when the district receives them. However, the district also uses an inventory management system and has not integrated the two, although this capability exists.
	Assign tag numbers, location codes, and responsibility to assets as they are received.	The district does not assign tag numbers, location codes, and responsibility to assets when received, although the inventory management system has that ability.
	Monitor the movement of all fixed assets using appropriate forms approved by designated district personnel.	The district does not monitor the movement of all fixed assets.
	Conduct periodic inventories and determine the condition of all assets. Generate appropriate reports noting any change in status of assets, including changes in condition, location, and deletions.	Dilley ISD does not conduct periodic inventories or determine the condition of the assets, although the inventory management system has that ability.
	Reconcile the physical inventory to the accounting records, account for discrepancies, and adjust inventory records.	The district does not have an inventory reconciliation process. The superintendent said that he is planning to conduct an inventory and reconcile the physical inventory to the accounting records, account for discrepancies, and adjust inventory records.
	Use information from the system to support insurance coverage, budget requests, and asset replacements and upgrades.	Dilley ISD does not use information from the system to support insurance coverage, budget requests, and asset replacements and upgrades.

NOTE: TxEIS=Texas Enterprise Information System.

SOURCES: Legislative Budget Board School Review Team, May 2015; Texas Comptroller of Public Accounts, 1999.

days of receipt; although the technology director is responsible for tagging the fixed assets, it is the responsibility of the principal in each school to notify the Business Office when the school receives the fixed asset and that tag(s) is/are needed. The district should record any item that the district cannot tag, such as software licenses, buildings, or musical instruments, on a fixed asset inventory record card developed by the Business Office;

- transfer of fixed asset or inventory item—the district should use location codes to account for all fixed assets and inventory items and assign a location code to each classroom, office, etc. The district should develop a transfer protocol it will use if an item is transferred from one location to another, including a property transfer form, which the school or district administration will complete when moving an asset from one location to another;

- property disposal—if an item reaches the end of its useful life, as determined by the superintendent, the superintendent should classify the item as obsolete; the district can then sell the item and remove it from district records;
- removal of items from fixed asset and physical inventory systems—all items stolen, destroyed, or sold should be removed from the books after it is determined that insurance claim and replacement procedures have been followed; and
- physical counts—the superintendent and the business manager should coordinate an annual physical inventory of all fixed assets and reconcile them to the information in its accounting records; each school’s principal will be responsible for physical counts at those locations.

The business manager should assign responsibility for tagging and tracking items with the inventory management system

to the staff that receives or most frequently works with the item. For example, the technology director could continue to tag technology items, and the assistant principals at each campus could be responsible for tagging the textbooks at that campus.

This recommendation could be implemented with existing resources.

PROCEDURES (REC. 14)

Dilley ISD does not have documented procedures to guide the Business Office operations.

Dilley ISD has board policies that govern the general business operations of the district. However, the district does not have written procedures to guide Business Office staff in their daily jobs to ensure all policies are followed. The Business Office relies on the knowledge of staff who have held their positions for several years. The superintendent noted that some procedures have changed since he arrived in the district in 2013; however, the district does not retain any documentation to instruct staff when procedures change.

PURCHASING

The board adopted purchasing and acquisition policies in November 2014. Board Policy CH (LOCAL), provided by the Texas Association of School Boards and adapted by the district, requires that any single, budgeted purchase of goods or service that costs \$25,000 or more, regardless of whether the goods or service are competitively purchased, be approved by the board before a transaction may take place. The policy also grants the superintendent or designee the authority to determine the method of purchasing. The purchasing methods include policies for competitive bidding, competitive sealed proposals, or electronic bids or proposals. **Figure 3–9** shows the applicable policies for purchasing and acquisition of goods and services.

Although the district has purchasing policies in place, it does not have formal procedures for staff to follow to initiate and complete the procurement process. Business Office and other staff are aware of the purchasing process and their roles within it. However, no documented purchasing procedures or purchasing manual are available as a reference for staff or to train new staff when there is turnover.

PAYROLL AND ACCOUNTS PAYABLE

The district's payroll function is not documented. While the payroll clerk is experienced with the payroll process, the

district also has an assistant payroll clerk, who has less experience with the process.

The payroll clerk serves as the lead staff on payroll activities for elementary and middle schools staff, and the assistant payroll clerk serves as the lead on payroll for the high school, central office, custodial, and cafeteria staff. The two staff verify one another's activities. When discrepancies arise, the clerks consult with the business manager.

Most tasks within the payroll function are conducted manually based on the knowledge of the payroll clerk. For example, as part of the payroll activities that are conducted twice a month, the payroll clerk must call the U.S. Internal Revenue Service to complete the tax payments for the period. The calculations done to prepare for the call are completed manually, and the process is not documented.

In addition, procedures for the accounts payable function are not documented. The accounts payable clerk is experienced with the accounts payable process.

Both the superintendent and the business manager acknowledge the potential gap in services without having recorded the procedures performed by the experienced staff. However, leadership has not required that the payroll and accounts payable clerks record and document the process. Without explicit procedures, the district risks noncompliance with board policies and there is an increased risk that the Business Office may not provide adequate and timely payroll and accounts payable services. The district also risks inconsistencies in implementing policies if staff are absent and present staff do not know how to perform a task.

According to the Human Resources Council, "Policies and procedures should be clearly defined and stated, and note the distinct difference between the two. A policy is a formal statement of a principle or rule that members of an organization must follow. Each policy addresses an issue important to the organization's mission or operations. A procedure tells members of the organization how to carry out or implement a policy. Policy explains what to do, and the procedure explains how to complete the task. Policies are written as statements or rules; procedures are written as instructions, in logical steps. Effective school districts maintain written procedures for all Business Office functions.

FASRG, Section 3.6, provides the following elements to include in a purchasing procedures manual:

- purchasing organization;

**FIGURE 3--9
DILLEY ISD PURCHASING AND ACQUISITION BOARD POLICY
NOVEMBER 2014**

TOPIC	POLICY
Competitive bidding	If competitive bidding is chosen as the purchasing method, the superintendent or designee shall prepare bid specifications. All bids shall be in accordance with administrative regulations, and the submission of any electronic bids shall be in accordance with board-adopted rules. All bidders shall be invited to attend the bid opening. Any bid may be withdrawn prior to the scheduled time for opening. Bids received after the specified time shall not be considered. The district may reject any and all bids.
Competitive sealed proposals	If competitive sealed proposals are chosen as the purchasing method, the superintendent or designee shall prepare the request for proposals and/or specifications for items to be purchased. All proposals shall be in accordance with administrative regulations, and the submission of any electronic proposals shall be in accordance with board-adopted rules. Proposals received after the specified time shall not be considered. Proposals shall be opened at the time specified, and all proposers shall be invited to attend the proposal opening. Proposals may be withdrawn prior to the scheduled time of opening. Changes in the content of a proposal, and in prices, may be negotiated after proposals are opened. The district may reject any and all proposals.
Electronic bids or proposals	Bids or proposals that the district has chosen to accept through electronic transmission shall be administered in accordance with board-adopted rules. Such rules shall safeguard the integrity of the competitive procurement process; ensure the identification, security, and confidentiality of electronic bids or proposals; and ensure that the electronic bids or proposals remain effectively unopened until the proper time.
Responsibility for debts	The board shall assume responsibility for debts incurred in the name of the district so long as those debts are for purchases made in accordance with the adopted budget, state statute, board policy, and the district's purchasing procedures. The board shall not be responsible for debts incurred by persons or organizations not directly under board control. Persons making unauthorized purchases shall assume full responsibility for all such debts.
Purchase Commitments	All purchase commitments shall be made by the superintendent or designee in accordance with administrative procedures, including the district purchasing procedures.
Personal Purchases	District employees shall not be permitted to make purchases for personal use through the district's Business Office.

SOURCE: Dilley ISD Board Policy CH (LOCAL), November 2014.

- competitive procurement options;
- price quotations;
- emergency purchases;
- sole source procurement;
- purchase orders;
- central warehouse requisitioning;
- vendor relations;
- supply management;
- purchasing ethics; and
- legal considerations.

Dilley ISD should develop written procedures that provide a detailed guide for the daily operations of the Business Office.

The Dilley ISD business manager and other key stakeholders should develop administrative procedures concerning all Business Office duties for use by district staff. The district should make the procedures readily available to Business Office staff and review and revise them as appropriate or whenever significant changes occur.

This recommendation could be implemented with existing resources.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015-16	2016-17	2017-18	2018-19	2019-20	TOTAL	ONE-TIME
						5-YEAR (COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 3. BUSINESS SERVICES							
11. Establish a board policy to identify the level of fund balance the district will maintain in the General Fund and how the district will use it.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12. Assess the district's appropriate banking collateralization level and amend the depository contract to address those needs.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13. Implement a comprehensive asset management process to guide the recording, inventorying, tracking, and disposal of the district's assets.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14. Develop written procedures that provide a detailed guide for the daily operations of the Business Office.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 4. HUMAN RESOURCES

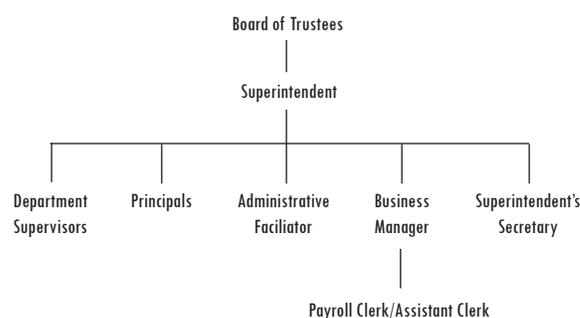
An independent school district's human resources function is responsible for the management of staff. Human resource management is dependent on the organizational structure of the district. Larger districts may have staff dedicated to human resource management, while smaller districts assign staff these responsibilities as a secondary assignment.

Human resource management includes compensation and benefits, recruitment, hiring, and retention, administrative planning and duties, records management, staff relations and grievances, and staff evaluations. These functions are defined by either compliance-based or strategic-based responsibilities. Compliance-based responsibilities include assuring an organization is following federal, state, and local labor laws in areas such as benefits, compensation and hours worked, records management, mandatory leave, discrimination, medical privacy, safety, termination, and eligibility to work. Strategic-based responsibilities include recruiting and retention, compensation and benefits, and staff relations.

In Dilley Independent School District (ISD), the superintendent assigns the majority of the human resources (HR) responsibilities to the business manager. The superintendent and the superintendent's secretary also have some HR duties. Principals and department supervisors identify vacancies, develop interview, screen and interview applicants, assist in recruitment efforts and recommend candidates to hire to the superintendent. The payroll clerk and assistant clerk manage leave administration, and the administrative facilitator conducts new staff orientation, implements Professional Development and Appraisal System training, establishes and maintains the district staff

development calendar, and implements the district's mentor program. **Figure 4–1** shows the district's organization of the HR function.

**FIGURE 4–1
DILLEY ISD HUMAN RESOURCES FUNCTION
ORGANIZATION
SCHOOL YEAR 2014–15**



SOURCES: Legislative Budget Board School Review Team, May 2015; Dilley ISD, Staff Interviews, May 2015.

In school year 2013–14, the district employed 160.9 full-time-equivalent (FTE) positions, which included 71.1 FTE teaching positions on the district's three campuses. Additional staff included 54.2 auxiliary staff, 18.6 educational aides, 6.9 professional support staff, 7.1 campus administrators, and 3.0 central office administrators. In school year 2012–13, Dilley ISD's payroll accounted for 66.8 percent of the total district expenditures. **Figure 4–2** shows Dilley ISD's payroll expenditures compared to peer school districts. Peer districts are Texas school districts selected for comparison purposes for this review.

**FIGURE 4–2
DILLEY ISD PAYROLL EXPENDITURES AS PERCENTAGE OF ALL FUNDS COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2013–14**

CATEGORY	DILLEY ISD	LYTLE ISD	CARLISLE ISD	KEENE ISD
Total Expenditures	\$13,885,172	\$25,894,986	\$7,163,444	\$13,585,234
Payroll Expenditures	\$7,906,506	\$11,856,938	\$4,637,865	\$6,713,675
Payroll Percentage	56.9%	45.8%	64.7%	49.4%
Total Staff	160.9	256.4	103.2	132.6

SOURCE: Texas Education Agency, Public Education Information Management System (PEIMS), Actual Financial Data and Texas Academic Performance Report (TAPR), school year 2013–14.

ACCOMPLISHMENTS

- ◆ Dilley ISD has implemented a new human resources system to establish a more efficient and effective process for managing human resources tasks.
- ◆ Dilley ISD has implemented the Grow Our Own Program to increase the number of staff with degrees to meet the continued demand for certified teachers, counselors, and school administrators.

FINDINGS

- ◆ Dilley ISD's human resources function lacks structured management and formal, documented policies and procedures to efficiently and effectively manage human resources tasks.
- ◆ Dilley ISD lacks sufficient oversight of staff development opportunities to ensure that all district staff receive notice of and attend necessary training.
- ◆ Dilley ISD does not have a comprehensive plan to recruit and retain qualified staff.
- ◆ Dilley ISD does not provide sufficient autonomy in hiring decisions by campus leaders.

RECOMMENDATIONS

- ◆ **Recommendation 15: Assign district-level staff the responsibility to coordinate and oversee all aspects of the district's human resources function, and develop written human resources policies and procedures consistent with industry standards.**
- ◆ **Recommendation 16: Designate district-level staff to coordinate the district's professional development efforts at the district and campus levels.**
- ◆ **Recommendation 17: Establish a comprehensive recruitment and retention plan that explores sustainable, innovative options and incentives for recruitment and retention of teachers and staff in small rural districts.**
- ◆ **Recommendation 18: Enhance campus autonomy in the hiring process.**

DETAILED ACCOMPLISHMENTS

EMPLOYEE MANAGEMENT SYSTEM

Dilley ISD has implemented a new human resources (HR) system to establish a more efficient and effective process for managing human resources tasks. This system is the K–12 Strategic Talent Management Suite used by districts to make it easier to find, evaluate, and develop the best kindergarten to grade 12 educators. As of January 2015, the district began using the records retention module of this system. Previously, the district manually conducted all records management and retention tasks and issued paper contracts, forms and requests for information. This system enables the district to streamline its day-to-day HR processes and activities. In Phase I, the district implemented the contract renewal management module of this system. This module enables the district to electronically issue all renewal and new contract offers. The district sends the employee an email via the system to make them aware of a pending action. When the employee enters the system with the temporary password and username, the employee is able to change the password and enter a unique account. Employees are able to respond in a secure electronic environment, note the acceptance or rejection of the contract offer, and return it to the superintendent's secretary through this system. The superintendent's secretary notes the employee's acceptance or rejection of the contract, and proceeds to the next step in the process. The spring 2015 contract cycle was the first time that Dilley ISD successfully delivered all of its contracts through this system.

Using this tool increases the efficiency of the contract process for the district by saving time to provide employees contract notices and to receive acceptable legally binding documents in return. Before this system, the superintendent's secretary spent time following up with emails and phone calls to get responses from employees and to manage all of the paper contracts. The superintendent's secretary mailed contracts to new employees outside of the district area and waited to receive the signed documents in the mail. Issues with the contract process sometimes required a special trip to the district for new employees. This distance served as a barrier to contract completion and a disincentive to accept the district's employment offer.

GROW OUR OWN PROGRAM

Dilley ISD has implemented the Grow Our Own Program to increase the number of staff with degrees to meet the continued demand for certified teachers, counselors, and school administrators. Dilley ISD established the Grow Our

Own Program to meet the district’s goal to “recruit, develop and retain exceptional staff committed to student excellence.” The district established program guidelines, an application, and a promissory note to guide and support implementation of the program. The district advertises the program as an employee benefit and uses it as a recruitment tool.

In spring 2015, the district implemented the application process. The program is open to all staff eligible to attend and meet the requirements for acceptance in an accredited college or university with a degree plan to receive a bachelors or master’s degree in an approved field. The district considers staff seeking certification in the district’s high need areas such as math, science, and counseling.

The district has committed to sponsoring ten participants, selecting a maximum of four staff each year. The district selects candidates based on the recommendation of a selection committee appointed annually by the superintendent. The recommendations are subject to approval by the school board. The district will pay tuition and fees up to \$10,000 for an undergraduate degree or \$6,500 for a graduate degree. The district will forgive the loan if, upon graduation, the staff returns to work in Dilley ISD for three years. Otherwise, the district requires the staff to repay the funds within 24 months if the staff fails to comply with or complete the requirements of the Grow Our Own Program.

DETAILED FINDINGS

HUMAN RESOURCES OVERSIGHT AND OPERATIONS (REC. 15)

Dilley ISD’s human resources function lacks structured management and formal, documented policies and procedures to efficiently and effectively manage human resources tasks.

Dilley ISD’s HR function is managed by multiple staff in the district. **Figure 4–3** shows Dilley ISD’s HR tasks by position. This figure shows that six district-level staff share HR-related responsibilities in addition to district principals and supervisors.

This HR structure has resulted in incomplete HR documents and inconsistent understanding of HR policies throughout the district. The district has multiple documents that address HR-related issues. For example, the Dilley ISD employee handbook addresses some HR topics, including employment, compensation and benefits, leaves and absences, and complaints and grievances. The district annually updates the Employee Handbook in August of each school year. The school year 2013–14 Substitute Handbook includes a welcome letter from the superintendent dated February 2014, a list of key contact numbers, some HR-related payment information, and a nondiscrimination policy statement.

**FIGURE 4–3
DILLEY ISD HUMAN RESOURCES TASK DISTRIBUTION BY POSITION
MAY 2015**

POSITION	PRIMARY HUMAN RESOURCES (HR) RESPONSIBILITY
Superintendent	Reviews recommendations to fill employee vacancies and approves job postings
	Reviews need to add new, unbudgeted positions to district
	Reviews and prepares recommendation to add a new, unbudgeted position to board of trustees (board)
	Recruits staff by attending job fairs
	Implements District Grow Our Own Program recommends to the board the candidates for participation in the program
	Establishes hiring procedures
	Establishes salaries based on board approved salary schedules
	Oversees the hiring process

**FIGURE 4–3 CONTINUED
DILLEY ISD HUMAN RESOURCES TASK DISTRIBUTION BY POSITION
MAY 2015**

POSITION	PRIMARY HUMAN RESOURCES (HR) RESPONSIBILITY
Superintendent’s Secretary	<p>Arranges for posting of positions</p> <p>Monitors the hiring process</p> <p>Receives recommendations for hire from district principals and supervisors, including the highly qualified status documentation, if applicable</p> <p>Checks criminal history of all applicants and informs superintendent of results</p> <p>Prepares board agenda for approval of recommended candidates</p> <p>Uses the new hire check list to gather new hire paperwork to forward to the business manager</p> <p>Enters applicant information in the HR data management system</p> <p>Prepares and maintains the personnel files</p> <p>Monitors expiration dates of teachers’ standard certificates</p> <p>Prepares teacher and administrator contracts with guidance from superintendent</p> <p>Collects signed contracts for filing in personnel files (electronically as of 2015)</p> <p>Collects employee appraisals at the end of the year</p> <p>Manages district records, including service records</p> <p>Coordinates training for superintendent and school board members</p>
Business Manager	<p>Establishes new staff on district’s data management system for payroll purposes</p> <p>Oversees business office records</p> <p>Manages the payroll and accounts payable functions</p> <p>Reviews need to fill staff vacancies and approves job postings</p> <p>Reviews need to add new, unbudgeted positions to district</p> <p>Prepares recommendation to add a new, unbudgeted position to board of trustees (board)</p> <p>Oversees unemployment claims process</p> <p>Oversees family medical leave requests and collects medical information</p> <p>Oversees workers’ compensation claims</p>
Payroll Clerk/Assistant Clerk	<p>Manages leave administration</p> <p>Collects absence forms from district personnel</p> <p>Gathers leave reports that are kept by district secretaries and enters them in the data management system</p> <p>Coordinates benefits program with all staff through shared paperwork</p>
Administrative Facilitator	<p>Conducts new staff orientation</p> <p>Implements Professional Development and Appraisal System (PDAS) training for new teachers</p> <p>Establishes and maintains district staff development calendar</p> <p>Implements district mentor program</p>

FIGURE 4–3 CONTINUED
DILLEY ISD HUMAN RESOURCES TASK DISTRIBUTION BY POSITION
MAY 2015

POSITION	PRIMARY HUMAN RESOURCES (HR) RESPONSIBILITY
District Principals and Supervisors	Identify and notify the superintendent of vacancies Request new, additional non-budgeted positions to superintendent Develop interview committees Screen applicants that have responded to postings Interview applicants Recommend hires to superintendent Oversee collection of employee leave information Oversee substitute use Recruits staff by attending job fairs Manages professional development at the campus level
District Secretary	Serves as backup to the superintendent's secretary, primarily handles all issues related to substitutes

SOURCE: Dilley ISD Administration, school year 2014–15.

Although the district has several documents that address HR-related issues, the district lacks a coordinated approach to HR and sufficient written policies and procedures to provide direction to staff on implementation of critical HR functions. The district's HR functions operate independently of one another, with no accountability. For example, the superintendent acknowledges that there have been some changes to procedures during his leadership; however, these changes are not sufficiently documented. Instead, staff individually note the changes that the superintendent communicates in the meetings and implement them as required. The superintendent, district administrators and staff all agree that there is a lack of sufficient districtwide written policies and procedures. Without documented policies and procedures, district staff could receive mixed communications regarding HR-related operations.

Furthermore, the payroll staff and assistant clerk provides HR-related services such as managing leave administration and benefits coordination. The district lacks documented written policies and procedures related to these areas and the payroll and accounts payable staff conducts these tasks according to their institutional knowledge. At the time of the onsite review, the accounts payable clerk had been with the district for 28 years. The accounts payable clerk backup staff person resigned from the district in June 2014, and the district filled this position in August 2014. The district leadership acknowledges there would be a potential gap in

services and knowledge if key staff were to leave the district. The support that the payroll and accounts payable function provides to HR in general overlaps with other HR functions that ensure proper payment for days of service and maintenance of accurate personnel files, service records and salary information. However, district leadership has not taken steps to document institutional knowledge in the form of written procedures or establish a succession plan.

Small school districts often distribute HR responsibilities across a variety of staff members and appoint a key staff person to coordinate the various HR activities. Dilley ISD does not provide for such coordination. The superintendent's secretary receives some HR training, via the annual Texas Association of School Personnel Administrators (TASPA) Support Staff Conference and the Texas Association of School Boards Administrative Professionals Conference. With multiple staff in the district responsible for HR-related functions, the lack of comprehensive written policies and procedures increases the district's risk of non-compliance with critical federal and state HR regulations. For example, as a state governmental entity, a school district is required to follow state law for retention of records, including retaining records related to staff for five years. However, before the district implemented the TalentED system, Dilley ISD lacked formal documentation for the records retention process for employee records. Although the district is implementing this system, the system does not eliminate the

need for documented procedures regarding records retention. The district relies solely on the memory of individual staff to remember the timeframe to transition documents for retention purposes. Since the time of the onsite review, the district adopted a records retention plan in November 2015.

The district uses the Regional Education Service Center XX (Region 20) for some of its professional development needs. However, the campus leaders manage the professional development for campus-level staff with little coordination at the district level.

Districts that manage and maintain effective and efficient HR functions do so with detailed written policies and procedures to establish consistency and reduce the risk of non-compliance with HR regulations. HR industry best practices state that policies serve several important functions. Policies enable districts to:

- communicate values and expectations for how things are done within the organization;
- keep the organization in compliance with legislation and provide protection against employment claims;
- document and implement best practices appropriate to the organization;
- support consistent treatment of staff, fairness and transparency;
- help management make decisions that are consistent, uniform and predictable; and
- protect individuals and the organization from the pressures of expediency.

San Elizario ISD's HR Department cross-trains its staff to increase department sustainability and to improve the overall effectiveness and efficiency of the department. Every three months the HR assistants report to a different specialist. The HR director instituted this rotation of assistants in an effort to expand the effectiveness of the HR Department and strengthen each employee's understanding of the process and to give each employee the opportunity for professional growth.

Manor ISD has formed a human resources advisory committee (HRAC) to provide input regarding district HR objectives. The HRAC does not develop policy but provides feedback on district policies, practices, or initiatives. The committee meets three to four times per year for approximately one hour, depending on the agenda.

To ensure coordinated HR functions and compliance with federal and state HR regulations, some small districts establish an HR generalist position or identify staff to coordinate every aspect of the HR function. This staff performs a variety of functions throughout the day. Districts with effective HR functions have staff designated to advise administrators in all HR practices, to provide information to staff about regulations and policies, and to provide general support for all HR functions.

Figure 4-4 shows the purpose, required knowledge, skills, and primary responsibilities for an HR generalist position.

Dilley ISD should assign district-level staff the responsibility to coordinate and oversee all aspects of the district's human resources function, and develop written human resources policies and procedures consistent with industry standards. This staff, along with the superintendent, should determine the level of HR involvement each position as shown in **Figure 4-3** should continue. However, the district should coordinate all HR functions through the district-level staff.

The HR generalist job description could serve as a reference point to develop the roles and responsibilities of this staff. Additionally, the superintendent should also work with Region 20 to develop the roles and responsibilities of this position based on the district's need. At a minimum, this staff should advise district leadership on all human resources-related activities, coordinate the development and distribution of district HR policies and procedures, and provide general support to the district's human resources function. The staff should coordinate support and provide direction on HR activities to include but not limited to:

- recruiting;
- retention;
- hiring;
- personnel file management;
- employee appraisals;
- professional development and training;
- benefit administration;
- employee handbooks maintenance; and
- policies and procedures update and review schedule.

Dilley ISD should continue to use Region 20 for support in HR-related activities to ensure the district maximizes its

FIGURE 4–4
SAMPLE HUMAN RESOURCES GENERALIST QUALIFICATIONS AND TASKS
JULY 2015

PURPOSE	REQUIRED KNOWLEDGE AND SKILLS	PRIMARY RESPONSIBILITIES
To facilitate the efficient operation of the district’s human resources functions and ensure quality staffing and legally sound human resources practices.	<ul style="list-style-type: none"> • Strong level of influence and negotiation skills. • Knowledge of wage, salary, and benefit regulations. • Knowledge of school district employment law and hearing procedures. • Knowledge of school district organization and operations. 	<ul style="list-style-type: none"> • Interpret and recommend personnel policies and regulations for the district. • Recruiting. • Screen, evaluate, and recommend applicants for interviews. • Assist with preparing and maintaining job documentation, job evaluation, and district compensation and classification structures. • Administer exempt and nonexempt compensation programs and ensure compliance with federal wage and overtime pay laws. • Administer and explain benefits to employees, serving as liaison between insurance carriers, accounting staff and employees. • Recommend, develop, and schedule professional development and training courses for non-academic staff. • Participate in development and execution of orientation programs and procedures for new employees. • Manage the district’s substitute program and conduct orientation sessions. • Review employee complaints and ensure accurate and timely documentation of concerns or issues. • Ensure accurate personnel files on all active and inactive employees are properly maintained. • Ensure that the employee handbook and personnel directory are established, updated and distributed annually. • Stay informed of and comply with all state and district policies and regulations.

SOURCE: Society for Human Resource Management website, July 2015.

services. The superintendent should ensure the designated staff gains the training necessary to fully execute the functions identified for the position, and prioritize the training based on the district’s needs. The superintendent should ensure this staff joins at least one HR-affiliated professional association for additional educational and networking opportunities with other HR professionals. The district should consider forming an HR advisory committee or team that includes key staff to review the district’s existing policies and procedures and establish new policies and procedures as necessary. This committee should also develop a plan to conduct the comprehensive review of these policies and procedures and establish a reasonable timeline for completion.

The fiscal impact of this recommendation assumes the district would assign an existing staff to coordinate the district’s HR-related activities. The fiscal impact assumes that the district would support this staff’s membership in an HR organization and attendance at an annual conference for a total cost \$855 (\$100 membership fee + \$755 conference registration and travel).

PROFESSIONAL DEVELOPMENT AND TRAINING (REC. 16)

Dilley ISD lacks sufficient oversight of staff development opportunities to ensure that all district staff receive notice of and attend necessary training.

The district provides professional development opportunities to instructional and some non-instructional staff. In addition, the district uses the Region 20 for some professional development. The coordination and planning of staff development differs among campus-level instructional staff and district-level staff. The Districtwide Educational Improvement Committee (DWEIC) submits the campus staff professional development calendar to the district administrative facilitator who maintains the master calendar. According to staff interviews, the district involves campus site-based decision-making (SBDM) committees in the process of selecting staff development training, with the committee soliciting recommendations from staff. The SBDM committee submits the recommendations and suggestions to the DWEIC committee for consideration.

The district begins this process in March of each school year, finishes the process in May and includes the training on the district calendar for the upcoming school year. Unless the training is required of all staff districtwide, noninstructional staff at the campus level are not included in the planning process. **Figure 4–5** shows a sample of the types of training and staff development that Dilley ISD’s campus staff attends. This sample includes staff development provided at the campus and district levels, Region 20, and conferences.

**FIGURE 4–5
DILLEY ISD SAMPLE CAMPUS-LEVEL TRAINING AND STAFF DEVELOPMENT
SCHOOL YEAR 2014–15**

TRAINING (1)	
Mentor/Teacher Training	TAP Evaluation System Training (4)
District In-Service Training	AVID Training (5)
Child Abuse Prevention Training	Region 20 Math Specialist (6)
Instructional Strategies	Texas English Language Proficiency Assessment System (TELPAS)
Conference Period District Technology Training	Gifted and Talented Training
PDAS Orientation (2)	TCEA Convention (7)
STAAR Test Administration Module Training (3)	Eduphoria Training
Texas Elementary Principals and Supervisors Association Conference	Team Building

- NOTES:
- (1) This list is a sample of trainings from staff development forms completed by staff at the individual campuses.
 - (2) PDAS=Professional Development and Appraisal System.
 - (3) STAAR=State of Texas Assessments of Academic Readiness.
 - (4) TAP is the System for Teacher and Student Advancement.
 - (5) AVID=Advancement Via Individual Determination.
 - (6) Region 20=Regional Education Service Center XX in San Antonio.
 - (7) TCEA= Texas Computer Education Association
- SOURCE: Dilley ISD, Staff Development Forms, school year 2014–15.

The superintendent’s secretary coordinates the training needs for the superintendent and the school board members but not other district-level staff. During onsite interviews, one district staff stated that “district staff are pretty much on their own” regarding staff development. District staff were not clear regarding the availability of specific training on integration of the TimeClock Plus software, the district’s time and attendance tracking software. Some district staff also said that they missed training opportunities during the year because they were not aware of the once a year training.

Figure 4–6 shows a sample of the types of training and staff development that Dilley ISD’s district-level staff attends. This sample includes staff development provided at the district level, Region 20, and conferences.

**FIGURE 4–6
DILLEY ISD SAMPLE DISTRICT-LEVEL TRAINING AND STAFF DEVELOPMENT
SCHOOL YEAR 2014–15**

TRAINING (1)	
TxEIS Position Management Training—Multiple Sessions (2)	TASBO Conference Federal Grants Management
TxEIS Human Resources: End-of-Year Contracts and Accruals	TASBO PEIMS (3) Webinar Series TASPA Conference PDAS Training (4)
TXEIS W-2 and 1099	
Texas Association of School Business Officials (TASBO) Internal Revenue Service Compliance Workshop	

- NOTES:
- (1) This list is a sample of trainings from staff development forms completed by district-level staff.
 - (2) TxEIS=Texas Enterprise Information System.
 - (3) PEIMS=Public Education Information Management System.
 - (4) TASPA=Texas Association of School Personnel Administrators; PDAS=Professional Development and Appraisal System.
- SOURCE: Dilley ISD, Staff Development Forms, school year 2014–15.

The district has not identified a position to coordinate staff development for district-level staff. The administrative facilitator is responsible for scheduling the majority of the district’s instructional staff professional development. However, the administrative facilitator does not maintain campus-level professional development records and only coordinates and tracks professional development for campus staff that is mandated for all district staff. Because staff development is not centrally coordinated, the district is unable to accurately track professional development and training hours for campus and district-level staff. The manual system to collect completed staff development forms from staff limits the district’s ability to analyze this data to identify professional development needs. The district provides staff with a paper form requesting a list of all of the trainings or workshops that staff attended during the year. The staff provides the date, training title, and total number of training hours. The staff submits the form to the campus secretary or district supervisor by a designated date in May. This process requires staff to complete this form once per school year. The

campus does not require the staff to provide the name of the training organization or individual trainer. Furthermore, the campus does not require staff to submit training completion certificates or a signed statement from staff verify completion of training. During a review of the staff professional development records, the review team noted that staff attending the same training reported different times for the class. The review team did not observe documentation verifying that the district leadership confirmed the accurate time for the classes.

Although the district provides some professional development, staff has mixed views as to the effectiveness of the professional development. **Figure 4–7** shows district and campus staff responses to the review team’s survey question related to professional development. Responses to the review team’s staff survey statement “the staff development program relevant to my position is effective,” campus staff responses to the statement were divided with 53.0 percent agreeing, while the remaining 46.0 percent expressed no opinion, disagreed, or strongly disagreed. District-level staff responses to the statement reveal a greater degree of satisfaction, with 69.0 percent to include strongly agree and agree responses.

During onsite interviews, campus staff indicated that sometimes the available districtwide professional development opportunities are not as beneficial for more experienced staff, because experienced staff are already familiar with the information covered in the trainings. Although staff understand that certain professional development is applicable to all district staff, experienced teachers expressed an interest in expanding the training offerings to allow for more departmental or advanced training at the beginning of the school year.

Dilley ISD lacks an effective process and tracking method to ensure the professional development is adequate to meet staff needs. For example, a review of the campus staff development forms indicate the district allots significant time training teachers in technology during teacher conference periods.

Since the district does not centrally collect and analyze the training information or receive training evaluation feedback from staff the district is not able to determine if this is the most efficient and effective method to present this training and ensure staff understand the information.

In the “Evaluation of Educator Professional Development Program Implemented at the Regional and Local Levels” final report prepared by the Southwest Educational Development Laboratory (SEDL) for the Texas Education Agency, expert reviewers identified eight promising practices that typify high-quality professional development practices across content areas:

- grounding training materials in current research in the areas of professional development design and implementation, area content, and teaching pedagogy;
- making direct and explicit connections between training activities and state standards;
- discussion of all instructional strategies and activities includes a rationale and an examination of context for use, with a constant relating of ideas back to classroom practice;
- using the strategy of going from “big ideas” to specific illustrative activities;
- focusing on more in-depth knowledge of a few concepts;
- using ongoing assessment to monitor progress and growth throughout the training to reinforce learning;
- inclusion of time for individual and group work to reflect and collaborate; and
- designing materials that work for participating teachers at different levels.

FIGURE 4–7
DILLEY ISD DISTRICT STAFF AND CAMPUS STAFF PROFESSIONAL DEVELOPMENT SURVEY RESULTS
APRIL 2015

RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
The staff development program relevant to my position is effective.					
District Staff	16%	53%	16%	16%	0%
Campus Staff	0%	53%	21%	21%	4%

NOTE: Totals may not sum due to rounding. Survey respondents included 32 district staff and 47 campus staff.
SOURCE: Legislative Budget Board School Performance Review, District and Campus Surveys, April 2015.

The eight features identified in the SEDL report primarily focus on professional development provided to instructional staff; however, similar standards of quality are applicable to non-instructional professional development as well. Effective districts coordinate staff development for all staff on a departmental or school level and the district level. These districts ensure that the staff development plan adheres to district priorities and effectively addresses the staff's training needs. Some districts use the Electronic Registrar Online (ERO) System available 24 hours a day, seven days a week, to track staff professional development activities. Effective districts also ensure that the professional development staff organizes specific staff development days each school year. Each staff development day would provide numerous classes geared to all staff, including teachers, paraprofessionals and classified staff. Districts also provide monthly calendars of available training and distribute evaluation forms to obtain feedback on the professional development provided.

Dilley ISD should designate district-level staff to coordinate the district's professional development efforts at the district and campus levels. The district should conduct an annual staff survey regarding staff professional development needs.

The designated staff should coordinate with campus principals and senior district staff to address instructional and district-level staff development needs. The designated staff should work collaboratively to coordinate the staff development calendar for the district, provide updates on changes to, and availability of, professional development offerings and provide this information to the campus and district leadership.

The superintendent should have the DWEIC work with the designated staff to establish an effective process to receive staff training records. This process should require staff to provide documentation verifying completion of training. This process should also establish a method for the district to electronically record the training records so the district could analyze the data to address future training needs. The superintendent should assign the SBDM committees along with the designated staff to develop a staff survey on specific needs and desires for professional development of all instructional and noninstructional staff at the campus and district levels.

This recommendation could be implemented with existing resources.

STAFF RECRUITMENT AND RETENTION (REC. 17)

Dilley ISD does not have a comprehensive plan to recruit and retain qualified staff.

During school year 2013–14, the district replaced 41 of its 161 total staff. Dilley ISD replaced the principals at the elementary, middle, and high schools. None of the campus principals have been employed with the district for longer than four years. The high school principal previously served as the principal at the former prekindergarten to grade 2 elementary campus in school year 2013–14, his first year in the district. In school year 2011–12, the former superintendent hired the middle school principal. In school year 2012–13, the district hired the elementary principal to serve as the principal of the grades 3 to 5 elementary campus. The high school will have its fifth principal since 2011–12. None of the existing principals during the onsite review remained in the same positions for school year 2015–16.

Figure 4–8 shows the teachers' years of experience and turnover rates at Dilley ISD compared to peer districts, districts served by Region 20, and the state. The district's teacher turnover rate for school year 2013–14 was 21.8 percent. In comparison, the average turnover rate for teachers in the districts served by Region 20 was 15.7 percent, and the average state rate of teacher turnover was 16.2 percent. Among its peer districts, Dilley ISD has the highest percentage of beginning teachers. The district has the second-highest percentage of teachers with less than five years of experience.

Furthermore, during school years 2012–13 to 2014–15, the district replaced the counselors at all three campuses, and no high school counselor was in place at the time of the onsite review. The middle school counselor assists with basic high school counselor functions, but receives no additional pay or stipend for these duties.

Figure 4–9 shows the results of the review team's survey about the length of employment of district and campus staff at Dilley ISD. Regarding campus-level staff, 51.0 percent of the campus staff that responded (47 total respondents) have been employed with the district for five years or less. Among the campus-level staff that participated in the survey, 67.0 percent were teachers. Staff turnover at the district level is equally high. Among the district-level staff, 51.0 percent have worked in the district for five years or less. Among the district-level staff that responded to the survey, 70.0 percent were administrative staff.

**FIGURE 4–8
DILLEY ISD TEACHERS' YEARS OF EXPERIENCE AND TURNOVER RATES COMPARED TO PEER DISTRICTS, REGION 20, AND STATE, SCHOOL YEAR 2013–14**

TEACHERS	DILLEY ISD	LYTLE ISD	CARLISLE ISD	KEENE ISD	REGION 20	STATE
Total	71.1	120.6	55.0	71.9	27,480.4	334,510.5
Teachers as a Percentage of All Staff	44.2%	47.0%	53.1%	54.3%	48.8%	51.0%
Beginning Teachers (Less than 1 Year Experience)	20.8%	14.8%	3.6%	12.4%	9.6%	8.3%
1 to 5 Years' Experience	32.8%	27.3%	25.5%	37.5%	25.2%	25.3%
6 to 10 Years' Experience	11.2%	25.5%	18.2%	12.5%	22.7%	22.8%
11 to 20 Years' Experience	9.8%	19.9%	29.1%	19.5%	27.3%	27.0%
More than 20 Years' Experience	25.3%	12.5%	23.6%	18.1%	15.3%	16.5%
Average Years' Experience	10.6	9.1	12.8	9.7	10.9	11.2
Average Years of Experience with District	7.7	5.8	6.4	7.4	7.6	7.6
Teacher Turnover Rate	21.8%	29.2%	20.3%	21.9%	15.7%	16.2%

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school year 2013–14.

**FIGURE 4–9
DILLEY ISD DISTRICT STAFF AND CAMPUS STAFF PROFESSIONAL DEVELOPMENT SURVEY RESULTS
APRIL 2015**

RESPONDENTS	LESS THAN 2 YEARS	2 TO 5 YEARS	6 TO 10 YEARS	11 TO 15 YEARS	MORE THAN 16 YEARS
How long have you been employed by Dilley ISD?					
District Staff	31.4%	20.0%	8.6%	11.4%	28.6%
Campus Staff	31.9%	19.2%	17.0%	10.6%	21.3%

NOTE: Totals may not sum due to rounding. Survey respondents included 32 district staff and 47 campus staff.
SOURCE: Legislative Budget Board School Performance Review, District and Campus Surveys, April 2015.

In addition, the lead administrators in the district, which include the superintendent, administrative facilitator (similar to an assistant superintendent in other districts) and the business manager, have all been in their positions for less than two years. The administrative facilitator served at the campus level for 29 years before becoming a district-level administrator.

Figure 4–10 shows the district and campus staff responses to the review team's survey question of whether district salaries are competitive with similar positions in the job market. Among district staff, 53.0 percent agreed or strongly agreed with the statement, and 40.6 percent disagreed or strongly disagreed with the statement. Among campus staff, 38.3 percent agreed or strongly agreed with the statement and 44.7 percent disagreed or strongly disagreed.

Figure 4–11 shows the district and campus staff responses to the review team's survey question of whether the district has an effective employee recruitment program. Among district

staff, 34.4 percent agreed or strongly agreed with the statement, while 34.4 percent also disagreed or strongly disagreed with the statement. Of the campus staff responses, 14.9 percent agreed or strongly agreed with the statement and 36.2 percent disagreed or strongly disagreed. Among the campus staff, 48.9 percent responded with no opinion to this question.

During onsite interviews, district and campus staff listed several reasons why Dilley ISD has difficulties recruiting and retaining qualified staff. The top three reasons provided were competitive salaries, the Eagle Ford Shale oil boom, and staff morale issues. Dilley ISD is located in South Texas, to the south of San Antonio and north of Laredo. Dilley ISD has traditionally focused its teacher and staff recruiting efforts in these two cities and the surrounding areas. Although Dilley ISD considers its salaries competitive with their surrounding small, rural school districts, they are not competitive with the larger urban and suburban school districts with whom they compete with for quality candidates.

**FIGURE 4–10
DILLEY ISD DISTRICT STAFF AND CAMPUS STAFF PROFESSIONAL DEVELOPMENT SURVEY RESULTS
APRIL 2015**

RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
District salaries are competitive with similar positions in the job market.					
District Staff	9.2%	43.8%	6.3%	28.1%	12.5%
Campus Staff	0.0%	38.3%	17.0%	29.8%	14.9%

NOTE: Totals may not sum due to rounding. Survey respondents included 32 district staff and 47 campus staff.
SOURCE: Legislative Budget Board School Performance Review, District and Campus Surveys, April 2015.

**FIGURE 4–11
DILLEY ISD DISTRICT STAFF AND CAMPUS STAFF PROFESSIONAL DEVELOPMENT SURVEY RESULTS
APRIL 2015**

RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
The district has an effective employee recruitment program.					
District Staff	0.0%	34.4%	31.3%	31.3%	3.1%
Campus Staff	2.1%	12.8%	48.9%	27.7%	8.5%

NOTE: Totals may not sum due to rounding. Survey respondents included 32 district staff and 47 campus staff.
SOURCE: Legislative Budget Board School Performance Review, District and Campus Surveys, April 2015.

Furthermore, limited housing is available to district staff in the area. In 2014, the South Texas Family Residential Center, a federal detainee facility, began operating in Dilley. This facility hired 600 staff, which further reduced the amount of available housing for Dilley ISD staff. As a result, some school district staff live outside the district and commute from other parts of the region. Since the time of the onsite review, at the beginning of school year 2015–16 the district purchased five mobile homes for district staff housing and placed them on district property. Currently, all five of these mobile homes are occupied by district staff. Although the district experiences challenges with recruitment and retention, the district has implemented various recruitment and retention efforts. The superintendent and campus administrators attend regional job fairs. The district posts positions on its website, with Region 20 and other trade association career sites. Regarding retention, the district offers stipends and bonuses for various roles and positions in the district. At the campus level, teachers and staff may get stipends for assuming additional duties such as department head, serving on campus or district SBDM committees, serving as class sponsors or other extracurricular activities. At the time of the onsite review, the school board had recently approved a \$2,000 stipend for teachers agreeing to teach dual credit courses. The district previously provided one-time \$3,000 signing bonuses in high need areas like math and science. However, since the time of the onsite visit, for school year 2015–16 the district began providing the \$3,000 stipend again to certified secondary math and science teachers after

completion of one year of teaching in that subject area. At the district level, a retention bonus is offered to staff who complete a full year of employment. Additionally, there is the opportunity to convert unused leave time for pay. The district previously surveyed staff regarding the provision of carpool services for commuters; however, staff expressed minimal interest. Due to the perception of fairness, district leadership has been hesitant to implement certain incentives, bonuses, or stipends, e.g., travel stipends, for staff that commute long distances, despite the fact that approximately 25.0 percent of employees commute daily from outside the Dilley area.

The district has not used relocation stipends to address the lack of housing issue. The superintendent is required to live in the district as a part of his contract. The superintendent expressed intent to require future administrators to live in the district and is willing to pay for relocation costs; however, the severe housing shortage remains an issue. At the time of the onsite review, Dilley ISD was considering purchasing property to provide subsidized housing for staff.

The district has established some new programs to improve the staff retention rates. For example, the district established a teacher mentor program that serves 15 mentees with 13 mentors. The mentors and mentees meet at least once every six weeks during the year. Mentors receive a task from the coordinator every six weeks to ensure engagement with the mentees. Mentors receive a \$500 stipend for each teacher they mentor.

Campus principals stated that they engage in a variety of efforts to retain quality staff. These retention efforts include mentoring, maintaining an open door policy, and access to quality professional development. The middle and high school principals use relationships within the district to host a team-building exercise at the beginning of the school year at the local horse stables. On the elementary campus, the principal reinstated Friday staff luncheons, implemented use of a hospitality committee to acknowledge staff birthdays and celebrations, and established a campus leadership advisory team. However, district administrators, teachers and district staff said few districtwide socials or team-building events are available to facilitate staff interaction. The district also began in school year 2013–14, providing returning staff a \$250 retention bonus in July of the school year. Since the onsite review, effective September 2015 the board approved a 457 matching program for all staff that stay with the district for three years. In addition, during school year 2015–16 the district added an Employee Assistance Program for all staff and their households.

Dilley ISD has established a goal for the district to “recruit, develop and retain exceptional staff who are committed to student excellence.” The district has not fully analyzed the effects of the district’s recruitment and retention efforts for all areas of the district. Although the district is making some effort to use stipends and bonuses to recruit new staff, there is no indication that the district receives feedback from existing district staff regarding desired retention efforts. The district has not developed a method of communication, email or written policy to inform staff of the host of incentives, stipends or staff-focused activities regarding retention. The superintendent expressed concern regarding the district’s ability to pay and commit to long-term stipends as the district faces a substantial shift downward in its budget as oil jobs decrease, which would affect the district’s tax base.

The lack of a focused recruitment and retention plan has caused inconsistency in district recruitment and retention efforts. For example, the district has successfully used signing bonuses to attract new math and science teachers; however, the district has not used commensurate financial incentives to retain the more experienced teachers in the same department. Furthermore, staff are not rewarded for assuming more responsibilities. For example, a teacher who serves as a mentor to multiple teachers receives the same stipend as a teacher who mentors one teacher. Staff that take on leadership roles, often more experienced teachers, in multiple extra-duty capacities do not receive additional

financial or other recognition. The inconsistent manner in which the district awards stipends leaves experienced teachers feeling unappreciated because some new staff receive large stipends. Meanwhile, new staff could reconsider staying in their position once the initial year recruitment stipend is no longer available.

Although the district is striving to address the issue of recruitment and retention, these efforts lack a uniform, cohesive structure. Board minutes do not provide evidence that the board discusses recruitment and retention issues. For example, the board discussion regarding the potential staff housing project at the May 2015 board meeting was in the context of the ongoing construction project work instead of recruitment and retention. Furthermore, the board discussed staff stipends, bonuses, and salaries, in relation to the budget, although all of these items affect recruitment and retention.

School districts use a wide variety of methods, both traditional and innovative, to recruit and retain staff. Although efforts may have to be modified or adjusted to accommodate a district’s size, location and resources, there are many opportunities from which to choose. In the publication *Rural Education: Attracting and Retaining Teachers in Small Schools*, by Jerry M. Lowe, researchers identify and recommend strategies for rural districts to consider, including:

- welcome accountability – “They must accept the responsibility and be willing to be held accountable for the effectiveness level of their school”;
- establish community building as a top priority – “Building community involves fostering collegiality and support among faculty and staff”;
- provide authentic mentoring for new teachers;
- invest in quality staff development;
- budget for teacher recruiting – “Even during these times when most school districts have to tighten their belts, adequate funding for an active recruiting program may be one of the most important items in a rural district’s budget”;
- focus on planning – “In rural schools where recruiting and retaining teachers can be a difficult task, it is important that planning for teacher recruiting be a continuous process ... Members of all stakeholder groups should be involved at some point in this effort”;

- offer incentives to teachers;
- develop a marketing strategy – Do not be afraid to use faculty and staff as recruiters;
- provide a school/community induction program for new teachers;
- form cooperatives; and
- do not neglect the locals – Grow your own teachers whenever possible. For example, establish teacher clubs in your schools; encourage retired teachers to return to the classroom; inform the community about alternative routes to teacher certification.

Culberson County-Allamoreo ISD faced the challenges of recruiting teachers and staff to a small rural area. Culberson County-Allamoreo ISD has met this challenge through a number of strategies to recruit qualified teachers, including:

- providing rental homes (teacherages) at a reduced rate as a recruitment tool for new teachers;
- providing signing bonuses for teachers in critical need areas and salary supplements for teachers who assume additional duties;
- promoting the state's tuition reimbursement program for teacher aide training to become teachers; and
- providing a \$500 bonus to teachers who miss two days or less per semester, or up to \$1,000 a year.

Rusk ISD, a small, rural school district, has comprehensively addressed its recruitment and retention efforts. The district implements an annual incentive stipend that applies to all staff; a performance reward plan; a teacher attendance incentive, and a longevity pay program, Rusk ISD publishes a summary of their recruitment and retention efforts on the district's website and provides details regarding each aspect of the plan online.

School districts also recognize the importance of improving and maintaining strong, positive staff morale that would help with not only recruitment efforts, but also retention. Lamesa ISD district leaders established a number of programs to help improve staff morale and engender loyalty to the district. These programs include:

- Team Lamesa, an informal district employee effort to bring staff together for camaraderie and community projects;
- a recruitment video that shares information about the community and its amenities and provides potential

employees with a glimpse of the district's facilities, staff, and students; the video is posted on Lamesa ISD's website and is readily available to anyone who might be considering employment in the district;

- onsite childcare program for preschool age children;
- after-school access to the weight room and handball court;
- exercise classes;
- leave-early passes for teachers; and
- occasional relaxed-dress day (blue jeans and t-shirt).

Dilley ISD should establish a comprehensive recruitment and retention plan that explores sustainable, innovative options and incentives for recruitment and retention of teachers and staff in small rural districts. The recruitment and retention plan should address opportunities for all staff, classified and salaried, teachers, and administrators. The plan should integrate the district hiring process and activities in recruitment efforts.

To facilitate the development of the recruitment and retention plan, the district should establish a districtwide advisory committee focused specifically on recruitment and retention. The advisory committee should involve representatives of all key stakeholders—administrators, teachers (experienced and new)—and be a diverse mix of local and non-local staff. Achieving buy in from other staff in the district would be easier if the district involves staff in the development of the plan. Selection of participants would be instrumental to successful development and implementation of the plan. As part of the inclusive process, Dilley ISD should consider conducting a survey of all district staff in the context of recruitment and retention.

As the plan is developed, Dilley ISD should consider how traditional and non-traditional strategies could best support the district's efforts. The district could consider collaborating with surrounding districts to host a targeted recruitment fair. The district could also identify incentives and/or stipends that address districtwide needs from the recruitment and the retention aspects. In addition, the district could identify incentives for existing staff that successfully recruit new staff to the district, and provide morale boosters and loyalty builders, such as an annual districtwide staff event and staff recognitions.

This recommendation could be implemented with existing resources.

HIRING (REC. 18)

Dilley ISD does not provide sufficient autonomy in hiring decisions by campus leaders.

Campus-level hiring decisions require approval from the superintendent and the board. Initially, campus leaders identify their staff needs for the upcoming school year based on new programming, resignations, and nonrenewals. The campus principals present the completed list of vacancies and staff needs to the superintendent or his designee. After the superintendent approves the recommended positions, the principal provides job postings to the superintendent's secretary who posts position vacancies. There are two ways the principal pursues potential candidates. The principal either schedules attendance at employment fairs in the region or reviews applications submitted to the district. The principal meets potential candidates and schedules interviews onsite at employment fairs (when possible) and/or in the district.

While attending an employment fair, the principal spends time in the morning talking with individual candidates and schedules afternoon interviews. Typically, only the principal is involved in offsite recruiting efforts. Senior teachers only participate in candidate interviews at the campus; however, during onsite interviews with the review team, the teachers expressed interest in participating in offsite recruiting efforts.

Principals have the authority to interview prospective candidates at employment fairs. However, the board has not granted the superintendent authority to allow principals to offer contracts or make any level of commitment with prospective candidates. This practice results in prospective candidates canceling interviews or withdrawing from the hiring process while onsite at the employment fairs because they have received an offer or commitment from another district. The principal then tries to contact the second, third and fourth prospective candidates for interviews while at the employment fair. If the principal is successful in getting a candidate to interview onsite at the fair, the principal then informs the candidate that they are interested and will follow up with them. The principal tries to schedule a second interview on campus to help the candidate experience the potential commute, if hired, and to tour the campus in hopes that the exposure increases the likelihood the candidate would accept the position.

In addition to the employment fairs, all three campuses use campus-based hiring committees. The hiring committee typically includes the campus principal, assistant principal,

department head, and one or two additional teachers in the subject matter area for the open position. Each committee operates slightly differently, but each typically meets early in the process to review applications and select interview questions. After the interview, the team discusses the applicants to identify the top candidates. The hiring committee along with the principal identifies the top two candidates for the principal to submit to the superintendent and board for approval. Each of the staff interviewed during the onsite review acknowledged frustration with the decision making process after the recommendation leaves the campus. According to onsite interviews, staff perceive that the hiring process at the campus level is effective and the teachers support the principals' efforts; however, staff perceive the lag in district-level decisions as a lack of support from the district regarding decisions made at the campus level. Campus staff feel that actions by district administration, such as the disregard of campus committee recommendations and untimely approval of recommendations, cause the district to lose quality candidates and devalues the campus hiring committee process. While district staff expressed concerns regarding the candidate approval process at the district-level, the administration in place at the time of the onsite review said that these concerns are reflective of decisions made before this administration.

The school district requires that all principals submit their candidates to the superintendent and the board for approval before they make an offer to the candidate, instead of making offers onsite at recruitment fairs like other districts. According to district staff there may be a lag of a few weeks to a month while waiting for school board meetings to be scheduled. As a result, district staff said that candidates withdraw from the process as they accept positions elsewhere. Ultimately, the district may fill its desired positions by the start of the school year, but could compromise teacher quality and experience in the process. The inability of campus leaders to make timely job offers contributes to an ineffective and inefficient hiring process. Principals must restart the process for each position where the candidate either cancels the interview or declines the offer while waiting for superintendent and board approval. The quality of available applicants decreases as positions remain unfilled. The district may not fill positions until just before school starts, affecting the ability of new staff and the district to properly prepare for the students. Additionally, the length of time from interviews to final superintendent and board approval leaves the interview committee and department heads in a bind as they await additional guidance before continuing the interview process.

Shared decision making is a product of site-based management. The 2000 report *Critical Issue: Implementing Site-Based Management to Support Student Achievement* by the Consortium for Policy Research in Education states that site-based management, also known as school-based management, is a way to structure relationships between districts and school sites in a manner that places more power, authority, and accountability in the school. Dilley ISD uses SBDM at the campus and district levels. However, due to turnover and inconsistency in district leadership, more authority remains at the superintendent level. The *Critical Issue* report states that there are varying levels and types of control in site-based decision making; but “ideally and by definition, a site-based managed school should seek to distance itself from any one specific locus of control. Rather the idea is to draw upon all members within an existing educational community as equal partners working toward a common goal: the improvement of student learning.” Just as the superintendent is the lead administrator for the district and is ultimately responsible for providing sound leadership to the district as a whole, this research further states “at a typical site-based managed school, the principal may act as team leader, organizing the various decision-making teams and committing them to agree upon goals and implementation strategies.” The research further indicates that there are two characteristics necessary for site-based management to improve student achievement. First, people on school-site councils must have real authority regarding budget, personnel, and curriculum. Second, changes must be introduced that directly affect teaching and learning. The ultimate goal of all site-based management efforts should be to improve student achievement.

Nacogdoches ISD has a recruitment program that minimizes start-of-year position vacancies. In the fall, the district targets college recruitment fairs and other opportunities. Nacogdoches ISD recruiters gather contact information from attendees who express an interest in Nacogdoches ISD. The district uses the data to compile an invitation list for the Nacogdoches ISD spring recruitment fair. At the spring fair, principals and school hiring committees attend and set up their own tables to “sell” their school to the applicants. Although the fair is focused on Nacogdoches ISD teacher recruiting, it is also open to surrounding districts.

Dilley ISD should enhance campus autonomy in the hiring process. The district should develop specific guidelines and procedures for campus leaders to follow to support greater autonomy. The district should identify and establish more

autonomous, flexible boundaries for campus leaders to act within the hiring process that provides greater comfort and confidence from the superintendent to allow campus leaders to be more proactive and responsive on recruiting trips. To further strengthen the hiring process, Dilley ISD should set clear expectations for shared decision-making in the hiring process. The district should conduct a joint workshop/training with the superintendent and campus leaders to facilitate confidence and trust between all the stakeholders. The district should conduct an additional training for the school board to ensure that the board members have a clear understanding regarding its specific role in supporting the superintendent and campus leaders in the hiring process.

Dilley ISD should review its existing procedures and practices that limit or hinder shared decision making in hiring. The district should identify those barriers and develop specific guidelines to enhance the district’s ability to hire desirable candidates.

Dilley ISD should explore efforts to involve senior campus staff in campus and districtwide recruiting. The district should use existing staff in recruiting efforts to support the hiring process and potentially improve the candidates successfully brought to the district. Other staff may be included in the recruiting process without significant additional expense to the district by using creative methods such as including staff in a recruitment video, including individual staff highlights on the website and in recruiting brochures. Additionally, the district should encourage coordination across campuses so campus leaders could share with each other regarding potential candidates for their campus.

This recommendation could be implemented with existing resources.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015-16	2016-17	2017-18	2018-19	2019-20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 4. HUMAN RESOURCES							
15. Assign district-level staff the responsibility to coordinate and oversee all aspects of the district's human resources function, and develop written human resources policies and procedures consistent with industry standards.	(\$855)	(\$855)	(\$855)	(\$855)	(\$855)	(\$4,275)	\$0
16. Designate district-level staff to coordinate the district's professional development efforts at the district and campus levels.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17. Establish a comprehensive recruitment and retention plan that explores sustainable, innovative options and incentives for recruitment and retention of teachers and staff in small rural districts.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
18. Enhance campus autonomy in the hiring process.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$855)	(\$855)	(\$855)	(\$855)	(\$855)	(\$4,275)	\$0

CHAPTER 5. FACILITIES AND SAFETY MANAGEMENT

An independent school district's facilities program is responsible for providing safe and clean learning environments. A school district's facilities include campuses, buildings, grounds, athletic facilities, portable buildings, and supplement facilities (e.g., storage, warehouses). Facilities management includes planning for facilities use, construction of projects, and maintenance of infrastructure (e.g., electrical, plumbing, irrigation, heating and cooling).

Managing facilities depends on a district's organizational structure. Larger districts typically have staff dedicated to support facilities management, while smaller districts may have staff with dual roles. For example, staff may be responsible for custodial and groundskeeping tasks. A facilities plan establishes district priorities, allocates resources and funds, and identifies milestones. Planning is based on student enrollment, campus and building capacity, facility conditions, curriculum needs, and state regulations. Management of construction and maintenance projects should include contract management, cost control, and a project schedule with defined milestones. Facilities maintenance requires a program for planned maintenance of facilities and equipment, and routine cleaning of facilities to ensure a safe environment for students and staff.

An independent school district's safety and security function identifies vulnerabilities and includes strategies to minimize risks to ensure a protected learning environment for students and staff. This protection includes a balanced approach of prevention, intervention, enforcement, and recovery. Risks can include environmental disasters, physical hazards, security threats, emergencies, and human-caused crises.

Managing safety and security initiatives is dependent on a district's organizational structure. Larger districts typically have staff dedicated to safety and security, while smaller districts assign staff tasks as a secondary assignment. Safety and security includes ensuring the physical security of both a school and its occupants. A comprehensive approach to planning for physical security considers school locking systems; monitoring systems; equipment and asset protection; visibility of areas and grounds; police and school resource officers; and emergency operations. Emergency and disaster-related procedures must include fire protection, environmental disasters, communication systems, crisis management, and contingency planning. The identification

of physical hazards must consider playground safety, and overall building and grounds safety. Environmental factors, such as indoor air quality, mold, asbestos, water management, and waste management, also affect the safety of school facilities.

One of the stated objectives of public education in the Texas Education Code (TEC) is to "provide safe and disciplined environments conducive to learning." To achieve this objective, safety and security operations go hand-in-hand with education, as districts are responsible for protecting students, teachers, and school property while also providing a positive learning environment. Working together, district leaders, campus principals, facility managers, transportation supervisors, and safety and security staff look at ways to identify risks and develop plans to mitigate threats. A safe and secure school environment as defined by the U.S. Department of Education, Title IV, Section 401, 21st Century Schools and the Safe and Drug-Free Schools and Communities Act, encompasses: communication systems, fire protection, playground safety, facility safety, environmental regulations, and emergency operation planning.

Dilley Independent School District (ISD) served a student population of approximately 1,006 students in school year 2013 –14. The district has an elementary school, middle school and high school centrally located on approximately 57 acres of land east of Interstate 35 on Texas FM 117 in Dilley.

Dilley ISD operates three instructional facilities that serve prekindergarten to grade 12. The Dilley Elementary School and Mary Harper Middle School campuses are located on the same site and are within one city block of the Dilley High School campus. The Dilley ISD athletic fields, the bus parking area, and the transportation and maintenance building are also located on the high school site. The City of Dilley sports fields are adjacent to the high school facilities. Other buildings in the district include the band hall–gymnasium that is used during the day for physical education programs and for evening athletic events; a cafeteria shared by the elementary and middle schools; an agricultural building; a criminal justice building; and a weight training room that serves as a physical training room for the sports programs.

The Dilley ISD administration building is located within walking distance of the district’s campuses. Offices and functions that are located in the administration building include the superintendent’s office, the superintendent’s secretary, the district office receptionist, and the Board of Trustees meeting space. The administration building also contains offices for support staff. Support staff include the business manager, administrative facilitator, accounts payable and payroll staff, and curriculum and testing staff.

The district employs 11 custodial staff. Eight custodial full-time-equivalent (FTE) positions perform the majority of custodial care during the evening shift, and three FTE positions work the day shift. In addition to the facilities director, two full-time general maintenance personnel and four grounds maintenance staff perform building and site maintenance. The total square footage of the district’s facilities is approximately 225,643 square feet. As a result, the district maintains a ratio of approximately 1.0 FTE custodial position per 20,513 square feet. **Figure 5–1** shows the organization of the Facilities Department.

The ages of the educational facilities range from 86 years for the band hall–gymnasium to 11 years for sections of the middle school and high school buildings. The original high school facility was constructed in 1958 and consists of approximately 46,892 square feet of educational and administrative space. At the time of the onsite review, the district was constructing a new high school that is expected to open in school year 2016–17. This project was funded by a bond election in 2013. Additional renovations funded through the 2013 bond election include:

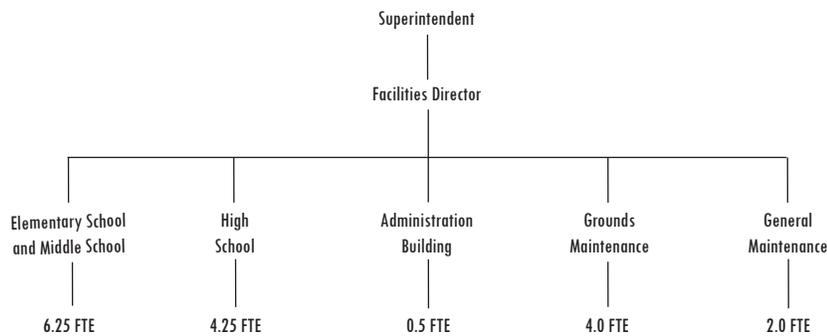
- abandonment and demolition of the original high school, gym, and band hall;
- new high school construction that includes a new cafeteria, competition gym, and locker rooms;
- site improvements that include grading to enhance drainage during storms and pavement improvements for all campuses;
- new batting cages to support the baseball and softball programs ; and
- elementary school additions and renovations.

Based on financial data reported to the Texas Education Agency (TEA), Dilley ISD spent \$1.1 million for maintenance and custodial care of the district’s buildings and sites, or 14.0 percent of the district’s general fund operating expenditures in school year 2012–13.

Figure 5–2 shows the maintenance and operations costs for Dilley ISD and its peer districts. Peer districts are Texas school districts similar to Dilley ISD that are used for comparison purposes.

Dilley ISD’s maintenance and operations costs as a percentage of the total budget are 2.0 percent higher than the average maintenance and operations costs of Carlisle, Keene, and Lytle ISDs, identified as the peer districts for this review. Dilley ISD’s per-student maintenance and operations costs are higher than those of each of the peer districts.

**FIGURE 5–1
DILLEY ISD FACILITIES DEPARTMENT ORGANIZATION
SCHOOL YEAR 2014–15**



NOTE: The head custodian is 1.0 full-time-equivalent (FTE) position fractionally assigned to the administration building and the elementary, middle, and high schools.

SOURCES: Legislative Budget Board School Review Team, May 2015; Dilley ISD, May 2015.

**FIGURE 5–2
DILLEY ISD MAINTENANCE AND OPERATIONS COSTS COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2012–13**

DISTRICT	GENERAL FUND OPERATING EXPENDITURES	PLANT MAINTENANCE/ OPERATIONS	PERCENTAGE OF TOTAL BUDGET	ENROLLMENT	COST PER STUDENT
Dilley ISD	\$7,816,812	\$1,117,718	14.0%	975	\$1,146
Carlisle ISD	\$5,424,184	\$638,523	12.0%	663	\$963
Keene ISD	\$6,809,580	\$718,599	11.0%	902	\$797
Lytle ISD	\$12,785,372	\$1,646,258	13.0%	1,736	\$948
Peer Average	\$8,339,712	\$1,001,127	12.0%	1,100	\$903
Dilley ISD Over/Under Peer Average	(\$522,900)	\$116,591	2.0%	(125)	\$243

SOURCES: Legislative Budget Board School Review Team, May 2015; Texas Education Agency Public Education Information Management System (PEIMS), school year 2012–13.

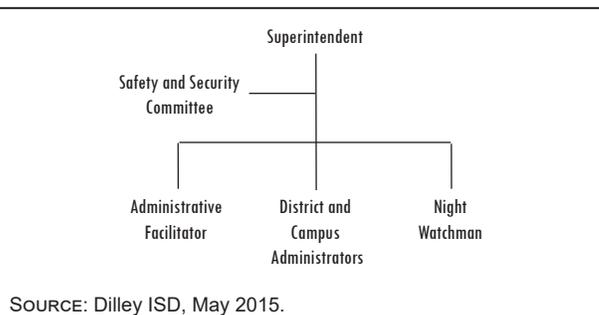
The Dilley ISD superintendent is responsible for providing a safe and secure learning environment. The district assigns safety and security functions to staff as secondary assignments. Groups and individuals responsible for safety and security functions include the administrative facilitator position, the safety and security committee, and district and campus administrators. The administrative facilitator’s safety-related functions include safety planning, coordination of safety and security audits, triennial safety audit presentations to the board and coordinating safety and security training for staff and the board.

Dilley ISD Board Policy CK (LEGAL), regarding safety program and risk management, establishes a school safety and security committee. The safety and security committee meets quarterly to discuss the district’s safety needs. The committee is also responsible for developing emergency plans; providing the district with any campus, facility, or support services information required in connection with a safety and security audit; and reviewing district reports submitted to the Texas School Safety Center (TxSSC).

The responsibilities of district and campus administrators include promoting safety awareness, training employees on safe job performance and proper use of equipment, conducting frequent safety inspections, and taking prompt corrective action to address unsafe conditions.

The district has a contract with a canine drug search vendor. After construction began on the projects funded by the 2013 bond program, the district hired a nighttime security guard. The guard reports to the superintendent and is responsible for monitoring campuses and construction equipment during noninstructional hours. **Figure 5–3** shows the district’s safety and security organization.

**FIGURE 5–3
DILLEY ISD SAFETY AND SECURITY ORGANIZATION
SCHOOL YEAR 2014–15**



FINDINGS

- ◆ Dilley ISD does not have controls in place to ensure that designated personnel monitor safety and security functions and enforce the visitor management policy during the school day.
- ◆ Dilley ISD lacks a process to evaluate and address safety and security issues identified in district safety assessments and audit reports.
- ◆ Dilley ISD is not adequately prepared for emergency situations and has not fully implemented the emergency operations plan.
- ◆ Dilley ISD lacks a clearly defined reporting and evaluation structure for custodial staff.
- ◆ Dilley ISD has not fully established work standards and schedules for custodians and does not clearly communicate responsibilities to custodial staff.
- ◆ Dilley ISD has not developed a comprehensive energy management plan.

RECOMMENDATIONS

- ◆ **Recommendation 19: Establish procedures to monitor safety functions during the school day and to implement and enforce the district's visitor management policy.**
- ◆ **Recommendation 20: Establish a process to evaluate and implement the results of district safety assessments.**
- ◆ **Recommendation 21: Amend and fully implement the district's emergency operations plan to optimally prepare for potential emergencies.**
- ◆ **Recommendation 22: Clarify the reporting relationship between district custodians, campus principals, and the facilities director.**
- ◆ **Recommendation 23: Establish districtwide custodial cleaning standards and document custodial work assignments in a custodial work schedule to ensure that the workload is balanced between staff and to support an established baseline level of custodial care.**
- ◆ **Recommendation 24: Establish a comprehensive energy management plan and conduct an assessment of district energy usage to identify opportunities for reducing energy usage and assist with long-range planning.**

DETAILED FINDINGS

SECURITY MONITORING (REC. 19)

Dilley ISD does not have controls in place to ensure that designated personnel monitor safety and security functions and enforce the visitor management policy during the school day.

The district has video cameras located on the interior and exterior of instructional and noninstructional buildings. According to the Dilley ISD Student Handbook, the district uses video and audio recording equipment to monitor student behavior on buses and campuses for safety purposes. The handbook also states that the campus principals will review video and audio recordings routinely and document student misconduct. However, the district lacks clear written guidance for daily security monitoring responsibilities.

At the middle school the principal's secretary is responsible for monitoring security cameras during school hours. Administration at the elementary and high school campuses

has not assigned a position responsibility for monitoring security cameras each day. Assistant principals at each school have access to campus security cameras and can view historical and live activity. The Dilley ISD technology director is responsible for coordinating video surveillance equipment maintenance with vendors.

The middle school secretary is responsible for monitoring security cameras through a live feed on a dedicated desktop computer monitor near her work area. However, during the onsite observations, the review team found that the secretary did not have her surveillance monitor turned on and was not monitoring campus activity. Video data is recorded on servers located on each campus for approximately two to three weeks. Campus administrators informed the review team that they review video footage as needed. However, Dilley ISD does not have standard guidelines or processes in place for monitoring security camera footage, to immediately alert staff to student misconduct or other safety and security risks.

Dilley ISD also lacks a standard process for managing visitors. Board Policy GKC (LOCAL), regarding community relations and visitors to schools, states that prominent notices shall be posted at each campus requiring all visitors to first report to the campus administrative office. The Dilley Student Handbook states that all visitors must report to the principal's office and comply with all applicable district policies and procedures. Dilley ISD provided the review team with the district's Administrative Guidelines on Sex Offenders and Campus Visitation. In addition to the board policy, these guidelines state that all campus visitors must sign or check in at the campus administrative office; list their reasons for the visits; and display their driver's licenses or other government-issued forms of photographic identification before proceeding elsewhere on campus.

During the onsite review, the review team noted that visitor management practices vary across the district. Dilley ISD campuses use the Raptor system to verify the identification of visitors. This system is a visitor management software system that scans a visitor driver's license or other state-issued identification to screen for registered sex offenders and alert staff to security concerns. The central administration building and one campus recently implemented a self-guided sign-in process, which allows visitors to sign themselves in electronically using their identification cards. The system prompts visitors to enter their destinations and the purposes of their visits. This automated system requires that visitors provide identification and state the purpose and destination

of their visit. However, two campuses have not implemented this self-guided sign-in process.

At the time of the onsite review, each campus had signs posted on external doors directing visitors to the building’s main office to verify their identification and sign in. However, implementation of the ID verification and sign-in process is not consistent across campuses. The district is aware that campuses do not consistently implement the visitor identification and sign-in process. In May 2014, the administrative facilitator reported in a school safety presentation to the board that the central office, high school, and maintenance facility failed to consistently require visitors to show ID to obtain visitors badges. The administrative facilitator also reported that all not all visitor passes stated the visitors’ destinations. As of the time of the onsite review, the district has not addressed the visitor policy enforcement issues noted in the school safety presentation.

Figure 5–4 shows the results of a survey conducted by the review team. This survey shows that 39.1 percent of campus staff and 31.4 percent of parents disagreed or strongly disagreed with the statement that safety hazards do not exist on school grounds. This response rate suggests a sizeable portion of parents and staff are unsatisfied with the district’s efforts to address safety hazards.

Failure to monitor building entrances, inconsistent enforcement of visitor policies and inconsistent security camera monitoring increases the district’s vulnerability to potential security threats.

The National Center for Education Statistics, a federal entity that collects and analyzes educational data, suggests that school systems have a surveillance camera policy. A surveillance policy outlines the appropriate reasons for using surveillance cameras, the roles and responsibilities of individuals with access to the cameras, who will have access to video footage, how long footage is kept, and how it will be destroyed.

The consulting firm National School Safety and Security Services outlines steps for reducing and controlling school access. The following are strategies for preventing unauthorized access to school facilities:

- establish a visitor sign-in, sign-out, badge issuance, and escort procedure;
- reduce the number of doors that can be opened from the outside, but which can be used as exits from the inside in the event of a fire or other emergency;
- assign responsibility for monitoring main campus doors to the campus secretaries; train all main office staff on proper procedures for allowing access;
- train all school staff, including support staff, to greet and challenge strangers, including reporting strangers to the office if they do not feel safe approaching individuals they believe to be intruders;
- train students not to open doors to strangers, other students, or even adults they may know;
- educate parents about access control procedures; and
- use magnetic locks on doors so that they close more easily.

Dilley ISD should establish procedures to monitor safety functions during the school day and to implement and enforce the district’s visitor management policy. The superintendent should develop detailed guidelines and procedures for monitoring security cameras. The guidelines should define the roles and responsibilities of individuals with access to the cameras and footage. Guidelines should also outline the number of days that video footage would be maintained and how it would be destroyed.

Dilley ISD should update the district’s handbooks and written guidelines to establish who has responsibility for enforcing visitation policies. The district should designate staff to walk through instructional and noninstructional

FIGURE 5–4
DILLEY ISD CAMPUS STAFF AND PARENT SURVEY RESULTS
SCHOOL YEAR 2014–15

GROUP	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	TOTAL RESPONDENTS
Safety hazards do not exist on school grounds.						
Campus Staff	4.4%	37.0%	19.6%	32.6%	6.5%	46
Parents	7.8%	34.3%	26.5%	22.6%	8.8%	102

NOTE: Totals may not sum due to rounding.
 SOURCE: Legislative Budget Board School Review Team, May 2015.

buildings daily to verify that exterior doors are secured. Campus staff should redirect visitor traffic to the campus administration offices to reduce entry points.

The district should provide training and education of parents, students, and campus staff on video surveillance and visitor policies through a series of open houses, assemblies, and in-service meetings.

This recommendation could be implemented with existing resources.

SAFETY PLANNING (REC. 20)

Dilley ISD lacks a process to evaluate and address safety and security issues identified in district safety assessments and audit reports.

The Texas Education Code (TEC), Section 37.108, requires school districts to conduct a safety and security audit at least once every three years and to report the audit results to the TxSSC. The TxSSC is a research center at Texas State University that disseminates safety and security information and offers training and technical assistance for kindergarten through grade 12 schools and junior colleges in Texas. The TxSSC recommends that districts conduct safety and security audits using their staff in collaboration with community partners. TxSSC recommends that the audit team is representative of stakeholders, including administrators, teachers, nurses, counselors, first responders, maintenance staff, custodial staff, transportation staff, and other district staff.

School districts are required to establish a school safety and security committee following guidelines developed by the TxSSC in accordance with TEC, Section 37.109. Dilley ISD Board Policy CK (LEGAL) requires the district to establish a school safety and security committee in accordance with guidelines established by the TxSSC. According to this policy, the committee is responsible for:

- participating on behalf of the district in developing and implementing emergency plans consistent with the district multihazard emergency operations plan to ensure that the plans reflect specific campus, facility, or support service needs;
- providing the district with any campus, facility, or support services information required in connection with a safety and security audit, a safety and security audit report, or another report required to be submitted to the TxSSC; and

- reviewing each district report required to be submitted to the TxSSC to ensure that the report contains accurate and complete information regarding each campus, facility, or support service in accordance with the center's criteria.

Dilley ISD has a safety and security committee that consists of administrators, teachers, and other district staff that meets quarterly to discuss the district's safety needs. Dilley ISD's school safety and security committee's most recent safety and security audit was presented to the board in May 2014. The superintendent submitted the audit results to TxSSC in June 2014. However, the district did not establish an implementation plan to address safety hazards identified in the audit report.

After the onsite review, Dilley ISD reported that the district safety and security committee met in the fall of 2014 to review the results of the safety and security audit. The district reported that during this meeting the committee decided which report items should be addressed immediately and which items the district could wait to address; however, Dilley ISD did not provide additional documentation to the review team.

In June 2012, Dilley ISD contracted with the Texas Association of School Boards (TASB) to complete a facility assessment. The purpose of the assessment was to evaluate the condition of the district's instructional and noninstructional buildings and identify any facility issues that could affect the safety and security of students and staff.

During the onsite observations, the review team identified many safety and security issues reported in both the 2014 safety and security audit and in the 2012 TASB facility assessment. Some of the safety and security issues identified in the audit and assessment that were still unresolved at the time of the onsite review include:

- fire code violations by chaining exterior school doors;
- lack of perimeter fencing around playground and campus instructional buildings;
- lack of designated student pickup and dropoff zones;
- exterior doors' panic bar hardware unable to lock properly;
- inadequate crosswalk conditions and absence of sidewalks for students to safely walk between buildings; and
- unsecured entrances to instructional buildings.

Without a plan to address these safety and security issues, the district exposes students and staff to potential hazards.

According to the TxSSC, following an audit, a district-level report should be presented to the board to share the audit results. The decision of what to report and how to report it to the board in a meaningful way is determined by the district's needs. Smaller districts may be able to provide a brief summary by school, campus, or facility. Presentation of the audit results to the district's board may be conducted in a closed session. These reports may contain specific vulnerabilities of a school, facility or district; therefore, it is important to limit the sharing of this information. In addition, as hazards are identified that might pose a danger to lives or property, the board is to be notified in a timely fashion, in accordance with local district guidelines. Data collected from the audits should be used to assess the safety and security of a district's facilities and address any concerns that may have been discovered. The audit is to be used as a tool to help districts develop a process and timeline to address safety and security issues.

Dilley ISD should establish a process to evaluate and implement the results of district safety assessments. The safety and security committee should meet regularly to assess the findings of safety reports. The committee should prioritize the findings into risk levels from high to low based on the degree of safety risk the findings present. The committee should then develop an action plan and an implementation schedule to address safety and security issues, beginning with those that present the greatest risk. The committee should present the action plan and schedule to the superintendent for approval. A representative of the committee should present the superintendent-approved action plan and schedule to the board. The superintendent should designate staff to be responsible for overseeing each action plan to ensure that it is completed within the scheduled period.

This recommendation could be implemented with existing resources.

EMERGENCY MANAGEMENT (REC. 21)

Dilley ISD is not adequately prepared for emergency situations and has not fully implemented the emergency operations plan.

Dilley ISD Board Policy CKC (LEGAL), regarding emergency plans, requires the district to adopt and implement a multihazard emergency operations plan (EOP) for use in the district's facilities. The plan must address emergency

mitigation, preparedness, and response and recovery. The plan must provide for:

- district employee training in responding to an emergency;
- mandatory school drills and exercises to prepare district students and employees to respond to an emergency;
- measures to ensure coordination with the Texas Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments in the event of an emergency; and
- the implementation of a required safety and security audit.

The district EOP included several components for emergency drills, but the four phases of emergency management (mitigation, preparedness, response, and recovery) were not clearly defined. The district also does not effectively monitor development of emergency preparedness teams, campus plans of action, and emergency drill implementation. The district EOP contains requirements for completing and recording drills and requirements for assessing drill effectiveness, in accordance with state law. However, the review team found the district is not consistently following the requirements in the EOP. For example:

- records of emergency drills are incomplete or missing;
- the district does not evaluate the effectiveness of each emergency drill; and
- the district does not routinely conduct emergency drills for noninstructional buildings.

The district EOP requires the superintendent or his designee to arrange for periodic disaster drills. According to the EOP, drills should address different types of disaster situations such as bus accidents, chemical leaks, weather emergencies, and lockdowns. The EOP does not address the required drill frequency for fire, evacuation, lockdown, reverse evacuation, weather, and shelter-in-place drills as required in TEC, Section 37.1081. The district EOP has procedures regarding what to do in case of fires, evacuation, lockdowns, severe weather, and shelter-in-place events, but the plan does not address how to conduct emergency drills in preparation of these events. Reverse evacuation, which is designed to move people who are outside to safety inside, was not addressed in the district EOP.

Each principal is responsible for establishing an emergency preparedness team and plan of action for the building that can be activated during a disaster. The EOP states that the emergency preparedness team should meet periodically and discuss types of disasters that could happen, and then develop plans to protect the building and occupants.

The district provided the review team with detailed emergency drill procedures for the middle school that addressed fire, tornado, emergency evacuation, and lockdown drills. Each section included the purpose of the drill, signals used during the drill, drill procedures, and the all-clear message to end the drill. The middle school emergency drill procedures also discussed procedures to follow in the event of a bomb threat that included a bomb threat checklist. The plan detailed the emergency management team for the middle school, which included the principal, assistant principal, counselor, nurse, secretary, and three teachers. The final part of the plan included a contact phone tree, leaders for crowd control, and response code. The district was unable to provide a comparable document for the elementary and high schools.

Figure 5–5 shows the drills that are required by TEC, Section 37.1081, and the Texas Administrative Code (TAC), Section 61.1036, and the frequency with which districts should conduct them, along with suggestions provided by TxSSC to make the drills as effective as possible.

Figure 5–6 shows the number of each type of drills that Dilley ISD conducted in school year 2013–14. The district did not conduct shelter-in-place, evacuation, or reverse evacuation drills on any campuses.

Dilley ISD’s lack of a strategic approach to developing and implementing effective emergency operations procedures impairs the district’s ability to react appropriately in an emergency situation.

The TxSSC recommends the following steps to ensuring that school districts have effective emergency drills:

- early in the school year, meet with the campus safety and security team to discuss the drill schedule for the year; discuss hazards, planning considerations, changes in student population from the previous year, and other concerns that should be tested; identify ways to combine drills to get the most training with the least disruption;
- have the team set a drill schedule with alternate drill dates; identify what will be practiced, who will practice, when will it take place, and how will it occur; incorporate ways to measure success;
- share emergency plans and drill options at faculty meetings, encourage staff to establish a buddy system

**FIGURE 5–5
STATUTORILY REQUIRED EMERGENCY DRILLS
SCHOOL YEAR 2014–15**

DRILL	MINIMUM FREQUENCY	GUIDANCE
Fire	One drill each month that has 10 or more school days (including summer school)	One announced drill (during first two weeks of new school year) One obstructed drill each semester One drill with special circumstances (scheduled during lunch, class change time, accountability/reunification issues, functional needs, etc.)
Evacuation	One drill each year independent of fire drill	Incorporate scenarios such as procedures associated with exiting a lockdown, sheltering, regional hazards, reunification, weather, etc. Test evacuation procedures not usually addressed during fire drills
Lockdown	One drill each year and each summer school session	Allow time after the drill for teachers and students to talk about options and safety considerations Provide ways for staff to share their concerns and those of their students with administrators
Reverse Evacuation	One drill each year and each summer school session	Consider conducting this drill in combination with other drills.
Weather	One drill each year and each summer school session	
Shelter in Place	One drill each year and each summer school session	

SOURCES: The Texas Education Code, §37.1081; the Texas Administrative Code, §61.1036; Texas School Safety Center Guidance for Schools, 2015.

FIGURE 5–6
DILLEY ISD PREPAREDNESS DRILLS
SCHOOL YEAR 2013–14

CAMPUS	FIRE DRILLS	LOCKDOWNS	SEVERE WEATHER	SHELTER IN PLACE	EVACUATION AND REVERSE EVACUATION
Elementary	9	1	1	0	0
Middle School	9	1	1	0	0
High School (1)	6	2	0	0	0

NOTE: (1) Denotes school year 2014–15 as of March 31, 2015, because school year 2013–14 high school records were not available.
SOURCE: Dilley ISD, May 2015.

to improve response, deal with emergencies, and support substitute teachers;

- plan to implement various scenarios and timing to strengthen campus response; ensure that drills are realistic and reflect the plans in place; and
- use forms such as those available in the TxSSC planning and evaluation tools to facilitate the planning and followup processes.

Dilley ISD should amend and fully implement the district's emergency operations plan to optimally prepare for potential emergencies. The superintendent should meet with principals and the safety and security committee to evaluate the EOP and determine which sections should be further developed, and which sections the district is not adequately implementing. Together, they should revise the EOP so that all sections comply with state requirements and provide a comprehensive guide to addressing emergency situations. The district should also develop a drill schedule and an assessment to be used after each drill to evaluate how well students and staff performed the emergency procedures.

Dilley ISD should train all campus principals regarding how to write, review, and update campus emergency preparedness plans. Principals should develop comprehensive EOPs for their campuses. These EOPs should be reviewed by the safety and security committee for completeness.

This recommendation could be implemented with existing resources.

LACK OF CLARITY IN STAFF REPORTING (REC. 22)

The district lacks a clearly defined reporting and evaluation structure for custodial staff.

The district has assigned 11 custodians to clean Dilley ISD's facilities. The custodians provide services at school campuses from 7:00 a.m. to 10:30 p.m. Each of the schools has a day-

shift custodian assigned to the campus. The facilities director designated the middle school custodian as the head custodian for all of the district's buildings. The day-shift custodian's primary responsibility is to maintain the restrooms and perform other cleaning assignments that can be conducted while students are present. These assignments include cleaning storage areas, cleaning floors and washing windows in common areas, and responding to the needs of the building principal and teaching staff.

The second-shift custodians work from 2:00 p.m. to 10:30 p.m., and are responsible for the majority of the daily campus cleaning, including:

- detailed cleaning of student and staff restrooms, including cleaning and sanitizing toilets, wash basins, privacy partitions, and mirrors, and sweeping and mopping floors; custodians are also responsible for removing trash and replacing supplies such as paper towels and hand soap;
- sweeping hard-surface flooring, manual wet mopping or the use of a floor machine to remove spills and stains, and vacuuming carpeted floors and removing spots; and
- cleaning and dusting floors and other surfaces, trash removal, and cleaning classroom restrooms and sinks.

Industry methods for cleaning school buildings usually consist of either area cleaning or team cleaning. Area cleaning is the more traditional approach. In this method, a custodian is assigned an area and is responsible for all cleaning tasks in this area. Responsibilities include trash removal, floor cleaning, and restroom cleaning. Team cleaning assigns responsibility for cleaning each area of a school or building to a team of custodians. One or more custodians may specialize in one aspect of the cleaning. For example, one custodian may perform floor care, while another custodian dusts and removes trash. This method makes more efficient use of

employee time and equipment; however, a potential problem with this approach is that accountability is shared among the whole team. In the event of substandard work by any of the team members, the overall quality of the work and the morale of the team can suffer.

Before school year 2014–15, Dilley ISD used the team cleaning approach for custodial care. To achieve greater accountability and promote cleaner facilities, the superintendent changed the method of cleaning to the area cleaning concept beginning in school year 2014–15.

With the change to area cleaning, the district also changed the reporting structure for custodians. Previously, custodians reported solely to the facilities director. However, beginning in school year 2014–15, custodians report to the principal at their assigned campuses when school is in session. When school is not in session (i.e., summer break or during evening hours), the custodians report directly to the facilities director.

Interviews with building principals indicate that assigning custodians to specific areas of responsibility has resulted in improved custodial care. However, staff stated that the dual reporting relationship has caused confusion regarding the reporting structure for custodians and the role of the principals and the facilities director in evaluating each custodian's performance. In interviews with the review team, staff indicated that custodians assigned to Dilley Elementary School are jointly evaluated by the principal and the facilities director. Custodians assigned to other campuses reported that the evaluation for school year 2014–15 was conducted verbally with their campus principals, without the facilities director present. As a result, some custodial staff reported that no process is in place to reconcile differences in the staff's perception of job performance and that of the campus principals. Custodians were also concerned that the input of the facilities director may not have been included in their evaluations. Before school year 2014–15, the facilities director conducted performance evaluations for custodians in the spring each school year. The facilities director provided custodians an opportunity to discuss the evaluation and to express objections.

Dilley ISD should clarify the reporting relationship between district custodians, campus principals, and the facilities director. The district should establish a clear chain of command that defines the roles of building principals and the facilities director and document the new reporting relationship. The reporting structure should clearly state that, although the building principals are the direct

supervisors of the custodians, the facilities director has authority to direct the activities of the custodians daily, during evenings, and when school is not in session.

The district should establish a process in which the facilities director periodically reviews the duties and responsibilities of the custodial staff. This review would help establish the custodial staff's duties and responsibilities and ensure that the custodial needs of the district's buildings are met.

Documentation of the reporting relationship should also include the clarification of the evaluation process. Given the dual or shared reporting relationship, each custodian's evaluation should be a cooperative effort between the building principals and the facilities director.

This recommendation could be implemented with existing resources.

CUSTODIAL WORK STANDARDS (REC. 23)

Dilley ISD has not fully established work standards and schedules for custodians and does not clearly communicate responsibilities to custodial staff.

The district has not clearly defined custodial work standards. In review team interviews, custodians and building principals indicated that the lack of defined work standards has resulted in a lack of understanding of custodian responsibilities and has negatively affected the quality of custodial care. For example, staff reported that the district instructed custodians to clean the common areas and main entryways of campuses more frequently. However, Dilley ISD has not developed a standard to clearly define the level and frequency at which the district expects the custodians to perform these tasks. During onsite interviews, the facilities director also acknowledged that responsibilities and standards are not clearly defined. Since the time of the onsite review, the district reported that the facilities completed a custodial procedures manual.

Custodians and principals reported concerns that the Facilities Department is understaffed and that the workloads are not balanced between the buildings. Although the elementary principal has established work schedules for custodians assigned to that school, schedules have not been established for custodians assigned to other campuses. The lack of custodial schedules and work standards contributes to the perception that the number of custodians working in the district is insufficient. The lack of well-documented custodial schedules does not enable the district to compare custodial workloads within campuses or across the district.

Planning Guide for Maintaining School Facilities, published by the School Facilities Maintenance Task Force, the National Forum on Education Statistics, and the Association of School Business Officials International, identifies and defines the levels of cleaning typically found in school buildings. **Figure 5–7** shows the levels of cleaning identified and described in this publication. Typical school cleaning would be in levels 2 and 3, resulting in a range between 18,000 to 31,000 square feet per custodian, depending on the use of the areas being cleaned.

Custodians' areas of responsibilities require different levels of cleaning. The amount of time districts assign to complete a work assignment can vary depending on the functional use of each area. Work schedules document each classroom or functional space that should be cleaned, the level of cleaning that each functional space requires, and the time required to clean each space. Assignments for each functional area are scheduled to ensure that custodians have sufficient time to complete the required work. The time required to complete a custodian's assignment reflects the scope of responsibilities involved in each task. Because tasks vary among assignments, the square footage assigned to each custodian often varies.

For example, a custodian who does not have any responsibility for cleaning restrooms or special education areas would have sufficient time to clean 28,000 to 31,000 square feet, compared to a custodian whose area contains these facilities and who would have sufficient time to clean less square footage.

Based on facilities data provided by the district, the combined square footage of the district is approximately 225,643 square feet. The department is staffed by 11 custodians or a base ratio of approximately one custodian per 20,513 square feet. **Figure 5–8** shows the ratio of custodial FTE positions to district square footage. The fractional position allocated at all of the campuses is the result of the head custodian having responsibilities in each building, along with being primarily responsible for cleaning the administration building. As shown in **Figure 5–8**, the square feet per custodian is within the industry standard range of 18,000 to 30,000 square feet.

The overall square footage per custodian and the number of custodians assigned per building in Dilley ISD is within the level accepted by industry standard. However, without specific schedules for each custodian, it is not possible to accurately determine if custodial workloads are balanced across the district.

**FIGURE 5–7
RECOMMENDED SCHOOL FACILITIES CLEANING LEVELS
FEBRUARY 2003**

LEVEL	SQUARE FOOTAGE PER CUSTODIAN
(1) Results in a spotless building, as might normally be found in a hospital environment or corporate suite	10,000 to 11,000
(2) The uppermost standard for most school cleaning, typically reserved for restrooms, special education areas, kindergarten areas, or food service areas	18,000 to 20,000
(3) The normal level for school facilities; acceptable to most stakeholders and does not present any health concerns	28,000 to 31,000
(4) Normally not acceptable in a school environment. Classrooms would be cleaned every other day, carpets would be vacuumed every third day, and dusting would occur once a month	45,000 to 50,000

SOURCE: School Facilities Maintenance Task Force, Planning Guide for School Facilities, 2003.

**FIGURE 5–8
DILLEY ISD CUSTODIAL STAFFING PER BUILDING
SCHOOL YEAR 2014–15**

BUILDING(S)	CUSTODIANS	SQUARE FOOTAGE	SQUARE FEET PER CUSTODIAN
Elementary and Middle Schools	6.25	124,501	19,920
High School	4.25	90,853	21,337
Administration Building	0.5	10,289	20,578
Total/Average	11.0	225,643	20,513

NOTE: Custodial staff shown as full-time-equivalent positions.

SOURCE: Legislative Budget Board School Review Team, May 2015; Dilley ISD, May 2015.

Custodial work standards are intended to ensure that all stakeholders—including custodians, occupants or users of the space, such as teachers, staff, and supervisors—clearly understand the expectations and limitations of the work that can be accomplished throughout the course of a custodian's work day. In the absence of established custodial cleaning standards and with a lack of clear communication of responsibilities, the level of custodial care may be lower than desired for several reasons, including:

- substitute custodians might not adequately clean assigned areas because expectations are not clearly defined;

cleaning frequencies may not meet, or may exceed, the needs of the educational programs. For example, auditoriums or other occasional meeting spaces might need to be checked only before their use and then cleaned to standards after their use, as opposed to daily cleaning; and

- custodial staff might fail to make necessary changes in the level or frequency of cleaning due to seasonal changes in the weather or due to weather events.
- Well-defined custodial schedules ensure that the custodians and the users of the area understand:
 - the area to be cleaned;
 - comprehensive description of the services performed;
 - the amount of time allocated to each specific task or functional area;
 - the frequency of cleaning; and
 - staff responsible.

When a custodian is absent, or a new custodian is hired, schedules help ensure that campus administrators can accurately respond to questions or concerns regarding custodial care raised by educational staff or other users of district buildings. If cleaning standards are not met, having schedules in place helps management and staff to develop corrective actions to ensure that the desired level of cleaning is consistently provided.

Dilley ISD should establish districtwide custodial cleaning standards and document custodial work assignments in a custodial work schedule to ensure that the workload is balanced between staff and to support an established baseline level of custodial care. The campus principals and the facilities director should conduct an evaluation of the areas of each campus that require cleaning to develop work standards.

Mechanical rooms, custodial closets, and storage areas should be cleaned periodically. These areas do not require daily cleaning, nor the level of cleaning required of classrooms, restrooms, locker rooms, or kitchens. Restrooms, prekindergarten and kindergarten rooms, and food service areas should receive a higher level of cleaning than other areas.

When the appropriate level of cleaning for each area has been determined, the facilities director should compare the desired levels of cleaning against the levels being provided. The facilities director should then divide the work among available staff. Staff responsibilities should be based on square footage and documented in a custodial work schedule. A work schedule will help to ensure that each custodian's workload is balanced within each campus and across the district. After the work schedules are developed, they should be distributed to ensure that all stakeholders clearly understand the level of cleaning that each area is expected to receive, and the time that is allotted for the tasks.

This recommendation could be implemented with existing resources.

ENERGY MANAGEMENT (REC. 24)

Dilley ISD has not developed a comprehensive energy management plan.

Texas school districts are required to develop energy management strategies to reduce their overall consumption of energy. TEC, Section 44.902, requires that a district's board of trustees establishes a long-range energy plan to reduce the district's annual electric consumption by 5.0 percent, beginning in the 2008 state fiscal year, and consume electricity in subsequent fiscal years at levels in accordance with the district's energy plan. In addition to this basic mandate, the plan should include:

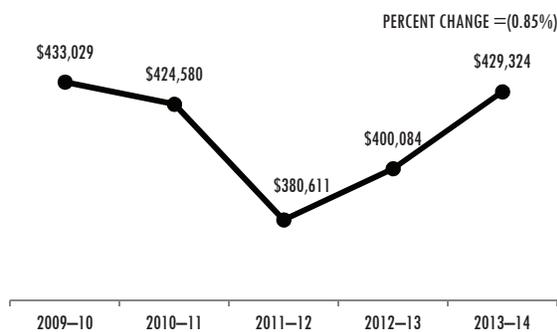
- strategies for achieving energy efficiency that result in net savings for the district, or could be achieved without financial cost to the district; and
- the initial, short-term capital costs and lifetime costs and savings that could result from implementation of each strategy.

An effective energy management plan includes strategies for using the minimum amount of energy while continuing to provide a desired level of comfort to building occupants. These strategies should include the education of building staff, enhancements to or automation of building controls,

proper maintenance of existing equipment, and installation of energy-efficient equipment as systems are replaced. Dilley ISD has not developed a comprehensive energy plan that includes these strategies or identifies actions to support the district's annual reduction in energy usage, in accordance with statute.

Figure 5–9 shows Dilley ISD's annual utilities expenditures for school years 2009–10 to 2013–14.

FIGURE 5–9
DILLEY ISD UTILITIES EXPENDITURES
SCHOOL YEARS 2009–10 TO 2013–14



SOURCE: Texas Education Agency Public Education Information Management System (PEIMS), school years 2009–10 to 2013–14.

As shown in **Figure 5–9**, Dilley ISD's utilities expenditures decreased from \$433,029 in school year 2009–10 to \$429,324 in school year 2013–14, a decrease of \$3,705, or 0.85 percent. The district's utilities expenditures increased from \$400,084 to \$429,324 from school year 2012–13 to school year 2013–14. The district's increase in its utilities expenditures could indicate that Dilley ISD lacks an effective, comprehensive plan to annually reduce its electricity usage.

Dilley ISD has not completed an energy assessment of its facilities. Although some of the district's facilities have sections that will either be demolished or repurposed, the lack of an assessment of the buildings or sections that will remain inhibits the district from identifying opportunities to reduce energy costs.

Ongoing energy reduction initiatives include the planned installation of an energy management system in the new high school, light-emitting diode (LED) lighting technology, and the use of an automated system for the control of the heating, ventilation, and air conditioning (HVAC) units in the central cafeteria. Although the district is implementing these energy-

saving measures, these initiatives are not guided by a comprehensive energy management plan. Dilley ISD has a combined total square footage of approximately 225,643 square feet. The new high school will have an estimated square footage of 88,000 square feet, and the cafeteria's square footage is 13,600 square feet. Combined, the area controlled by an energy management system will total approximately 101,600 square feet, or 45.0 percent of the district's current total.

Without a comprehensive energy management plan in place, Dilley ISD cannot identify strategic actions to support its annual reduction in energy usage and could fail to meet the statutorily required reduction of energy consumption. Furthermore, the absence of an energy management plan increases the risk that the district could engage in future energy management contracts that do not consider the district's goals and objectives.

The Texas State Energy Conservation Office (SECO) offers school districts free assessments of district facilities to identify opportunities for savings. These savings might be made available through systems retrofits or through the maintenance and operation of facilities. This service, known as a Preliminary Energy Assessment (PEA), is intended to identify and recommend cost-effective renovations, equipment upgrades, or changes to building operations that could be implemented to reduce utility consumption or utility costs. SECO provides this service at no cost to participating public entities. PEA includes:

- analysis of utility bills and other building information to determine energy and cost utilization indices for facilities;
- recommendations of maintenance procedures and capital energy retrofits that will positively affect energy consumption;
- recommendations for the development and monitoring of customized procedures to control the run times of energy-using systems;
- onsite training for building operators and maintenance staff;
- followup visits to assist with implementing the recommendations and to determine savings associated with the project;
- development of an overall energy management policy;

- assistance with developing guidelines for efficiency levels of future equipment purchases; and
- facility benchmarking using the ENERGY STAR Portfolio Manager.

Dilley ISD should establish a comprehensive energy management plan and conduct an assessment of district energy usage to identify opportunities for reducing energy usage and assist with long-range planning.

The facilities director should develop an energy management plan that includes a mission statement and specific energy conservation and building management guidelines. These guidelines should include policies for classroom temperatures and communication and enforcement strategies. The energy management plan should also include the following components:

- evaluation of installed controls to ensure that systems are functioning correctly; as part of this evaluation, the district should check independent motion detectors for controlling lights and HVAC systems, check night and weekend set-back controls, and conduct preventive maintenance tasks such as fixing leaks to reduce water consumption;
- performance of energy surveys to identify solutions for systems or operational practices that are wasting energy;
- policies for closing windows and doors and for controlling exhaust fans to reduce the cost of heating and cooling;
- a schedule for regular cleaning, maintenance, and filter changes of HVAC equipment to ensure indoor air quality and extend the equipment life;
- standards for routine maintenance that require the use of energy-efficient equipment; for example, all re-lamping or fixture replacements should be based on high-efficiency fluorescent or LED technology; and
- an incremental plan to increase staff awareness; for example, district staff should be encouraged to place equipment with high-energy use, such as coffee pots and refrigerators, in common rooms instead of keeping personal equipment in classrooms and offices.

The district should also seek assistance from SECO to obtain an assessment of its facilities.

This recommendation could be implemented with existing resources.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015-16	2016-17	2017-18	2018-19	2019-20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 5. FACILITIES AND SAFETY MANAGEMENT							
19. Establish procedures to monitor safety functions during the school day and to implement and enforce the district's visitor management policy.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
20. Establish a process to evaluate and implement the results of district safety assessments.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21. Amend and fully implement the district's emergency operations plan to optimally prepare for potential emergencies.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22. Clarify the reporting relationship between district custodians, campus principals, and the facilities director.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
23. Establish districtwide custodial cleaning standards and document custodial work assignments in a custodial work schedule to ensure that the workload is balanced between staff and to support an established baseline level of custodial care.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
24. Establish a comprehensive energy management plan and conduct an assessment of district energy usage to identify opportunities for reducing energy usage and assist with long-range planning.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 6. TRANSPORTATION

An independent school district's transportation function transports students to and from school and other school-related activities. This function is regulated by federal and Texas state laws related to funding, vehicle type, driver education, and safety issues. Districts implement these regulations, budget and allocate resources, and establish operational procedures for bell schedules, bus routes, and transportation fleet maintenance.

Managing transportation operations is dependent on the organizational structure of the district. Districts may either contract for or self-manage their transportation departments. Using a contracted management model, districts rely on the company to provide supervision of its transportation department. In this arrangement, a district may rely on the company to provide all or some staff, or may use district staff for its operations. Using the self-management model, a district operates its transportation department without assistance from an outside entity. Managing transportation operations requires planning; state reporting and funding; training and safety; and vehicle maintenance and procurement. Primary transportation expenditures include capital investments in vehicle fleets, and annual costs of maintenance and operations. State transportation funding relies on a district's annual submission of certain transportation reports to the Texas Education Agency (TEA), which is determined by a formula that includes the number and type of students transported.

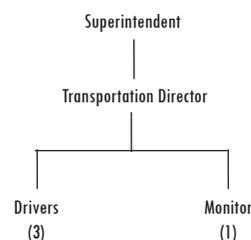
Dilley Independent School District (ISD) owns 13 buses. The district operates four active bus routes and has nine spare buses. Based on the school year 2013–14 Route Services Report for Dilley ISD, home-to-school transportation services are provided to approximately 138 regular and nine special program students for a total average daily ridership of 147 students. Two small buses (for 28 and 20 passengers) and one 71-passenger, full-size bus provides transportation to the regular education students. The special needs bus is also a small bus with a rated capacity of 24 students. The planned bus route schedule transports students to school from 7:15 a.m. to 7:30 a.m. to enable students to participate in the breakfast program before school begins at 8:00 a.m. Considering the number of students and the rural attributes of the district, all kindergarten to grade 12 students are transported together. This is also used due to the proximity

of the elementary and middle schools on the same campus and the high school's location across the street. The bus routes are scheduled such that the driver of the early route is able to complete the run and then perform a second local run, which eliminates the need for four route drivers.

The district secretary manages all extracurricular and athletic trips. Before scheduling, all trips require approval by the campus administrator and the superintendent to ensure that funding exists to support the extra trip activity. The use of a Bus Transportation Request or Transportation Request form is required for trip approval and monitoring. The transportation director schedules drivers for extracurricular and athletic trips and prepares smaller vehicles driven by other members of the staff for conferences or other district-related activities.

Dilley ISD parks all buses in an area adjacent to the athletic facility. The transportation director's office, storage area, and a light-duty work or wash bay are all located in the district's transportation facility. The Transportation Department shares this facility with the Facilities Department. Given the size of the department and the limitations of the facility, transportation staff members complete only minor maintenance on campus; all other maintenance is outsourced. The department includes a transportation director, three drivers, and one monitor. The monitor and two of the drivers serve in the classroom as a teacher, program administrator, and coach. The Transportation Department employs the remaining driver. **Figure 6–1** shows the organization of the department.

FIGURE 6–1
DILLEY ISD TRANSPORTATION DEPARTMENT
ORGANIZATION
SCHOOL YEAR 2014–15



SOURCE: Dilley ISD organization chart, May 2015.

Typical key measures of cost effectiveness for a student transportation operation include the annual and daily cost per active bus route and transported student. These metrics allow for the comparison of district costs to peer districts and typical industry standards for the pricing of contracted services. **Figure 6–2** shows the key measures of cost effectiveness for Dilley ISD.

**FIGURE 6–2
DILLEY ISD KEY MEASURES OF COST EFFECTIVENESS
SCHOOL YEAR 2013–14**

MEASURE	METRIC
Annual Cost per Transported Student	\$1,444
Annual Cost per Bus (All Vehicles)	\$16,327
Daily Cost per Bus	\$91
Buses per 100 Students Transported (Total Fleet of 13 Vehicles)	8.84
Buses per 100 Students Transported (Active Fleet of 4 Buses)	2.72

Sources: Legislative Budget Board School Review Team, May 2015; Texas Education Agency, School Transportation Operation and School Transportation Route Services Reports, school year 2013–14.

As shown in **Figure 6–2**, Dilley ISD’s cost per student is approximately \$1,444 with an annual cost of \$16,327 per vehicle. To understand the basic cost performance of the operation, the Legislative Budget Board (LBB) school review team compared Dilley ISD to its peer districts. Peer districts are Texas school districts similar to Dilley ISD used for comparison purposes. The peer districts included are Carlisle ISD, Lytle ISD, and Keene ISD. **Figure 6–3** shows Dilley ISD’s performance on key metrics compared to peer districts. Dilley ISD’s cost per student is approximately 134.0 percent higher than the peer district average of \$617. This assessment is based on the total number of buses reported in each of the fleets and not active route buses.

As shown in **Figure 6–3**, the ratio of the total number of buses in the fleet to 100 students transported is 8.84 for Dilley ISD, while the peer district average for total buses is 2.80. Based on the four active Dilley ISD route buses, the ratio is approximately 2.72 buses per 100 students.

Figure 6–4 shows population information for Dilley ISD and the peer districts. Dilley ISD serves an area with a low population density, resulting in fewer students, which

**FIGURE 6–3
DILLEY ISD AND PEER DISTRICTS COST PER BUS
SCHOOL YEAR 2013–14**

DISTRICT	COSTS	BUSES	STUDENT RIDERS	COST PER STUDENT RIDER	ANNUAL COST PER BUS	BUSES PER 100 STUDENTS TRANSPORTED	STUDENTS PER BUS
Carlisle	\$167,189	11	413	\$405	\$15,199	2.66	38
Lytle	\$577,488	20	696	\$830	\$28,874	2.87	35
Peer Average	\$372,339	16	555	\$617	\$22,037	2.80	36
Dilley	\$212,250	13	147	\$1,444	\$16,327	8.84	11
Over/(under)	(\$160,089)	(3)	(408)	\$827	(\$5,710)	6.05	(25)

NOTE: Data for Keene ISD was not available because parents provide transportation.

SOURCES: Legislative Budget Board School Review Team, May 2015; Texas Education Agency, Route Services and Operation Reports, school year 2013–14.

**FIGURE 6–4
DILLEY ISD AND PEER DISTRICTS POPULATION DENSITY
SCHOOL YEAR 2014–15**

DISTRICT	COUNTY(IES)	2014 POPULATION	POPULATION YOUNGER THAN AGE 19	PERCENTAGE YOUNGER THAN AGE 19
Carlisle	Rusk	54,000	12,474	23%
Lytle	Atascosa	47,774	13,520	28%
Peer Average		50,887	12,997	26%
Dilley	Frio	18,531	4,466	24%
Over/(under)		(32,356)	(8,531)	(2%)

SOURCES: Legislative Budget Board School Review Team, May 2015; U.S. Census Bureau Estimates, 2014.

accounts for both the higher-than-average cost per student and lower capacity utilization. The city of Dilley is located in Frio County, which has an estimated population of approximately 18,531. This amount compares to a 2014 estimate of a population of almost 54,000 for the Rusk County served by Carlisle ISD and an estimated 47,774 for Atascosa County served by Lytle ISD.

TEA's annual transportation allotment includes funding for Dilley ISD's regular and special route services. Funding for these categories is calculated by multiplying the preceding school year's linear density and cost per mile. The Texas Education Code (TEC), Section 42.155, defines regular program students as students who reside two or more miles from their school of regular attendance. The cost per mile allocation is based on data the district submits to TEA in the School Transportation Route Services Report and the Student Transportation Operation Report. Linear density of bus routes is determined based on the number of regular riders carried per mile on regular bus routes during the school year. Dilley ISD had a daily average of 147 regular and special program students transported, with a total annual mileage of 20,394 miles at a reported annual cost of \$212,250. Dilley ISD received a total allotment of \$19,152 from TEA for regular and special route services, or 9.0 percent of the total operating costs. In school year 2013–14, Dilley ISD's prior-year spending was \$220,917. The amount of state funding that a district receives for transportation is based on the lowest calculation of the actual cost per mile or the maximum amount determined in one of the seven density groupings established by TEA. In school year 2013–14, Dilley ISD's cost per mile was \$2.17 for regular program students, and its linear density was 0.66. The district received a linear density allotment of \$0.88, which resulted in a total allotment of \$17,947 for regular program transportation. The allotment for special program transportation was \$1,205. This calculation is based on the reported annual mileage of 1,116 miles and an allotment of \$1.08 per mile. **Figure 6–5** shows the calculation of Dilley ISD's total allotment.

FINDINGS

- ◆ Dilley ISD lacks complete operational procedures, guidelines, and policies to guide the delivery of transportation services, ensure compliance with rules and regulations, and support the achievement of the district's goal of safe student transportation.
- ◆ Dilley ISD's Transportation Department lacks an efficient way to communicate with its drivers for daily operational information or during an emergency.
- ◆ Dilley ISD's Transportation Department does not provide driver safety awareness or skill improvement training other than the limited training provided by the regional education service center.
- ◆ Dilley ISD's Transportation Department lacks effective maintenance management procedures.
- ◆ Dilley ISD lacks a defined and supported fleet replacement plan.

RECOMMENDATIONS

- ◆ **Recommendation 25: Develop and document departmental operational procedures to support safe and effective transportation and to ensure compliance with state and federal rules and regulations pertaining to student transportation.**
- ◆ **Recommendation 26: Investigate the cost and benefits of a two-way radio system to ensure bus-to-base communications for daily operations and during an emergency.**
- ◆ **Recommendation 27: Supplement mandated state driver training programs with periodic refresher courses to promote a culture of safety and a high level of driver skill.**

FIGURE 6–5
DILLEY ISD TRANSPORTATION ALLOTMENT CALCULATION
SCHOOL YEAR 2013–14

PROGRAM	SUBPROGRAM	ANNUAL MILEAGE	ALLOTMENT PER MILE	TOTAL ALLOTMENT
Regular Program	Home to School/School to Home	20,394	\$0.88	\$17,947
Special Program	Home to School/School to Home	1,116	\$1.08	\$1,205
Total School Year 2013–14 Allotment				\$19,152

SOURCES: Legislative Budget Board School Review Team, May 2015; Texas Education Agency, School Transportation Operation and School Transportation Route Services Reports, school year 2013–14.

- ◆ **Recommendation 28: Develop processes and procedures to schedule and track preventive and reactive vehicle maintenance.**
- ◆ **Recommendation 29: Develop a fleet management and replacement plan that determines the optimal number of buses in the fleet, sets age and mileage replacement criteria, and identifies a dedicated funding stream.**

DETAILED FINDINGS

POLICIES AND PROCEDURES (REC. 25)

Dilley ISD lacks complete operational procedures, guidelines, and policies to guide the delivery of transportation services, ensure compliance with rules and regulations, and support the achievement of the district’s goal of safe student transportation.

Dilley ISD’s website does not include any information related to the operations of the Transportation Department besides listing the department in the district’s organization. Board policies adopted by Dilley ISD’s Board of Trustees and statements in the school year 2014–15 Student Code of Conduct Handbook provide only limited guidance on transportation services. In addition, the district’s policy manual—required of every school district to ensure the district’s compliance with state and federal statute and applicable court decisions—contains only two locally developed transportation policies. **Figure 6–6** shows Dilley ISD’s transportation policies.

As **Figure 6–6** shows, Dilley ISD has not developed specific local policies that clearly define the level of services to be provided nor how those services will be delivered. In addition, the Transportation Department could not provide any defined procedures. Examples of missing guidelines include:

**FIGURE 6–6
DILLEY ISD TRANSPORTATION-RELATED BOARD POLICIES
SCHOOL YEAR 2014–15**

POLICY	SUMMARY
CNA (LEGAL): Transportation management of student transportation	<ul style="list-style-type: none"> • Defines school bus vehicle types • Establishes reimbursement for students living two or more miles from their school of attendance • Provides additional allotment for the transportation of students subject to hazardous traffic conditions within the two-mile walk zone • Directs transportation to childcare facilities and for homeless students • Regulates transportation to school activities and technology programs
CNA (LOCAL): Transportation management of student transportation	<ul style="list-style-type: none"> • Defines eligibility: The district shall not provide transportation to any student for whom it does not receive state transportation funds, except as required by law
CNB (LEGAL): Transportation management of district vehicles	<ul style="list-style-type: none"> • Authorizes school bus purchase or lease • Requires school buses operated by the district to be maintained and inspected as required by the Texas Transportation Code, Chapter 548
CNB (LOCAL): Transportation management of district vehicles	<ul style="list-style-type: none"> • Regulates nonschool, emergency, and school-related use of district vehicles
CNC (LEGAL): Transportation management of transportation safety	<ul style="list-style-type: none"> • The district shall meet or exceed the safety standards for school buses established by the Department of Public Safety (DPS), with the advice of the Texas Education Agency • The district may not require or allow a child to stand on a moving bus or passenger van (The Texas Education Code, §34.004) • An operator may not use a wireless communication device while operating a motor vehicle within a school crossing zone or on the property of a public elementary, middle, junior high, or high school served by a school crossing zone, during the time a reduced speed limit is in effect for the school crossing zone, unless: <ul style="list-style-type: none"> ○ the vehicle is stopped; or ○ the wireless communication device is used with a hands-free device • An operator may not use a wireless communication device while operating a passenger bus with a minor passenger on the bus unless the passenger bus is stopped (The Texas Transportation Code, §§545.425 and 545.4252)

NOTE: Board policies are based on policies provided by the Texas Association of School Boards.
SOURCE: Dilley ISD Board Policy Manual, 2013.

- ride time guidelines that define the maximum time that a student is expected to be riding while being transported to or from school;
- route planning and management procedures that are intended to ensure that the routes are planned in a manner that supports service efficiency and cost effectiveness;
- bus stop and loading zone procedures and responsibilities to ensure that all stakeholders, including the drivers, students, school staff, and parents, clearly understand loading and unloading procedures to ensure student safety as they board or exit the bus; and
- well-defined operational or departmental management procedures, such as for the maintenance of the vehicles to ensure that maintenance schedules are met and the vehicles are maintained at or above industry standards to promote safety and operational efficiency.

The Dilley ISD Student Code of Conduct Handbook discusses student behavior expectations and how the district may restrict or revoke transportation privileges for failure to meet those expectations. However, the handbook does not describe procedures for the provision of transportation services. For example, no specific procedures are documented describing the safety of students at the school bus stop or around the school bus during the loading and unloading processes. Although this information is provided to school bus drivers in the 2009 Texas School Bus Driver Recertification Course Participant Handbook, Module 6, the district does not appear to have an established procedure for sharing information with students and parents. Additionally, the result of the lack of departmental procedures is that transportation is provided without a clear departmental or organizational structure. Effective and efficient districts organize around the following four key functional areas: route planning and management; time keeping and attendance; operations including dispatch, on-road supervision, service monitoring, training, and compliance; and fleet management and maintenance.

The goal of any school transportation organization is the safe transportation of its students. The development and adoption of safety-related policies and procedures help to ensure that all transportation staff are aware of the safety standards, rules, and regulations that are intended to promote student safety. In the absence of such policies, departmental staff might unknowingly violate student transportation rules and regulations and might place the district in an untenable

position in the event of an accident or incident involving a school vehicle. As an example, Dilley ISD has developed a pretrip inspection form, but the district has not implemented a mandated pretrip process including recording the results of the inspection. If a Dilley ISD school bus were involved in an accident, it would be difficult to prove that the bus was inspected before each bus run and that safety-related defects were proactively identified and mitigated.

Best practices dictate the development and adoption of transportation policies and procedures to:

- define expectations so that services are provided consistently and equitably;
- clearly establish how services are to be delivered within state and local parameters for eligibility, within safety standards, and for exceptions to the policy based on safety or other considerations; and
- establish the responsibilities of all stakeholders of the service including drivers, bus monitors, school staff, students, and parents.

Other school districts have developed comprehensive transportation policies. Austin ISD's website shows on its Transportation Department page links to regular and special needs policies and procedures. Each of the policy areas are available in English and Spanish, helping to ensure that useful and important information is provided to members of the community. Using Austin ISD's regular route service policy statement as an example, the document serves to clearly establish:

- eligibility, including transportation for students living in areas that would require students walking in areas where hazardous traffic conditions are present;
- scheduling guidelines with the goal of minimizing ride times as much as possible;
- bus stop location policies, including:
- limits on the number of stops to minimize ride times;
- a policy of locating stops off of main roadways for student safety; and
- assessing walk-to-stop distances by grade level.

These and other examples can be found on the department's homepage at www.austinisd.org.

Dilley ISD should develop and document departmental operational procedures to support safe and effective

transportation and to ensure compliance with state and federal rules and regulations pertaining to student transportation.

The process for implementation should include:

- reviewing and documenting Dilley ISD practices to assess compliance with the district's legal and local policies and compliance with state and federal rules and regulations; this initial step would also help to ensure that the function of providing transportation considers the core elements of an efficient department; and
- documenting key safety-related policies and procedures, including pretrip and post-trip inspections, railway crossing procedures, loading zone procedures, and departmental training policies as a first priority, and establishing ride time goals, loading parameters, and processes for monitoring and reporting performance.

This recommendation could be implemented with existing resources.

BUS-TO-BASE COMMUNICATIONS (REC. 26)

Dilley ISD's Transportation Department lacks an efficient way to communicate with its drivers for daily operational information or during an emergency.

During the onsite review, the review team observed that the buses and other vehicles used to transport students do not have two-way radios or other types of communication devices. As a result, all on-road communications rely on the use of personal cellular telephones. Although the district's policy clearly prohibits the use of a wireless communication device while operating a passenger bus with a minor passenger on the bus unless the passenger bus is stopped, staff indicated in interviews that no further departmental or district policies or guidelines have been developed for the use of cellular telephones by school bus drivers. A radio tower located behind the district's administration building is not in use, although it has the capability to support two-way communications. During the onsite review, the review team learned that the tower was used for intradistrict communication before the district was wired for Internet access.

The use of cell phones presents operational risks in several areas, including:

- failure of the cellular device or the inability of the device to connect to the network;

- inability of communications to be monitored by multiple base stations in the event of a major accident or incident; first responders on dedicated channels can monitor two-way devices; and
- improper use of a cell phone by the driver when students are on board the vehicle.

Two-way communications between dispatchers or management and bus drivers supports school bus safety and efficient school bus operations. This communication is important during a bus accident or incident and during a weather-related or other emergency within the community. Cell phones might be necessary for communication in some areas of a district or for buses that are on extended-distance, extracurricular or athletic trips. However, the use of cell phones in lieu of installed two-way communication devices limits drivers' ability to communicate in a timely manner because they may use these devices only when the buses are stopped or when no students are on board. Additionally, because the law allows the use of cell phones while the bus is in motion absent students being on board, this use could become a distraction and present a safety risk for the driver and other vehicles on the road. The improper and illegal use of a cell phone by a school bus driver has been cited as the cause of December 2014 fatal accident in Knoxville, Tennessee.

Dilley ISD should investigate the cost and benefits of a two-way radio system to ensure bus-to-base communications for daily operations and during an emergency.

Dilley ISD should begin the process by reviewing the two-way system in use by the City of Dilley and the city's departments of public works, police, fire, and other public or private entities that use two-way radios for communications. Additionally, the district should investigate opportunities to join a countywide consortium to reduce costs. These steps should also include determining the viability of the use of the radio tower that is installed behind the district's administration building and how its use (by either the district or shared with other entities) may reduce the cost of installing a radio system. School safety grants may be available to the district. The Federal Emergency Management Agency–Homeland Security Grant Program is a source that could be considered to begin the search for possible grant-funded opportunities.

No fiscal impact is assumed for this recommendation. If the district decides to implement a two-way system, the cost would be based on grant and collaborative opportunities, and the topographical characteristics of the area served.

Figure 6–7 shows Wichita Falls ISD’s request for proposal for the initial cost of installation and annual service for their two-way radio system. A request for proposal is a written request asking contractors to submit specifications and prices that fit the districts requirements.

**FIGURE 6–7
EXAMPLE OF A TWO-WAY RADIO SYSTEM PURCHASE
SCHOOL YEAR 2012–13**

DESCRIPTION (UNITS)	COST PER UNIT	TOTAL COST
Narrow Banding License (3)	\$750	\$2,250
Repeater (2)	\$2,800	\$5,600
Base stations (2)	\$560	\$1,120
64 channel radios (16)	\$340	\$5,440
Repeater antennas (2)	\$1,200	\$2,400
Labor	\$4,500	\$4,500
Total Installation		\$21,300
Annual service at \$85 per hour (20 hours)	\$85	\$1,700

SOURCES: Legislative Budget Board School Review Team, May 2015; Wichita Falls ISD, school year 2012–13.

DRIVER TRAINING (REC. 27)

Dilley ISD’s Transportation Department does not provide driver safety awareness or skill improvement training other than the limited training provided by the regional education service center.

The district relies solely on the driver training programs provided by the state’s regional education service center. The department does not provide any safety awareness, defensive driving, skill improvement, or student behavioral management (for transportation-related issues) training. During the onsite review, transportation staff noted that they did not know what additional driver training they should attend. As prescribed by the Texas Department of Public Safety (DPS), new bus drivers are required to complete a 20-hour initial certification class, and all bus drivers are required to complete a refresher course every three years. The Regional Education Service Center XX (Region 20) in San Antonio provides these courses at a cost of \$100 for new drivers and \$50 for drivers requiring a refresher course. All district bus drivers meet these certification requirements.

The lack of additional training for drivers means that a school bus driver may provide transportation service for three years without any discussion or reminders of the steps to ensure student safety. The National Association of State Directors of Pupil Transportation Services recognized the importance of

ongoing school bus driver training and stated the following in the 2000 position paper *School Bus Drivers—Their Importance and Training*: “A modern, safe, well-maintained school bus operating on the best possible terrain with ideal loading zones cannot compensate for an ill-trained school bus driver.”

No national standards mandate periodic training programs for school bus drivers. However, DPS describes the necessity for providing regular training in its *Texas School Bus Driver Recertification Course*. Examples of the benefits of regular training include:

- periodic training helps drivers to retain critical operational and safety-related information that was provided during the refresher course or previous training sessions;
- regular training keeps drivers informed of changes in technology and rules and regulations regarding the operation of school buses; and
- periodic review of district policies and procedures and industry best practices can help to reduce the complacency that can occur in any profession or industry.

Dilley ISD should supplement mandated state driver training programs with periodic refresher courses to promote a culture of safety and a high level of driver skill.

To support a regular and consistent training program for Dilley ISD drivers, the district should consider the following steps:

- The transportation director along with the superintendent should ensure that departmental training initiatives are supported, ensuring that all bus drivers are required and permitted to attend training programs. For example, it is common for smaller districts whose employees have multiple roles within the district to have schedule conflicts when training programs are provided; therefore, professional development programs should be scheduled in a manner that allows staff to attend transportation-related training programs periodically.

The transportation director should investigate the resources available to develop an effective training program. One resource is a safety program developed by the National Highway Transportation Safety Administration (NHTSA). NHTSA has produced a *School Bus Driver In-Service Safety Series* that is available for use without charge to support

transportation supervisors in the effort to provide useful training and skills improvement information to drivers. This information is available at www.nhtsa.gov. The material includes an instructional guide, a presentation, and handouts.

Training topics include:

- driver attitude;
- student management;
- highway–rail grade crossing safety;
- vehicle training;
- route knowledge;
- loading and unloading procedures;
- emergency evacuation;
- transporting students with special needs; and
- driving in adverse weather conditions.
- In addition to the materials provided by the NHTSA, regular training topics should include safety-related concerns that are unique to Dilley ISD (i.e., truck traffic influenced by local industries or where route paths should be changed to improve student safety).
- The mandated three-year refresher courses and the periodic training programs should be well-documented and archived to ensure that the district can provide proof of diligence in providing drivers with safety-related and skills improvement training if a district vehicle is involved in a traffic accident.

This recommendation could be implemented with existing resources.

FLEET MAINTENANCE MANAGEMENT (REC. 28)

Dilley ISD's Transportation Department lacks effective maintenance management procedures.

The transportation director is responsible for managing the daily operation of buses and for overseeing fleet maintenance activities. Local vendors conduct most of the fleet maintenance activities. During the onsite review, the review team learned that the transportation director does not have a systematic method to determine when a school bus will require maintenance. The director tracks and schedules maintenance based on the oil service reminder that is placed on the vehicle by the local repair shop for service at intervals of either 3,000 or 5,000 miles between oil changes, depending on the type of vehicle. The district uses the K12 tracker, a

work order processing and tracking software system to manage service and repairs in the Facilities and Technology departments. However, this system is not used in the Transportation Department. When the transportation director has the vendor perform preventive or reactive services or repairs, he records it in a spreadsheet. Although this spreadsheet provides the district with a repair history by vehicle, the transportation director has only served in the position for the last two years, which limits the historical data that is available. Before the director's tenure, maintenance was not tracked. During the onsite review, the Transportation Department was not able to produce any vehicle maintenance records.

Additionally, the district lacks a well-defined process for reporting mechanical defects. Without such a process, necessary repairs may not occur. An example arose during the onsite review when the stop arm on one of the buses failed to extend during the observation of bus routes by review team members. An additional observation on the same bus found that the padding attached to the bulkhead immediately behind the driver's seat was detached from the top mount. In the event of an accident, the padding could detach and impede either the exit from the front door or the bus driver's ability to rapidly assist students in the evacuation of the vehicle.

In the absence of a well-defined preventive maintenance program and with the delegation of maintenance activities to repair facilities, maintenance work is performed at the discretion of the repair facilities with little direction from the district. Given the size of the district's facilities and the small size of its bus fleet, the outsourcing of fleet maintenance services is a reasonable approach to maintain the fleet. However, the lack of data and the lack of a process to track work and cost performance in addition to the use of the vendor's service reminder make it impossible for the district to analyze the costs and benefits of outsourced services.

Without a well-defined and enforced mechanical defect reporting process, necessary repairs may go unnoticed or forgotten. The result could be a district vehicle operating in a less than desirable condition or, in an extreme case, in a condition that is considered unsafe or below desired district standards.

The National School Transportation Specifications and Procedures publication adopted by the 15th National Congress on School Transportation defines a preventive maintenance program as a "carefully organized system of

inspections at regular mileage or time intervals combined with the immediate attention to all reported defects.” Effective preventive maintenance is intended to proactively identify and replace worn or defective vehicle components at the earliest stages to help to reduce costs, and also to identify and correct mechanical defects before a failure results in a service disruption. The proactive repair or replacement of a defective part or system helps to prevent more costly repairs of the part or system and other components that also may become compromised. A well-established preventive and reactive maintenance program supported by a process for tracking the type and cost of repairs provides the data necessary to guide fleet replacement decisions. Furthermore, the tracking of both preventive and reactive maintenance helps to ensure that the district can prove that vehicles are being maintained to meet manufacturer, state, and federal guidelines regarding school bus maintenance. This documentation can be especially important in the event of an accident or incident where a vehicle’s condition may be reviewed or investigated as a contributory cause of the accident.

It is common industry practice to schedule preventive maintenance services using a multitiered approach based on the manufacturer’s recommendations to scheduling services. For example, top-level services typically include routine and frequent services such as engine oil and filter changes and general vehicle inspection; other levels of inspection might include more detailed services that are performed at greater mileage intervals or annually. The National School Transportation Specifications and Procedures publication also provides useful information on the type of data that is necessary to include in each vehicle’s maintenance record. This data includes:

- description of the vehicle and its equipment (i.e., model year, wheelchair lifts, air conditioning, etc.);
- description of either the reactive or preventive maintenance performed by date and mileage; and
- record of the cost of labor, parts, and supplies.

The Maintenance Management and Safety Guide from the Texas Department of Transportation (TxDOT) provides further information that can be useful in developing preventive and reactive maintenance programs. This guide is available at www.dot.state.tx.us.

Dilley ISD should develop processes and procedures to schedule and track preventive and reactive vehicle maintenance.

Dilley ISD should investigate the resources that are available from its bus or parts suppliers. Major bus and power train manufacturers offer online maintenance tracking software that the district could use.

Other options are to explore the expanded use of the K12 Tracker system that is in use to track facility and technology work requests, or to establish a preventive and reactive maintenance tracking system based on common productivity software. Any system that is considered or developed should allow the data to be analyzed to support costs and performance analysis and reporting. The district should consider hosting the system on a central server to back up the data.

After a system is developed or chosen, the transportation director should document each vehicle in the district’s fleet with its specific recommended preventive maintenance schedule. This step would ensure that all maintenance is performed to the specifications and requirement of each type of vehicle and not to a generalized scheduled that may not be sufficient for each type of vehicle. Training should be provided to support and promote the system’s use and effectiveness.

This recommendation could be implemented with existing resources.

FLEET REPLACEMENT PLANNING (REC. 29)

Dilley ISD lacks a defined and supported fleet replacement plan.

Dilley ISD has 13 school buses with an average fleet age of 13 years. The district has nine spare buses to support the four active bus routes. The district’s fleet age ranges from 25 years to a two-year-old, small, special education bus. Five of the buses, or 38.0 percent, are 15 years or older. Dilley ISD has a spare-to-route bus ratio of 225.0 percent. Smaller districts typically have a higher ratio of spare-to-active buses to have ready replacements in the event of mechanical failures and for extracurricular trips. The typical active-to-spare ratio is from 10.0 percent to 15.0 percent. Interviews with the superintendent indicate that the district plans to add buses to the next bond issue. However, no indication was provided as to how many buses would be purchased in any year or the criteria that would be used to make replacement decisions. The district does not have a defined replacement policy, corresponding replacement plan, or a replacement process that considers either vehicle age or mileage.

Without a defined and supported replacement plan and a dedicated funding source, the average and maximum ages of

a district’s fleet of vehicles is likely to increase. Although interviews with principals indicate a high level of satisfaction with the service provided by the Transportation Department, maintaining an acceptable level of service is likely to result in increased costs due to higher maintenance costs for older buses. **Figure 6–8** shows the age of the district’s bus fleet compared to industry standards.

**FIGURE 6–8
DILLEY ISD FLEET AGE AND SPARE FLEET RATIO
SCHOOL YEAR 2014–15**

METRIC	INDUSTRY STANDARD	DILLEY ISD
Average bus age	6 years	13 years
Maximum bus age	12 to 15 years	25 years
Percentage of active to spare buses	10.0% to 15.0%	225.0%

SOURCES: Legislative Budget Board School Review Team, May 2015; Dilley ISD, May 2015; National Association of State Directors of Pupil Transportation Services, 2002.

Dilley ISD’s bus fleet measures higher than the expected ranges for the average age of the fleet, age of individual buses, and the number of spare buses. The National Association of State Directors of Pupil Transportation Services report “School Bus Replacement Considerations,” 2002, concludes that the failure to replace buses based on a combination of miles or age results in increased costs and potentially higher rates of mechanical failure as the buses continue to age. Additionally, the report suggests a maximum age of 15 years for large buses and a maximum age range of 8 years to 10 years for small buses. According to surveys conducted by the trade publication School Bus Fleet, the average age of school bus fleets continues to rise. In 2013, the average age was 9.3 years; however, that age is less than the Dilley ISD average of 13 years.

Figure 6–9 shows the Texas Comptroller of Public Accounts’ best practice example for vehicle replacement planning by outlining the analytical and budgetary processes that should be followed while developing a replacement plan.

Dilley ISD should develop a fleet management and replacement plan that determines the optimal number of buses in the fleet, sets age and mileage replacement criteria, and identifies a dedicated funding stream.

Using the planning process shown in **Figure 6–9**, Dilley ISD should begin developing a replacement plan by determining a standard for vehicle replacement based on reasonable mileage and age standards. In consideration of the number of

**FIGURE 6-9
SAMPLE VEHICLE FLEET MANAGEMENT PLAN, TEXAS
PROCUREMENT AND SUPPLIER SERVICES
MAY 2010**

New requirement/replacement analysis

- Develop replacement criteria
- Evaluate fleet vehicle use and type
- Conduct fleet size evaluation
- Develop recommendations for new or replacement vehicles

Budgeting

- Reconcile recommendations with budget
- Request funds in budget requests
- Receive authorization to purchase

Acquisition

- Purchase vehicle
- Lease vehicle
- Accept donated vehicle
- Incorporate seized vehicle

Vehicle preparation

- Receive vehicle
- Register vehicle
- Prepare or retrofit vehicle
- Assign vehicle
- Enter vehicle into fleet management system

Fleet operations

- Vehicle maintenance and repair
- Warranty service
- Preventive maintenance
- Unscheduled maintenance
- Roadside assistance
- State vehicle inspection
- Trip logging
- Retail fuel purchasing
- Bulk fuel purchasing
- Alternative fuels

Fleet management

- Data analysis and reporting
- Vehicle utilization
- Vehicle disposition
- Driver and vehicle safety: qualification, training, certification, accident reporting

SOURCE: Texas Comptroller of Public Accounts, May 2010.

spare vehicles in the fleet, the next step is to determine the optimal number of spares that the district requires to support an effective preventive maintenance program (allowing for route buses to be removed from daily service to support maintenance activities), and to support extracurricular and athletic trips. TxDOT’s Maintenance Management and Safety Guide recommends that a five-year plan is developed and updated annually or as conditions warrant.

Although no fiscal impact is assumed for this recommendation, **Figure 6–10** shows an example replacement plan. The replacement plan would begin with the replacement of two buses per year, based on an estimated cost of \$93,252 per bus. Following the industry-suggested 15-year replacement cycle, the district has five buses due for replacement. The plan shown in **Figure 6–10** assumes the replacement of the two oldest buses (1990 and 1992 models) immediately for a total cost of \$186,504. The next two oldest buses (both 1997 models) would be replaced in 2016 for a total cost of \$192,100. Replacements in each of the following years would follow this trend by replacing the oldest buses in each fiscal year. The increase in purchase price is assumed to be 3.0 percent per year for each year of the plan. **Figure 6–10** also shows that the number of buses requiring replacement begins to decrease in 2018, resulting in a reduction in the annual replacement amount. For each of the fiscal years where no replacements are necessary, funding could be set-aside to establish a dedicated transportation funding account to support the budgeting process and ease the financial requirement for any fiscal year. For example, although no buses are required for replacement in 2019, 2020, 2023, and 2024, approximately \$60,000 would be encumbered for bus purchases. The result is that, even though approximately \$111,348 and \$149,236 would be required for bus purchases

in school years 2021–22 and 2022–23, a dedicated funding source or fund balance would limit the actual funding required in each fiscal year to approximately \$60,000. As previously stated, any replacement plan should be evaluated annually and adjusted as needed. It is also important to note that if the district were able to reduce the number of spare buses that it requires, the budgeted amount per year also would be reduced.

Since the onsite review, the district provided a list of buses, vehicles and equipment by year of proposed replacement. However, the district has not determined the optimal number of buses in the fleet, and the list lacks set age and mileage replacement criteria.

**FIGURE 6–10
DILLEY ISD SAMPLE FLEET REPLACEMENT PLAN
EXCLUDING REDUCTION IN SPARE BUSES
FISCAL YEARS 2015 TO 2024**

FISCAL YEAR	BUSES	REPLACEMENT COSTS	FUNDING REQUIRED	FUND BALANCE
2015	2	\$186,504	\$190,000	\$3,496
2016	2	\$192,100	\$190,000	\$1,396
2017	2	\$163,297	\$190,000	\$28,099
2018	1	\$66,297	\$60,000	\$21,802
2019			\$60,000	\$81,802
2020			\$60,000	\$141,802
2021	1	\$111,348	\$60,000	\$90,454
2022	2	\$149,236	\$60,000	\$1,218
2023			\$60,000	\$61,218
2024			\$60,000	\$121,218
Totals	10	\$868,782	\$990,000	\$121,218

SOURCES: Legislative Budget Board School Review Team, May 2015; Dilley ISD Transportation Department, school year 2014–15.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015-16	2016-17	2017-18	2018-19	2019-20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 6. TRANSPORTATION							
25. Develop and document departmental operational procedures to support safe and effective transportation and to ensure compliance with state and federal rules and regulations pertaining to student transportation.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
26. Investigate the cost and benefits of a two-way radio system to ensure bus-to-base communications for daily operations and during an emergency.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
27. Supplement mandated state driver training programs with periodic refresher courses to promote a culture of safety and a high level of driver skill.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
28. Develop processes and procedures to schedule and track preventive and reactive vehicle maintenance.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
29. Develop a fleet management and replacement plan that determines the optimal number of buses in the fleet, sets age and mileage replacement criteria, and identifies a dedicated funding stream.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 7. COMPUTERS AND TECHNOLOGY

An independent school district's technology management affects the operational, instructional, and financial functions of a school district. Technology management requires planning and budgeting, inventory control, technical infrastructures, application support, and purchasing. Managing technology is dependent on a district's organizational structure. Larger districts typically have staff dedicated to administrative or instructional technology responsibilities, while smaller districts may have staff responsible for both functions.

Administrative technology includes systems that support a district's operational, instructional, and financial functions (e.g., financial management, human resources, payroll, student attendance, grades, and Public Education Information Management System (PEIMS) reporting). Administrative technology improves a district's operational efficiency through faster processing, increased access to information, integrated systems, and communication networks. Instructional technology includes the use of technology as a part of the teaching and learning process (e.g., integration of technology in the classroom, virtual learning, and electronic instructional materials). Instructional technology supports curriculum delivery, classroom instruction and student learning.

Texas state law requires school districts to prepare plans that include the integration of technology with instructional and administrative programs. A plan defines goals, objectives, and actions for technology projects; assigns responsibility for implementation steps; and establishes deadlines. The state provides a tool for planning and assessing school technology and readiness, which identifies performance measures for teaching and learning, educator preparedness, administration, support services, and infrastructure.

Dilley Independent School District's (ISD) Technology Department is responsible for implementing and maintaining the technology infrastructure and telecommunications capabilities of the district. For infrastructure, this responsibility includes deployment, maintenance, and support of the server environment (network, application, and database), computers (desktop, laptop, and tablet), and printers (local and networked). For telecommunications, this responsibility includes deployment, maintenance and support of the telephone circuits, telephones,

telecommunications servers, communications switches and routers, Internet circuits, firewalls, and content filters.

The technology director leads Dilley ISD's Technology Department and reports to the district's administrative facilitator. The Technology Department's staff consists of two computer technicians that provide support for the entire district and who report to the technology director. In addition, a paraprofessional provides technician services to the middle school campus and reports to the middle school principal. The technology director's responsibilities include technology and information management, development of policies and procedures that govern technology activities, inventory control, ensuring access to information and related technology for administrative departments and campuses, and management of the Technology Department staff. Additionally, the computer technicians and the technology director's responsibilities include the installation, testing, and oversight of all network hardware, software, and related equipment. **Figure 7–1** shows Dilley ISD's technology organization for school year 2014–15.

FIGURE 7–1
DILLEY ISD TECHNOLOGY DEPARTMENT
SCHOOL YEAR 2014–15



SOURCES: Legislative Budget Board School Review Team, May 2015; Dilley ISD Technology Department, May 2015.

The district uses the Texas Enterprise Information System (TxEIS) as its business and student data management system. The Regional Education Service Center XX (Region 20) hosts and supports the system. TxEIS is a web-based system that is integrated and supports all operational and reporting requirements for the district. TxEIS meets all compliance

and reporting requirements for the Texas Education Agency (TEA) and federal agencies.

Dilley ISD's technology operational budget for school year 2014–15 was \$459,308 or \$449 per student. Dilley ISD has 1,113 computer devices, 631 of which are designated for student use in a district of 1,048 students, resulting in an overall student-to-computer ratio of 2:1. Dilley ISD has not yet met the Texas State Board of Education 2006–2020 Long-Range Plan for Technology (LRPT) recommendation of a student-to-computer ratio of 1:1. But the district has met the 1:1 teacher-to-computer ratio as recommended in the 2006–2020 LRPT. The district's superintendent has oversight of the preparation and management of the district's technology budget, hardware and software acquisition.

FINDINGS

- ◆ Dilley ISD does not have a formalized process to monitor and assess the effectiveness of the goals in the technology plan.
- ◆ Dilley ISD's Technology Department lacks a process to monitor and assess technology support effectiveness and identify areas of improvement as they relate to cost efficiency and quality of service.
- ◆ Dilley ISD's Technology Department has not developed job descriptions for all staff, procedures for implementing job duties, or standards to ensure the proper allocation of work.

RECOMMENDATIONS

- ◆ **Recommendation 30: Monitor the progress of the district's technology plan, including assessing the adequacy of its bandwidth needs.**
- ◆ **Recommendation 31: Develop key performance indicators with targets to measure the district's technology support effectiveness.**
- ◆ **Recommendation 32: Establish district staffing standards that encompass job descriptions for technology staff, document procedures for the Technology Department, and restructure and staff the department accordingly.**

DETAILED FINDINGS

LONG-RANGE TECHNOLOGY PLAN (REC. 30)

Dilley ISD does not have a formalized process to monitor and assess the effectiveness of the goals in the technology plan.

A technology plan guides technology initiatives and spending within a district. In addition, a technology plan defines how the district implements and integrates technology into its daily operations. Dilley ISD developed a school year 2014–15 technology plan. The technology plan was developed by the technology committee, which includes the superintendent, administrative facilitator, technology director, campus principals, and computer technicians. Dilley ISD's technology plan reflects their goal of incorporating technology into the curriculum and into classroom instruction to enhance the learning experience of students. The district's technology plan describes the use of technology in the district and for each campus, and includes four district goals. The technology plan includes the objectives and strategies needed to reach those goals, and describes their status. In the school year 2014–15 technology plan, the four goals and the associated strategies are listed as Planned or In Progress. At the time of the onsite review, the technology director could not provide clear indication of the status of the goals, and did not have a process to monitor and assess the effectiveness of the technology plan.

As a result of not developing a process to assess effectiveness, Dilley ISD does not have adequate bandwidth capacity to support its users' needs. The district has 1,113 computer devices, with users including students, teachers, administrators, and staff. The district upgraded to a broadband connection of 100 megabits per second (mbps) in July 2014. Staff reported that the Internet bandwidth does not provide adequate, reliable, or quality access. They also noted that Internet access is too slow and cannot provide the necessary video quality needed to support instructional lessons. The majority of the complaints came from teachers and staff in the district's middle school. This campus has the highest number of computer devices in the district. In school year 2011–12, the middle school was awarded a Texas Title I Priority Schools (TTIPS) grant, from federal funding pursuant to the U.S. Elementary and Secondary Education Act, which lasted until 2014. The TTIPS grant enabled all students at the district's middle school to use a tablet computer, which has resulted in a large demand on the district's network bandwidth. During the onsite review, the technology director stated that Dilley ISD plans to acquire

tablet computers for the district's grade 9 students in school year 2015–16.

Without a process to monitor and assess the effectiveness of the technology plan, the district risks not being able to strategically implement technology across the campuses and to connect these devices to resources outside the district. In addition, the district loses the opportunity to identify the status of technology and define areas that need improvement to achieve goals and objectives.

Effective districts develop and use technology plans to establish goals and monitor progress toward achieving them. Additionally, effective school districts develop three-year technology plans because this period provides adequate time for planning, acquisition, implementation, and training on new processes and equipment. Well-developed, comprehensive technology plans lay the foundation for effective planning and decision making and guide a district toward achieving its stated goals. Some districts establish a five-year technology plan to include a replacement strategy or lease program that is longer than three years.

Long-range technology plans that effectively meet districts' current and future technology needs include:

- involvement of a technology committee that meets regularly during the development of the plan to provide input and meets after the plan has been adopted to review progress;
- a formal needs assessment of the administrative and operational systems for upgrade or replacement requirements, including those used by the Transportation and Food Service departments, for example;
- a review of the technology budgeting process and the establishment of a distinctive budgeting model and guidelines for districtwide technology spending, managed by the director; and
- a review of instructional technology applications and tools used throughout the district to gauge their effectiveness.

Dilley ISD should monitor the progress of the district's technology plan, including assessing the adequacy of its bandwidth needs.

The technology committee should evaluate the annual technology planning process, including how the goals and objectives will be implemented and monitored to completion.

The technology committee should also consider expanding to a three-year technology plan to ensure adequate time for planning, acquisition, implementation, and training on new processes and equipment. As part of the technology planning process, the Technology Department should assess the broadband connection to determine if it is sufficient or should be upgraded to ensure adequate Internet connectivity on all campuses. As part of the planning process, the Technology Department should also determine the type of hardware needed to reduce the high school and elementary school student-to-computer ratios from 2:1 to 1:1.

This recommendation could be implemented with existing resources.

Since the onsite review, the district upgraded its bandwidth capacity from 100mbps to 1,000 mbps. In addition, the district responded that its technology plan would now be a component of its district long-range plan.

TECHNOLOGY SUPPORT (REC. 31)

Dilley ISD's Technology Department lacks a process to monitor and assess technology support effectiveness and identify areas of improvement as they relate to cost efficiency and quality of service.

Dilley ISD's Technology Department uses a web-based work order processing and tracking system. This work order management system is also used by the district's Facilities Department. The work order management system enables users to generate work order tickets and submit the request to an assigned technician via email. The system allows users to identify themselves, the type of device requiring maintenance, designate the problem, and provide the location of the device. Upon completion of the required work, the technician emails a request to close the work order ticket to the user who initiated the service request. The request to close the ticket contains the actions taken to resolve the request, and the originating user can either accept or reject the request's completion. In addition, the work order management system allows users to track their ticket requests; however, district staff at the middle school indicated that a technician is not regularly available to resolve their issues, and they do not always receive confirmation from the Technology Department that the request has been received. The work order management system can produce an automatic response when a request is received, but the district does not use this feature. Staff across the district also indicated that some work order tickets close without resolution. As of March 2015, the activity report from Dilley ISD's work

order management system showed 824 tickets listed as open with the Technology Department, and 881 tickets as closed.

Due to delays in responses from the Technology Department, the middle school principal hired a paraprofessional to provide the technical support for the middle school.

Without established goals related to technology support, the district is unable to ensure that support is provided in an effective and cost-efficient manner. This has led to delayed or missing responses from the Technology Department and has impeded classroom instruction. When technology work order requests are not fulfilled in a timely manner, other staff are unable to do their jobs effectively. Additionally, without quality goals and adequate tracking of when work order tickets are issued and work is completed, the Technology Department increases the risk of poor customer service, increased response times, and substandard quality.

Effective districts develop critical success factors (CSF) for the efficiency and performance of their organizations. CSFs are a limited number of characteristics, conditions, or variables that affect the effectiveness, efficiency, and viability of an organization. To achieve the organization’s objective, activities associated with CSFs must be performed with the

highest level of quality. In addition, key performance indicators (KPI) track progress toward achieving the organization’s objectives by monitoring activities that likely cause serious losses or failure. **Figure 7–2** shows an example of CSFs and KPIs.

Dilley ISD should develop key performance indicators with targets to measure the district’s technology support effectiveness.

Each month, the director should compile and publish the key performance indicators for technology support results. To establish the key performance indicators, Technology Department staff should meet to identify and agree on those key areas and performance targets that would indicate how well they are supporting the district’s technology environment. In addition, the technology director should develop a procedure that requires technicians to enter all support work performed into the work order management system and to require that all work occurs before work order tickets are closed. The procedure should include the entry of data to indicate the type of support performed and the corrective action taken to resolve the issue. After this procedure is implemented, the district can establish evaluation measures.

**FIGURE 7–2
CRITICAL SUCCESS FACTORS AND KEY PERFORMANCE INDICATORS
2011**

FACTOR	PERFORMANCE	MEASURE	TARGET	DATA ELEMENTS	DATA SOURCE	TOOL
Incidents are resolved within timeframes agreed with the customer.	<ul style="list-style-type: none"> Quantity Timeliness Compliance 	Percentage of Severity 1 incidents in any 12-month period that are resolved within four hours.	Equal to or greater than 80%	<ul style="list-style-type: none"> Customer ID Count of Severity 1 incident records Interval limits Start and Resolved timestamp for each Severity 1 Incident 	<ul style="list-style-type: none"> Service Level Agreement Report interval Dates Incident System 	Excel
The service desk should resolve the majority of incidents on first contact.	<ul style="list-style-type: none"> Quantity Timeliness Compliance 	Percentage of incidents resolved by the service desk on first contact in any two-month period.	Equal to or greater than 75%	<ul style="list-style-type: none"> Count of Incident Records Interval limits Count of Incidents with Recipient = Resolver 	<ul style="list-style-type: none"> Report Interval dates Incident system 	Excel
Customers can reach a service desk agent when needed.	<ul style="list-style-type: none"> Quantity Timeliness 	Call abandonment rate in any one-month period.	Less than 10%	<ul style="list-style-type: none"> Calls received Calls abandoned 	<ul style="list-style-type: none"> Report Interval dates AutomaticCall Distribution Monthly Reports 	Excel

NOTE: A severity 1 incident is when a critical system, network component, or key application is under outage or imminent outage with critical impact on customer service delivery in terms of services and revenue. Additionally, no work around options are available.
SOURCE: Creating Service Desk Metrics, Zendesk, 2011.

This data can then be used to gauge and monitor support performance and identify areas for improvement.

This recommendation could be implemented with existing resources.

Since the onsite review, the district switched its work order management system, which provides additional performance related statistics.

STAFFING STANDARDS (REC. 32)

Dilley ISD's Technology Department has not developed job descriptions for all staff, procedures for implementing job duties, or standards to ensure the proper allocation of work.

The district has two technicians and one paraprofessional who handle all technical support for the district. The technicians report to the technology director, and the paraprofessional reports to the middle school principal. However, the paraprofessional does not have a background in technology and needs instruction from the computer technicians and technology director to complete job duties.

Additionally, Dilley ISD lacks job descriptions for all technology staff, as the paraprofessional does not have one associated with the position. Moreover, the Technology Department does not have documented procedures for effective department management. Although the technicians may know their job duties, the procedures to perform them are not available to new staff, or for cross-training staff.

The lack of staffing standards related to the amount of work each technician is expected to complete leads to having technology resources inefficiently deployed. Missing job descriptions impede the ability of staff to know what to do, and of the technology director to effectively evaluate job skills and overall job performance because the activities and description do not align. For this reason, technical support issues risk not being addressed. Furthermore, the lack of staffing standards and documented procedures affects the ability to execute repeatable processes and to determine quality improvement.

Successful integration and use of technology depends on efficient support. Effective technology organizations maintain a level of staffing necessary to perform all functions adequately. In addition, effective districts provide a level of staff based on an evaluation of all duties that need to be performed. The Michigan Department of Education funded a study in 2005 identifying staffing guidelines for schools to maintain effective educational technology programs. The

Michigan Technology Staffing Guidelines are based on adopted industry benchmarks for the education field. These staffing guidelines consider the amount of equipment to be maintained; the number of software applications that are installed and maintained on each computer; the number of staff required to handle website content, telephone, video and other noncomputer technologies; and the number of management, administrative, and administrative support staff. The guidelines also consider environmental factors that may require additional support, such as the physical size of the district and the age and condition of computers and buildings. **Figure 7–3** shows an example of how effective districts determine how many technical support staff is needed. According to Dilley ISD's inventory list for school year 2014–15, the district has the correct number of staff required for computer support; however, as the district moves closer to the 1:1 student-to-computer ratio goal stated in the LRPT, the district will need to reevaluate its staffing requirements.

Dilley ISD should establish district staffing standards that encompass job descriptions for all technology staff, document procedures for the Technology Department, and restructure and staff the department accordingly.

The Technology Department should structure the department to shift the middle school technician to report to the technology director. In addition, the paraprofessional should have a job description created. Furthermore, as the district approaches the 1:1 student-to-computer ratio goal listed in the LRPT, the Technology Department should reassess to determine the correct number of technology support staff needed to support Dilley ISD.

This recommendation could be implemented with existing resources.

**FIGURE 7–3
TECHNOLOGY STAFFING GUIDELINES
2005**

STAFFING AREA	CALCULATION ASSUMPTIONS USED/FORMULA	STAFFING LEVEL
Computer Support = (workstations and peripherals in use full-time)/500	Workstations:3,056 Printers: 1,261 Percentage of full-time use: 0.4 [4(3,056+1,261)]/500	3.5
Support provided outside Technology Services Department	Assumes that technology coordinators at all schools combined provide equivalent of 1.0 staff in this area.	0.0
Totals for Computer Support		3.5
User Support = users/1000. Users are prorated based on determinations of their frequency of use, and assigned the following multipliers: high-end=1; medium=0.5; occasional=0.25	High-end users (daily use—50% to 100%): 82 Medium users (daily use—10% to 50%): 4,181 Occasional users (10% or less): 2,697 [50+0.5(4,181)+0.25(2,697)]/1000	2.9
Support provided outside Technology Services Department	Assumes that technology coordinators at all schools combined provide equivalent of 1.0 staff in this area.	0.0
Totals for Software Applications Support		2.9

SOURCE: Merit Network and Western Michigan University, Michigan Technology Staffing Guidelines, 2005.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015–16	2016–17	2017–18	2018–19	2019–20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 7. COMPUTERS AND TECHNOLOGY							
30. Monitor the progress of the district's technology plan, including assessing the adequacy of its bandwidth needs.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
31. Develop key performance indicators with targets to measure the district's technology support effectiveness.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
32. Establish district staffing standards that encompass job descriptions all for technology staff, document procedures for the Technology Department, and restructure and staff the department accordingly.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 8. FOOD SERVICE

An independent school district's food service operation provides meals to its students and staff. The district may provide meals through the federally funded Child Nutrition Programs, which include the School Breakfast and National School Lunch programs. The School Breakfast Program (SBP) is a federal entitlement program administered at the state level by the Texas Department of Agriculture (TDA). Participating schools receive cash assistance for breakfasts served that comply with program requirements. Districts receive different amounts of reimbursement based on the number of breakfasts served in each of the benefit categories: free, reduced-price, and paid. Texas state law requires schools to participate in the breakfast program if at least 10.0 percent of their students are eligible to receive free or reduced-price meals. The National School Lunch Program (NSLP) serves low-cost or free lunches to students. Like the breakfast program, lunches must comply with federal nutrition guidelines and are reimbursable to schools based on the number of meals served within the benefit categories. A district's food service operations may also offer catering services as a way to supplement the food services budget or provide training for students interested in pursuing a career in the food service industry.

Food service operation is dependent on the organizational structure of the district. The three primary models of organizing food service operations are self-management, contracted management, and contracted consulting. Using the self-management model, a district operates its food service department without assistance from an outside entity. Using a contracted management model, a district contracts with a food service management company to manage either all or a portion of its operations. In this arrangement, a district may rely on the company to provide all or some staff, or may use district staff for its operations. Using a consulting model, a district contracts with a food service consulting company to provide guidance on food service operations (e.g., menus, sales and marketing plans, and ordering processes based on industry standards, etc.). In this arrangement, district staff would operate the food service department.

Dilley Independent School District (ISD) operates its Food Service Department using the self-management model whereby the district's federal programs director/Public Education Information Management System (PEIMS) coordinator manages all aspects of food service operations. Dilley ISD participates in the National School Lunch Program, the School Breakfast Program, and the Summer Food Service Program. The

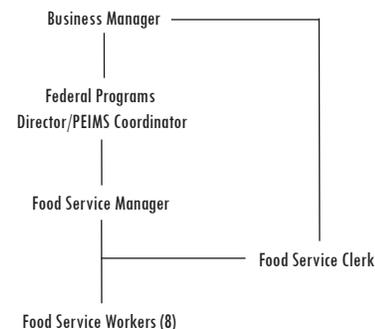
goal of these programs is to provide participants with wholesome, nutritious meals that comply with all local, state and federal regulations. TDA administers these programs through agreements with school districts. The district did not participate in the Afterschool Care Program in school year 2014–15, as funding for the operation of after school programs was not available.

Dilley ISD implemented the Community Eligibility Provision (CEP) during school year 2014–15, which allows all students to eat breakfast and lunch at no charge. Dilley Elementary School implemented Breakfast in the Classroom in school year 2014–15 because of ongoing building construction. Middle school students eat breakfast in the cafeteria, and high school students receive breakfast distributed in the school foyer, referred to as a grab-and-go breakfast. In addition, Dilley ISD operates a daycare facility that serves students and district employees with young children first, and as space allows children from the community. The Food Service Department provides breakfast and lunch to the district daycare facility for 10 to 11 students daily.

The food service operation staff consists of the federal programs director/PEIMS coordinator, the food service manager, clerk and eight food service staff. The food service staff report directly to the manager and the manager reports to the federal programs director/PEIMS coordinator.

Figure 8–1 shows the district's reporting structure for the food service operation.

FIGURE 8–1
DILLEY ISD FOOD SERVICE ORGANIZATION
SCHOOL YEAR 2014–15



NOTE: The food service clerk position is a shared position between the district's business office and federal programs office. The clerk reports to both the food service manager, and the business manager.

SOURCE: Dilley ISD Organizational Chart, 2014–15.

The Food Service Department is funded through federal reimbursement funds, state matching funds and local revenue from a la carte sales. The Dilley ISD Food Service Department provides some catering for various school district functions.

Dilley ISD has three campuses serviced by one cafeteria used by all grade levels. All food preparation is onsite. Food Service Department staff transport breakfast items to the elementary and high school campuses, and all students eat lunch in the cafeteria. Food service staff handles dining room clean-up and trash removal.

Dilley ISD operates a closed campus as of school year 2014–15; however, parents may bring outside food to their students. According to the high school principal, several parents come to the school to check their student out for lunch and return them in time for afternoon classes.

The Food Service Department's operating budget for school year 2013–14 included \$549,621 in revenue and \$568,570 in expenditures. According to the end of the year report, Dilley ISD transferred \$23,250 in funds from the district's General Fund to the Food Service Department to cover the difference between revenue and expenditures. This transfer exceeded the operating loss by \$4,300. During October 2014, the average daily participation (ADP) for the NSLP was 77.0 percent and the ADP for the SBP was 46.0 percent.

ACCOMPLISHMENT

- ◆ Dilley ISD's Food Service Department implemented the Community Eligibility Provision during school year 2014–15, enabling the department to be financially solvent without assistance from the district's General Fund.

FINDINGS

- ◆ Dilley ISD's Food Service Department lacks procedures and planning tools needed to properly oversee labor cost for food service operations.
- ◆ Dilley ISD's Food Service Department has not developed a process to charge the daycare facility to cover the cost of the breakfast and lunch meals provided.
- ◆ Dilley ISD's Food Service Department lacks a monitoring process for meal components and the meal service delivery method for breakfasts served in the classroom.

- ◆ Dilley ISD's Food Service Department's lack of oversight resulted in claimed reimbursements for breakfasts and lunches that did not comply with federal meal pattern requirements.
- ◆ Dilley ISD's food service staff is not consistently using standardized recipes or completing all required food production records.
- ◆ Dilley ISD's menus lack variety and input from students in the menu planning process.

RECOMMENDATIONS

- ◆ **Recommendation 33: Develop and utilize staffing formulas based on meals per labor hour and daily menu-specific work schedules to direct productivity and service of the Food Service Programs.**
- ◆ **Recommendation 34: Develop and ensure that a system is in place to reimburse the Food Service Department for food and labor used to provide breakfast and lunch meals to children in the district-provided daycare facility.**
- ◆ **Recommendation 35: Submit a revised Attachment B form to the Texas Department of Agriculture that includes breakfast in the classroom and better monitor meal service to ensure that methods used in the point of service comply with approved counting and claiming procedures.**
- ◆ **Recommendation 36: Provide training to teachers and staff to ensure that each of the required items offered as part of a reimbursable meal contributes sufficient amounts to meet the requirements of the National School Lunch Program and School Breakfast Program meal patterns.**
- ◆ **Recommendation 37: Ensure that the food service staff is consistently using standardized recipes, recording accurate and complete information on the food production records, and keeping appropriate documentation including Child Nutrition labels and product formulation statements to document compliance with meal pattern requirements.**
- ◆ **Recommendation 38: Provide variety in the menus offered by including student participation in the planning process.**

DETAILED ACCOMPLISHMENT

COMMUNITY ELIGIBILITY PROVISION IMPLEMENTATION

Dilley ISD's Food Service Department implemented the Community Eligibility Provision (CEP) during school year 2014–15, enabling the department to be financially solvent without assistance from the district's General Fund.

Dilley ISD implemented the CEP during school year 2014–15, which allows all students to eat breakfast and lunch at no charge. The district submitted required data to TDA in March 2014 to seek approval for the upcoming school year. Districts that elect this option agree to serve all students free lunches and breakfasts for four successive school years and claim meals for reimbursement based on a percentage of identified students. CEP eligibility is determined on school districts that have an Identified Student Percentage (ISP) of 40.0 percent or greater. CEP eliminates the districts' task of collecting free and reduced-price applications to determine eligibility for school meals, relying instead on information from other means-tested programs.

Enrollment certified without household application includes students who participate in or are eligible for participation in the following categorical programs, as of April 1st of the previous school year:

- federal assistance programs;
- Supplemental Nutritional Assistance Program;
- Temporary Assistance for Needy Families;
- Food Distribution Program for Indian Reservations;
- early literacy programs;
- Head Start;
- Early Head Start;
- Even Start; and
- comparable state-funded prekindergarten programs.

Children may be eligible to directly certify if:

- they are in foster care;
- they are homeless, including runaways and individuals displaced by declared disasters; or
- they are migrant students.

All three of Dilley ISD's campuses met the CEP requirements; therefore the entire district is eligible for CEP. One of the benefits of CEP is the predetermined blended reimbursement rate for free and paid rates. Each month the district submits the number of reimbursable meals served for lunch and breakfast using the food service software e-Triton 7 to TDA, and the system automatically assigns a percentage of the meals as free and the remaining percentage as paid. In school year 2014–15, the district claimed 91.0 percent of the meals served to students as free and 9.0 percent as full-price.

Figure 8–2 shows additional benefits a school district receives from participating in CEP.

When implementing CEP, the district closed the high school campus to off-campus lunch. This decision resulted in an increase in participation and program revenues for the district's Food Service Department. The business manager stated that school year 2014–15 food service revenue exceeds expenditures for the first time in at least five years due to CEP participation. In the past five years, the district has had to supplement the food service account with funds from the General Fund ranging from \$36,000 to \$97,000 per year. **Figure 8–3** shows the increase in participation and revenue from school years 2013–14 to 2014–15, using October as the month for comparison.

By implementing this program, the district is able to provide additional funds for program stability and improvements.

FIGURE 8–2 BENEFITS OF COMMUNITY ELIGIBILITY PROVISION MAY 2015

- ease the stress for parents or guardians to complete household applications;
- eliminate overt identification issues because all meals are served at no charge;
- increase participation in breakfast and lunch;
- reduce labor and material costs associated with printing and distributing paper household applications;
- reduce cost for distributing information about electronic household applications;
- reduce paperwork at the district level;
- reduce the labor costs for processing payment for meals or charging meals; and
- simplify meal counting and claiming.

SOURCE: Texas Department of Agriculture Administrator's Reference Manual 2015.

**FIGURE 8–3
COMPARISON OF PARTICIPATION AND REVENUE FOR DILLEY ISD FOOD SERVICE PROGRAMS
OCTOBER 2013 AND OCTOBER 2014**

PROGRAM	MEALS SERVED 2013	MEALS SERVED 2014	DIFFERENCE	REIMBURSEMENT 2013 (1)	REIMBURSEMENT 2014 (1)	DIFFERENCE
National School Lunch Program	13,303	18,595	5,292	\$34,361	\$52,435	\$18,074
School Breakfast Program	9,963	10,983	1,020	\$15,339	\$19,584	\$4,244
Totals	23,266	29,578	6,312	\$49,700	\$72,019	\$22,318

NOTE:

(1) Includes additional \$0.06 Performance-Based Reimbursement (Lunch).

SOURCES: 2013 Reimbursement Claim Summary, 2014 Reimbursement Claim Summary.

DETAILED FINDINGS

LABOR COST AND PROCEDURES (REC. 33)

Dilley ISD’s Food Service Department lacks the procedures and planning tools needed to properly oversee labor cost for food service operations.

The Food Service Department does not have written procedures to guide staff in performing their job duties. Instead, the federal programs director/PEIMS coordinator stated that food service staff receives on-the-job-training by working with experienced employees. In the focus group with food service staff, staff stated that they were verbally told what to do rather than given scheduled work assignments, and discussions with the federal programs director/PEIMS coordinator, food service manager and the food service staff confirmed that the department does not have any written procedures. As a result of the food service staff not having written procedures, the Food Service Department failed to notify the district’s Maintenance Department that the kitchen equipment needed servicing before the summer of 2011, when they lost a large amount of their inventory when the freezer needed repair. Additionally, in April 2015, the cooler needed repair, and maintenance revealed the compressor had never been serviced. During a focus group with the Food Service Department, both food service staff and the food service manager indicated that the department is short-handed and needs more positions. However, the federal programs director/PEIMS coordinator said that some of the staff often has free time during the day. In addition, both the business manager and federal programs director/PEIMS coordinator stated that they were overstaffed, but the district did not take action.

The kitchen is staffed with 10 positions: a manager who works eight-hour shifts; a clerk that splits her time between the Business Office and the Food Services Department; seven food service staff who work eight-hour shifts; and one food service staff who works a four-hour shift. The staff works a total of 72 hours daily. In addition, the Food Service Department has two staff preapproved as substitutes to cover absences. During

April 2015, Dilley ISD’s ADP for lunch was 76.0 percent and 41.0 percent for breakfast. Additional income from a la carte sales averages \$384 daily. During school year 2014–15, the district reinstated the breakfast in the classroom (BIC) program for the elementary school as a result of decreased breakfast participation from the prior year when the district discontinued the program.

The most common measure for productivity in school kitchens is meals per labor hour (MPLH). According to the federal programs director/PEIMS coordinator, the MPLH for school year 2014–15 was on average 14. MPLH is a productivity index that is measured by dividing the total meal equivalents (ME) for a given period by the total number of productive paid labor hours for the same period.

The actual hours assigned to a kitchen are called productive labor hours and include all labor charged to and paid for by the district’s food service program for work performed. One meal equivalent is equal to one reimbursable lunch. All other sources of revenue such as reimbursable breakfasts, snacks, a la carte, and catering sales are converted to the equivalent of one reimbursable lunch (one ME). The National Food Service Institute developed the meal equivalent calculation. Food service directors and school business managers use MEs as the unit measure of productivity for school food service programs when evaluating efficiency and formulating staffing patterns for budgeting. MEs are determined from meal count categories and other sources of revenue using the following factors, rounded to the nearest whole number:

Lunch: 1 lunch = 1 ME

Breakfast: 3 breakfasts = 2 ME (factor – 0.67)

Snack: 3 snacks = 1 ME (factor – 0.33)

Nonreimbursable food sales (a la carte and catering): dollar amount divided by the total free reimbursement, which for Dilley ISD is \$3.06 + U.S. Department of Agriculture (USDA) commodity assistance rate \$0.29 = \$3.35

Figure 8–4 shows the calculation of the MPLH produced by the Dilley ISD kitchen. After determining the number of MEs a kitchen is producing, MPLH is calculated by dividing the number of daily MEs by the number of paid labor hours. After applying this formula, Dilley ISD’s April 2015 MPLH was calculated to be 16.

One of the decisions any school nutrition director must make is how to manage the cost effectiveness of the school meals program. Determining staffing needs is not always the application of a simple formula because many factors may affect staffing in the school nutrition programs. Possible criteria used to assign labor include:

- number of meals or MEs served;
- number and type of services offered and the complexity of the menu (for example, breakfast meals are transported to three different sites for the elementary as well as to the high school location. It takes additional time to pack the foods in insulated carriers for each location, transport, distribute the breakfasts, and transport the foods back to the cafeteria);
- amount of convenience foods used (cooking from scratch takes more labor hours than preparing convenience type menu items);
- complexity of the menu; and
- skill level of employees.

Before using the MPLH guidelines, a district must determine whether a conventional system or convenience system of food production is used. The determining factor for MPLH guidelines is to conclude whether the majority of the menu items are kitchen-prepared, purchased-prepared or a combination of both.

An evaluation of the May 2015 menus indicates that the district uses many purchased-prepared foods; however, staff also cooks many items from scratch. The menus are neither strictly conventional nor convenience. A conventional system is prepared of some foods from raw ingredients on premises (using all bakery breads and prepared pizzas, and washing dishes). A convenience system is using the maximum amount of processed foods (for example, using all bakery breads, proportioned condiments and washing only trays or using disposable dinnerware).

Figure 8–5 shows an example of sample staffing guidelines from Managing Child Nutrition Programs Leadership for Excellence for school districts to follow to determine their MPLH. To calculate the actual number of labor hours needed, divide the total number of meal equivalents by the desired number of MPLH. Using the information in **Figures 8-4** and **8-5**, the desired number of labor hours would be between 55 and 60 ($1,150 \div 22 = 55$ and $1,150 \div 19 = 60$). The district’s current labor hours are 72.

The lack of written policies and procedures leads to an over-reliance on staff knowledge, which could lead to misunderstandings and confusion. Another risk of not having written policies and procedures is an inability to hold staff accountable for the performance of their assigned duties and responsibilities. Additionally, if the district fails to identify MPLH goals and provide written procedures for food production and service, employees may feel overworked.

When evaluating the guidelines in **Figure 8–5** against kitchen productivity, there are two ways to increase the number of MPLH: 1) raise productivity by increasing meals served and foods sold or 2) reduce labor hours. As identified in **Figure 8–4**, Dilley ISD is produces approximately 16 MPLH but the guidelines in **Figure 8–5** suggest the MPLH should be between 19 and 22 based on the number of meals served.

**FIGURE 8–4
DILLEY ISD MEALS PER LABOR HOUR (MPLH)
APRIL 2015**

MEAL	SERVED	MEAL EQUIVALENTS (ME)	FACTOR	DAILY ME	LABOR HOURS	MPLH
Lunch	760	1=1	1	760		
Breakfast	410	3=2	0.67	275		
A la carte	\$384	Dollar Value	+ \$3.35	115		
Total				1150	72	16

SOURCE: Legislative Budget Board School Review Team, May 2015; Dilley ISD Reimbursement Claim of Meals Served, April 2015; National Food Service Management Institute, Financial Management: A Course for School Nutrition Directors, University of Mississippi, 2014.

**FIGURE 8-5
SAMPLE STAFFING GUIDELINES
2008**

MEAL EQUIVALENTS (1)	MEALS PER LABOR HOUR (MPLH)/TOTAL HOURS			
	CONVENTIONAL SYSTEM (2)		CONVENIENCE SYSTEM (3)	
	LOW	HIGH	LOW	HIGH
Up to 100	8	10	10	12
101 to 150	9	11	11	13
151 to 200	10 to 11	12	12	14
251 to 300	13	15	15	16
301 to 400	14	16	16	18
401 to 500	14	17	18	19
501 to 600	15	17	18	19
601 to 700	16	18	19	20
701 to 800	17	19	20	22
801 to 900	18	20	21	23
More than 901	19	21	22	23

Notes:

- (1) Meal equivalents include breakfast and a la carte sales.
- (2) Conventional system is preparation of some foods from raw ingredients on premises (using all bakery breads and prepared pizzas, and washing dishes).
- (3) Convenience system is using the maximum amount of processed foods (for example, using all bakery breads, proportioned condiments, and washing only trays or using disposable dinnerware).

Source: Managing Child Nutrition Programs Leadership for Excellence, Second Edition, Josephine Martin and Charlotte Oakley, 2008.

Dilley ISD serves all three campuses in one cafeteria. This service method should reduce labor needs. However, there are some conditions specific to the kitchen that may cause the district to produce at a lower MPLH, including:

- production staff are responsible for packing breakfasts each morning, delivery to the distribution locations at three locations for elementary, one for high school and one for the daycare facility, and distributing meals to students; this method is time-consuming because it requires six to seven employees to serve the off-site locations;
- once breakfast is over, the coolers must be collected from the schools, returned to the kitchen, unloaded and cleaned;
- production staff produces almost one-third to one-half of the menu items from scratch. This method usually requires more labor hours for preparation; and
- food service staff are responsible for cleaning the dining room as well as the kitchen.

Best practices dictate that each district develops a staffing formula that works in their kitchen so that sufficient labor hours are available and used for productive work. According to the School Nutrition Association “Keys to Excellence: Standards of Practice for Nutrition,” the best practice is to have a system in place to ensure high standards for quality food production which includes:

- planned safe and efficient work methods to maximize the food service program productivity;
- work schedule guidelines and productivity benchmarks, such as meals per labor hour are developed and implemented to meet operational goals; and
- work schedules are reviewed, evaluated and revised as participation and programs change.

Dilley ISD should develop and utilize staffing formulas based on meals per labor hour and daily menu-specific work schedules to direct productivity and service of the Food Service Programs.

The federal programs director/PEIMS coordinator and business manager should evaluate and analyze the work conducted in the district’s kitchen throughout the day and determine how to best utilize assigned hours. Additionally, they should consider the following:

- A good starting point in this process would be to identify the major duties required: produce, serve and clean-up during the normal production day. Someone who knows both the operation and the staff’s abilities should always do the assignment of work;
- The federal programs director/PEIMS coordinator and business manager should conduct meetings with staff to review the goals identified and provide an opportunity for their input before implementation;
- Preparing work schedules helps managers to determine the particular hours that they need staff the most. Few kitchens have all eight-hour employees. Schedule the greatest number of hours during meal service. As the staff reduces through attrition, consider hiring several part-time staff instead of one full-time staff;
- Staggering work hours often is more advantageous in getting the maximum benefit from staff. Consider whether all staff needs to begin the day at the same time or whether staggering the starting and ending hours might better serve the kitchen operation; and
- Preparation for the next day’s menu should be considered when work schedules are planned. This preparation requires the manager to look ahead and not just consider the jobs required for a particular day. When a menu requires little preparation, much time could be wasted unless the time is used in preparing for another day’s menu. An option could be to prepare items for breakfast in the classroom the day before. Work schedules should help distribute the workload more evenly, so that employees do not feel overworked on any particular day.

As the work schedules are tested, staff should be encouraged to note suggestions for change. Upon testing and revision as appropriate, the work schedules could be cycled with the menu and only need to be modified when the menu changes.

The fiscal impact for this recommendation as shown in **Figure 8–6** assumes that the Food Service Department will reduce its annual labor hours by 12 or by 16.7 percent. A 16.7 percent reduction in labor hours would result in an annual savings of \$15,660 (12 x \$7.25 x 180).

DAYCARE MEALS (REC. 34)

Dilley ISD’s Food Service Department has not developed a process to charge the daycare facility to cover the cost of the breakfast and lunch meals provided.

Dilley ISD operates a daycare facility that serves infants through age 5. The children are provided breakfast and lunch from the Food Service Department. The daycare staff contacts the Food Service Department with daily counts needed for breakfast and lunch. The daycare is responsible for purchasing and preparing items used for snacks. Food service staff prepares meals in to-go containers for pick-up and delivery by the daycare staff. The food service manager documents the menu, completes required meal production forms, and records the amount of food used to prepare the meals. During the week of the onsite review, the daycare had to purchase food from a local grocery store because the planned menu for SBP and NSLP that week did not meet the meal pattern requirements for the daycare.

The daycare claims reimbursement for the meals provided by the Food Service Department through the Child and Adult Care Food Program (CACFP) administered by TDA. The federal programs director/PEIMS coordinator submits monthly reimbursement claims to TDA through the Texas Unified Nutrition Programs System (TX-UNPS). During the onsite review, the business manager said the reimbursement funds from CACFP went into the general fund rather than to the Food Service Department fund; however, Food Service Department funds are used to purchase food needed to prepare meals for the daycare.

Dilley ISD is using food service labor and food purchased with funds from the Food Service Department to provide meals to the daycare. The daycare program is receiving CACFP funds to cover the costs of meals provided to the children in their program. In school year 2013–14, the daycare received almost \$7,000 in reimbursement from CACFP; however, the

FIGURE 8–6
LABOR HOURS SAVINGS MAY 2015

LABOR HOURS	TARGET LABOR HOURS	DIFFERENCE	MINIMUM WAGE ESTIMATE	MINIMUM WORK DAYS	ANNUAL SAVINGS
72	60	12	\$7.25	180	\$15,660

NOTE: This fiscal impact assumes that food service staff earn the federal minimum wage and work the entire school year.
SOURCE: National Conference of State Legislatures, State Minimum Wage Chart January 2016.

district does not track expenditures for daycare food service and the district does not transfer funds from the daycare to cover the food and labor for the meals provided to the daycare.

According to the School Nutrition Association’s (SNA) Keys to Excellence: Standards of Practice for Nutrition Integrity, 2015, all revenue categories including catering, contract meals, vending, and other meal initiatives should be analyzed monthly to ensure that food service expenditures are covered. Prices for nonprogram foods should be set to ensure compliance with federal regulations. Nonprogram foods include a la carte items and adult meals. They also include items purchased with nonprofit school food service account funds for vending machines, fund-raisers, school stores, daycare meals, and catered and vended meals.

White Settlement ISD provides meals to their daycare operation through its catering function. The district conducts a cost analysis to identify labor and food costs to determine the amount the daycare is charged for meals provided. This analysis is calculated on a daily basis and the charges are resolved monthly through an invoice.

Dilley ISD should develop and ensure that a system is in place to reimburse the Food Service Department for food and labor used to provide breakfast and lunch meals to children in the district-provided daycare facility.

The federal programs director/PEIMS coordinator and business manager should develop a system for identifying food costs as well as labor costs involved in preparing meals provided to the daycare. As this system is developed, the following steps should be taken:

- determine the amount of labor needed to prepare, document, record the meals prepared, and assign a specific cost per meal;
- follow the same menu as much as possible used for SBP and NSLP meals. When a cycle menu is developed, costs could be identified daily;

- determine the nonfood cost for trays, utensils, transportation and other costs associated with the preparation of the meals;
- when the labor, food and other costs are determined, identify a per meal fee to be charged to the daycare program;
- the food service manager should track the number of daycare meals prepared daily; and
- each month, an invoice should be prepared to identify the cost of meals provided to the daycare.

After the costs have been determined, the federal programs director/PEIMS coordinator and business manager should develop a process to transfer funds from the daycare program to the food service program to cover the costs of this catering function. The following steps should be taken:

- identify the date the daycare usually receives the monthly reimbursement from CACFP;
- the food service manager submits the invoice for meals prepared for each month;
- district will transfer funds from daycare account to the food service account monthly; and
- to promote accountability, the business manager should provide regular monitoring to ensure that this process is being implemented.

The fiscal impact of this recommendation as shown in **Figure 8-7** assumes that the Food Service Department will continue feeding the daycare children the same menu as Dilley ISD’s students resulting in a revenue gain of \$8,280 ($\$1.62 + \$2.98 = \$4.60 \times 10 \times 180$).

Since the onsite review, the district indicated that the daycare meals are tracked and that the revenue is provided to the food service program. However, no additional information was provided.

**FIGURE 8-7
ANNUAL DAYCARE BREAKFAST AND LUNCH FOOD COST REVENUE GAIN
MAY 2015**

DAILY AVERAGE MEALS SERVED	SCHOOL DAYS	BREAKFAST REIMBURSEMENT	LUNCH REIMBURSEMENT	ANNUAL SAVINGS
10	180	\$1.62	\$2.98	\$8,280

NOTE: This fiscal impact assumes that all daycare students receive the free reimbursement rate and serve an average of 10 students daily. SOURCE: U.S. Department of Agriculture, Child and Adult Care Food Program 2014–2015 reimbursement rates.

COLLECTION PROCEDURE FOR BREAKFASTS SERVED IN THE CLASSROOM (REC. 35)

Dilley ISD's Food Service Department lacks a monitoring process for meal components and the meal service delivery method for breakfasts served in the classroom.

All districts participating in the food service program must comply with a TDA-approved Policy Statement for Free and Reduced-Price Meals, Attachment B: Meal Count/Collection Procedures, which is also referred to as Attachment B. If modifications are needed, each year districts must resubmit Attachment B to TDA through TX-UNPS. Dilley ISD's Attachment B states that breakfasts for all schools are served in the cafeteria, and that the count is taken by the cashier stationed at the end of the line using either a coded card for prekindergarten to grade 2 or a coded number that is typed into a keypad system for grades 3 to 12. However, Dilley ISD serves breakfasts in the classroom to its elementary students. In addition, observations during the review found that Dilley ISD's elementary school teachers did not have a systematic way of counting reimbursable breakfast meals; instead, they used classroom rosters for breakfast meal counts for prekindergarten to grade 5.

The point of sale (POS) is the point in a food service operation where a determination is made that a reimbursable free, reduced-price, or paid meal has been served to an eligible student. The cashier or an appropriate serving staff member makes this determination. The district is using a combination of breakfast-in-the-classroom and grab-and-go breakfast. The food service staff sets up stations in the three buildings used for elementary students, three stations for prekindergarten to grade 2, and one each for grades 3 to 4 and grade 5. Food service staff try to monitor what each student selects at the stations before they leave. However, Dilley ISD teachers only mark on the class roster whether a student received a breakfast, not a reimbursable breakfast. A reimbursable breakfast is composed of grain (one or two servings), meat/meat alternate is optional once the minimum daily grain requirement is fulfilled, fruit or vegetable and milk. A student may refuse one of the breakfast components and still have a reimbursable meal; however, a student must take at least half cup of fruit for a reimbursable meal.

In addition to not following the approved Attachment B, several of the meals did not meet requirements to be counted and claimed as breakfast meals. Many of the teachers did not understand what students needed to take to be counted and claimed for reimbursement. Some teachers said they believed

the student had to take everything, but others thought students had to have three food items to count for reimbursement. Some of the teachers were checking the students off the roster when they returned to the classroom with their breakfast while another teacher checked the students off the roster after everyone was finished and just asked who ate without any knowledge of the food items selected by the student.

When breakfast service is completed, food service staff collects the rosters and returns them to the cafeteria where they are then entered into the POS system, to be counted and claimed. During observation of this process, three meals were not keyed into the computer system from the student roster because the clerk missed them. Meals claimed using an inaccurate procedure for counting and claiming may be subject to technical assistance and/or corrective action.

The variety of procedures for tracking breakfast indicates a lack of training and follow up with the teachers regarding what is expected. This inconsistency has resulted in inaccurate counts and the possibility of claiming meals that do not meet meal pattern requirements. If the district does not submit a revised POS collection procedure for approval to TDA and does not implement the procedures successfully, the district may continue to claim reimbursement funds that could be at risk.

A best practice many school districts use is to train teachers at the beginning of the school year on the breakfast-in-the-classroom collection procedures. This training ensures that the teachers perform the counting and claiming procedure in the classroom as it has been approved by TDA in the district's Attachment B. Training materials often include sample menus that will be used by the program with examples of what items students would need to select to have a reimbursable meal.

Rio Grande City CISD has implemented breakfast in the classroom on 11 campuses. The Food Service Department works directly with campus principals to implement this program. Rio Grande City CISD provides training to participating school staff. The school level manager provides a menu to each teacher on a weekly basis. Food service staff prepares food in the cafeteria and delivers breakfast to the classroom in color-coded coolers; red for hot food and blue for cold food. Teachers are required to mark rosters indicating who received a breakfast. The teacher returns the roster to the cafeteria where staff totals the meal counts.

Figure 8–8 shows an example of an instructional tool that effective districts use when training teachers to determine if a particular selection qualifies as a reimbursable meal. The breakfast menu example is the menu observed during the onsite review. It includes a pig in a blanket; half cup of grapes; half cup of 100 percent fruit juice; and half a pint of milk. The fruit and fruit juice are two menu items; however, they are only one component – fruit. Therefore, when fruit and fruit juice are selected with milk, the breakfast is not reimbursable unless the student also selects the pig in a blanket. With a cycle menu in place for breakfast, effective districts provide examples for each menu and provide to the teachers as a guide.

Dilley ISD should submit a revised Attachment B form to the Texas Department of Agriculture that includes breakfast in the classroom and better monitor meal service to ensure that methods used in the point of service comply with approved counting and claiming procedures.

In developing an effective system of counting and claiming meals, the federal programs director/ PEIMS coordinator should take the following steps:

- identify the counting and claiming system used for breakfast-in-the-classroom in Attachment B and submit it to TDA for approval;
- provide food service staff and teachers with all necessary training, so they are ready to implement the written counting and claiming procedures;
- develop training materials as reference for regular and substitute teachers to ensure staff has adequate information to perform the counting and claiming procedures correctly, possibly with a guide similar to **Figure 8–8**;

- implement the counting and claiming system as written; and
- regularly visit classrooms during breakfast service to monitor implementation, providing technical assistance and follow-up as needed.

This recommendation could be implemented with existing resources.

MEAL PATTERN REQUIREMENTS (REC. 36)

Dilley ISD’s Food Service Department’s lack of oversight resulted in claimed reimbursements for breakfasts and lunches that did not comply with federal meal pattern requirements.

The review team observed meal service for the SBP and the NSLP at all three campuses in the district. The menus for breakfast and lunch were the same for all age/grade groups. Because Dilley ISD is approved for CEP, all meals are calculated based on the CEP formula identified by TDA and claimed as either free or paid. Breakfast service for Dilley Elementary School is a type of BIC; breakfast service for Mary Harper Middle School is regular service in the cafeteria; and service at Dilley High School is a remote setup in the lobby area, which provides a grab-and-go style using a wireless laptop computer to claim the meals.

For Dilley ISD, the SBP provides nutritionally balanced, free breakfasts to all students each day. Districts that choose to participate in the SBP receive reimbursement from the USDA for each breakfast they serve. In return, districts must serve breakfasts that meet the meal pattern requirements. Meal requirements are food-based and specify kinds and amounts of food for the three required breakfast food components. **Figure 8–9** shows the nutrition standards for the SPB. The

**FIGURE 8–8
EXAMPLE OF STUDENT BREAKFAST SELECTIONS THAT QUALIFY AS A REIMBURSABLE MEAL**

MENU	COMPONENT	SELECTION 1	SELECTION 2	SELECTION 3	SELECTION 4	SELECTION 5
Pig in a blanket	2 servings of grain (1)	X	X		X	X
Grapes	½ cup fruit	X		X		X
Juice	½ cup fruit		X	X		X
Milk	1 half-pint milk			X	X	X
Reimbursable Selection?	Yes	Yes	No	Yes	Yes	Yes

NOTE:
(1) One serving of meat/meal alternate counts as a grain.
SOURCE: Legislative Budget Board School Review Team, May 2015.

**FIGURE 8–9
NUTRITION STANDARDS IN THE SCHOOL BREAKFAST PROGRAM, MEAL PATTERN CHART OF MIMIMUM AMOUNT OF EACH FOOD COMPONENT PER WEEK, SCHOOL YEAR 2014–15**

MEAL PATTERN	KINDERGARTEN TO GRADE 5	GRADES 6 TO 8	GRADES 9 TO 12	KINDERGARTEN TO GRADE 12
Fruits (cups) (1)	5	5	5	5
Grains (ounce equivalent) (1)	7 to 10	8 to 10	9 to 10	9 to 10
Meat or Meat Alternates (ounce equivalent) (2)	0	0	0	0
Milk (cups) (1)	5	5	5	5
Calories (kcal)	350 to 500	400 to 550	450 to 600	450 to 500

NOTES:
 (1) Minimum daily offering.
 (2) The School Breakfast Program (SBP) has no separate meat or meat alternate component. For SBP, districts may substitute 1.0 ounce of meat or meat alternates for 1.0 ounce of grains after the minimum daily grains requirement is planned for the week.
 SOURCE: Texas Department of Agriculture Administrator’s Reference Manual, 2015.

meal pattern chart provides detailed information on the minimum meal pattern requirements for meals served for each age/grade group. Components must meet requirements for both daily and weekly servings.

The menu for breakfast on May 19, 2015, was pig in a blanket, one-half cup of grapes, four ounces of juice, and milk. While observing breakfast for the grade 5 site, the review team noted that the food service staff had run out of grapes before serving all students breakfast. Because the requirement for breakfast is that one cup fruit total must be offered, this meal did not meet meal pattern requirements. Therefore, the menu served for grade 5 students did not qualify for reimbursement. At least five meals were observed that did not have the full one cup of fruit offered. **Figure 8–10** shows the value of the potential over-claim for five breakfasts offering an insufficient portion of fruit component. When the food items used for breakfast in the classroom and grab and go are returned to the cafeteria, all leftover items are grouped together, so identifying which particular site was short of a specific component or food item is not possible.

**FIGURE 8–10
VALUE OF POTENTIAL OVERCLAIM FOR NONELIGIBLE BREAKFASTS AT DILLEY ELEMENTARY SCHOOL MAY 19, 2015**

MEAL	CLAIMED	REIMBURSEMENT	TOTAL CLAIM
Free	5	\$1.93	\$9.65
Full price	0	\$0.28	\$0.00
Daily Totals	5		\$9.65

SOURCE: Dilley ISD Daily Record of Meals Claimed May 19, 2015; U.S. Department of Agriculture School Breakfast Program reimbursement rates, school year 2014–15.

For Dilley ISD, the NSLP provides nutritionally balanced, free lunch to students each day. Districts that choose to participate in the NSLP receive reimbursement from the USDA for each lunch they serve that meets the meal pattern requirements. The district’s food service program operates a two-week breakfast cycle menu for all school sites. **Figure 8–10** shows a \$9.65 potential over-claim for five non-reimbursable breakfasts for the elementary site. If this same error were repeated each time the menu cycle was served, the annual potential over-claim would be \$168.88 (\$9.65 per day over-claim x 17.5 repeated menu cycles annually).

Figure 8–11 shows the nutrition standards in the NSLP. This meal pattern chart provides detailed information on the minimum meal pattern requirements for meals to be served for each age or grade group. Components must meet requirements for both daily and weekly servings.

The lunch menu for the high school on May 19, 2015, was chicken and rice (a local recipe that contains 2.0 ounces of meat or meat alternative and 1.0 ounce of grain), one-half cup pinto beans, one-half cup celery sticks, one-half cup peaches, one small apple, and milk. As shown in **Figure 8–11**, the requirement for grains for high school lunch is 2.0 ounce equivalents, and Dilley High School only offered students 1.0 ounce equivalent grain for the day. Therefore, the high school menu did not qualify for reimbursement. The school served and claimed 164 lunches for high school that day. **Figure 8–12** shows the value of the potential over-claim for 164 high school lunches offering an insufficient portion of the grain component.

The lunch menu on May 20, 2015 at Dilley ISD was Frito pie (a local recipe that consists of 2 ounces of meat or meat

**FIGURE 8–11
NUTRITION STANDARDS IN THE NATIONAL SCHOOL LUNCH PROGRAM, MEAL PATTERN CHART OF MINIMUM AMOUNT OF EACH FOOD COMPONENT PER WEEK, SCHOOL YEAR 2014–15**

MEAL PATTERN	KINDERGARTEN TO GRADE 5	GRADES 6 TO 8	KINDERGARTEN TO GRADE 8	GRADES 9 TO 12
Fruits (cups) (1)	2.5 (0.5)	2.5 (0.5)	2.5 (0.5)	5 (1)
Vegetables (cups) (1)	3.75 (0.75)	3.75 (0.75)	3.75 (0.75)	5 (1)
Dark Green	0.5	0.5	0.5	0.5
Red/Orange	0.75	0.75	0.75	1.25
Beans/Peas (Legumes)	0.5	0.5	0.5	0.5
Starchy	0.5	0.5	0.5	0.5
Other	0.5	0.5	0.5	0.75
Additional Vegetable to Reach Total	1	1	1	1.25
Grains (ounce equivalent) (1) (2)	8 to 9	8 to 10	8 to 9	10 to 12
Meat or Meat Alternates (ounce equivalent)	8 to 10	9 to 10	9 to 10	10 to 12
Milk (cups)	5	5	5	5
Calories (kcal)	550 to 650	600 to 700	600 to 650	750 to 850
Saturated Fat (% of total calories)	< 10	< 10	< 10	< 10
Sodium Target 1 (mg)	≤ 1230	≤ 1360	≤ 1230	≤ 1420

NOTES:

- (1) The minimum offering per day for kindergarten to grade 8 is: 0.5 cup fruit; 0.75 cup vegetables; 1.0 ounce equivalent each grain and meat or meat alternative; and 1.0 cup milk. The minimum offering per day for grades 9 to 12 is: 1 cup each fruit and vegetables; 2.0 ounces equivalent each grain and meat or meat alternative; and 1.0 cup milk.
- (2) Districts may substitute 1.0 ounce of meat or meat alternates for 1.0 ounce of grains after the minimum daily grains requirement is planned for the week.

SOURCE: Texas Department of Agriculture Administrator’s Reference Manual Lunch, school year 2014–15.

**FIGURE 8–12
POTENTIAL OVERCLAIM FOR LUNCHES OFFERING INSUFFICIENT GRAIN AT DILLEY HIGH SCHOOL
MAY 19, 2015**

MEAL	CLAIMED	REIMBURSEMENT (1)	TOTAL CLAIM FOR NONREIMBURSABLE MEALS
Free	149	\$3.06	\$455.94
Full price	15	\$0.36	\$5.40
Daily Totals	164		\$461.34

NOTE:

- (1) Includes additional \$0.06 Performance-Based Reimbursement (Lunch).

SOURCE: Dilley ISD Daily Record of High School Meals Claimed May 19, 2015; U.S. Department of Agriculture National School Lunch Program reimbursement rates, school year 2014–15.

alternative), one slice of bread (one grain), one-half cup of corn, one-half cup of fruit cocktail (all grades), one small orange (prekindergarten to grade 5), one-half cup of watermelon (grades 6 to 12), and milk. Because the requirement for vegetables at lunch is at least three-fourths

cup for all grades, this menu offered an insufficient vegetable component. In addition, high school students were only offered one grain for the day. Therefore, the menu did not qualify for reimbursement for all three age and grade groups.

The schools served and claimed 822 lunches for that day. **Figure 8–13** shows the value of the potential over-claim for 822 lunches offering an insufficient portion of vegetables component.

The district’s food service program operates a four-week lunch cycle menu for all school sites. **Figures 8–12** and **8–13** show a \$461.34 potential over-claim for 164 nonreimbursable lunches at the high school for May 19, 2015, and a \$2,318.22 potential over-claim for 822 nonreimbursable lunches for the elementary, middle, and high schools sites for May 20, 2015. If these same errors were repeated each time the menu cycle was served, the annual potential over-claim would be \$24,321.15 (\$2,779.56 per day over-claim x 8.75 repeated menu cycles annually).

In addition, the district provided a significant number of sack lunch meals for students in in-school suspension (ISS)

**FIGURE 8–13
DILLEY ISD POTENTIAL OVER-CLAIM FOR LUNCHES AT ELEMENTARY, MIDDLE, AND HIGH SCHOOLS
MAY 20, 2015**

MEAL TYPE	CLAIMED			TOTAL	REIMBURSEMENT (1)	TOTAL CLAIM FOR NONREIMBURSABLE MEALS
	ELEMENTARY	MIDDLE	HIGH			
Free	423	177	149	749	\$3.06	\$2,291.94
Full price	41	17	15	73	\$0.36	\$26.28
Daily Totals	464	194	164	822		\$2,318.22

NOTE:
(1) Includes additional \$0.06 Performance-Based Reimbursement (Lunch).
Source: Dilley ISD Daily Record of Meals Claimed May 20, 2015; U.S. Department of Agriculture National School Lunch Program reimbursement rates, school year 2014–15.

for all three schools. Dilley ISD serves the same menu to students in ISS every day which includes a peanut butter and jelly sandwich (one meat/meat alternative and one grain), a half cup of fresh fruit, a half cup of carrot sticks and choice of milk. Meals provided to ISS students must meet the weekly meal pattern as well. Because the requirement for vegetables at lunch is at least three-fourths cup for all grades, this menu offered an insufficient vegetable component. The menu did not qualify for reimbursement for all three age/grade groups for the 39 served and claimed ISS lunches on May 19, 2015 because of the potential over-claim on the missing vegetable. **Figure 8–14** shows the value of the potential over-claim for 39 lunches offering an insufficient portion of vegetables component.

According to district staff, ISS students are served the same sack lunch every day. **Figure 8–14** shows a \$111.02 over-claim for 39 nonreimbursable lunches for ISS students in all three school sites. If this same error was repeated each day, the annual potential over-claim would be \$19,983.60 (\$111.02 per day over-claim x 180 days in the school year).

Similarly inconsistent patterns occurred with menu planning based on food production records for the week before the onsite review. **Figure 8–15** shows that meal pattern

requirements are not being met for weekly vegetable requirements or grain requirements for the high school.

If Dilley ISD does not review the menus served to ensure they meet the meal pattern requirements of the reimbursable meal, reimbursement funds may be at risk. During the TDA Administrative Review (AR), the reviewer determines if lunches and breakfasts claimed for reimbursement by the district contain food items/components for the appropriate age/grade group as required by program regulations. Specific areas that are examined for Performance Standard 2 (Meal Pattern and Nutritional Quality) are as follows:

- menus (day of review and review week);
- food production records;
- standardized recipes; and
- related materials (Child Nutrition (CN) labels, food receipts, product analysis).

**FIGURE 8–14
POTENTIAL OVER-CLAIM FOR LUNCHES OFFERING INSUFFICIENT VEGETABLE AT ELEMENTARY, MIDDLE, AND HIGH SCHOOLS
FOR IN-SCHOOL SUSPENSION MEALS; MAY 19, 2015**

MEAL	CLAIMED	REIMBURSEMENT(1)	TOTAL CLAIM FOR NONREIMBURSABLE MEALS
Free	36	\$3.06	\$110.16
Full price	3	\$0.36	\$1.08
Daily Totals	39		\$111.02

NOTE:
(1) Includes additional \$0.06 Performance-Based Reimbursement (Lunch).
SOURCE: Dilley ISD Daily Record of Meals Claimed May 19, 2015; U.S. Department of Agriculture School National School Lunch Program reimbursement rates, school year 2014–15.

**FIGURE 8–15
DILLEY ISD LUNCH MEAL PATTERN REQUIREMENTS POTENTIAL NONCOMPLIANCE
WEEK OF MAY 11 TO 15, 2015**

COMPONENT	WEEKLY (DAILY) REQUIREMENT	DAY 1	DAY 2	DAY 3	DAY 4	DAY 5	COMPLIANCE
Total vegetable (cups)		0.875	0.5	1	0.75	1	Week: no, all grades Day 2: no, all grades Days 1 and 4: no, grades 9 to 12
• Kindergarten to grade 8	3.75 cups (0.75)						
• Grades 9 to 12	5 cups (1)						
Dark green (cups)	0.5	0.375					Week: no, all grades
Red/orange (cups)					.25	0.5	Week: no, grades 9 to 12
• Kindergarten to grade 8	0.75 cup/week						
• Grades 9 to 12	1.25 cups/week						
Beans/peas (cups)	0.5		0.5				Yes, all grades
Starchy (cups)	0.5	0.5					Yes, all grades
Other (cups)					0.75		Yes, all grades
• Kindergarten to grade 8	0.5 cup/week						
• Grades 9 to 12	0.75 cup/week						
Additional (cups)				1.0		0.5	Yes, all grades
• Kindergarten to grade 8	1 cup/week						
• Grades 9 to 12	1.5 cups /week						
Grains (oz eq)		2	2	1	2	2	Week: no, grades 9 to 12 Day 3: no, grades 9 to 12
• Kindergarten to grade 8	8 (1)						
• Grades 9 to 12	10 (2)						

SOURCES: Legislative Budget Board School Review Team May 2015; Dilley ISD food production records for week of May 11 to 15, 2015.

Meals served on the day of the AR that do not meet the minimum meal pattern requirements are subject to being disallowed/reclaimed by TDA. Additional over-claims may be assessed if a school’s food production records for previously served menus indicate meals were missing required components or offered insufficient portion sizes. An over-claim is the portion of the district’s claim for reimbursement that exceeds the federal financial assistance that is properly paid.

To comply with federal requirements, school district must serve breakfasts and lunches that meet the meal pattern requirements. The nutrition standards in the NSLP and SBP meal pattern chart provide information on the required components to be served for each age and grade group. The chart is located in the TDA Administrator’s Reference Manual for breakfast and for lunch.

Components must meet requirements for both daily and weekly servings. The nutrient specifications must be met weekly. The meal pattern for breakfast consists of three components:

- fruit, grains, and milk.

The meal pattern for lunch consists of five components:

- fruit, vegetables (with five vegetable subgroups), grains, meat or meat alternate, and milk.

The USDA has provided at usda.gov certification worksheets and instructions that effective districts use to evaluate whether the planned menu for a week meets the meal pattern requirements. Effective districts use these worksheets to enter menu information and portion sizes to ensure that all meal pattern requirements are met. TDA has provided a food-based menu portion planning template which is available at

www.squaremeals.org. This document can be found in the forms section, and it provides a format for districts to follow to ensure that all meal pattern requirements are met.

Dilley ISD should provide training to teachers and staff to ensure that each of the required items offered as part of a reimbursable meal contributes sufficient amounts to meet the requirements of the National School Lunch Program and School Breakfast Program meal patterns.

The food services manager should attend the New Manager Academy at Regional Education Center XX (Region 20) in San Antonio. This training should be required for any new managers or staff identified to plan menus. As the menu planner, the food service manager must meet the requirements of the meal pattern and menus must contain a specified quantity of each of the food components. The food service manager should refer to the appropriate portion of the nutrition standards in the NSLP and SBP chart for information regarding specific quantities per age and grade group. The TDA Administrator's Reference Manual has information on meeting these requirements for breakfast and lunch. These portion sizes are required for meals served to students in the cafeteria, breakfast in the classroom, and ISS sack lunch meals.

Because the federal programs director/PEIMS coordinator is overseeing the food service operation in the role of food service director, he should ensure that the breakfast and lunch menus are planned to meet all USDA meal pattern requirements. The federal programs director/PEIMS coordinator should meet with the food service manager to review the menu cycle at least once per year and when the cycle changes to determine that all meal pattern requirements are met. The federal programs director/PEIMS coordinator should schedule site visits to the cafeteria and kitchen, and should include an evaluation of the menus served to students to ensure that meals meet the meal pattern requirements. Additionally, the federal programs director/PEIMS coordinator should provide on-going training to all food service staff regarding meal pattern requirements. Each summer and throughout the year, the regional education service centers offer a variety of workshops and training classes that cover menu planning as well as meeting meal pattern requirements. Dilley ISD should take advantage of these classes for their food service staff by contacting Region 20 or checking TDA's website for summer workshop schedules at www.squaremeals.org.

No fiscal impact is assumed for this recommendation.

Since the onsite review, the food service manager has attended the New Manager Academy.

FOOD PRODUCTION RECORDS, STANDARDIZED RECIPES AND PRODUCT DOCUMENTATION (REC. 37)

Dilley ISD's food service staff is not consistently using standardized recipes or completing all required food production records.

Dilley ISD does not ensure that food service staff is consistently following standardized recipes, maintaining complete and accurate food production records, and retaining a complete file of Child Nutrition labels and product analysis sheets as documentation of the meals served and claimed for reimbursement.

One food production record is maintained for all three schools because they are served in the same cafeteria and utilize one kitchen to prepare all meals. The food service manager noted that she completes the food production records every Tuesday. The review team noted that the food production records were not complete. For example, the meals prepared and claimed for students that are part of ISS are not documented on the food production records. The district's food service software can record weekly food production; however, the district does not use it because of a lack of training. Additionally, incomplete documentation was noted for the extra entrée item that is usually added for the high school students. Food service records are necessary to support the meals served and claimed for reimbursement and ensure that they meet meal pattern requirements. The requirements include:

- standardized recipes;
- food production records; and
- Child Nutrition labels or signed, dated product analysis sheets containing weights of contributing ingredients, and a certification statement regarding the contribution of the creditable meat or meat alternate for purchased-prepared menu items.

During the onsite review, the review team observed that food service staff was not using standardized recipes during meal preparation. During discussion with the federal programs director/PEIMS coordinator, he stated that the cooks are responsible for preparing the meals, and they know what to do and do it. The food service manager is not involved in overseeing meal production, which results in gaps in the process of preparation and actual documentation of meal preparation. Cooks have access to USDA standardized

recipes, which districts use when adjusting the recipe. However, during the onsite review, they were observed using recipes that were handwritten on paper. Many of the recipes used by the cooks were recipes that have been used for years and are adjusted as needed based on the quantity planned. However, there was a lack of consistent and measureable information on the recipes used in the kitchen during the onsite review and the recipes were not organized at all or kept in a central location.

Standardized recipes ensure product quality, accurately predict the number of yield portions, and provide consistency in customer satisfaction. Additionally, they document and ensure nutritional values per serving are valid and provide consistency in identifying contributions of the menu item to the meal pattern.

Observations during the onsite review identified that kitchen staff were using recipes during food preparation. However, the use of quantity recipes that have been adjusted to serve a particular number of students is not standardized. A quantity recipe is not standardized until it has been adapted to an individual food service operation. As changes are made to the

recipe and this process is repeated, the recipe changes, including the finished product, the nutrient content, the yield and the contribution to the meal pattern.

Although all required food production information is important, the number of planned and served adult and student meals by grade level, the meal contribution amounts by age/grade group and meal type, the amount of food prepared in purchase units, and the amount of food leftover or discarded are all required to make the determination if the meal contributed to reimbursement as planned. **Figure 8–16** shows inconsistencies noted during a review of the district production records.

All food services programs are required to retain documentation that demonstrates that menus and food items served are compliant with the meal pattern. CN labels, Nutrition Facts labels, and product formulation statements verify the contribution of purchased-prepared foods such as chicken nuggets, pizza, and beef patties. These manufactured products have supporting documentation to determine that they are compliant with the meal pattern.

**FIGURE 8–16
DILLEY ISD FOOD PRODUCTION INCONSISTENCIES
MAY 2015**

MENU ITEM	INCONSISTENCIES WITH FOOD PRODUCTION RECORDS
Daily sack lunches for students in in-school suspension (ISS)	No documentation of meals claimed for reimbursement
Daily meals served for breakfast and lunch	No documentation regarding student meals, adult meals or total meals served
Hot and spicy chicken	No meal contribution or planned portion documented for this item (added as extra entree for high school only)
Rice	Documented as a vegetable which indicates insufficient vegetable offered for all grades without further documentation available
Corn dog	Only one grain documented for this food item which indicates insufficient grain component for high school without further documentation available.
Pizza	No meal contribution or planned portion documented for this item (added as extra entrée for high school only)
Sack lunches for high school	No documentation of meals claimed for reimbursement (note made on food production record, however the meals were not documented)
Burrito	No meal contribution or planned portion documented for this item (added as extra entrée for high school only)
Watermelon	No meal contribution or planned portion documented for this item (added in place of mixed fruit for middle and high school only)
Whole-grain roll	Only one grain documented for this food item which indicates insufficient grain component for high school without further documentation available.

SOURCE: Dilley ISD Daily Food Production Records for elementary, middle, and high schools sites, May 2015.

Foods are guaranteed to contain the contributions listed on the CN label when the product is manufactured according to the directions. Nutrition Facts Labels provide nutritional information based on the recommended daily dietary values. Although some products do not carry a CN label, a district could determine the contribution by using a product formulation statement. This statement is a document that provides information on the product’s potential contribution toward meal pattern. These statements are written, designed, signed/certified, and distributed by the individual manufacturer. However, the USDA does not review or approve product formulation statements; therefore, there is no guarantee that the statements made by the manufacturer are accurate.

During the onsite review, the review team noticed that the food service staff was not keeping or utilizing information from CN labels, Nutrition Facts labels or product formulation statements. The food service manager stated that she does not track of CN labels or product analysis documentation. Appropriate documentation and records are essential to the district’s ability to demonstrate that reimbursable meals meet the meal pattern requirements.

If Dilley ISD does not ensure that menus are planned, prepared and documented in a manner that demonstrates that the meals served and claimed comply with meal pattern requirements, reimbursement funds may be at risk as well as the nutritional integrity of the program not being met. In addition, TDA may subject the department to technical assistance and/or corrective action if a school’s production records for previously served menus indicate meals were missing components, offered in insufficient amount or if there is not enough information documented to make the determination as to whether or not meals served meet the minimum meal pattern requirements.

Figure 8–17 shows that the potential over-claim from errors in menu planning, food production, and recordkeeping for the two weeks reviewed by the review team could be up to \$3,800.

**FIGURE 8–17
POTENTIAL OVER-CLAIM FOR INCOMPLETE LUNCH
PRODUCTION RECORDS AT DILLEY ISD ELEMENTARY, MIDDLE,
AND HIGH SCHOOLS SITES
WEEKS OF MAY 11 TO 15, 2015, AND MAY 18 TO 22, 2015**

MEAL	CLAIMED	REIMBURSEMENT	TOTAL REVENUE	POTENTIAL RECLAIM
Free	1241	\$3.06	\$3,797.46	
Paid	121	\$0.36	\$43.56	
Total	1362		\$3,841.02	\$3,841.02

SOURCE: Dilley ISD Daily Meal Count May 11 to 15, 2015, and May 18 to 22, 2015, food production records; U.S. Department of Agriculture National School Lunch Program reimbursement rates.

Figure 8–18 shows that the potential over-claim as a result of the district not documenting the ISS lunch meals could be up to \$1,100.

**FIGURE 8–18
POTENTIAL DAILY OVER-CLAIM FOR IN-SCHOOL
SUSPENSION LUNCHESES NOT DOCUMENTED ON FOOD
PRODUCTION RECORDS AT DILLEY ISD ELEMENTARY, MIDDLE,
AND HIGH SCHOOLS SITES, MAY 19, 2015**

MEAL	CLAIMED	REIMBURSEMENT	TOTAL REVENUE	POTENTIAL RECLAIM
Free	36	\$3.06	\$110.16	
Paid	3	\$0.36	\$1.08	
Total	39		\$111.24	\$111.24

SOURCE: Legislative Budget Board School Review Team, May 2015; Dilley ISD Daily Meal Count, May 19, 2015; U.S. Department of Agriculture National School Lunch Program reimbursement rates.

Federal requirements dictate that the district maintains sufficient documentation to demonstrate that the meals served and claimed for reimbursement comply with meal pattern requirements. Documentation and records that support reimbursement must be kept on file include the following:

- standardized recipe and preparation techniques that are used during planning and serving reimbursable meals that are constant in measurement and preparation;
- quantity planned, quantity prepared, number served, and amount of leftover food; and
- CN label or product formulation statement documenting the ingredient quantities of each purchased-prepared item contributing to the meat or meat alternate component of the reimbursable meal.

The TDA Administrator’s Reference Manual, May 2015, states that, “All districts must develop and follow standardized recipes. Standardized recipes and preparation techniques must be used when planning and serving reimbursable meals. In order to qualify as a standardized recipe, a recipe must have an established and specified yield, portion size, and quantity. In addition, the ingredients must be consistent in measurement and preparation.”

Standardized recipes developed by the USDA are in the Child Nutrition Database. Examples of standardized recipes are included in the USDA’s Quantity Recipes for School Food Service. The Region 20 Child Nutrition staff has copies of these resources. Districts may also use local or state standardized recipes. If a district uses its own recipes, the

recipes must be added to its local database of recipes. According to the SNA's Keys to Excellence: Standards of Practice for Nutrition, all recipes in the school nutrition program should be standardized. School nutrition staff should be trained to follow standardized recipes and to calculate quantities prepared based on forecasting data. A master file (hard copy or electronic) of standardized recipes should be maintained and used.

Figure 8–19 shows food production documentation for reimbursable meals as identified by TDA in the Administrator's Reference Manual.

According to the May 2015 TDA Administrator's Reference Manual, districts should use the following guidance in maintaining production records:

- districts should keep in mind that this requirement includes all breakfasts and lunches including salad and other food bars, quick line, sack meals, field trips, etc.;
- these records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day including, but not limited to:
 - a complete record of menu substitutions; and
 - an itemized list of vegetable subgroups offered;
 - any meal claimed for reimbursement must be supported by a food production record; and
 - production records should be organized in an easily accessible format on a daily basis with cumulative accounting weekly or monthly as appropriate and ready for review on request.

According to SNA's Keys to Excellence: Standards of Practice for Nutrition, the food service director should establish procedures for maintaining required daily food production records at each school site. Effective districts complete production records each day following meal service. A good practice is to have production records that are preprinted to match menus. Portion sizes and serving utensils are specified on the production records. School nutrition staff should be trained to complete production records.

Effective districts maintain complete and accurate food production records for all meals claimed for reimbursement. These records demonstrate how the food items offered contribute to the required components of the meal pattern for each age and grade group. Food production records and standardized recipes are used in conjunction with the USDA Food Buying Guide. In a well-developed production system, standardized recipes and food production records are used together to plan, prepare, serve, and document the meals served and claimed for reimbursement. Districts have the option of developing their own food production records or using the TDA food production records, which can be found at www.squaremeals.org in the forms section.

Dilley ISD should ensure that the food service staff is consistently using standardized recipes, recording accurate and complete information on the food production records, and keeping appropriate documentation including Child Nutrition labels and product formulation statements to document compliance with meal pattern requirements.

In addition, Dilley ISD should use standardized recipes for every meal preparation, record all required information to document that the meals served and claimed for reimbursement met requirements, and keep other required documentation

FIGURE 8–19
FOOD PRODUCTION DOCUMENTATION FOR REIMBURSABLE MEALS, SCHOOL YEAR 2014–15

FOOD PRODUCTION RECORDS REQUIREMENTS

- Date of service;
- Portion sizes;
- Itemized list of food items with contribution amounts by age/grade group and meal type by component for reimbursable meals;
- Number of planned servings by age/grade group and meal type;
- Amount of food prepared by age/grade group and meal type;
- Number of meals served;
- Amount of leftovers by food item;
- Indication of offer versus serve;
- Menus for meals served;
- Records indicating food substitutions that include:
 - Food item replaced;
 - Substituted food item;
 - Reason for substitution;
 - Invoices or receipts for food products purchased; and
 - Documentation on meal pattern contribution that includes:
 - Child Nutrition labels;
 - nutrition facts;
 - U.S. Department of Agriculture Food Fact sheets; and
 - product formulation statements.

Source: Texas Department of Agriculture Administrator's Reference Manual, Record Retention, May 2015.

needed to support the reimbursement claim. To accomplish this recommendation, the federal programs director/PEIMS coordinator should oversee the food service manager in the development and coordination of the food production operation.

The food service manager should obtain or develop a standardized recipe for every meal and have these available in one central location in the kitchen. Staff should then use these during the preparation process. If a recipe needs to be adjusted, the food service manager should review any changes to ensure the meal contributions would not be altered and then changes recorded so that it is consistent.

The food service manager should train the food service staff in the importance of recording all foods on the food production record as well as how to record food contributions and other required information. Currently, the food service staff uses a blank food production record form. The food service manager can complete some of the information on the food production record before giving the form to food service staff. This provision of information would reduce the likelihood of not having consistent and correct information on the food production record. Some of this information would include menu items, meal contribution, and portion size. Then, on the day of production, staff should record the number planned and the amount of food prepared in purchase units (i.e. pounds of ground beef, cans of peaches, or one case of purchased-prepared food at 96 servings). At the end of the day, the amount of each food leftover should be recorded on the food production record. The federal programs director/PEIMS coordinator should then routinely monitor completed food production records to ensure that all required information is recorded daily.

The district should also consider using the food production record module in its existing software. This usage would streamline the process and could provide a more reliable documentation process for supporting reimbursable meals claimed by the district. The district could use its current computers.

All meals claimed for reimbursement, including sack lunches and meals for ISS students must be documented on the daily food production record. The food service manager and staff could develop a standardized recipe for each day's sack lunch/ISS meal, identifying all components and portion sizes by age and grade group and identify a specific number for that recipe. Each day, that recipe number could be listed on the food production record with the number of meals prepared

for each age/grade group for documentation. Recipes would be kept on file with food production records for documentation purposes. The district should also retain a file of CN labels and product formulation statements to document the contribution of all purchased-prepared meat or meat alternate menu items to demonstrate that the meals served and claimed for reimbursement meet the requirements of the SBP and NSLP meal patterns. TDA recommends the following practices for retaining CN labeling documentation or records:

- Establish a procedure for designated food service staff to safely remove CN labels from boxes. Only one CN label is needed for the same CN labeled product purchased by the district;
- File CN labels in a designated binder for future reference and check CN labels of reordered products against CN label on file to ensure the filed label is current;
- File digital photos or electronically scanned labels with food service program documentation or records that could be easily retrieved for future reference; and
- Each summer and often throughout the year, Region 20 offers a variety of workshops and training classes that cover food production records as well as standardized recipes and other required documents. Dilley ISD could take advantage of these classes by contacting Region 20 or checking TDA's website for summer workshop schedules at www.squre meals.org.

This recommendation could be implemented with existing resources.

MENU VARIETY AND STUDENT INVOLVEMENT (REC. 38)

Dilley ISD's menus lack variety and input from students in the menu planning process.

The federal programs director/PEIMS coordinator stated that the food service manager is responsible for planning menus and often gets ideas from other surrounding districts, as the district belongs to a food-purchasing co-op with Region 20. The federal programs director/PEIMS coordinator also stated that the district is using cycle menus; breakfast menus were on a two-week cycle and the lunch menus were on a four-week cycle. The menus are primarily the same for all schools. As a result of the implementation of CEP, lunch participation is higher than breakfast even with the implementation of breakfast in the classroom for elementary students. Participation varies which may depend on the

menu offered. Many of the high school students eat lunch on the snack bar line unless they like what is offered on the reimbursable line. No cash sales are allowed on the reimbursable serving lines. If a student wants additional items, they must pay for them at the snack bar line.

Dilley ISD's Food Service Department's May 2015 menu for breakfast demonstrates that the district is not using cycle menus. According to the May breakfast menu, six main items are on the breakfast menu. According to both the SBP and NSLP menus, the Food Service Department repeats some items the next serving day, such as grilled cheese on Friday, May 8, and Monday, May 11. Additionally, the sausage biscuit was on the menu five times, while the breakfast burrito and the pancake on a stick were on the menu two times each. These serving options lack any type of cycle, which results in a lack of variety in menu items offered to students.

The May 2015 lunch menu also shows that the district is not using a cycle menu at lunch. According to the May lunch menu there were 17 different main items offered on the lunch menu with four items offered twice during the month. Many of the sandwich style main items were served within days of each other as opposed to being spaced out through the month. Two items identified as nonacceptable items by students through the student focus group during the onsite review, corn dogs and sloppy joes, were on the menu three times; however, a popular main item, chicken nuggets, was not on the menu in May. The Food Service Department offered a variety of fruit daily; however, pineapple and mandarin oranges were only offered once during the month of May. A lack of variety of vegetables was offered to students during May. Additionally, the Food Service Department offered some type of bean 11 days out of the 21 days in May.

Menu planning is challenging and affects many parts of the food service operation. Unpopular menus could reduce participation. This lowered participation could be a result of lack of variety in the menu, use of unpopular food items, or the lack of student involvement in the menu process. Low participation reduces the amount of reimbursement received for that meal.

In a focus group with principals, the principals indicated that students, especially high school students, are unhappy with the lack of variety. The principals noted that elementary students mentioned pizza, burgers and nachos as their favorite foods. Pizza and cheeseburgers were each on the menu twice, while nachos were not on the menu. According

to the principals, middle school students stated they preferred to eat in the snack bar, but they have limited access to that option. They are required to go through the reimbursable line, before having access to the snack bar line. During the principal focus group when asked about student's perception of the food served in the cafeteria, comments included complaints from high school students about not getting enough food. Principals also stated that portion sizes are an issue for teachers.

Additionally, more than half of the respondents (70.0 percent) to the Dilley ISD review team parent survey had no opinion, disagreed or strongly disagreed with the statement "The cafeteria's food looks and tastes good." Responses to the same statement on the campus staff survey were similar with 72.0 percent disagreeing or strongly disagreeing with the statement. Food service staff stated that not only could they tell what the students like based on the amount of food waste at the end of the meal, but students will also tell them if they like a particular item or not. However, students are not involved in the meal planning and taste testing process. The federal programs director/PEIMS coordinator tries to get input from the food service staff and then re-evaluates food offerings. In school year 2013-14, the Food Service Department conducted an evaluation with middle school students who said they wanted less whole wheat products such as rice and pasta and wanted more flavor to the food. Comments from the principal focus group confirmed that there was no taste testing with students, and principals said changes had not been made based on student preferences or suggestions. If Dilley ISD does not make an effort to offer more variety and choices to their menu and involve students in the process, participation will decrease, which will reduce the nutritional benefits delivered to students as well as reduces accessible federal and state revenues to support the operation of the food service operation.

Throughout the year, Brownsville ISD surveys students to determine what menu items they prefer. When considering a new menu item, the district has a taste testing to gauge student response. The menu planning committee carefully reviews the survey responses and decides whether to incorporate the item into the menu. After the committee adds an item to the menu, they track its reception by students. If the item is not popular, the committee will remove it from the menu. For example, Brownsville ISD students did not like celery and carrot sticks, so the committee decided to discontinue the item immediately and prevent future food waste.

Effective districts plan school menus to meet the current Dietary Guidelines for Americans, and follow USDA guidelines and operational goals to ensure student acceptance. Cycle menus for all reimbursable meal programs are used to direct school nutrition operations. The menu system includes, but is not limited to, costing, portion planning for each age/grade group, forecasting, nutrient analysis, variety, local foods and preferences. A menu planning team is established that may include, but is not limited to, school nutrition staff, students, school wellness team members, and other school staff. Additionally, effective districts consider student preferences when planning menus by including them in panels and/or committees used to select products and/or plan menus.

Dilley ISD should provide variety in the menus offered by including student participation in the planning process.

Dilley ISD should add variety to its menus and involve students and district staff in the process. With proper planning, precosting, control of food production, and monitoring food waste, the food cost for the reimbursable meal should not increase. To accomplish this goal, the federal programs director/PEIMS coordinator should oversee the food service manager in the development and coordination of the menu planning process. The Food Service Department should do the following:

- survey the students, teachers and food service staff members for suggestions for menu improvement;
- gather menu ideas from neighboring districts especially those using the same purchasing co-op through Region 20;
- establish a menu planning committee to assist in developing menus that are nutritious, appealing and meet USDA guidelines for program operations. The committee should include students, teachers, parents, the food service manager and the federal programs director/PEIMS coordinator;
- identify which cycle menu period will work best for the district and implement it throughout the school year making modifications and changes as needed for holidays, special celebrations and seasonal food items;
- include more variety in all components of the meal and offer daily choices as feasible of entrees, vegetables and fruits. Breakfast choices should be expanded to offer more variety and be spaced out in a cycle menu format;

- use the frequency chart and list the number of times foods appear on the menu. If a food is repeated frequently on the menu, the reason should be that the item is popular and students will eat it; and
- periodically review the food production records to identify less popular items that are routinely leftover and utilizing plate waste information. Make changes to the menu as indicated.

This recommendation could be implemented with existing resources.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation.

RECOMMENDATION	2015-16	2016-17	2017-18	2018-19	2019-20	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE-TIME (COSTS) OR SAVINGS
CHAPTER 8. FOOD SERVICE							
33. Develop and utilize staffing formulas based on meals per labor hour and daily menu-specific work schedules to direct productivity and service of the Food Service Programs.	\$15,660	\$15,660	\$15,660	\$15,660	\$15,660	\$78,300	\$0
34. Develop and ensure that a system is in place to reimburse the Food Service Department for food and labor used to provide breakfast and lunch meals to children in the district-provided daycare facility.	\$8,280	\$8,280	\$8,280	\$8,280	\$8,280	\$41,400	\$0
35. Submit a revised Attachment B form to the Texas Department of Agriculture that includes breakfast in the classroom and better monitor meal service to ensure that methods used in the point of service comply with approved counting and claiming procedures.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
36. Provide training to teachers and staff to ensure that each of the required items offered as part of a reimbursable meal contributes sufficient amounts to meet the requirements of the National School Lunch Program and School Breakfast Program meal patterns.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
37. Ensure that the food service staff is consistently using standardized recipes, recording accurate and complete information on the food production records, and keeping appropriate documentation including Child Nutrition labels and product formulation statements to document compliance with meal pattern requirements.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
38. Provide variety in the menus offered by including student participation in the planning process.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$23,940	\$23,940	\$23,940	\$23,940	\$23,940	\$119,700	\$0