LEGISLATIVE BUDGET BOARD

Dalhart Independent School District

Management and Performance Review

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August 31, 2017

John Massey
Superintendent
Dalhart Independent School District

Dear Mr. Massey:

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

The report's recommendations will help Dalhart 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 Dalhart 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 Public Works LLC 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,

Ursula Parks
Director
Legislative Budget Board

/sr

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cc: Colette Moorhouse, President   Tammy Schniederjan, Vice-President
       Joni Atha, Secretary   Boyd Barrow, Member
       Dr. Richard Dunham, Member   Robert Ledbetter, Member
       Joyce Speer, Member

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EXECUTIVE SUMMARY

The Texas Legislature established the Texas School Performance Review (TSPR) in 1990 to "periodically review the effectiveness and efficiency of the budgets and operations of school districts" (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 the district and multiple state agencies, including the Texas Education Agency (TEA), the Texas Department of Agriculture, and the Texas School Safety Center. 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, the review team gathers information through multiple interviews and focus groups with district and campus administrators, staff, and board members.

Dalhart Independent School District (Dalhart ISD) is located in Dalhart, which is in Dallam and Hartley counties, in the Panhandle. The district is served by Regional Education Service Center XVI (Region 16), which is located in Amarillo. The state legislators for the district are Senator Kel Seliger and Representative John Smithee.

The district has five instructional campuses, including Dalhart High School, Dalhart Junior High School, Dalhart Intermediate School, Dalhart Elementary School, and the XIT Secondary School, which is the district's alternative campus. During school year 2015–16, the student population was 55.0 percent Hispanic, 41.6 percent White, 1.3 percent two or more races, 1.1 percent African American, 0.7 percent Asian, and 0.3 percent American Indian. Approximately 55.3 percent of students were considered economically disadvantaged, which is less than the state average of 59.0 percent. The district identified 9.5 percent of students as English Language Learners, which is less than the state average of 18.5 percent. Approximately 35.4 percent of students were designated as at risk, which is also less than the state average of 50.1 percent.

EDUCATIONAL OVERVIEW

Dalhart ISD has a history of variable academic achievement. In accordance with the state accountability system, TEA rated the district Met Standard from school years 2012–13 to 2015–16. All campuses received a rating of Met Standard except Dalhart Intermediate School and the XIT Secondary School. Dalhart Intermediate School was rated Improvement Required for school years 2012–13 and 2014–15, and the XIT Secondary School was rated Improvement Required for school year 2012–13. **Figure 1** shows state accountability ratings from school years 2012–13 to 2015–16 for the district and the individual campuses in accordance with the system that was implemented during school year 2012–13 (Met Standard, Improvement Required, or Not Rated).

FIGURE 1
DALHART ISD STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2012–13 TO 2015–16

CAMPUS	2012–13	2013–14	2014–15	2015–16
District	Met Standard	Met Standard	Met Standard	Met Standard
High School	Met Standard	Met Standard	Met Standard	Met Standard
Junior High School	Met Standard	Met Standard	Met Standard	Met Standard
Intermediate School	Improvement Required	Met Standard	Improvement Required	Met Standard
Elementary School	Met Standard	Met Standard	Met Standard	Met Standard
XIT Secondary School	Improvement Required	Met Alternative Standard	Met Alternative Standard	Met Alternative Standard

NOTE: Accountability ratings were not issued for school year 2011–12 with the implementation of new state assessments.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2012–13 to 2015–16.

Dalhart ISD's academic performance is less than state averages in all areas, and less than regional averages in most areas. **Figure 2** shows various academic measures comparing Dalhart ISD to the average of other school districts in Region 16 and the state.

FINANCIAL OVERVIEW

For tax year 2015–16, Dalhart ISD's preliminary property wealth per weighted average daily attendance was $314,951. This amount is less than, and thus not subject to, the state's primary equalized wealth level (EWL). For property wealth level greater than the EWL of $514,000, the state recaptures a portion of school districts' local tax revenue to assist in financing public education in other districts. This primary EWL applies to a district's tax rates up to $1.00 per $100 of valuation. The state's school finance system has a secondary EWL that applies to certain enrichment tax effort greater than $1.00.

For school year 2015–16, Dalhart ISD's total actual expenditures were approximately $17.9 million. Dalhart ISD's actual operating expenditures per pupil for school year 2015–16 were $9,034, compared to the state average of $9,373. During school year 2015–16, Dalhart ISD spent approximately 54.3 percent of total actual operating expenditure on instruction, compared to the state average of approximately 56.7 percent. The instructional expenditures percentage was calculated using the district's total actual operating expenditures that funded direct instructional activities. These activities, as categorized by TEA by function, include Function 11 (Instruction), Function 12 (Instructional Resources and Media Sources), Function 13 (Curriculum Development and Instructional Staff Development), and Function 31 (Guidance, Counseling, and Evaluation Services.)

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.

BOARD MANAGEMENT

The district struggles to manage a variety of aspects related to the School Board. To help the board operate more effectively and efficiently, Dalhart ISD should update board policies, ensure that board members receive all required training, submit board agendas and packets on time, use a yearly board calendar, implement a board self-assessment, and ensure that the district strategic plan and district and campus plans are tied to the strategic plan and the budget.

School board policies are the basis for how a school district functions in all areas. Dalhart ISD lacks a process to regularly review and update board policies and ensure that procedures accompany those policies. Dalhart ISD subscribes to the policy service provided by the Texas Association of School Boards (TASB), and the district has codified policies using the TASB model. However, the district does not have an internal process to review and update board policy. A review of the district policy manual identified many policies that were outdated and in need of thorough review. Dalhart ISD also has insufficient administrative procedures to accompany board policies. By working with TASB to update the board policies, the district could ensure that policies reflect statutory changes and are consistent with best practices.

Because elected board members may not have expertise in all school-related functions, the Texas Government Code requires board members to obtain training. Dalhart ISD does not have a plan for new board member orientation; instead, the district relies on new board members to ask questions. Although the district developed a board operating procedures manual, several board members had never seen the manual, and the district had not presented it in the new board member orientation. At the time of the review, several board members had not completed all required training. By ensuring that the board is well-trained, the district could avoid issues in which board members involve themselves in the district's daily management.

In addition, Dalhart ISD does not have a clearly defined process for placing an item on the board agenda, delivering timely information to the board, taking minutes that are comprehensive, or ensuring a high rate of public participation in board meetings. Although all board packets are supposed to be delivered to all board members by 4:00 pm the Friday before a Tuesday board meeting, instances have occurred when the superintendent's secretary added information after the packets were delivered. Board minutes are very short and vague, and meetings show a lack of audience participation

FIGURE 2
DALHART ISD STUDENT ACADEMIC MEASURES COMPARED TO REGION 16 AND STATE (1)
SCHOOL YEAR 2015–16
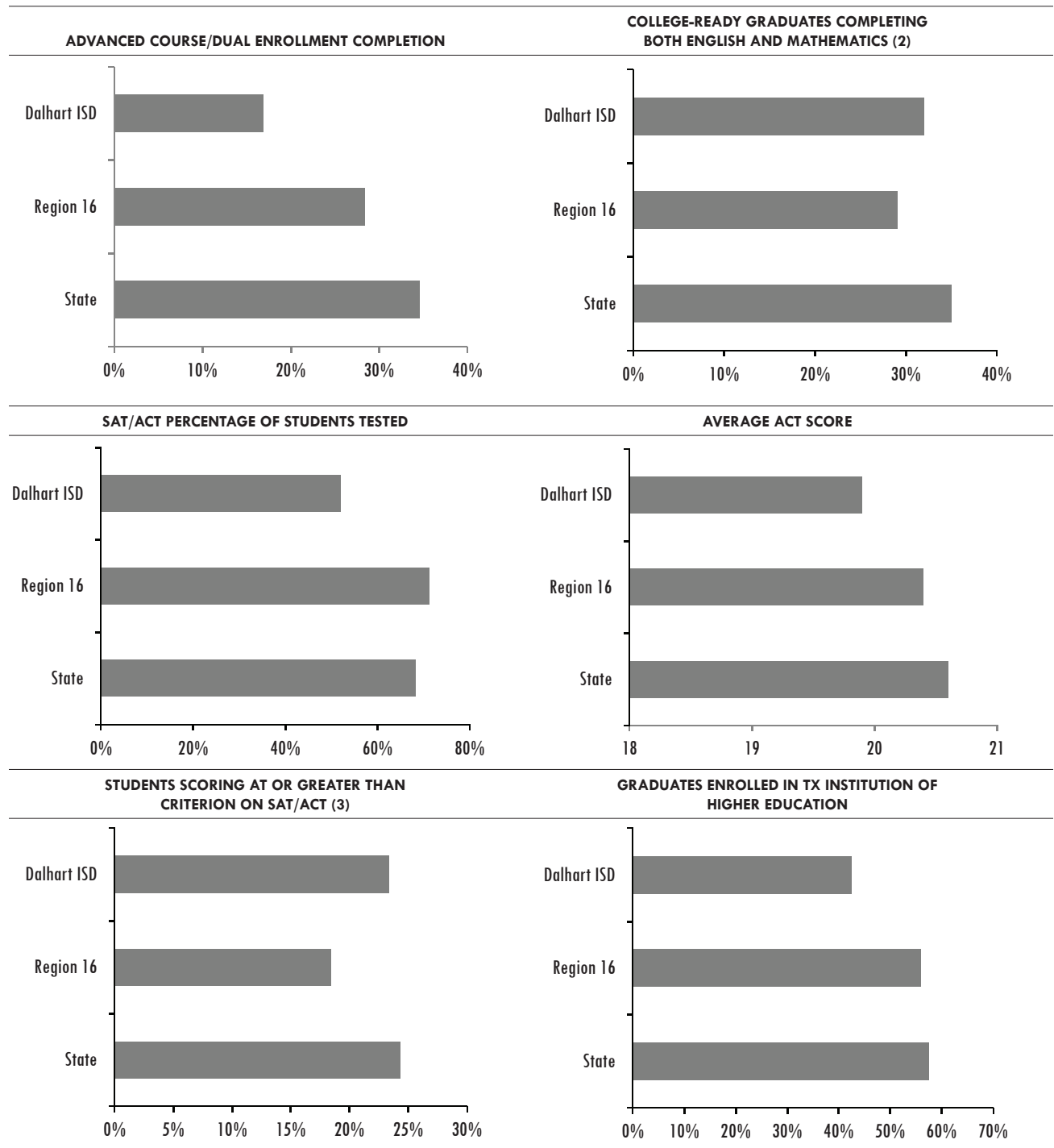
NOTES:
(1)   Region 16 = Regional Education Service Center XVI.
(2)   To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the Texas Success Initiative Assesment, or the SAT or ACT standardized college admissions tests.
(3)   Criterion refers to the scores on the SAT and ACT college admissions tests. For these tests, the criterion scores are at least a composite 24 on the ACT and at least 1110 total on the SAT.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2015–16.

and a lack of processes in place to encourage more public participation. The district would have more effective and efficient meetings that benefit the community by improving communication processes related to board meetings.

Dalhart ISD does not use an annual board calendar to ensure that all board-required actions occur at the appropriate time, nor does the district have a process to conduct a board self-assessment. Instead of populating a full calendar of events at the beginning of each school year, the superintendent and board president use the board agenda from the same month in the previous year to plan the agenda for an individual month. In addition, the board has not participated in any form of self-assessment or self-reflection to evaluate how well the board has done or is doing to function more effectively. Developing an annual board calendar and self-assessment would help the board maximize its effectiveness.

Dalhart ISD lacks comprehensive processes to develop a long-term strategic plan, district improvement plan (DIP), and campus improvement plans (CIP), including the structure for budgeting and evaluation. The district has a number of plans and goals, but it has no process in place to integrate the plans into a strategic plan for improvement. The district has not clearly outlined how these plans all tie together. The district also does not have a process to ensure that the budget aligns with strategic goals. By having a more coordinated process to develop plans and goals, the district could avoid confusion among stakeholders and ensure that the budget is consistent with agreed-upon goals.

Recommendations to assist the district with the board management process include:

- develop and update all policies and associated procedures on a five-yearcycle;

- ensure that the board receives all required trainings and follows proper protocol as board members;

- reorganize the process for the development and communication of board meeting agendas, the development and distribution of board packets, scheduled public participation, and accurate and complete minutes;

- develop and implement a yearly board calendar that includes all essential deadlines for board action, and conduct an annual board self-assessment; and

- design and implement a comprehensive planning process.

ROLES AND RESPONSIBILITIES

The district does not clearly define human resource functions. Additional staff training would improve the district operations and, for maintenance staff, the variety of tasks they administer. Segregation of duties in the Business Department and a position to address the district's safety and security concerns would reduce the risk in those areas.

Dalhart ISD's human resource (HR) functions lack consistent and coordinated implementation. HR tasks are handled by a variety of staff at the district and campus levels. The decentralized structure of Dalhart ISD's HR functions leads to confusion among staff about whom to contact with HR concerns and questions. The lack of leadership and written procedures has caused inconsistent implementation of some HR functions. By defining roles and developing detailed procedures, the district would improve HR functions at the district and campus levels.

Dalhart ISD's organizational structure includes dual reporting structures, and key administrative staff lack training in their areas of responsibility. For example, campus principals report to both the superintendent and the executive director of student services. Principals reported a lack of consistency between directives given by the superintendent and the director. The executive director of student services has many job responsibilities; therefore, some assigned areas may be neglected. In addition, the CFO and the executive director of student services lack adequate training in the some of the functional areas they oversee, including HR, food services, and custodial operations. Developing clear reporting structures for principals and providing additional training would ensure consistent district initiatives, and would ensure that administrators understand the areas they oversee.

Dalhart ISD's Business Department lacks effective internal controls and segregation of duties. The Business Department does not effectively segregate the duties of Dalhart ISD's payroll specialist, accounts payable specialist, and employee benefits specialist to prevent the possibility of fraud, theft, or other financial impropriety. In addition, the CFO does not validate some of the Business Department staff's work to identify errors. Reviewing work helps reduce the risk of errors or omissions.

Dalhart ISD has not effectively analyzed, planned, or implemented facility maintenance and improvements across the district. Dalhart ISD does not conduct annual audits or inspections of district facilities. Furthermore, the district has not conducted a districtwide facility needs assessment to

assess facility conditions and evaluate the capital needs of existing facilities. Neither the maintenance director nor CFO tracks work orders or maintenance staff's individual performance to develop training and expand existing skills based on facility needs. With improved planning and training, the Maintenance Department could better address issues with the district facilities.

Dalhart ISD's organizational structure does not ensure that all facets of its safety and security program are monitored or effectively performed. Although the district employs a chief of police, the position focuses on law enforcement and management of district police functions, not on student safety and security. Furthermore, Dalhart ISD lacks a formal process for staff to communicate or report safety and security issues. Dalhart ISD has also not developed a memorandum of understanding with city or county emergency response specialists or established a district safety and security committee, as required by state law. By assigning clear roles and responsibilities for security issues, the district could reduce confusion and avoid potential safety issues.

Recommendations to assist the district to develop comprehensive roles and responsibilities include:

- define key leadership HR roles and develop a comprehensive human resources operating administrative procedures manual;

- train leadership positions to perform their primary responsibilities, and revise the reporting structure for principals to report directly to the superintendent;

- review the roles, responsibilities, and duties of each staff in the Business Department, and develop a system enabling the segregation of their duties to ensure effective internal controls that will deter and prevent fraud, theft, and financial impropriety in accordance with board policy;

- develop and implement a formal process to manage district facilities; and

- assign district safety and security responsibilities to the district chief of police, form a district safety and security committee, and address outstanding safety and security concerns.

PROCESSES AND PROCEDURES

Procedures provide guidance to staff regarding how to fulfill job responsibilities. The processes and procedures that guide Dalhart ISD management are inconsistent and incomplete.

These procedures include those related to transportation, finance, contract management, and educational service delivery.

The Dalhart ISD Transportation Department lacks written procedures to ensure safe and effective transportation service delivery. Transportation Department staff rely on the institutional knowledge and instruction from the director of transportation to perform their daily duties. The district also provides little information to parents and students regarding transportation operations. The only written policies available to transportation staff and to parents are the high-level policies set in the Board of Trustees Policy Manual, which the district publishes on its website. Having a consistent set of detailed procedures would ensure that operations are more consistent and efficient and avoid confusion among staff, students, and teachers.

Procedures are also important in school district business operations. Dalhart ISD lacks comprehensive written procedures to guide the daily functions and activities of the Business Department. Although the district has a comprehensive purchasing manual, it lacks procedures for payroll, accounts payable, accounting, employee benefits, activity funds, cash handling, and textbook purchasing operations. Instead, the Business Department relies on staff's experience and knowledge. Procedures would provide systematic instructions for all staff and consolidate the district's institutional knowledge.

Many school districts contract with vendors to perform various services. Dalhart ISD does not effectively monitor its contracted services. The district does not have a formal process to monitor the requirements of the district's contracts or the performance of vendors. Additionally, the district does not follow any formal criteria or guidelines when approving or renewing district contracts. Without proper contract oversight, Dalhart ISD exposes itself to potential fraud and abuse.

One of the district's largest contracts is for food services. Dalhart ISD lacks adequate financial oversight of the food service management company. After experiencing financial losses in the program, in July 2014, the district contracted with a new vendor to manage the operation and administration of the food services program. The district has not established a formal procedure to validate the charges on the invoices that the vendor provides, which increases the risk of improper payment. The district also lacks a process to analyze the costs and benefits of contracted food service

management and contract renewals. With closer financial monitoring, Dalhart ISD could avoid unsubstantiated charges.

Another large contract in the district is for custodial services. The district's process for contract oversight and performance monitoring of this contract does not ensure that the district receives consistent and quality services. The district did not conduct a cost/benefit analysis of the contracted services when deciding to renew the contract. Campus principals complete a Report Card for Custodial Services to assess the performance of the contract service provider each month. However, no performance or cleanliness standards are in place upon which the administrators base their grades. Having a consistent set of standards for performance would ensure that the district is properly evaluating the service and could improve the level of quality.

Processes and procedures are also important for educational staff in a school district. Dalhart ISD does not ensure the consistent use of the components of the curriculum management system, and teachers do not receive adequate curriculum support. During school year 2014–15, Dalhart ISD adopted the Texas Essential Knowledge and Skills (TEKS) Resource System (TRS) as the district curriculum. Although staff indicate that the system's implementation has been beneficial to the district, they also indicate that the implementation process is inconsistent among campuses and among departments. No administrative office position is dedicated to curriculum and instruction support. A documented process related to curriculum would reduce confusion and help to ensure consistent implementation across campuses.

Recommendations to assist the district in developing effective processes and procedures include:

- develop and implement a transportation procedure manual to address all school transportation operations;

- develop comprehensive written procedures for each operation of the Business Department;

- develop and implement a formal contract management process with written procedures and practices to identify all district contracts, centrally capture and monitor contract requirements, and evaluate vendor performance;

- develop and implement a process to provide comprehensive financial oversight of the food service management company;

- adopt cleanliness standards and modify the performance management process for the custodial contract; and

- develop and implement a process to continuously monitor the curriculum management system at all campuses.

ASSET MANAGEMENT AND SECURITY

Effectively managing and securing assets is essential with limited district resources. Dalhart ISD should better control its fixed assets, including data and computer equipment. The district can also better ensure student safety by enhancing the visitor management process and having a certified director conduct the school bus certification program.

The district does not tag, track, and inventory all its fixed assets. The district uses one process for assets with a value of more than $5,000 and another process for computers and other technology. However, the district lacks a process for assets with a value of less than $5,000. Although the district's accounting system contains an asset management module, the district does not use it. A comprehensive fixed assets inventory ensures that the district's assets are available when needed.

Dalhart ISD lacks controls to ensure that the security of its data and servers are adequate, including risks related to physical security, fire suppression, power backup, climate control, and disaster recovery. For example, the data center's doors and external window are unlocked, increasing the risk of unauthorized access, theft, or destruction of digital information or hardware. The Technology Department has not developed a disaster recovery plan to address how the district should replace equipment and remain operational in the event of a disaster. Improving the data center physical security and developing procedures to reduce the risk of data losses would ensure that the district's data resources are secure.

Dalhart ISD does not have effective safety and security processes related to visitor management, campus access, and use of video surveillance. Each campus has an electronic visitor management system that prints a visitor badge. At the time of the onsite review, the district had not activated the system's functionality to verify the visitor's identity and conduct a background check. Each campus addresses access control differently, with varied levels of effectiveness. The district maintains surveillance cameras at some campuses, but they do not effectively cover all areas. Developing and

implementing procedures to improve visitor management controls, secure access to campuses, and make effective use of video surveillance would help to ensure safety for all the district's students, teachers, and visitors.

The Dalhart ISD Transportation Department annual school bus inspections do not comply with state law, and the vehicle inspection and repair program is not sufficient to ensure the safe and secure operation of fleet vehicles. The director of transportation is not certified as a state inspector by the Texas Department of Public Safety to perform mandatory annual school bus inspections. The director also is not certified as a school bus technician by the National Institute for Automotive Service Excellence. Supervised by the director, high school students enrolled in the district's auto mechanics program complete quarterly preventive maintenance checks on school buses, annual inspections, and basic repairs to district vehicles. Dalhart ISD school bus drivers do not conduct pre-trip and post-trip school bus inspections. A comprehensive vehicle inspection and repair program would ensure the consistency, safety, efficiency, and accountability of its operations.

Recommendations to strengthen the district's asset management and security include:

- develop and implement a comprehensive inventory process for all fixed assets;

- improve the data center physical security and develop procedures to reduce the risk of data losses;
- develop and implement procedures to improve visitor management controls, secure access to campuses, and make effective use of video surveillance; and

- develop and implement a comprehensive vehicle inspection and repair program in accordance with industry standards.

Implementing recommendations in these areas will enable the district to better target its efforts and resources and to meet district goals.

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 showing the chapter's recommendations and associated savings or costs for school years 2017–18 to 2021–22. The following figure shows the fiscal impact of all 48 recommendations in the performance review.

FISCAL IMPACT

	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
Gross Savings	$106,671	$80,729	$62,569	$20,196	$12,276	$282,441	$0
Gross Costs	($80,261)	($80,261)	($80,261)	($80,261)	($80,261)	($401,305)	($6,695)
TOTAL	**$26,410**	**$468**	**($17,692)**	**($60,065)**	**($67,985)**	**($118,864)**	**($6,695)**

CHAPTER 1. DISTRICT ORGANIZATION, LEADERSHIP, AND MANAGEMENT

An independent school district's governance structure, staff management, and planning process provide the foundation for effective and efficient education of students. An elected seven-member board of trustees (board) governs each school district in Texas. 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.

Dalhart Independent School District (ISD) is located in Dalhart, Texas, and unincorporated portions of Dallam and Hartley counties. According to the U.S. Census Bureau, the city of Dalhart had a population of 8,370 in 2015, an increase of 5.5 percent since the official 2010 census. In 2010, the percentage of persons under age 18 was 37.6 percent. Dalhart ISD is one of the largest employers in the Dalhart area. Dalhart ISD employed 221 staff in school year 2014–15. In 2014, the area's median household income was $47,724.

According to the 2010 census, the population categorized themselves as 62.6 percent white, 34.0 percent Hispanic or Latino, 1.2 percent African American, 0.9 percent American Indian, and 0.7 percent Asian. In school year 2015–16,

Dalhart ISD had approximately 1,767 students enrolled in kindergarten through grade 12. There are five campuses in the district, including Dalhart High School, grades 9–12; Dalhart Junior High School, grades 6–8; Dalhart Intermediate School, grades 4–5; Dalhart Elementary School, pre–kindergarten to grade 3; and XIT Secondary School, grades 7–12.

The city of Dalhart is growing with new industry. Industrial dairy farms, Hilmar Cheese Company, JBS Hog Production, and Larson Farms are attracting more families and migrant workers. The district expects that Hispanic, English Language Learners (ELL), and migrant student populations will increase, and cause student mobility rates to increase.

The seven-member Dalhart ISD Board of Trustees (board) serves terms of three years, with elections held annually. The terms of one-third of the board members, or as near to one-third as possible, expire each year. **Figure 1–1** shows Dalhart ISD's board members.

The board meets at 7:00 pm on the third Tuesday of each month in Dalhart ISD's central administration office. Board Policy BE (LOCAL) states that the board president can call special meetings at his or her discretion or upon request by two board members. From August 2015 to November 2016, the district held nine special meetings.

The public may attend all regular meetings and may address the board on topics of interest. If the public wishes to

FIGURE 1–1
DALHART INDEPENDENT SCHOOL DISTRICT BOARD OF TRUSTEES
SCHOOL YEAR 2016–17

NAME (1)	TITLE (1)	TERM EXPIRATION	YEARS OF SERVICE	OCCUPATION
Peter Baumert	President	2017	6	Laborer/Manager
Colette Moorhouse	Vice-President	2019	1	Controller
Tammy Schniederjan	Secretary	2018	2	Educator
Joni Atha	Member	2019	1	Business Owner
Janet Banks	Member	2017	6	Homemaker
Boyd Barrow	Member	2018	5	Laborer
Justin Moore	Member	2017	4	Business Owner

NOTE: (1) The May 2017 board elections shifted both board members and positions. Since the onsite review, board members Dr. Richard Dunham, Robert Ledbetter, and Joyce Speer replaced board members Peter Baumert, Janet Banks, and Justin Moore. In addition, the board leadership positions shifted. Board member Colette Moorhouse is president, Tammy Schniederjan is vice-president, and Joni Atha is secretary.
SOURCE: Dalhart ISD, November 2016.

participate, they must sign up with the presiding officer or designee before the meeting begins and indicate the topic about which they wish to speak. Presentations are limited to five minutes.

Board meetings are not audio recorded and the chief financial officer (CFO) and/or the superintendent typically takes the minutes of board meetings. The minutes are then given to the superintendent's secretary, who compiles them and distributes in an email to Dalhart ISD staff and key community members so they will not have to wait a month, for the next board meeting minutes approval, to find out what happened at the meeting.

The board appointed Mr. John Massey the superintendent of Dalhart ISD on July 1, 2013. The board renewed his contract for a term of three years beginning on July 1, 2016 and ending on June 30, 2019. Prior to Dalhart ISD, Mr. Massey has served in multiple roles in other school districts, including superintendent, principal, assistant principal, and teacher.

According to the superintendent's employment contract, the superintendent is "the chief executive of the district and shall faithfully perform the duties of the superintendent of schools for Dalhart ISD as prescribed in the job description and as may be lawfully assigned by action of the Board and shall comply with all lawful board directives, state and federal law, district policy, rules, and regulations as they exist or may hereafter be amended."

The superintendent's district leadership team consists of the CFO and the executive director of student services. The district leadership team meets every weekday from 7:00 to 7:30 AM. The superintendent and executive director of student services formally meet once a month with principals and directors at the central office. The superintendent also holds two separate meetings once a month, one with assistant principals and one with the department heads at the high school.

Figure 1–2 shows Dalhart ISD's current organization. Although the principals report to the executive director of student services, they also, to some degree, report to the superintendent. Most of the educational functions report to the executive director of student services and most operational areas report to the CFO. The secretary, chief of police, athletic director, and technology director report to the superintendent.

FINDINGS

♦ Dalhart ISD's organizational structure has dual reporting structures, and key administrative staff lack training in their areas of responsibilities.

♦ Dalhart ISD lacks a process to regularly review and update board policies and ensure procedures accompany those policies.

♦ Dalhart ISD lacks comprehensive processes to develop a long-term strategic plan, district improvement plan (DIP) and campus improvement plans (CIPs), including the structure for budgeting and evaluation.

♦ Dalhart ISD does not have an effective process for evaluating the superintendent.

♦ The Dalhart ISD Board of Trustees lacks appropriate training.

♦ Dalhart ISD does not have a clearly defined process for placing an item on the board agenda, for getting timely information to the board, for taking minutes that are comprehensive, and for ensuring a high rate of public participation in board meetings.

♦ Dalhart ISD does not have a process for an annual board calendar to ensure all board-required actions occur at the appropriate time, nor is there a process to conduct a board self-assessment.

♦ Dalhart ISD does not have an effective process to develop accurate short-range and long-range enrollment projections for staffing and facility needs.

RECOMMENDATIONS

♦ **Recommendation 1: Train leadership positions to perform their primary responsibilities, and revise the reporting structure for principals to report directly to the superintendent.**

♦ **Recommendation 2: Develop and update all policies and associated procedures on a five-year cycle.**

♦ **Recommendation 3: Design and implement a comprehensive planning process.**

♦ **Recommendation 4: Develop annual objectives and an aligned evaluation instrument for managing the district superintendent's performance.**

FIGURE 1–2
DALHART ISD ORGANIZATION
SCHOOL YEAR 2016–17
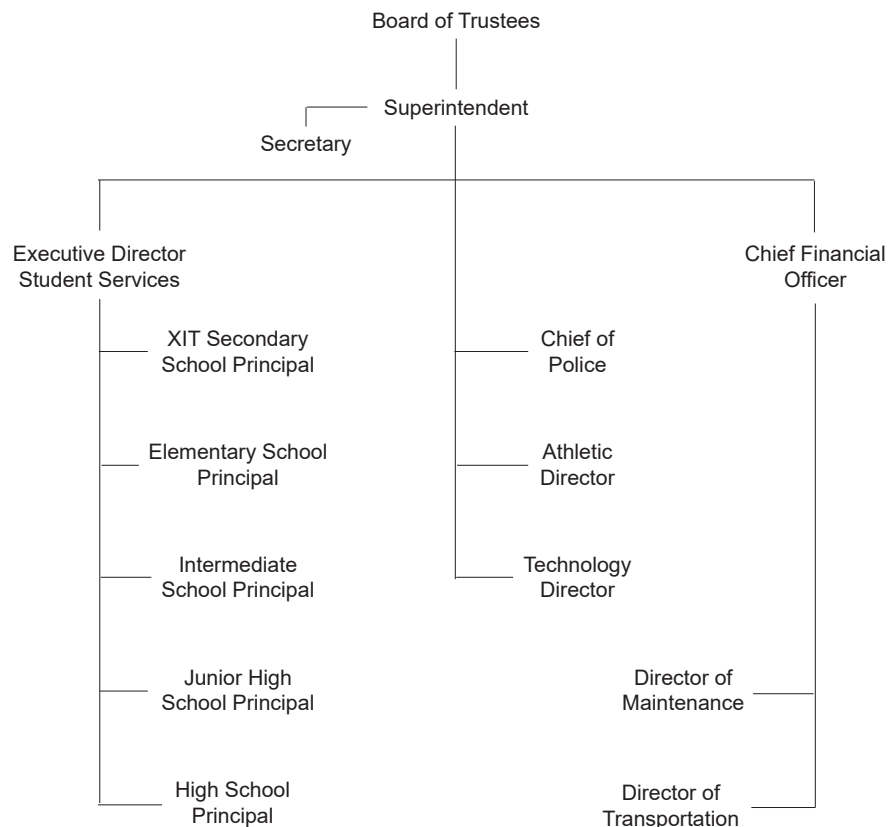
Sources: Legislative Budget Board School Review Team; Dalhart ISD, November 2016.

♦ **Recommendation 5: Ensure that the board receives all required trainings and follows proper protocol as board members.**

♦ **Recommendation 6: Reorganize the process for the development and communication of board meeting agendas, the development and distribution of board packets, scheduled public participation, and accurate and complete minutes.**

♦ **Recommendation 7: Develop and implement a yearly board calendar that includes all essential deadlines for board action and conduct an annual board self-assessment.**

♦ **Recommendation 8: Develop and apply accurate short-range and long-range enrollment projections for staffing and facility needs.**

DETAILED FINDINGS

ORGANIZATIONAL STRUCTURE (REC. 1)

Dalhart ISD's organizational structure has dual reporting structures, and key administrative staff lack training in their areas of responsibilities.

Figure 1–3 shows the functional areas for each of the three administrative leadership positions, who the positions oversee, and the number of direct reports. The superintendent has six direct reports (and shares the oversight of the principals with the executive director of student services). The CFO has eight direct reports, including six staff and two contract staff. The executive director of student services has 12 direct reports, including the principals. The superintendent has 10 areas of functional responsibility as specified in his 2016 contract.

FIGURE 1–3
DISTRICT LEADERSHIP TEAM FUNCTIONAL RESPONSIBILITIES AND NUMBER OF DIRECT REPORTS
SCHOOL YEAR 2016–17

POSITION	RESPONSIBILITIES
Superintendent	• Assume administrative responsibility and leadership for the planning, operation, supervision, and evaluation of the education programs, services, and facilities of the Dalhart ISD and for annual performance appraisal of the Dalhart ISD's staff.
	• Assume administrative authority and responsibility for the assignment and evaluation of all staff other than the superintendent.
	• Make recommendations regarding the selection of Dalhart ISD staff, subject to approval by the Board of Trustees (board).
	• Initiate the termination or suspension of a staff employment or the non-renewal of a staff term contract.
	• Manage the day-to-day operations of Dalhart ISD as its administrative manager.
	• Prepare and submit to the board annually a proposed budget covering all estimated revenue and proposed expenditures of Dalhart ISD for the following fiscal year.
	• Prepare recommendations for policies to be adopted by the board and oversee the implementation of adopted policies.
	• Develop appropriate administrative regulations to implement adopted policies.
	• Provide leadership for the attainment of student performance based on the academic excellence indicators adopted by the State Board of Education and other indicators adopted by Dalhart ISD board.
	• Organize the district's central administration.
	• **Total Number of Direct District Staff Reports: Six, including chief financial officer, executive director of student services, secretary, chief of police, athletic director, and technology director. The principals have a partial reporting relationship to the superintendent**.
Chief Financial Officer	• Oversight of all financial and business affairs of the district (including accounts payable, accounting, and budget).
	• Serve as the chief financial advisor and budget advisor to the superintendent and the board.
	• Oversight of the food service management company, custodial management company, district maintenance, and transportation.
	• Staff management: Select, train, evaluate, and supervise department staff and make recommendations relative to assignment, retention, discipline, and dismissal.
	• Oversight of human resources, payroll, and employee benefits.
	• Develop training options and improvement plans for department staff to enhance the effectiveness of department operations.
	• Oversees public information requests.
	• Reporting in Public Education Information Management System (PEIMS).
	• Provides finance services regarding federal programs.
	• Prepares and submits Title I Part C-Carl D. Perkins Vocational grants.
	• **Total Number of Direct District Staff Reports: Six, including director of maintenance, director of transportation, PEIMS director/payroll specialist, employee benefits specialist, accounts payable specialist, and payroll specialist.**
	• **Total Number of Contracted Services Staff that Report to the CFO: Two, including Southwest Food Services Excellence director of dining services and the custodial manager for GCA Services Group's K–12 Education Division**.
Executive Director of Student Services	• Instructional management and evaluation of educational programs.
	• Monitors school improvement.
	• Oversees the district improvement plan.
	• Oversees all instructional programs and special programs including gifted and talented, English as a Second Language, homeless, alternative education, migrant, federal programs, after school programs, Section 504, and special education.
	• Oversees all student services and staff, including librarians, nurses, occupational/ physical therapy, and speech therapy.
	• Oversees instructional technology.
	• Submits data to PEIMS.
	• Oversees federal programs.

FIGURE 1–3 (CONTINUED)
DISTRICT LEADERSHIP TEAM FUNCTIONAL RESPONSIBILITIES AND NUMBER OF DIRECT REPORTS
SCHOOL YEAR 2016–17

POSITION	RESPONSIBILITIES
Executive Director of Student Services (continued)	• Human resources: professional development, recruitment, staff orientation, mentorship, and leadership programs. • School/community relations: parent community involvement, volunteers, public relations, and foundations. • Serves as the interim principal for the XIT Secondary School (XIT). • **Total Number of Direct District Staff Reports: 12, including XIT principal (vacant), elementary principal, intermediate principal, junior high principal, high school principal, director of special education, instructional technologist, district librarian, migrant coordinator, and three migrant recruiters**.

SOURCE: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

In addition to having 12 direct reports, the executive director of student services is the interim principal for the XIT Secondary School, is responsible for the district's community involvement activities, oversees district hiring of principals and teachers, and implements various assigned special projects. The executive director of student services stated that 40.0 to 50.0 percent of her time is devoted to curriculum and instruction (and programs), approximately 30.0 percent is devoted to the oversight of the district improvement plan (DIP), and approximately 10.0 to 20.0 percent is devoted to public relations and community involvement.

During onsite interviews, staff indicated that the executive director of student services has too many job responsibilities and, as a result, has neglected some assigned areas. For example, the position is responsible for overseeing the district's public relations activities; however, there is no coordinated districtwide public relations, parent, or business involvement initiatives. There is also no districtwide volunteer program and the Dalhart Education Foundation does not regularly meet and does not have a district liaison.

Additionally, the executive director of student services job description shows that she should be assisting the district to develop observation methods to improve teacher effectiveness, conference regularly with assigned staff to discuss performance, and develop improvement objectives to identify professional growth opportunities. However, the director is not performing any of these tasks. Further, this position is responsible for evaluation of district programs, but onsite interviews and a review of documents show that no program evaluations have occurred in the past three years.

Dalhart ISD's organizational structure also lacks continuity of supervision resulting in an ineffective and inefficient reporting process. Campus principals co-report to both the superintendent and the executive director of student services. The principals formally meet with the superintendent bi-weekly, and informally on an as-needed basis. The superintendent's contract assigns him responsibility for the annual performance appraisals of district staff, which includes the principals. Yet, principals indicated they report to both the superintendent and the executive director of student services, and that together they conduct the principals' evaluations. Onsite interviews indicate that the director writes the evaluations. However, the superintendent disciplines the principals. Principals reported there is often a lack of consistency in directives and assignments, with one supervisor asking for a job done one way, and another supervisor a different way. Some principals discuss and work through issues with the executive director of student services, while others work directly with the superintendent.

The CFO and the executive director of student services also lack adequate training in the some of the functional areas they oversee. For example, neither position is trained in school district human resource (HR) management. The CFO oversees staff benefits and the executive director of student services oversees hiring. During onsite interviews, the CFO and the executive director of student services noted that they did not receive specific human resources training. They both have received some training from Regional Educational Service Center XVI (Region 16) and some state training, but commented that they would like to have additional training opportunities. The lack of training is evident in the deficiency of HR procedures, strategic planning, and organizational development.

In addition, the CFO oversees Dalhart ISD's food service and custodial operations; however, he lacks training on how to oversee these areas at a school district. The district

contracts with external companies to manage both its food and custodial services. During onsite interviews, staff indicated that part of the reason the district contracts for these services is the CFO's inexperience in overseeing these areas at a school district. At the time of the review, the CFO is responsible for monitoring both the food service and custodial contracts, but onsite interviews indicate he is not effectively managing the oversight of the contracts.

The Texas Association of School Boards (TASB) offers Leadership Team Training. This training is committed to enhancing the effectiveness of district leadership teams through its training, consulting services, conference, events, and information resources.

Region 16 offers a Leadership Development Component for districts in the area of general administration that provides needed expertise, information, and hands-on assistance through technical assistance and training for district staff, administration, and school board members.

The Texas Principal Evaluation and Support System (T-PESS) is a new principal evaluation system from the Texas Education Agency (TEA) provides to support principals in their professional development and help them grow and improve as campus and instructional leaders. Although the superintendent, executive director of student services, and principals received training from Region 16 during fall 2016, at the time of the review Dalhart ISD did not use T-PESS for its principal evaluations. In school year 2014–15, approximately 60 school districts piloted, and in school year 2015–16, approximately 200 school districts implemented it as a refined system. In school year 2016–17, TEA fully implemented T-PESS statewide. **Figure 1–4** provides a

checklist for effectively implementing the principal evaluation system.

Dalhart ISD should train leadership positions to perform their primary responsibilities, and revise the reporting structure for principals to report directly to the superintendent.

The superintendent should prepare a revised organization chart and submit it to the board for review and approval. The superintendent should inform principals of the new reporting structure and the superintendent should hold meetings with each of them to address any questions.

In the planning process, several important steps should occur to ensure a more effectively administered district. The superintendent should identify all the areas where the CFO and executive director of student services need additional training and make sure that they get that training as quickly as possible. The superintendent could require the CFO and executive director of student services to develop personal learning plans to address their professional growth and areas where they need more training. The superintendent should follow TEA's T-PESS evaluation process for principals.

The Educational Service Delivery and Human Resources Management chapters of this report address opportunities for improvement in the roles and responsibilities of the executive director of student services.

This recommendation could be implemented with existing resources.

FIGURE 1–4
THE TEXAS PRINCIPAL EVALUATION AND SUPPORT SYSTEM (T-PESS)
2016

ROLES AND EXPECTATIONS

Know and understand the Texas Standards for Principals.

Participate in professional development to understand and implement T-PESS.

Supervise T-PESS, and ensure that all steps are conducted according to the approved process.

Identify the principal's strengths and areas for improvement to make recommendations for improving performance.

Ensure that the contents of the Summary Rating form contain accurate information and accurately reflect the principal's performance.

Understand the context and environment in which the principal must work and leverage the skills and knowledge that are required to implement T-PESS.

Effectively guide and facilitate the Mid-year Progress Meeting and Final Evaluation Goal Setting meetings.

SOURCE: Texas Education Agency, 2016.

DISTRICT POLICIES AND ADMINISTRATIVE PROCEDURES (REC. 2)

Dalhart ISD lacks a process to regularly review and update board policies and ensure procedures accompany those policies.

Board Policy BF (LOCAL) states, "The Board shall designate one copy of the local policy manual as the official policy manual of the District. The official copy shall be kept in the central administration office, and the Superintendent or designee shall be responsible for its accuracy and integrity and shall maintain a historical record of the District's policy manual."

Dalhart ISD subscribes to the policy service provided by the Texas Association of School Boards (TASB). The superintendent oversees and manages board policies and the superintendent's secretary distributes new policies. The district has codified policies using the TASB model. The Dalhart ISD Board Policy Manual is composed of seven major classifications denoted as sections, with each section containing a detailed table of contents. The manual codes individual policies within sections A to G. There are two versions of the manual, one is the official district document kept in hard copy form in the central administration office and the other is an online manual available on the district's website. The online manual contains an alphabetic topic index that is alpha coded following the listing of sections.

Figure 1–5 shows the Dalhart ISD Board Policy Manual sections, titles, and policy codes.

The web-based Dalhart ISD Board Policy Manual provides an issuance date for each policy, while the official district document at the central administration office has the actual adoption dates. The adoption dates are not necessarily aligned with issue dates and determining actual adoption or update dates requires reviewing the official district document. **Figure 1–6** shows the issue status of Dalhart ISD's board policies. The figure shows the following:

- the Legislative Budget Board's School Performance Review Team examined 457 policies;

- 30.6 percent of the policies (140) were issued prior to 2010; and

- the greatest number of policies issued prior to 2010 relate to Community and Governmental Relations, Business and Support Services, and Local Governance.

FIGURE 1–5
DALHART ISD BOARD POLICY MANUAL ORGANIZATION OCTOBER 2016

SECTIONS

SECTION TITLES	POLICY CODES
A Basic District Foundations	AA - AID
B Local Governance	BA - BR
C Business and Support Services	CAA - CY
D Personnel	DA - DPB
E Instruction	EB - EMI
F Students	FB - FP
G Community and Governmental Relations	GA - GRC

SOURCE: Dalhart ISD Board Policy Manual, October 2016.

The TASB policy service provides the district with at least quarterly updates of recommended legal policy changes based on changes in law and regulations. In some instances, these also include unique local policy recommendations. Dalhart ISD subscribes to the TASB policy service at an annual cost of $800.

Dalhart ISD last worked with TASB to conduct a policy review session (PRS) in May 2004. The PRS process involves TASB providing a consultant to work with the board and the superintendent to evaluate and revise the entire policy manual. This process provides policy recommendations for the board to consider and approve, which results in a newly updated policy manual. TASB recommends that districts participate in a PRS every five to eight years, or when there has been a change in the superintendent or significant turnover in board membership. However, the board does not have a regular schedule for reviewing its local policy provisions or related procedural documents. Interviews with staff indicate that because of complaints regarding the student attendance policy, the board requested an overall policy review. The district had not reviewed the attendance policy since 2004.

Dalhart ISD does not have an internal process to review and update board policy. A review of the district policy manual identified many district policies that were outdated and in need of a thorough review. For example,

FIGURE 1–6
DALHART ISD BOARD POLICIES ISSUE STATUS
OCTOBER 2016

			POLICIES ISSUED IN EACH PERIOD:			
SECTION	TITLE	POLICIES EXAMINED	PRIOR TO 2010	2010–12	2012–14	2014–16
A	Basic District Foundations	12	3	1	3	5
B	Local Governance	58	23	8	10	17
C	Business and Support Services	93	28	15	20	30
D	Personnel	81	19	9	18	35
E	Instruction	70	17	10	10	33
F	Students	39	14	5	2	18
G	Community and Governmental Relations	104	36	20	11	37
TOTAL		**457**	**140**	**68**	**74**	**175**

Sources: Legislative Budget Board School Performance Review Team, November 2016; Dalhart ISD Board Policy Manual, October 2016.

the district and campus committee, employment procedures, high school grading and class rank, and board operations' policies are in need of revisions based on recommended changes from TASB's 2004 review that the district has not yet fully implemented.

In addition to outdated policies, Dalhart ISD also has insufficient administrative procedures to accompany board policy in each of its primary operational areas (human resources, food services, business, facilities, safety and security, transportation, and technology). Dalhart ISD's Board Policy BP (LOCAL) states:

> "The superintendent and administrative staff shall be responsible for developing and enforcing procedures for the operation of the District. These procedures shall constitute the administrative regulations of the district and shall consist of guidelines, handbooks, manuals, forms, and any other documents defining standard operating procedures. The superintendent or designee shall ensure that administrative regulations are kept up to date and are consistent with board policy. The superintendent or designee shall resolve any discrepancies among conflicting administrative regulations. In case of conflict between administrative regulations and policy, policy shall prevail. Administrative regulations are subject to Board review but shall not be adopted by the Board. All administrative regulations shall be made accessible to staff, students, and the public by law or board policy."

The superintendent indicates that the district's administrative procedures are not complete. Interviews with the CFO and executive director of student services indicate the only procedures that are printed and up-to-date are purchasing guidelines, curriculum guidelines, gifted and talented procedures, special education procedures, and board operating procedures. The district last updated the board operating procedures in 2013. Furthermore, there is no consistent pattern of established links in the policy manual to noted procedural documents. The district has linked some policies to procedures, while the district has not linked others.

Administrative procedures provide detailed guidance to staff to implement a school district's policies. The potential inconsistencies among outdated policies, plus the lack of and/or inconsistent administrative procedures, expose the district to errors, losses, lawsuits, theft, loss of institutional knowledge, and safety concerns for staff and students.

Policymaking is an essential tool for school board members. It is an effective way for the board to make sound decisions on complex issues. All procedures should comply with board policy and all applicable laws and regulations. Good policymaking and strong administrative procedures serve to focus the district's activities on student education, and reduce the likelihood of potential litigation. Weak, outdated, or poor policies can cause confusion and legal risk.

TASB offers a comprehensive policy review, which includes:

- Audit: TASB compares the district's policy manual to TASB's records. TASB notes any discrepancies and any policies that are out-of-date or that contain questionable provisions.

- Policy recommendations: The district's TASB policy consultant assembles a packet of recommended changes to the district's manual, including legal policies, local policies, and administrative regulations. TASB submits these to the superintendent for review, and a process of back-and-forth ensues as the superintendent and the TASB policy consultant agree on the details.

- District visit and board training session: The TASB consultant visits the district, works with the superintendent to polish the policy recommendations that will go before the board, and then conducts several hours of board training to familiarize board members with their role as stewards of the district's policies. The board members' continuing education requirements can include this training.

- Wrap-up and summary: The district visit always produces new changes that the district needs to make to the manual. TASB adds these to the work produced to date, and then the consultant returns to the superintendent a "Policy Review Schedule (PRS) Summary," a checklist document that summarizes the changes and invites the superintendent and board to say "yea" or "nay" to each policy. The board may adopt the policy changes based on the PRS summary, or may wait to receive the newly revised policy manual.

- Print and place online: Once the policy changes having been finalized, TASB prints and sends a brand new copy (or multiple copies, if needed) of the board's revised policy manual to the district.

TASB also offers a Regulations Resource Manual for its member districts. The manual provides model administrative regulations intended for use by superintendents and boards. Because the regulations and forms provided are generic models, the district must be prepared to customize them for Dalhart ISD.

Dalhart ISD should develop and update all policies and associated procedures on a five-year cycle.

The superintendent should propose the amendment of Board Policy BF (LOCAL) to include a five-year cycle for review of all policies and related procedures, procedures links, and web-based adoption and review dates to the board for approval. The board should approve the superintendent's recommended actions and direct the superintendent to implement the recommendation.

Figure 1–7 shows a review schedule the district could implement on a five-year basis.

This optional schedule distributes the number of policies for the district to review on an equitable basis over the five-year period, thus ensuring that district staff review

FIGURE 1–7
DALHART ISD PROPOSED POLICY REVIEW SCHEDULE
SCHOOL YEARS 2017–18 TO 2021–22

SECTION	TITLE	POLICIES TO BE EXAMINED	YEAR 1 REVIEW	YEAR 2 REVIEW	YEAR 3 REVIEW	YEAR 4 REVIEW	YEAR 5 REVIEW
A	Basic District Foundations	12	12				
B	Local Governance	58		58			
C	Business and Support Services	93			93		
D	Personnel	81				81	
E	Instruction	70	70				
F	Students	39		39			
G	Community and Governmental Relations	104					104
TOTAL		**457**	**82**	**97**	**93**	**81**	**104**

SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

all policies internally on a regular basis and in addition to any proposed changes by the TASB process. The district could review related procedural documents along with the policy review. Furthermore, the district could insert links to ease access to referenced documents where such links do not currently exist.

The superintendent should direct the appropriate staff to prepare administrative procedures for each operational area. The superintendent and the superintendent's secretary should make the needed changes in the official board policy manual and the district's web-based manual. The superintendent's secretary should prepare for the superintendent and, upon approval, send a memorandum of changes to all staff and the board. The superintendent's secretary should submit the amended policy to the TASB policy development section.

The policy historical data should be included on the web version. This would save parties, including board members, the expense and time necessary to obtain the needed information from the central administration office.

Since the time of the review, TASB met with the superintendent and all directors, principals, and board members related to district policies. TASB reviewed all policies and gave recommendations to the district administrators and board.

This recommendation could be implemented with existing resources.

DISTRICT AND CAMPUS IMPROVEMENT PLANS (REC. 3)

Dalhart ISD lacks comprehensive processes to develop a long-term strategic plan, district improvement plan (DIP) and campus improvement plans (CIPs), including the structure for budgeting and evaluation.

The district has numerous plans. Plans reported in interviews include:

- district improvement plan (DIP);

- campus improvement plans (CIPs);

- superintendent's goals (often referred to as the Team of Eight Goals) and plan to implement;

- targeted improvement plans;

- curriculum plan; and

- technology plan.

Region 16 provided two related training sessions with Dalhart ISD board members and the superintendent. The October 2015 session, "Developing a Vision for the Future," reviewed board operating procedures, discussed core beliefs of the district, and defined the goal statements of the Team of Eight. **Figure 1–8** shows the board and superintendent's goals for school year 2016–17, which the district developed at a September 2016 Region 16 training.

The district has a number of plans and goals, but there is no process in place to integrate the plans into an overall strategic plan for improvement. For example, in the past, the district has not used the Team of Eight goals to help determine the district goals or as a basis to write the DIP; however, interviews indicate that the district plans to use Team of Eight goals to help form the goals for the school year 2017–18 DIP.

The district has no long-term strategic plan. When the district hired the superintendent in July 2013, he assembled a strategic planning committee composed of a wide range of stakeholders. The committee met periodically in school year 2013–14, but stopped meeting in school year 2014–15 due to lack of attendance. Consequently, the district has not developed a long-term strategic plan since the superintendent was hired. No plan exists that may be used to set long-term priorities, focus energy and resources, strengthen operations, ensure that staff and other stakeholders are working toward common goals, establish agreement around intended outcomes/results, and assess and adjust the annual DIP in response to updated state data and other district environmental changes.

According to the Texas Education Code, Section 11.252(a), the purpose of the DIP is to guide district and campus staff in the improvement of student performance for all student groups (including students in special education programs under TEC Chapter 29, Subchapter A), to attain state standards in respect to the academic excellence indicators.

The process used to develop the school year 2015–16 DIP consisted of the following four steps:

- the district received the state testing data in late September 2016;

- a district needs assessment was administered;

- the executive director of student services compiled the results; and

- a Title I staff updated the school year 2015–16 DIP using the school year 2014–15 plan as a basis.

FIGURE 1–8
DALHART ISD BOARD AND SUPERINTENDENT GOALS
SCHOOL YEAR 2016–17

GOAL NUMBER	TOPIC AREA	FOCUS(ES) OF GOAL	TARGET COMPLETION DATE
1	Dalhart ISD District, Campus, and Community Relations	Improve teacher satisfaction and retention	June 2017
		The effective observation and evaluation practices of campus principals	June 2017
2	Instructional Management and School Improvement	Administration of an articulated core curriculum	Ongoing
		Development of an Articulated Bilingual/English as a Second Language framework	July 2017
		Enhance career and technology offerings to support House Bill 5	Ongoing
		School improvement through the alignment of math standards	June 2017
		School improvement through special education services	June 2017
3	Five Year Plan	Enrollment and demographic projections	June 2017
		Long-range planning for facilities, maintenance, transportation, and technology	Ongoing
		Fiscal stability	Monthly

Source: Dalhart ISD Superintendent Goals, school year 2016–17.

A review of the 2015 board minutes shows that the board did not vote on approving the DIP.

The district did not use its District Educational Improvement Committee (DEIC) to assist in developing the school year 2015–16 DIP. During onsite interviews, staff indicated that the district developed the structure for the nomination and election of a DEIC committee to develop the school year 2016–17 DIP. The DEIC included three teachers from each of the campuses, with the exception of XIT Secondary, which has one teacher represented; two parents; and one community member. The members each serve three-year terms and work to develop the annual DIP. The DEIC met twice in September and October 2016. The DEIC reviewed state data, the school year 2015–16 needs assessment results, and the school year 2015–16 DIP to develop the goals and strategies. Interviews indicate the board approved the goals and performance objectives for the plan in the October 2016 board meeting. With regard to the district connecting the budget to the DIP, interviews indicate that the CFO, superintendent, and the executive director of student services reviewed the funding sources to accompany the plan, but did not budget with the plans and goals in mind. Interviews indicate that the process for developing the school year 2016–17 DIP was more

coordinated, and the board will begin receiving a quarterly update on the plan's progress.

Dalhart ISD's official process for developing their CIPs is similar to the DIP process. Each campus nominates and elects a CIP committee that includes campus and district staff, parents of students enrolled in the school, business representatives, and community members. Each campus conducts a campus-level needs assessment. Based on the results of the assessment and the state data, each campus's CIP committee keeps the same goals and performance objectives as in the DIP, but develop campus-specific strategies for each goal. The elementary and XIT campuses must develop targeted CIPs due to the campuses' low performing accountability ratings.

In a focus group with campus leadership teams, more than one participant stated that the campus leadership teams have not had any type of training on how to develop a comprehensive CIP. They also stated that they do not consider the DIP when developing the CIPs. The 14 campus leadership team members interviewed were unable to identify any district goals.

Interviews with staff, board members, and community members show there is confusion on the process and outcome

of the district planning initiatives. One board member stated, "The board lacks information on where we are with the DIP; it does not seem like anything is measureable."

During onsite interviews, staff indicated that the district does not have a coordinated effort to integrate or implement its various plans. There is confusion regarding which plan is which and how they all tie together. The district also does not have a plan for allotting a sufficient budget to implement the plans. One board member requested information about the funding tied to the district goals, but did not receive it. Some board members were also unsure whether the district aligns CIPs with the DIP.

The current planning process is problematic because it causes confusion among the board, district leadership team, and campus-level staff on a clear direction for the district. When there is an insufficient focus on the key goals, there is an increased risk related to the appropriate use of funds in areas that are unrelated to the key goals' projected outcomes.

The current process also does not comply with board policy. Board Policy BQ (LOCAL) states that the board shall approve and periodically review the district's vision, mission, and goals to improve student performance. It also states that the DEIC shall be involved in the development of administrative procedures related to planning and budgeting and in ensuring the planning processes for the DIP and CIPs includes implementation guidelines and the necessary resources to implement the plans. The policy also states that the board shall ensure that data are gathered, and that the board shall develop criteria to undertake the required biennial evaluation to ensure that policies, procedures, and staff development activities related to planning and decision making are effectively structured to positively impact student performance. The district is not implementing these tasks.

It was not until school year 2016–17 that a district-level planning and decision-making committee was organized as required by TEC 11.251 (b)-(e). Additionally, pursuant to TEC 11.252 (a), the superintendent is required to consult the district-level committee in the planning, operation, supervision, and evaluation of the district educational program. Evidence of this requirement does not exist.

According to the Balanced Score Card Institute, "Strategic planning is an organizational management activity that is used to set priorities, focus energy and resources, strengthen operations, ensure that staff and other stakeholders are working toward common goals, establish agreement around intended outcomes/results, and assess and adjust the

organization's direction in response to a changing environment. It is a disciplined effort that produces fundamental decisions and actions that shape and guide what an organization is, who it serves, what it does, and why it does it, with a focus on the future. Effective strategic planning articulates not only where an organization is going and the actions needed to make progress, but also how it will know if it is successful."

Region 16 outlines key steps in its strategic planning process, including:

- The board, superintendent, and key stakeholders define the district's values, vision, and mission.

- The district collects data and conducts a comprehensive needs assessment.

- By analyzing the needs assessment and data, major priorities are identified.

- A series of goals which describe the district in a specified number of years are developed.

- Strategies are developed to address the goals and priorities identified. Timelines for completion, performance evaluation measures, and resources required will be identified.

- Develop an action plan that addresses goals and strategies identified to begin implementation.

- Finalize a written strategic plan that summarizes the results and decisions of the planning process.

- Build in procedures for monitoring and modifying strategies based on changes in data or within the organization.

- Annually evaluate the success of the plan and report findings to the board and key stakeholders.

Other districts have successfully linked their planning tools. The Austin ISD five-year strategic plan provides administrative commitments to implementing the strategic plan at the district level. Periodically, the district departments participate in implementing the strategic plan. The district assigns responsibility for each key action step in the strategic plan and require the departments to provide status reports about the implementation. Another important aspect of the Austin ISD strategic plan is its alignment with the annual district budget. Investments in the preliminary budget and recommended budget show alignment with the strategic

plan. Collectively, the five-year strategic planning implementation and alignment processes will ensure compliance with statutory requirements (TEC 11.252) to provide an annual DIP.

Figure 1–9 shows the recurring steps related to strategic plan implementation, review, and monitoring used by Austin ISD.

Dalhart ISD should design and implement a comprehensive planning process.

The superintendent should coordinate with the board to establish the planning processes that the district will incorporate in policy and use to guide the development

and maintenance of a district strategic plan, DIP, and CIPs. The district should complete this process no later than three months following the establishment of the district's commitment to implement the plan.

Upon completion of establishing the approved policy for the planning processes, the superintendent should communicate the planning processes to staff and assign coordination to the executive director of student services. The long-range strategic plan should include measureable objectives, timelines, and assignments for which the board should hold the superintendent and district leadership team accountable. The district should complete the planning process to guide actions for school year 2017–18.

FIGURE 1–9
AUSTIN ISD FIVE-YEAR STRATEGIC PLANNING PROCESS
SCHOOL YEARS 2015–16 TO 2019–20

TIMEFRAME	ANNUALLY RECURRING STEPS RELATED TO STRATEGIC PLAN IMPLEMENTATION, REVIEW, AND MONITORING
September	Budget and Finance Advisory Committee (BFAC) discusses budget process, budget parameters, and budget calendar
September	Board discusses approach to budget process, and approves budget parameters and budget calendar
October	Discussion with district leadership on budget process and budget priorities
October	Campus Improvement Plans (CIP) submitted and reviewed
October (Beginning 2016)	Annual Strategic Plan Scorecard results report
October	District Advisory Council (DAC) planning retreat
November	State of the District Address
November	BFAC and DAC budget recommendations
November	Board discusses and approves budget assumptions and staffing formulas
November (Beginning 2016)	DAC strategic plan review recommendations
November–December (Beginning 2016)	Annual strategic plan review: • Board reaffirms or revises Strategic Plan Framework and Strategic Plan Scorecard • Superintendent and senior leadership reaffirm or revise the Five-Year Implementation Plan
December	Departmental budget workshops
December–January	Meetings with employee groups to discuss budget process and receive recommendations
January	Departmental budgets submitted with strategic plan alignments
January–March	Compilation of preliminary budget with strategic plan alignments
April	Preliminary budget presented to Board
May	Meetings with community to discuss preliminary budget and receive input
May	Recommended budget presented to Board
June	Board adopts budget
July–August	CIP template developed with strategic plan alignments and CIP training
August	Beginning of school year convocation of all district staff

Source: Austin ISD five-year strategic plan, 2015.

Since the time of the review, the district used their contract with Region 16 to have four on-site planning days related to district plans and goals.

This recommendation could be implemented with existing resources.

SUPERINTENDENT EVALUATION (REC. 4)

Dalhart ISD does not have an effective process for evaluating the superintendent.

The district has multiple documents that contain performance goals and job requirements for the superintendent, but they do not all align, and there is no consistency on which ones are used to evaluate the position. Additionally, the district's superintendent evaluation process does not comply with board policy. Board Policy BJCD (LOCAL) states, "The instrument used to evaluate the superintendent shall be based on the superintendent's job description and performance goals and shall be adopted by the board." However, there is no job description for the superintendent other than general provisions in his employment contract. Onsite interviews indicated that Board Policy BJA (LOCAL) serves as a job description for the superintendent but the district has not revised it since November 2006. Dalhart ISD is also not using performance goals to evaluate the superintendent. Region 16 assisted the superintendent and board with establishing district goals for school year 2015–16 (listed in **Figure 1–8**). These are goals that should correspond to the superintendent's evaluation, but the district uses a separate evaluation instrument to assess the superintendent's performance. The district bases the evaluation instrument on 13 job performance statements that are not associated with the district/superintendent goals or the job description listed in Board Policy BJA (LOCAL).

Board members are instructed to rate the superintendent on a scale of one to five with one being unsatisfactory and five being outstanding. None of the performance statements or indicators of the statements are measureable or quantifiable. The 13 performance statements used to evaluate the superintendent are as follows:
- displays effective personal leadership attributes;

- effectively delegates authority and responsibility;

- maintains a positive and productive working relationship with the board;

- assists in the development of and effectively administers board policy;

- plans district programs and services to meet identified needs;

- directs the preparation and expenditure of the district budget within the district's fiscal capabilities;

- anticipates the district's needs for facilities and materials and establishes an effective system for their use.;

- coordinates a program of instruction that supports the philosophy and goals of the district;

- oversees a system of student services and student discipline that is effective and equitable;

- provides for staff practices that promote high quality staffing and job performance;

- initiates and promotes an effective staff relations program;

- promotes community relations through effective communication and involvement of community members; and

- seeks opportunities for continued professional growth.

Based on the school year 2015–16 evaluation, which was a roundtable discussion with no measurable outcomes, the board approved an extended contract for the superintendent from July 1, 2016 through June 30, 2019. The board has previously used an instrument to evaluate the superintendent, but did not use the instrument for school year 2015–16.

The superintendent's contract has yet another set of 10 required duties. While there is some overlap in these 10 duties, they are not in alignment with the 13 performance statements or Board Policy BJA (LOCAL). The 10 duties outlined in the superintendent's school years 2016–17 to 2018–19 contract are:
- Assume administrative responsibility and leadership for the planning, operation, supervision, and evaluation of education programs, services, and facilities of Dalhart ISD and for the annual performance appraisal of Dalhart ISD's staff.

- Assume administrative authority and responsibility for the assignment and evaluation of all staff other than the superintendent.

- Make recommendations regarding the selection of Dalhart ISD staff, subject to board approval.

- Initiate the termination or suspension of a staff member's employment or the nonrenewal of a staff member's term contract.

- Manage the day-to-day operation of Dalhart ISD as its administrative manager.

- Prepare and submit to the board annually a proposed budget covering all estimated revenue and proposed expenditures of Dalhart ISD for the following fiscal year.

- Prepare recommendations for policies to be adopted by the Board and oversee the implementation of adopted policies.

- Develop appropriate administrative regulations to implement adopted policies.

- Provide leadership for the attainment of student performance based on the academic excellence indicators adopted by the State Board of Education and other indicators adopted by the Board of Trustees of Dalhart ISD.

- Organize the district's central administration.

The lack of a clear and consistent process to evaluate the superintendent causes confusion as to the true indicators of the superintendent's progress and makes it difficult to hold him accountable for specific, measureable goals. This results in the board's inability to set clear performance improvement expectations with specific outcomes. A roundtable discussion with no specific, quantifiable outcomes is neither a best practice for evaluating the superintendent, nor a basis for continuing a contract an additional three years.

Without clearly defined sources of data, board members can substitute opinion based on anecdotal evidence, be overly influenced by a few vocal chronic complainants or advocates for the superintendent, and/or make judgments unrelated to measures of success or achievement of the district.

Since the board does not regularly discuss progress on the superintendent's performance in the context of clearly defined expectations and performance rubrics, it may result in conducting a rushed evaluation at the end of the year.

There are numerous best practices for effective superintendent evaluation instruments the district could use. **Figure 1–10** shows a few examples of best practices from the evaluation model of the New York State Council of School Superintendents.

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

The board president should schedule a special workshop meeting of the board to discuss and agree upon how to proceed with developing the superintendent's professional performance appraisal instrument and related implementation protocols. This agreement should include setting a timeline. The board could determine if assistance is needed to develop the necessary instrument(s) and related implementation procedures.

The board should begin the process of developing the instrument by developing a job description for the superintendent. The board should align the job description to the superintendent's goals developed with the assistance of Region 16 and the superintendent's employment contract. The final evaluation instrument should contain measurable goals and outcomes and comply with board policy. The board should also create procedures that document the evaluation process. The district should complete the development of the evaluation instrument and procedures so that implementation could occur during school year 2017–18.

The superintendent should be involved in discussions related to the development of instrumentation, specific expectations, and measurable outcomes to ensure a full understanding of the board's requirements. The board should hold a discussion quarterly on the progress the superintendent is making on the new evaluation instrument.

This recommendation could be implemented with existing resources.

BOARD OF TRUSTEES (REC. 5)

The Dalhart ISD Board of Trustees lacks appropriate training.

Board Policy BBD (LEGAL) states, "Within 60 days after a board member's election, the new board member shall participate in a local orientation session. The purpose of this

FIGURE 1–10
THE NEW YORK STATE COUNCIL OF SCHOOL SUPERINTENDENTS
SUPERINTENDENT MODEL EVALUATION
2014

CATEGORY	INEFFECTIVE	DEVELOPING	EFFECTIVE	HIGHLY EFFECTIVE
Relationship with the Board				
Information	Does not provide the information the board needs to perform its responsibilities.	Keeps only some members informed, making it difficult for the board to perform its responsibilities.	Keeps board informed with appropriate information as needed so it may perform its responsibilities.	Keeps all board members informed with appropriate, regular communication so it may perform its responsibilities.
Materials and background	Meeting materials are not available. Members arrive at meetings without any prior information regarding agenda.	Meeting materials are incomplete, and do not include supporting information.	Materials are provided. Some supporting information is included.	Meeting materials are provided with supporting information to make informed decisions.
Policy involvement	Makes decisions without regard to adopted policy.	Is minimally involved in the development, recommendation and administration of district policies.	Is actively involved in the development, recommendation, and administration of district policies.	Is proactive in the determination of district needs and policy priorities.
Community Relations				
Approachability	Is neither visible nor approachable by members of the community.	Is visible, at a distance.	Is visible and approachable by members of the community.	Is visible and approachable by members of the community. Attends a variety of events.
Staff Relationships				
Internal communications	Does not have a specific system to inform staff of important matters.	Is inconsistent in keeping staff informed of important matters.	Keeps staff informed of most important matters.	Establishes a system of keeping staff continually informed of important matters.
Delegation of duties	Does not delegate duties. Maintains personal control over all district operations.	Delegates duties to staff, but retains final decision-making authority.	Delegates responsibility to staff within their abilities, and then provides support to ensure their success.	Delegates responsibility to staff that will foster professional growth, leadership and decision-making skills.
Business and Finance				
Budget development and maintenance	Superintendent's budget knowledge is limited. The budget is developed and managed without taking into consideration current needs of the district.	Superintendent works to develop and manage the budget to meet the immediate fiscal issues. Decisions are primarily reactive to current needs of the district.	Budget actions are proactive and consider the most current information and data. A balance is sought to meet the needs of students and remain fiscally responsible to the community.	Budget actions are proactive and consider both current and long-range information and data. A balance is sought to meet the current and future needs of students and remain fiscally responsible to the community.
Resource allocation	Resources are allocated without consideration of district needs.	Resources are allocated to meet immediate needs.	Resources are distributed based upon district goals and seek to meet immediate objectives.	Resources are distributed based upon district goals and seek to meet immediate and long-range objectives.

FIGURE 1–10 (CONTINUED)
THE NEW YORK STATE COUNCIL OF SCHOOL SUPERINTENDENTS
SUPERINTENDENT MODEL EVALUATION
2014

CATEGORY	INEFFECTIVE	DEVELOPING	EFFECTIVE	HIGHLY EFFECTIVE
Instructional Leadership				
Focus on students	Focus is on the management of the district and maintaining day-to-day operations. Student achievement is not the priority.	Student achievement is a concern, but does not always guide decisions made within the district.	Student achievement is important and guides decisions made within the district.	Places student achievement as the top priority and consistently communicates this to others. Bases decisions on improving student achievement. This priority is reflected in the budget.
Goal development	Goals are not developed.	Goals are defined by implementing state curriculum and seeking to maximize student scores.	Facilitates development of short-term goals for the district. Provides the necessary financial resources to meet those goals.	Believes in and facilitates the development of short/ long term goals for the district. Aligns the available resources within the budget to accomplish these goals.

SOURCE: The New York State Council of School Superintendents, Superintendent Model Evaluation, 2014.

orientation is to familiarize the new board member with local board policies and procedures and district goals and priorities. The orientation shall be at least three hours in length for each new board member and must address local district practices in curriculum and instruction, business and finance operations, superintendent evaluation, and board member roles and responsibilities."

Onsite interviews indicated Dalhart ISD does not have a prepared plan for new board member orientation. Both new board members elected in 2016 stated that the orientation consisted of answering questions they had, and there was no formal information presented on board policies and procedures or district operations. The two new board members expressed the desire to learn how the district develops and approves the budget, but were not provided this information during the orientation.

Additionally, in 2013, the district developed a board operating procedures manual. The manual covers important board procedures, such as member conduct during a meeting, voting, individual board member requests for information, staff requests and complaints to board members, board member visits to campuses, communication, superintendent and board evaluations, the role and authority of board members, annual board orientation, and reorientation. Three of the board members had never seen the manual, and the district had not presented it in the new board member orientation.

Board Policy BBD (LEGAL) also states, "After each session of the Texas Legislature, each board member shall receive an update or orientation to the Education Code from a registered regional education service center provider." However, three board members indicated they did not receive any type of legislative update, and one board member indicated the superintendent provides legislative updates on an as-needed basis.

Board members are required by the Texas Government Code, Sections 551.005 and 552.012, to take specified hours of training in Tier 1 (orientation), Tier 2 (team building), and Tier 3 (board development). Additionally, board members are required to obtain one hour of open meetings training within 90 days of election or appointment. **Figure 1–11** shows an overview of the continuing education requirements for school board members.

Figure 1–12 shows a summary of Dalhart ISD's board member continuing education hours from January 2003 to November 2016. The total hours of continuing education completed by each Dalhart ISD board member ranges from 10 to 101 hours. The two board members who began their terms in 2016 have completed the fewest hours. However, when reviewing training records, the review team found that one board member did not complete the required one-hour open meetings training. Four board members have not taken some of the required training. In addition,

FIGURE 1–11
OVERVIEW OF CONTINUING EDUCATION REQUIREMENTS FOR BOARD OF TRUSTEES MEMBERS
2016

CONTINUING EDUCATION REQUIRED OF LOCAL SCHOOL BOARD MEMBERS	TIER	FIRST YEAR BOARD MEMBER	EXPERIENCED BOARD MEMBER	PROVIDER
Local District Orientation	1	At least 3 hours required within 60 days of election or appointment	Not required	Local district
Orientation to the Texas Education Code	1	3 hours required within 120 days of election or appointment	Not required	Education Service Center
Update to the Texas Education Code	1	Not required	*After legislative session,* with length determined by issues addressed in legislation	Any registered provider
Team-building Session must include a review of roles, rights, and responsibilities of the local board as outlined in the Framework for Governance Leadership and an assessment of continuing education needs of the board superintendent team	2	At least 3 hours	At least 3 hours each year	Any registered provider
Additional Continuing Education, based on assessed needs	3	At least 10 hours	At least 5 hours each year	Any registered provider
CONTINUING EDUCATION REQUIRED OF ALL ELECTED PUBLIC OFFICIALS–EFFECTIVE 1/1/2006	TIER	FIRST YEAR BOARD MEMBER	EXPERIENCED BOARD MEMBER	PROVIDER
Open Meetings Training	N/A	1 hour required within 90 days of election or appointment	Not required	Attorney General's Office or other approved provider
Public Information Act Training (Boards may delegate this training to the district's public information coordinator)	N/A	Check local district policy for any board requirement (BBD Local)	Not required	Attorney General's Office or other approved provider

SOURCE: Texas Association of School Boards, 2016.

FIGURE 1–12
DALHART ISD BOARD OF TRUSTEES CONTINUING EDUCATION HOURS
JANUARY 2003 TO NOVEMBER 2016

CONTINUING EDUCATION TOPIC	MEMBER A	MEMBER B	MEMBER C	MEMBER D	MEMBER E	MEMBER F	MEMBER G
Tier 1 – Orientation	2						
Tier 2 – Team Building	3	3	3	12	9	12	6
Tier 3 – Board Development	5	11	20	89	49.5	48	36.75
Total Hours	**10**	**14**	**23**	**101**	**58.5**	**60**	**42.75**

SOURCE: Texas Association of School Boards, School Board Member Continuing Education Report, November 2016.

records and interviews indicate that one board member elected in 2016 completed only a two-hour local orientation and the other board member elected in 2016 did not complete any orientation.

Despite the training, some board members conduct activities outside the scope of their defined roles and responsibilities. During onsite interviews, staff stated that if a board member was having issues with their child, the board member discussed the issue with the superintendent rather than the campus staff. Another example of inappropriate involvement in daily management activities is the board's single standing committee on the student attendance policy. Requested by two board members, the board formed this committee to validate whether the district is adhering to its attendance policy. Adherence to attendance policy is the responsibility of the administration,

and it is the administration's responsibility to communicate the results of its policies to the board using clearly established methods and procedures.

Others felt that certain board members were not following a chain of command in regards to certain issues. Some members feel like they are not receiving the information they should be and are concerned that the board "rubber stamps" the superintendent and his district leadership team.

The lack of board training could prevent the board from making the best possible decisions for the district. A lack of knowledge and information among the board can perpetuate an atmosphere of distrust between the board and administrators. Board members may seek involvement in the daily management of a school system because they do not have the proper training to understand and perform their defined governance role. Board involvement in administrative issues could have the negative effect of undermining the superintendent's leadership, making it difficult to implement or evaluate key district initiatives effectively.

As a best practice, a local orientation can assist in providing targeted training to new board members related to understanding their governance role. All board members can receive ongoing local training to ensure the board is working toward the same goals and to build an atmosphere of trust among board members and the district leadership team.

Dalhart ISD should ensure that the board receives all required trainings and follows proper protocol as board members.

The superintendent should follow the required policies and procedures that the district designed to provide appropriate board and administrative training. The superintendent's secretary should periodically review the training for the board to ensure they are current on their training requirements. The superintendent should provide members with important district information to minimize the need for acting outside the board's established scope of oversight.

This recommendation could be implemented with existing resources.

BOARD MEETINGS (REC. 6)

Dalhart ISD does not have a clearly defined process for placing an item on the board agenda, for getting timely information to the board, for taking minutes that are comprehensive, and for ensuring a high rate of public participation in board meetings.

The board operating procedures manual outlines the process for developing a board agenda. The manual states, "The deadline for submitting items for inclusion on the agenda is the sixth calendar day before regular meetings and the third calendar day before special meetings." The procedures for developing and placing items on the agenda, which are in alignment with Board Policy BE (LOCAL), are as follows:

Developing the Board Agenda

- Deadline for submitting items for the agenda.
  - Noon of the sixth calendar day before a regular meeting.
  - Noon the third calendar day before a special meeting.
- Placing items on the agenda.
  - The superintendent prepares the agenda in consultation with the board president.
  - Any board member may request a subject be included on the agenda. The request will be on the preliminary agenda.
  - The superintendent will finalize the agenda after consulting with the board president.
  - The board president shall ensure that individual board member requests are addressed on the agenda or scheduled for deliberation.
  - The board president shall not have the authority to remove a subject from the agenda without that board member's authorization.
- Consent Agenda
  - To expedite the board meetings and address routine and reoccurring business in an efficient manner, the board will use a consent agenda to the greatest extent possible.
  - If requested by a board member, an item listed under the consent agenda shall be immediately withdrawn for separate discussion and acted upon individually.

While the manual is clear on the process, according to interviews, not all board members have seen a copy of the board operating procedures manual. Interviews with board members indicate a variety of interpretations on how and when the agenda is set. One board member was unaware of

the procedure for putting something on the agenda. Others suggested they could call the board president or superintendent a few days in advance to get an item on the agenda.

Dalhart ISD changed its board meeting agenda preparation and posting processes in November 2016. The superintendent's secretary now sends a sample agenda on the Tuesday or Wednesday before the meeting to all board members. Board members have until Friday at noon to add items or request changes. She posts the agenda on that day (Friday) by 5:00 pm before the board meeting on the following Tuesday. This process is not in alignment with Board Policy BE (LOCAL) or in alignment with the board operating procedures.

Another issue is that a number of board members do not believe they are receiving board packets and information in a timely manner and thus do not have adequate time to properly prepare for the meetings. According to the board president, board packets are supposed to go to all board members by 4:00 pm the Friday prior to a Tuesday board meeting.

Dalhart ISD uses BoardBook, a web-based software application developed by TASB to provide paperless distribution of meeting materials. The application automates and assists in expediting many of the steps involved in assembling the agenda packet, such as pagination and formatting of the notice and agenda. The board operating procedures manual states, "At a minimum, each board member is expected to have done the following prior to arrival at every board meeting: 1. Studied the material in the board packet prior to arrival at every board meeting; and 2. Resolved questions by contacting the superintendent or appropriate central office personnel."

Examples of information not provided to board members in a timely manner include:

- Although there were previous meetings where more detailed budget information was shared in a timely manner, on one occasion, board members received a one-page budget fund and function handout on the Friday night prior to the board meeting. The handout had very little information and did not provide sufficient details on the proposed budget. However, the board voted 7–0 to approve the budget.

- The superintendent presented the board with the CIPs in the application at 6:30 am on October 18, 2016, the same day as the board meeting scheduled for 7:00 pm. Members had little time to review the plans prior to voting on them that evening. However, the board voted 6-0 to approve the CIPs.

The process for board meeting minutes and ensuring the minutes are thorough is not effective. Interviews indicate that a combination of three positions take the minutes: the superintendent, the executive director of student services, and the CFO. The superintendent gives the minutes to the superintendent's secretary, who prepares board notes from them. She then sends the board notes to Dalhart ISD staff, the Amarillo Globe-News, and the Dalhart Texan. The superintendent's secretary sends the board notes because stakeholders do not want to wait a month for board approval of the minutes to find out what happened at the board meeting. The review team compared selected board notes with the approved board minutes and found they are almost identical. As of December 5, 2016, the district had last posted the September 20, 2016 board minutes to the district's website. The district had not uploaded the board minutes from the October board meeting, even though over a month had passed since that meeting.

During onsite interviews, board members also stated that they felt that board minutes were very short and vague; a review of posted board minutes in 2016 confirmed they lacked detail. For example, Board Policy BBD (LEGAL) states, "Annually, at the last regular meeting of the board held during a calendar year, the Board President shall announce, and the minutes must reflect, the name of each board member who has completed the required training, who has exceeded the number of hours of training, and who is deficient in the required training as of the date of the meeting." Dalhart ISD board meeting minutes for December 2015 simply state, "Mr. Massey presented the Trustees' educational hours at this meeting." This approach does not reflect the amount of detail required by board policy. The job description of the superintendent's secretary states that one of her major responsibilities is to record minutes of executive staff and board meetings. However, she does not actually record the minutes.

Board policy BED (LOCAL) states, "At regular meetings the board shall allot 30 minutes to hear persons who desire to make comments to the board." While the district does provide an audience participation sign-up sheet at the entrance of the board meetings, a review of minutes and interview notes shows a lack of audience participation and a lack of processes in place to encourage more public participation. As of November 25, 2016, only three of the

previous nine board meetings with minutes posted had public participation. The Legislative Budget Board survey administered to Dalhart ISD parents showed that 36.3 percent of the survey respondents either disagreed or strongly disagreed that the board allows sufficient time for public input at meetings, and 40.6 percent of the respondents had no opinion.

Without an agenda process that is based on best practices and communicated effectively to board members, the district risks having disorganized meetings that may not appropriately identify all topics needed for discussion. If board members do not get the information they need in a timely manner, they do not have sufficient time to study the data supporting the decisions they vote on. Effective school boards use data extensively to guide them in decision making, setting and prioritizing goals, and monitoring the district's progress on established goals. The board can more effectively govern if its decisions are well thought out, and they are given ample time to study the data behind such decisions. By not giving ample time for board members to study the data, the possibility of voting on agenda items without proper research may have short-term and/or long-term consequences.

Accurate and complete meeting minutes provide valuable information about what changes are taking place within the district. Recording decisions and announcements provides all stakeholders with a reminder of what happened, aiding them in future planning.

TASB has a book available to member districts called A Board President's Guide to Meeting Preparation. This book is $10 for TASB members to purchase. Dalhart ISD has not provided its board president with a copy of the book and provided training to ensure effective preparation and operation for board meetings.

Effective boards assign the responsibility for minute taking and development to a single position with a second position trained as a backup. To ensure an accurate record, effective boards typically record actual meeting activity with either audio or video portable equipment. Region 16 provides suggestion for taking minutes, including:

- Prior to the meeting, make sure that some type of recording device is in place. As part of your preparation for the board meeting, obtain a copy of the meeting agenda in advance. This will help you keep up with the flow of the meeting and give you some idea of how to segregate different sections of the notes.

- The individual charged with keeping the minutes sits in a location where it is simple to confer with the person presiding. This makes it possible to discreetly indicate for something to be repeated or clarified for the official record.

- In addition to general discussion, it is important to note any motions that come before the board. This includes who made the motion, who seconded the motion, and any discussion relevant to the motion, while it is on the table. The minutes reflect the final tally of votes for and against the motion. Since meetings can often move quickly, the person taking minutes can make it known when something needs to be repeated. Doing so makes it much easier to ensure the minutes are complete and an accurate representation of the meeting.

- Once the board meeting is completed, the transcription process begins immediately, while the experience is fresh in the mind of the transcriber. The first draft of the minutes is compared with the audio recording of the board meeting.

- Once the transcriber is confident of the accuracy of the documented minutes, copies are circulated to all board members to ensure there are no miscommunications regarding the content of the meeting. Doing so will help to shorten any discussion regarding formal approval of the minutes at the next board meeting.

- Because the minutes become part of the permanent record of the school district and may contain specific directives that will influence the future operations of the Dalhart ISD, all possible strategies to ensure the completeness and accuracy of the minutes are important.

Options for encouraging public participation include publishing meeting agendas and minutes on the website as soon as they are approved. The posting should include opportunities for providing input either via email or in person at a board meeting. In Diboll ISD, the board page has questions and answers and provides the public with information on how citizens can participate in board meetings. Giddings ISD has a visitor's information form on its website to encourage more participation from the community.

Dalhart ISD should reorganize the process for the development and communication of board meeting agendas, the development and distribution of board packets, scheduled public participation, and accurate and complete minutes.

These actions could be accomplished by the board president or other board member presenting a motion at the next board meeting to set a work session for a review of board policies and procedures related to agenda preparation, minutes recording, development and distribution/web posting, and increasing opportunities for public participation. In preparation, the board could contact TEA or TASB to provide input or actual assistance with such a work session.

The board should carefully review existing Board Policy BE (LOCAL) and amend it, if necessary, to reflect specific, timely board and public communications protocols for agenda development and distribution and preparation of more detailed minutes. The superintendent should ensure that staff provide all data for BoardBook no later than 9 AM on Friday prior to each board meeting to give board members ample time to review data and materials prior to the Tuesday meeting.

In conjunction with a board review/work session process, the board could develop a series of steps to encourage public participation. One such step could involve rotating board meetings among the five campuses. This procedure provides the public with easy access to board meetings and specific opportunities to discuss matters related to their campus.

The superintendent should ensure the meetings are audio recorded and assign the superintendent's secretary to take meeting minutes at all board meetings.

The fiscal impact assumes that the district incurs a $10 one-time cost to purchase the TASB book, A Board President's Guide to Meeting Preparation.

BOARD CALENDAR AND SELF-ASSESSMENT (REC. 7)

Dalhart ISD does not have a process for an annual board calendar to ensure all board-required actions occur at the appropriate time, nor is there a process to conduct a board self-assessment.

The process the district uses to develop a calendar of board activities involves the superintendent's secretary retrieving the agenda from the month of the previous year and distributing it to the board president and superintendent. They then use that information to guide development of the agenda for each month's board meeting. For example, if the December 2015 board meeting covered announcing the board members' level of training, they will add the same activity to the December 2016

board meeting agenda. Neither the superintendent nor the board president provides the board members with a preview of the year's important events, other than the previous year's board minutes.

The superintendent and all seven board members report they have not participated in any form of self-assessment or self-reflection to evaluate how well the board has done (or is doing) to function more effectively. Board Policy BBD (LOCAL) includes the statement, "The board annually evaluates its own performance in fulfilling the board's duties and responsibilities, and the board's ability to work with the superintendent as a team." Without a planning calendar, individual members may not give adequate reflective thinking to their decisions on important issues. For example, each year the board must evaluate the superintendent's performance, review and approve the district's budget, and review board policies and update them as needed. Other important tasks of the board such as approving the DIP and CIPs, checking on progress of district goals, and reporting progress to parents and the community in compliance with state laws and regulations should be planned to ensure proper board accountability.

If the board continues to operate without reflecting on its effectiveness and trying to build on its strengths and improve on its weaknesses, it risks guiding local education without a shared vision. By not improving upon its weaknesses, it may be difficult to set clearly defined priorities for the district that structure both the board's decision-making and the work of district staff. Boards that are not unified risk losing valuable members or discouraging potential board members from running.

Figure 1–13 shows an example of an annual board calendar from TASB.

TASB also provides member districts with effective board practices, including a self-assessment tool and a document that assists boards in methods for discussing the results of the assessment or inventory. Some examples of items on the TASB self-assessment tool include:

- The vision statement meets the criteria for a well-developed vision statement.

- All current members of the board and the superintendent have agreed, in a formal adoption by the board, to be guided by the vision.

- Each member of the board can state in general terms the substantive content of the current district goals.

FIGURE 1–13
TEXAS ASSOCIATION OF SCHOOL BOARDS SAMPLE BOARD CALENDAR
2016

MONTH	REGULAR MEETING	SPECIAL MEETING/EVENT
January	District Annual Report Hearing	Superintendent Evaluation
	Monthly Financial Report	
February	Approve Superintendent Performance Goals/Update instrument	
	Approve District and Campus Performance Objectives	
	Administrator contract renewals	
	Budget Assumptions and Priorities	
	Monthly Financial Report	
	Texas Academic Performance Report	
March	Review District and Campus Improvement Plans	Board self-evaluation
	Teacher contract renewals	
	Monthly Financial Report	
	Quarterly Budget Amendment	
April	Update on current improvement plan implementation	
	Formative Superintendent Evaluation	
	New teacher contracts	
	Monthly Financial Report	
May	Monthly Financial Report	New board member orientation
	New teacher contracts	
	Results report on new programs	
	Annual reports on transportation, maintenance, food service, technology	
June	Monthly Financial Report	Team-building workshop and assessment
	Quarterly Budget Amendment	
	New teacher contracts	
	State of Texas Assessments of Academic Readiness Scores	
	Budget development update	
July	Formative Superintendent Evaluation	
	Report on staff development to meet district goals	
	Budget development update	
	Monthly Financial Report	
	New teacher contracts	

FIGURE 1–13 (CONTINUED)
TEXAS ASSOCIATION OF SCHOOL BOARDS SAMPLE BOARD CALENDAR
2016

MONTH	REGULAR MEETING	SPECIAL MEETING/EVENT
August	Accountability Ratings	Budget workshop and hearing
	Monthly Financial Report	
	Final Budget Amendment	
	Budget adoption	
September	Set tax rate	
	Update on curriculum alignment	
	Monthly Financial Report	
	Enrollment update	
October	Formative Superintendent Evaluation	
November	Campus Report Cards	Annual goals review and update
	Monthly Financial Report	
	Quarterly Budget Amendment	
December	Monthly Financial Report	
	Review district financial audit	
	Approve District and Campus Performance Objectives	

SOURCE: Texas Association of School Boards, 2016.

- The board can point to specific, written criteria that will be used to assess whether the district is succeeding in reaching its goals.

- The board has been formally briefed about the administration's plans for accomplishing the current district goals.

- The board's superintendent evaluation instrument and process focus first and foremost on the superintendent's success in addressing the board-adopted goals.

- The board monitors the improvement plan implementation and district success in a formal, scheduled manner.

- The board and superintendent have a schedule for periodic updates on major management systems in the district, including presentations on how benchmark data is used to plan improvement.

- The board has adopted and annually reaffirms an ethics statement or code of conduct for board members.

- A written annual calendar of board events, outlining major board activities by month is in place.

- The board can point to written board operating procedures.

Dalhart ISD should develop and implement a yearly board calendar that includes all essential deadlines for board action and conduct an annual board self-assessment.

The superintendent should initiate the annual development of a detailed calendar of actions that the board must review, implement, and distribute at a board meeting. The superintendent and board president should prepare a calendar draft and conduct a final review prior to distribution to the full board at a board meeting. At the board meeting, the superintendent and key staff should be prepared to discuss the various deadlines, clarifying if necessary, to ensure board understanding of their role and the actions required.

The board president should include on a board meeting agenda the evaluation and selection of a board assessment instrument, and establish implementation protocols and the annual assessment date(s).

This recommendation could be implemented with existing resources.

ENROLLMENT PROJECTIONS (REC. 8)

Dalhart ISD does not have an effective process to develop accurate short-range and long-range enrollment projections for staffing and facility needs.

The review team requested documentation of the enrollment and facilities use planning process used each year to ensure adequate space and staffing for the incoming student population. At the time of the onsite review, the district was not able to produce any documents detailing enrollment projection methods or any formal processes to inform future facilities planning. Interviews with district staff provided no additional detail of formal planning meetings, discussions, or analysis that would serve as a sufficient baseline for estimating changing local population trends, residential migration in and out of the school district, or economic factors that would affect the current or future enrollments of Dalhart ISD. This type of information is critical to inform the most basic of planning processes and their absence undermines the district's ability to serve its student population over time. In addition, the district did not have a full facility inventory, facility condition reports, or information on previous zone boundary changes or campus openings/closings.

Further, interviews with campus principals showed that the process requires each campus to use the previous year's enrollment figures as the planning benchmark for the following year. The process assumes that each campus will have the same number of full-time employees (FTE) as the prior year. Some negative results from this method include:

- Campuses have no adequate way to estimate student population, including considerations for students with special needs or needed facilities renovations, for the upcoming year. Interviews with campus-based leadership detailed the lack of information needed to make sound space utilization and staffing decisions.

- Dalhart Junior High School accepts students each year from local private schools that provide education for students through elementary grades. There is currently no planning relationship between the private schools and Dalhart ISD to promote a seamless transition and adequate resources once these students move into district campuses.

- There is no formal district staffing plan based on student enrollment. Each principal has discretion to change staff if needed. For example, if a campus principal decides she needs another English as a Second Language teacher, but not an interventionist, she could do that. However, the principals make these decisions without a clear understanding of the new population these positions will serve.

- There is no way to provide estimates of student population to the transportation department or food services vendor for adequate planning.

- There is no evidence that the district considers economic factors, such as businesses moving into the community, in any short-range or long-range planning for enrollment and facilities. Dalhart has experienced a large influx of business from out of state in recent years.

The lack of a comprehensive enrollment planning process forces Dalhart ISD to react to, instead of adequately plan for, each year's incoming class of students. The result is a scramble to place students each year, including school year 2016–17 when more students entered the junior high school than expected. This situation creates a potential lack of efficiency, as critical planning for costly specialty services is required before the start of the school year. Further, the district typically makes facilities decisions in response to enrollment and demographic changes, such as building a high school facility in response to industry moving into the area. A reactionary response to population changes could leave the district unprepared to manage the influx of students associated with economic growth, or other community changes.

Best practice in enrollment planning and management assumes that school districts will collect, compile, and analyze student population trends associated with residential migration and the impact of economic development on student population. Without a comprehensive method for estimating changes in student enrollment, Dalhart ISD leaves itself underprepared to deal with unexpected fluctuations in student enrollment at the campus level.

Some districts have developed an effective procedure for estimating annual enrollments used for projecting the number of teachers and classroom/facility space needed to serve their population. In addition to working with external consultants, Irving ISD uses a cohort survival model based on three-year rolling averages to project enrollment for the upcoming year. The projections provide essential information about enrollment by type, grade, and campus and form the

foundation for calculating the number of teachers and classroom space needed across the district. This process results in annual projections that are within one percent of the actual enrollments for a large and dynamic school district. By adopting a similar method, Dalhart ISD could substantially improve its planning and ultimate readiness to house and serve its student population over time.

Dalhart ISD should develop and apply accurate short-range and long-range enrollment projections for staffing and facility needs.

The superintendent should assign the CFO to develop a process to estimate changes in student population over time. Critical steps in developing this process should include:

- The CFO should research methods of estimating student enrollments, such as the one currently used by Irving ISD. The district should adopt and implement a method that meets the needs for the upcoming school year.

- The CFO should coordinate with local economic leaders in government and business to develop a process for reviewing changing economic status and conducting effective inter-organizational planning to support a changing student population.

- The CFO should develop a process to collect district- and community-based feedback on student and facility needs based on changing district population and demographic makeup.

- The district should evaluate the various sources of analysis and information through a committee consisting of district leadership, school leadership, and community and economic stakeholders to develop an annual strategy for changes in student population.

- The district should use this information to develop staffing plans, space utilization plans and to provide critical detail to inform planning for transportation and food services.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 1. DISTRICT ORGANIZATION, LEADERSHIP, AND MANAGEMENT							
1. Train leadership positions to perform their primary responsibilities, and revise the reporting structure for principals to report directly to the superintendent.	$0	$0	$0	$0	$0	$0	$0
2. Develop and update all policies and associated procedures on a five-year cycle.	$0	$0	$0	$0	$0	$0	$0
3. Design and implement a comprehensive planning process.	$0	$0	$0	$0	$0	$0	$0
4. Develop annual objectives and an aligned evaluation instrument for managing the district superintendent's performance.	$0	$0	$0	$0	$0	$0	$0
5. Ensure that the board receives all required trainings and follows proper protocol as board members.	$0	$0	$0	$0	$0	$0	$0
6. Reorganize the process for the development and communication of board meeting agendas, the development and distribution of board packets, scheduled public participation, and accurate and complete minutes.	$0	$0	$0	$0	$0	$0	($10)
7. Develop and implement a yearly board calendar that includes all essential deadlines for board action and conduct an annual board self-assessment.	$0	$0	$0	$0	$0	$0	$0
8. Develop and apply accurate short-range and long-range enrollment projections for staffing and facility needs.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**($10)**

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.

Dalhart Independent School District (ISD) includes one elementary school, one intermediate school, one junior high school, one high school, and the XIT Secondary School (XIT), which is the district's alternative campus. The district enrollment in school year 2015–16 was 1,767 students.

Figure 2–1 shows the demographics of Dalhart ISD compared to state averages. The student population is 55.0 percent Hispanic, 41.6 percent White, 1.3 percent two or more races, 1.1 percent African American, 0.7 percent

FIGURE 2–1
DALHART ISD STUDENT DEMOGRAPHICS
SCHOOL YEAR 2015–16

STUDENTS	DISTRICT	STATE
Hispanic	55.0%	52.2%
Asian	0.7%	4.0%
White	41.6%	28.5%
Two or More Races	1.3%	2.1%
African American	1.1%	12.6%
American Indian	0.3%	0.4%
Pacific Islander	0.0%	0.1%
Economically Disadvantaged	55.3%	59.0%
English Language Learners	9.5%	18.5%
At-Risk	35.4%	50.1%

Source: Texas Education Agency, Texas Academic Performance Reports (TAPR), school year 2015–16.

Asian, and 0.3 percent American Indian. Approximately 55.3 percent of students are economically disadvantaged, below the state average of 59.0 percent. The district has identified 9.5 percent of students as English Language Learners (ELL), which is below the state average of 18.5 percent. Approximately 35.4 percent of students are designated as at risk, which is also below the state average of 50.1 percent.

Figure 2–2 shows the state accountability ratings for Dalhart ISD and its campuses for school years 2013–14 to 2015–16. During this period, Dalhart ISD met state standards at the district and campus levels except for school year 2014–15, when Dalhart Intermediate School was rated Improvement Required by the Texas Education Agency (TEA).

FIGURE 2–2
DALHART ISD DISTRICT AND CAMPUS ACCOUNTABILITY RATINGS
SCHOOL YEARS 2013–14 TO 2015–16

SCHOOL YEAR	DISTRICT	XIT	HIGH SCHOOL	JUNIOR HIGH SCHOOL	INTERMEDIATE	ELEMENTARY
2015–16	Met Standard	Met Alternate Standard	Met Standard	Met Standard	Met Standard	Met Standard
2014–15	Met Standard	Met Alternate Standard	Met Standard	Met Standard	Improvement Required	Met Standard
2013–14	Met Standard	Met Alternate Standard	Met Standard	Met Standard	Met Standard	Met Standard

Note: XIT is the XIT Secondary School.
Source: Texas Education Agency, Texas Academic Performance Report (TAPR), school years 2013–14 to 2015–16.

In Dalhart ISD, the executive director of student services is responsible for all functions of educational service delivery and serves as the District Coordinator of School Improvement (DCSI). The DCSI is a district-level leader designated by a district to ensure support for the academic achievement of low-performing campuses. The executive director of student service's duties include overseeing education instructional programs, special education, counselors, gifted and talented, English as a second language (ESL), homeless, alternative education, the Migrant Education Program (MEP), federal programs, after school programs, library services, nursing services, occupational/physical therapy, speech therapy services, and the state and federal accountability system. The executive director of student services is also leading the development and implementation of a bilingual program that will begin in school year 2017–18. In collaboration with the chief financial officer, the executive director of student services ensures that the district meets TEA's Public Education Information Management System (PEIMS) and federal program requirements.

Dalhart ISD's organizational structure for educational service delivery has all campus principals, the instructional technologist, the director of special education, and the migrant coordinator reporting directly to the executive director of student services. The campus principals also have a secondary, informal reporting relationship with the superintendent. The executive director of student services reports directly to the superintendent.

Figure 2–3 shows the Dalhart ISD educational service delivery organization.

FINDINGS

♦ Dalhart ISD does not ensure the consistent use of the components of the curriculum management system and teachers do not receive adequate curriculum support.

♦ Dalhart ISD has not fully implemented or evaluated its bilingual, English as a second language, and migrant education programs.

♦ Dalhart ISD does not offer a comprehensive program to meet the instructional needs of students identified as gifted and talented.

♦ Dalhart ISD lacks a plan to identify a research-supported approach to address the achievement gaps between student groups.

♦ Dalhart ISD does not provide co-teaching support to special education and general education teachers.

♦ Dalhart ISD's Disciplinary Alternative Education Program (DAEP) lacks a process to meet the instructional needs of its students.

FIGURE 2–3
DALHART ISD EDUCATIONAL SERVICE DELIVERY ORGANIZATION
SCHOOL YEAR 2016–17
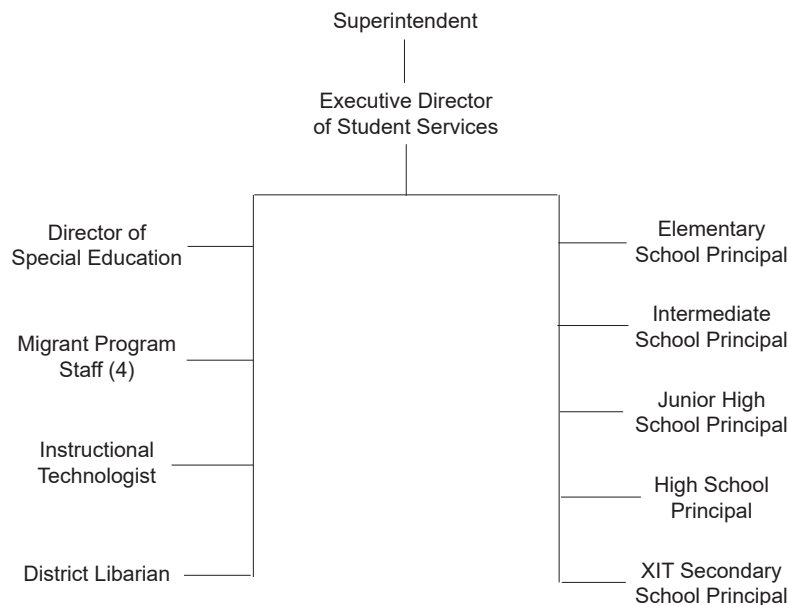
Sources: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

RECOMMENDATIONS

♦ **Recommendation 9: Develop and implement a process for continuously monitoring the curriculum management system at all campuses.**

♦ **Recommendation 10: Develop and implement a comprehensive evaluation process for Bilingual, ESL, and MEP programs.**

♦ **Recommendation 11: Develop and implement a comprehensive gifted and talented program to meet the instructional needs of identified students.**

♦ **Recommendation 12: Identify and implement an overall research-supported approach to address the needs of special populations in the district's District Improvement Plan (DIP) and align that approach to the individual campus plans as appropriate.**

♦ **Recommendation 13: Develop written procedures and provide training for the implementation of a districtwide inclusion model for all teachers of special needs students.**

♦ **Recommendation 14: Develop and implement a process to ensure DAEP instructional alignment with the general education classroom.**

DETAILED FINDINGS

CURRICULUM MANAGEMENT AND SUPPORT (REC. 9)

Dalhart ISD does not ensure the consistent use of the components of the curriculum management system, and teachers do not receive adequate curriculum support.

In school year 2014–15, Dalhart ISD adopted the Texas Essential Knowledge and Skills (TEKS) Resource System (TRS) as the district curriculum. TRS is a comprehensive online curriculum and assessment management system developed for Texas educators. The system aligns to current TEKS and is responsive to changes from TEA and end-user feedback. The district also developed the Dalhart ISD Curriculum Management Plan, which articulates the components of TRS that educators are required to implement and guides instructional alignment for all grade levels and campuses.

All teachers in Dalhart ISD are required to use the Vertical Alignment Document/TEKS Clarification Document, Year at a Glance (YAG), TEKS Verification Document, the Instructional Focus Document, and the

Assessment Creator from the TRS. The district requires Campus Professional Learning Communities (PLCs), made up largely of educators who meet at least monthly, to collaborate and review disaggregated student data and student progress for their campuses. PLCs at the elementary and intermediate schools are organized by grade level, and PLCs at the junior high and high school are organized by department.

Interviews with central office staff, principals, and teachers indicate that the implementation of TRS has been beneficial to the district; however, they also indicate that the implementation process is inconsistent from campus to campus, and from department to department. Some staff feel that the district has not given teachers a formal opportunity to provide constructive feedback about the implementation process and needed resources, including specific training needs.

Figure 2–4 shows TRS components and Dalhart ISD implementation. Concerns identified include inconsistent use of some of the required components, especially the Competency Based Assessments (CBAs) and the YAG.

Dalhart ISD has provided ongoing district and Regional Education Service Center XVI (Region 16) training opportunities to teachers and administrators since the district implemented TRS. In fall 2016, the district provided a comprehensive session that included 51 staff. In addition, the district provides teachers one day per six-week period to work together to plan lessons in the district or to attend Region 16 Round Up collaborative sessions to review TRS components and plan lessons at Region 16.

While these learning and planning opportunities exist in Dalhart ISD, there is no process to monitor the level of teacher/administrator engagement, their depth of understanding of the implementation process, or to ensure that the system is implemented systematically across the district.

During onsite interviews, staff indicated that teachers lack clear direction in curriculum and instructional activities. There is not a central office position dedicated to curriculum and instruction support. The executive director of student services is responsible for the evaluation of all educational programs and overseeing the district improvement plan. However, according to onsite interviews, campus staff feel the executive director has too many responsibilities to serve adequately as the curriculum director.

FIGURE 2–4
COMPARISON OF TRS COMPONENT EXPECTATIONS AND DALHART ISD IMPLEMENTATION
NOVEMBER 2016

TRS COMPONENT	PURPOSE	DALHART ISD IMPLEMENTATION
Vertical Alignment Document/TEKS Clarification Document (VAD/TCD)	Outlines the standards taught, and includes clarifying specificity and vertically tracks the depth and complexity of a standard through the grade levels. VADs can be used to support teacher understanding of the TEKS and understanding of grade-level accountability; analyze the content, rigor, and specificity; and, choose instructional resources and materials.	The elementary, intermediate and junior high schools only use the VAD as they believe they need it, but not necessarily as recommended. Some teachers use the documents as recommended at the high school, but use is not consistent among all teachers.
Year at a Glance (YAG)	Allows educators to view standards bundled into units of instruction with a recommended order for the year.	The elementary, intermediate and junior high schools only use the YAG as they believe they need it, but not necessarily as recommended. Other than high school math teachers, the YAG is used inconsistently at the high school.
TEKS Verification Documents	Provides teachers a snapshot of the standards taught within the year. Can be used to examine and adjust instructional pacing, reconcile curriculum sequence with local calendars and verify that all state standards are accounted for.	Elementary, intermediate and junior high school teachers do not use these documents consistently. The high school does not use these documents.
Instructional Focus Documents (IFD)	Bundle student expectations into units of instruction, provides major concepts for unity, key academic vocabulary, key understandings and guiding questions for students.	Elementary, intermediate and junior high school teachers only use IFDs as they believe they need them, but not necessarily as recommended. Other than high school math teachers, the documents are not used consistently at the high school.
Assessment Creator	Provides teachers a collection of unit test items in science, social studies, math, and English language arts and reading (ELAR) that assess the specified student expectations as noted on the IFD.	The Assessment Creator software is used by the elementary, intermediate, junior high, and high school teachers. However, because the YAG is not used consistently at the high school, the Assessment Creator items do not match the teaching process at the high school.
Competency Based Assessments (CBA)	Assess student performance of the mastery of the prescribed curriculum objectives for the nine-week grading period.	The elementary, intermediate, junior high school generally use consistently; however, they are used in a summative manner rather than as a formative assessment as designed. Other than high school math teachers, CBAs are used inconsistently at the high school.

Sources: Legislative Budget Board School Performance Review Team, November 2016; Dalhart ISD, November 2016.

Dalhart ISD's inconsistent implementation of TRS may have contributed to lower student test scores on the State of Texas Assessments of Academic Readiness (STAAR) exams. **Figure 2–5** shows the comparison of student performance on the STAAR exams between Dalhart ISD, the region, state and all three peer districts from school years 2013–14 to 2015–16. Peer districts are districts similar to Dalhart ISD that are used for comparison purposes. With only a few exceptions, Dalhart ISD student performance is lower than its three peer districts.

Monitoring the process of curriculum implementation is essential during all phases of program implementation to determine whether activities are occurring according to the plan and to identify unanticipated problems or barriers. In Evaluating Curriculum Improvement Programs, an article published by the Association for Supervision and Curriculum Development, 1951, Virgil Herrick states that an evaluation of the implementation of a curriculum program might start with the question, "Are we doing the most important things in the most effective way?" He goes on to say that any "attempt to answer this question will naturally involve continuous observation of what is being done" by those using the program and interpretation of those observations to determine whether there is a need for modification of the program and/or additional training of the participants. He suggests a second question is "to what extent are the administrative personnel

FIGURE 2-5
DALHART ISD PHASE-IN SCORES OF SATISFACTORY OR ABOVE ON STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS BY SUBJECT
SCHOOL YEARS 2013–14 TO 2015–16

ALL SUBJECTS	DALHART ISD	STATE	REGION	BORGER ISD	DIBOLL ISD	GIDDINGS ISD
2013–14	**68.0%**	77.0%	78.0%	76.0%	72.0%	78.0%
2014–15	**71.0%**	77.0%	77.0%	73.0%	75.0%	76.0%
2015–16	**69.0%**	75.0%	76.0%	70.0%	70.0%	72.0%
Reading	**Dalhart ISD**	State	Region	Borger ISD	Diboll ISD	Giddings ISD
2013–14	**71.0%**	76.0%	77.0%	73.0%	73.0%	77.0%
2014–15	**71.0%**	77.0%	78.0%	70.0%	75.0%	75.0%
2015–16	**68.0%**	73.0%	73.0%	68.0%	67.0%	68.0%
Mathematics	**Dalhart ISD**	State	Region	Borger ISD	Diboll ISD	Giddings ISD
2013–14	**68.0%**	78.0%	80.0%	79.0%	76.0%	80.0%
2014–15	**75.0%**	81.0%	83.0%	84.0%	86.0%	91.0%
2015–16	**71.0%**	76.0%	79.0%	72.0%	75.0%	7.03%
Writing	**Dalhart**	State	Region	Borger ISD	Diboll ISD	Giddings ISD
2013–14	**62.0%**	72.0%	73.0%	63.0%	59.0%	63.0%
2014–15	**57.0%**	72.0%	71.0%	61.0%	64.0%	55.0%
2015–16	**66.0%**	69.0%	69.0%	64.0%	51.0%	54.0%
Science	**Dalhart**	State	Region	Borger ISD	Diboll ISD	Giddings ISD
2013–14	**60.0%**	78.0%	79.0%	83.0%	76.0%	75.0%
2014–15	**67.0%**	78.0%	78.0%	79.0%	74.0%	76.0%
2015–16	**70.0%**	79.0%	79.0%	73.0%	76.0%	82.0%
Social Studies	**Dalhart**	State	Region	Borger ISD	Diboll ISD	Giddings ISD
2013–14	**73.0%**	76.0%	76.0%	81.0%	68.0%	91.0%
2014–15	**81.0%**	7.08%	74.0%	77.0%	82.0%	92.0%
2015–16	**71.0%**	77.0%	76.0%	76.0%	78.0%	91.0%

NOTE: Data includes all grades.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2015–16.

becoming involved as working members in the major activities of the curriculum effort?" This may include data gathering methods such as direct observations, surveys, and focus groups.

An effective example is a four-part curriculum management plan that includes a Curriculum Monitoring Consistency component. In Jasper ISD, the executive director of curriculum and instruction states that a "critical component of any program is the monitoring piece." The Jasper ISD plan requires that the district train administrators and instructional academic coaches to monitor pacing and content focus in TRS to ensure adequate implementation. Principals, assistant principals and instructional coaches receive training on how to monitor the following components:

- instructional focus document;

- vertical alignment document; and

- year at a glance document.

Principals, assistant principals and instructional coaches also receive training that stresses the importance of the curriculum, and the importance of ensuring that resources are available and staff are provided necessary staff development. The district trains these positions to conduct frequent walk-throughs in all classrooms to observe curriculum implementation and give feedback.

School districts provide effective curriculum support when a district's organizational structure places departments

responsible for teaching and learning under one leadership position dedicated to overseeing curriculum and instruction. Many districts in Texas have a central office instructional leader whose responsibility is to ensure appropriate curriculum support and oversight of all instructional programs. For example, Borger ISD has an assistant superintendent for curriculum and instruction and Giddings ISD has a curriculum and instructional administrator both of whom are responsible for overseeing curriculum management for their respective districts., As previously shown in **Figure 2–5**, both peer districts have consistently higher student achievement than Dalhart ISD.

Dalhart ISD should develop and implement a process for continuously monitoring the curriculum management system at all campuses.

The superintendent should identify a group of teacher leaders and administrators to serve as a working committee to develop a collaborative and transparent process to monitor the ongoing implementation of TRS. The committee should be responsible for the following implementation steps:

- reviewing each of the Dalhart ISD TRS components with the working committee;

- developing an anonymous survey seeking feedback on each of the TRS components;

- identifying a focus group of administrators and teachers from each campus to identify strengths and challenges of the implementation process;

- developing a report summarizing the results of the survey and focus group;

- considering suggestions such as developing and archiving a district bank of lesson plans as a resource pool from which teachers can draw lessons;

- identifying the expectations of each TRS component;

- developing a rubric based on the expectations of the component;

- developing a walk-through instrument and process based on the rubric to be used to monitor the implementation process; and

- training principals and central office staff and implement the walk-through process.

As a component of the process to monitor the implementation of TRS, the district should establish a director of curriculum and instruction position to oversee all instructional programs.

The director of curriculum and instruction position should be responsible for all general education instructional curriculum, including oversight of TEKS, instructional technology, and campus planning. Tasks to support this recommendation include:

- The superintendent should develop a job description for the director of curriculum and instruction reporting to the executive director of student services.

- The superintendent should include knowledge of instructional coaching and differentiated instruction as requirements for the position.

- HR Department should advertise the job description for the director of curriculum and instruction with specific experience requirements

- The superintendent should identify a qualified committee of staff to interview applicants and make a hiring recommendation to the board for approval.

- The executive director of student services should provide comprehensive internal training listed on the director of curriculum and instruction's job description.

- The executive director of student services should hold weekly meetings with the director of curriculum and instruction for planning and monitoring of curriculum functions.

The fiscal impact assumes the district develops one director of curriculum and instructor position at an estimated cost of $75,266 based on the $62,722 average salary of the four Dalhart ISD director positions plus an additional 20.0 percent or $12,544 ($62,722 x.20) for benefits. The district may incur additional costs to hire substitute teachers to cover classes for teachers who attend working committee meetings during the instructional day. Costs will depend on the number of teachers included in the committee and the number and duration of working committee meetings throughout the year.

BILINGUAL, ENGLISH AS A SECOND LANGUAGE, AND MIGRANT EDUCATION PROGRAMS (REC. 10)

Dalhart ISD has not fully implemented or evaluated its bilingual, English as a second language (ESL), and migrant education programs.

At the time of the onsite review, Dalhart ISD did not have a bilingual program. The district received a waiver from TEA to use school year 2016–17 to develop a bilingual program for school year 2017–18 implementation.

Region 16 provides technical assistance, training, and program administration for the district's ESL services. Dalhart ISD has an ESL program that provide services for English language learners (ELL). The district uses a home language survey to identify ELL students. Once the survey is returned, identified students are tested to determine their language proficiency and served through pull out classes. Students in the program receive small group instruction with the ESL teacher. The district uses a guided reading model along with phonics instruction for ELL students. In school year 2016–17, the district sent ESL teachers to Region 16 to receive training on literacy instruction though the Working with English Language Learners and Words of our World programs.

In school year 2016–17, the district had one full-time ESL teacher each at the intermediate school, junior high school and high school. The elementary school has one full-time ESL teacher and one part-time ESL teacher. **Figure 2–6** shows that the number of ELL students increased from school year 2013–14 to school year 2015–16 by 48 students, or a 40 percent increase.

FIGURE 2–6
DALHART ISD ENGLISH LANGUAGE LEARNER STUDENTS
SCHOOL YEARS 2013–14 TO 2015–16

SCHOOL YEAR	ELL STUDENTS
2013–14	119
2014–15	146
2015–16	167

SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2015–16.

Although the district's population of ELL students is increasing, the district has not assessed whether the ESL program has sufficient capacity to provide services to this population. During onsite interviews, Dalhart ISD staff expressed concern that the district does not have enough staff to meet the needs of an increasing number of ELL students. **Figure 2–7** shows Dalhart ISD's ELL STAAR scores compared to those of peer districts, Region 16 districts, and the state. Dalhart ISD's scores are below the peer districts, Region 16, and the state. Dalhart ISD's scores are lower than each comparison group on each cited test.

Dalhart ISD also operates a Migrant Education Program. Due to an increase in agricultural activities in the district, the district's population of migrant students has increased since school year 2011–12. **Figure 2–8** shows the number of migrant students from 2011–12 to 2015–16. School year 2014–15 had the largest number of migrant students, with 207 students, which was almost double the 105 migrant students in school year 2011–12.

FIGURE 2–8
DALHART ISD MIGRANT POPULATION
SCHOOL YEARS 2011–12 TO 2015–16

SCHOOL YEAR	MIGRANT STUDENTS
2011-12	105
2012-13	125
2013-14	142
2014-15	207
2015-16	148

SOURCE: Dalhart ISD Migrant Program, November 2016.

Dalhart ISD has a Shared Service Agreement (SSA) with Region 16 to provide leadership, staff development and technical assistance to the district's migrant funded projects. Dalhart ISD has a migrant coordinator and three migrant recruiters, who report to the executive director of student services. The migrant coordinator and migrant recruiters responsibilities include:

FIGURE 2–7
DALHART ISD PHASE-IN SCORES OF SATISFACTORY OR ABOVE ON STATE OF TEXAS ASSESSMENTS OF ACADEMIC READINESS BY SUBJECT FOR ENGLISH LANGUAGE LEARNERS
SCHOOL YEAR 2014–15

SUBJECT	DALHART ISD ELL	BORGER ISD ELL	DIBOLL ELL	GIDDINGS ELL	REGION 16	STATE
All Subjects	**36%**	39%	58%	51%	52%	55%
Reading	**32%**	39%	61%	53%	54%	56%
Math	**50%**	64%	89%	85%	63%	59%

NOTE: Data includes all grades.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2014–15.

- the active identification and recruitment of eligible migrant children residing in the school district using methods such as establishing communications networks, surveying the area, and periodically surveying students;

- home visits and interviews of migrant families to determine eligibility for services and educate parents on available school and social services programs in the area;

- certification of the eligibility of children to participate in Migrant Education Program (MEP) activities according to program eligibility criteria;

- determining the location of prospective migrant children. Visiting health clinics, charity organizations, civic groups, and other community agencies in order to find prospective migrant families;

- recruiting parents for Parent Advisory Council (PAC) and PAC activities; and

- providing registration and withdrawal services to migrant students.

According to interviews with Region 16 staff, Dalhart ISD's MEP meets the state and federal guidelines. However, the district lacks a process to evaluate the success of its ESL and MEP programs. During onsite interviews, staff indicated that there is not a formal evaluation process for newly implemented or existing instructional programs. The district does not have a process for surveying teachers or students on which programs work best. The district does not perform data analysis to determine how these programs affect state test scores or student academic achievement. According to the job description, it is the responsibility of the executive director of student services to evaluate and provide framework for instructional programs. While the executive director of student services has been involved in the design and implementation of these programs, there is no evidence that an evaluation process or timeline is in place to evaluate the new programs or existing district programs.

The lack of evaluations of instructional programs increases the risk that Dalhart ISD spends its resources on programs that do not improve student performance. Effective districts periodically assess and adapt all programmatic activities to ensure that the district is investing in programs that support continuous student improvement. Without such assessments, Dalhart ISD cannot ensure it is effective in achieving its intended purpose.

Program evaluation is a valuable tool for staff who are seeking to strengthen the quality of their programs and improve outcomes for students. According to Why Conduct a Program Evaluation?, by Dr. Allison Metz, October 2007, program evaluation "answers basic questions about a program's effectiveness, and evaluation data can be used to improve program services." Program evaluation is a systematic method for collecting, analyzing and using information to answer basic questions about a program. While there are many different models of evaluations, school districts typically divide the evaluation models into either process or outcome categories. Process evaluations assess whether an intervention or program model was implemented as planned, whether the intended target population was reached, and the major challenges and successful strategies associated with program implementation (i.e., were the steps and the program timeline followed?). Outcome evaluations determine whether, and to what extent, the expected changes in student outcomes occur and whether these changes can be attributed to the program or program activities i.e. student performance.

Rockwood ISD developed a program evaluation plan that contains best practice steps for organizing and designing a program evaluation. **Figure 2–9** shows Rockwood ISD's procedures for implementing a program evaluation plan.

In 2001 and 2002, the Intercultural Development Research Association conducted a national study to identify the characteristics that contribute to high academic performance in bilingual education programs. The study examined 10 school districts and described indicators of successful bilingual education programs. The indicators included leadership; vision and goals; school climate; linkages between central administration and school-level staff; school organization and accountability; professional development; parent involvement; staff accountability and student assessment; staff selection and recognition; and community involvement. The following summary describes the findings according to each of the characteristics studied:

- Leadership — Each school had principals who were committed to the success of their bilingual education program, had open and frequent communication with staff, and were aware of the rationale for the bilingual education program.

- Vision and Goals — The schools had clear and visible goals. School leadership set expectations for the students and the teaching staff. Teachers, the

FIGURE 2–9
PROCEDURES FOR IMPLEMENTING A PROGRAM EVALUATION PLAN
2010

STEPS	CONSIDERATIONS

Step 1: Develop a steering committee: include individuals with the needed expertise but limit the size to ensure manageable decision-making.	Responsibilities include:
	
	• Discuss key questions to be answered by the evaluation:
	
	    What is the purpose of the evaluation?
	
	    What do we desire to know about the program?
	
	    How has staff development impacted results?
	
	• Organize the effort, assign tasks
	• Conduct an information-gathering activity
	• Analyze the information so that it can be summarized and recommendations can be developed

Step 2: After the committee selects the purpose of the evaluation, focus and narrow the scope. The focus should include how the program increases student achievement.	• Possible areas of focus: • Staff, student, and parent perceptions of success; • Comparison of actual results to expected results; • Comparison of results to other districts/results; and • Evaluation of the effectiveness of professional development.
Step 3: Select the information sources that will be needed for the program evaluation.	Quantitative suggestions: • Scores; • Budgets; • Attendance; and • All applicable forms of data. • Qualitative suggestions: • Interviews; • Focus Groups; • Observations; and • Survey results.
Step 4: Establish a management plan or detailed schedule for the evaluation. The steering committee should list the 10 steps suggested in this Figure and place a target completion date next to each step and any resources needed for each step.	Suggested questions: • What data will be collected and how? • How large a sample is needed? • What will it cost in time and resources • Who needs to review the rough draft? • What will the final report look like? • When is the report due?
Step 5: Develop or select the instruments or forms for collecting quantitative and qualitative information.	Suggested questions: • What data collection/scoring/analysis instruments already exist? • What data have already been collected? • Who needs to provide information and how long will it take?
Step 6: Collect the information.	Be thoughtful about scheduling data collection activities to meet timelines.
Step 7: Analyze the information, summarize the results and make recommendations.	Suggestions: • Report verbatim for qualitative reporting; • Report results by topic or by question; • Chart results; and • Use measures of central tendency (mean, median or mode) for quantitative reporting.

FIGURE 2–9 (CONTINUED)
PROCEDURES FOR IMPLEMENTING A PROGRAM EVALUATION PLAN
2010

STEPS	CONSIDERATIONS
Step 8: Prepare the initial report	Suggestions: • Condense, but be as inclusive as possible; and • Key stakeholders should review and collaborative before shared.
Step 9: Share the final evaluation with stakeholders in the evaluation	Share with appropriate stakeholders: • Team members; • Department members; • Administrative staff; • Curriculum committee; and • Board of Education (as is appropriate)
Step 10: Develop a follow-up plan	Critical steps: • Follow-up objectives and timeline; • Determine who will be responsible; • Target completion dates; • Identify evidence of each activity; and • Determine what further staff development is needed.

SOURCE: Rockwood School District Program Evaluation Plan, 2010.

administration, and sometimes parents were involved in establishing the vision and goals for the program.

- School Climate — All the administration and teaching staff felt responsibility for creating and maintaining a safe school atmosphere.

- Linkages — Teachers and school administrators did not feel isolated from central administration staff. The roles and responsibilities of central office staff and those of school staff were clear.

- School Organization and Accountability — The bilingual education programs were integral components of the schools' curriculum. Faculty and staff held themselves accountable for the success of all students.

- Professional Development — Staff considered planning and grade level meetings as important ways of conducting their own professional development. Teachers who had opportunities to go outside of the district for professional development gave presentations and workshops for other teachers on staff.

- Parental Involvement — Parents were strong advocates of the bilingual education program and were welcomed into the school as partners engaged in meaningful activities within the school. Some businesses near schools granted parents flex time to enable them to participate in school activities held during the school day.

- Staff Accountability and Student Assessment — The schools studied used multiple assessments. Administrators set clear and rigorous standards and achievement levels. Schools used assessments in the native language when appropriate.

- Staff Selection and Recognition — Schools selected teachers for their bilingual education programs based on academic background, experience in bilingual education, proficiency in the target languages, enthusiasm, commitment, and openness to change and innovation. Schools recognized teachers for students' successes.

- Community Involvement — Members of the community shared school facilities and schools built relationships with businesses and community members. Many senior citizens and retired individuals participated in activities with the students.

In 2006, TEA published Best Practices for English Language Learners, which presents specific classroom instructional strategies for bilingual educators. The study recommends strategies for creating positive classroom climates,

heterogeneous grouping, language level grouping, balanced literacy approaches, higher order thinking skills, language development, literacy development, sheltered instruction, guided writing, using manipulatives, and formative and summative assessments. Manipulatives are objects and tools designed to help a learner understand a mathematical concept through tactile manipulation.

Other districts have successful programs. Tomball ISD's website describes the bilingual education model that the district uses, including its goals, what parents need to know, and periodic updates on the teachers in the program. It also includes activities designed to keep ELL students motivated as they increase their English language proficiency.

Dalhart ISD should develop and implement a comprehensive evaluation process for Bilingual, ESL, and MEP programs.

Dalhart ISD should establish a committee to study and develop a consistent and effective evaluation process for all instructional programs. The executive director of student services should coordinate the following steps and include them in the planning process:
- identify the task force;

- determine the purpose of the evaluation process;

- select data sources to inform the evaluation;

- create a timeline for the implementation determining what instructional programs will be reviewed in what years;

- select or develop the instruments to be used for data collection;

- collect the data;

- analyze the data;

- prepare the initial report;

- share the evaluation with appropriate stakeholders; and

- develop an action plan for modifying the instructional program(s) reviewed.

The district should review the goals and objectives of each program and service at least biennially; receive reports of the effectiveness of each program and service; and take action to ensure that these programs efficiently achieve their goals. The district should incorporate the process into the annual district plan to ensure consistency of review.

Since the time of the onsite review, Dalhart ISD contracted with a consulting firm to help design a bilingual program and plan a bilingual curriculum. The district also began offering stipends for teachers who complete ESL certification. The district indicates that ESL teachers will complete an ESL program evaluation for school year 2016–17 and will meet to align program content and set goals for school year 2017–18.

This recommendation could be implemented with existing resources.

GIFTED AND TALENTED EDUCATION (REC. 11)
Dalhart ISD does not offer a comprehensive program to meet the instructional needs of students identified as gifted and talented (G/T).

The Texas Education Code, Section 29.12, states, "Using criteria established by the State Board of Education, each school district shall adopt a process for identifying and serving gifted/talented students in the district and shall establish a program for those students in each grade level." In school year 2013–14, Dalhart ISD Elementary School began a G/T program in which students identified as G/T were pulled out for services. The pull-out classes were not formally structured, and there was no district G/T plan. In school year 2015–16, the district ended the elementary G/T program after the G/T teacher left the district.

In school year 2016–17, the district implemented a new G/T program. The program included procedures for identifying, testing, and providing services for G/T students. Parents, teachers and community members can refer students to the G/T program. Once referred, the district obtains written permission from parents and conducts screenings and assessments to identify G/T students. According to the G/T procedures, a G/T teacher is assigned to each campus, and the district uses the Texas Performance Standards Project (TPSP) as a curriculum at each grade level. TPSP is a resource provided by TEA for providing differentiated instruction to G/T students. G/T programs from kindergarten through high school use TPSP as it includes standards, curriculum, and assessments for use in G/T programs and TPSP aligns with the Texas State Plan for Education of G/T Students.

Figure 2–10 shows the percentage of students identified as G/T in Dalhart ISD compared to peer districts, Region 16 districts, and state averages for school years 2012–13 to 2014–15. The rate of identification for G/T students in

FIGURE 2–10
DALHART ISD PERCENTAGE OF ENROLLED STUDENTS IDENTIFIED FOR GIFTED AND TALENTED EDUCATION COMPARED TO PEER DISTRICTS

SCHOOL YEAR	DALHART ISD	BORGER	DIBOLL	GIDDINGS	REGION 16	STATE
2014–15	**1.9%**	5.8%	3.9%	2.8%	4.5%	7.6%
2013–14	**1.9%**	5.4%	4.3%	3.1%	4.7%	7.6%
2012–13	**1.5%**	5.3%	4.5%	3.1%	5.1%	7.7%`

SOURCE: Texas Education Agency, Texas Academic Performance Reports (TAPR), school years 2012–13 to 2014–15.

Dalhart ISD is significantly below the peer districts, Region 16, and the state.

The National Association for Gifted Children (NAGC) notes that school districts generally identify between five and seven percent of the enrolled students as G/T. By this measure, compared to national standards, Dalhart ISD's rate of identification is also low.

Interviews with administrators and G/T teachers indicated that while they are aware of the district's G/T procedures, teachers and administrators remain confused about the actual implementation process. Staff stated that there are no clear implementation steps or monitoring of the G/T program. District and campus staff also reported that the G/T program is not effective, and lacks leadership, direction, and funding to operate properly. Although the G/T procedures state that the district uses the TPSP as a curriculum, staff stated there is no curriculum for G/T and no vertical or horizontal alignment of G/T services throughout the district.

According to campus staff, Dalhart ISD provides limited G/T services. The high school offers its G/T students options through Advanced Placement (AP) and dual credit coursework; however, these courses are only available to juniors and seniors. There are no G/T services provided at the intermediate school or the junior high school.

Figure 2–11 shows advanced academic indicators for Dalhart ISD students compared to students in Region 16 and statewide. With few exceptions, Dalhart ISD students perform below state and regional averages for college readiness indicators.

The NAGC has developed a guide for PreK–12 G/T programming standards in six areas: learning and development, assessment, curriculum and instruction, learning environments, programming, and professional development. In the area of curriculum and instruction, the guide states that teachers should "apply the theory and research-based models of curriculum and instruction related to students with gifts and talents and respond to their needs

FIGURE 2–11
DALHART ISD ADVANCED ACADEMIC INDICATORS BY STATE, REGION, AND DISTRICT
SCHOOL YEAR 2014–15

	STATE	REGION 16	DALHART ISD
STAAR Percentage at Postsecondary Readiness Standard	41%	37%	**30%**
STAAR Percentage at Advanced Standard All Grades	16%	14%	**8%**
Recommended High School Program/Distinguished Achievement Program Graduates (Annual Rate)	83.8%	79.4%	**81.7%**
Advanced Course/Dual Enrollment Completion	33.1%	26.0%	**16.9%**
College-Ready Graduates (Both English and Math)	54%	50%	**44%**
Advanced Placement (AP)/International Baccalaureate (IB) – Students Tested	23.5%	10.9%	**0.0%**
Advanced Placement (AP)/International Baccalaureate (IB) – The percentage of examinees with at least one AP or IB score at or above the criterion score	51.3%	41.2%	-
SAT/ACT – Students Tested	66.3%	59.9%	**54.8%**
SAT/ACT – This shows the percent of examines who scored at or above the criterion score for either test	25.1%	22.6%	**23.8%**

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2014–15.

by planning, selecting, adapting, and creating culturally relevant curriculum."

Killeen ISD operates a commendable G/T program. G/T students at the elementary level are served in "cluster classes" that allow for accelerated instruction in areas of talent. The district also provides Gifted Resource Rooms for enrichment and independent study. Course offerings in the core areas of English, math, science and social studies are available to G/T students at the middle school level. Teaching strategies and the pace and complexity of the course materials distinguishes these gifted and talented courses from regular course offerings. High school students are offered special humanities courses in English and social studies in addition to AP coursework.

Dalhart ISD should develop and implement a comprehensive gifted and talented program to meet the instructional needs of identified students.

The district should use the NAGC's gifted programming standards guide as a starting point for seeking to improve their G/T programs. NAGC has developed a snapshot survey of G/T programming effectiveness factors that districts can use for self-assessment. The director of student services should begin with these standards and complete an internal analysis, focusing first on the elementary level. The district should complete the following activities:

- review the standards and resources developed by the NAGC;

- develop a G/T program model for the district, including program standards, objectives, assessment and screening procedures, a plan for professional development, and an evaluation plan;

- solicit stakeholder input on the model;

- revise the model based on stakeholder input;

- submit the plan to the board for adoption;

- implement the model;

- evaluate implementation;

- revise the model based on evaluation; and

- monitor and revise as needed.

Since the time of the onsite review, the district has conducted G/T planning meetings and determined that all certified staff will complete 30 hours of G/T training. The district indicates

that G/T teachers completed program evaluations developed by the Texas Association for Gifted and Talented, and that G/T teachers will meet to review evaluations and align G/T instruction for the 2017–18 school year.

The development and implementation of a comprehensive G/T program may require additional resources. The fiscal impact cannot be determined until the district identifies resource needs associated with implementation of the program.

ACHIEVEMENT GAP (REC. 12)

Dalhart ISD lacks a plan to identify a research-supported approach to address the achievement gaps between student groups.

The district improvement plan (DIP) and campus improvement plans include goals to identify and address individual student needs for special populations; however, the district has not developed a research-supported approach to meet the needs of these students.

For example, the district goal related to curriculum and assessment states that Dalhart ISD will establish a curriculum that targets individual performance so all students reach high standards. One of the strategies to achieve this goal is for the district to provide staff with targeted training for special student populations. However, the DIP does not indicate what this training will be, when it will occur, or who will provide the training. Further, the district schedule of staff training planned for school year 2016–17 does not include targeted training for teachers working with special student populations. A review of the district curriculum plan and interviews with district staff also found no evidence of an overall effort to address the needs of special populations.

In another example, the district goal related to student achievement states that Dalhart ISD will provide appropriate instructional services to all students, and will disaggregate data to identify performance strengths and weaknesses, as well as causal factors, and develop an out-come based plan. A performance objective for this goal is that the district will increase scores from dyslexia/504 students on state exams and will provide all students identified with dyslexia or a related disorder appropriate instruction. However, the DIP does not identify a research-supported approach to ensure that dyslexia/504 students will receive instruction based on their individual needs.

Similarly, a review of all campus plans shows that each campus has goals related to identifying and targeting

individual needs for the academic success of all students. Again, as in the district plan, the plan includes strategies to accomplish each objective; however, the campus plan does not identify a research-supported approach to ensure that all students will receive instruction based on their individual needs.

A review of district the STAAR percent passing scores for school years 2013–14 to 2015–16 shows that student groups in Dalhart ISD score lower than their peer groups in the state. **Figure 2–12** compares STAAR exam results between student groups in Dalhart ISD to student groups statewide. **Figure 2–12** shows that, with few exceptions, Dalhart ISD African-American, Hispanic, and White students score lower than corresponding student groups statewide.

Figure 2–13 compares STAAR exam results between student groups in Dalhart ISD to student groups statewide. **Figure 2–13** shows that with few exceptions, Dalhart ISD special education, economically disadvantaged, and ELL students score lower than corresponding student groups statewide.

Failure to identify and articulate a research-supported approach to support the needs of struggling students may cause students to fall further behind in student performance and potentially cause them to be unable to meet state standards for graduation. Today's classrooms include diverse learners who differ not only culturally and linguistically but also in their cognitive abilities, background knowledge and learning preferences. As stated above, there are significant student performance differences between Dalhart ISD student groups and student groups statewide.

An example of a research-supported approach is differentiation. Differentiation is a way of teaching in which teachers provide specific ways for each student to learn as deeply as possible, and as quickly as possible, without assuming one student's road map for learning is identical to another's. Differentiation requires teachers to know their students well so they can provide each one of them with experiences and tasks that will improve learning. In the publication Differentiated Classroom: Responding to the Needs of All Learners, 2nd Edition Carol Ann Tomlinson writes "differentiation means giving students multiple options for taking in information. Teachers begin

FIGURE 2–12
STATE OF TEXAS ASSESSMENT OF ACADEMIC READINESS (STAAR) PERCENTAGE OF PHASE-IN SATISFACTORY OR ABOVE BY STUDENT GROUP
SCHOOL YEARS 2013–14 TO 2015–16

ALL SUBJECTS	STATE AFRICAN AMERICAN	DALHART AFRICAN AMERICAN	STATE HISPANIC	DALHART HISPANIC	STATE WHITE	DALHART WHITE
2013–14	67.0%	**100.0%**	72.0%	59.0%	87.0%	77.0%
2014–15	68.0%	**(1)**	72.0%	63.0%	87.0%	79.0%
2015–16	64.0%	**62.0%**	70.0%	63.0%	85.0%	79.0%

NOTES:
(1)   Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34 CFR Part 99.1 and Texas Education Agency procedure OP 10-03.
(2)   Data includes all grades.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2013–14 to 2015–16.

FIGURE 2–13
STATE OF TEXAS ASSESSMENT OF ACADEMIC READINESS (STAAR) PERCENTAGE OF PHASE-IN SATISFACTORY OR ABOVE FOR SPECIAL EDUCATION, ECONOMICALLY DISADVANTAGED AND ENGLISH LANGUAGE LEARNER STUDENTS
SCHOOL YEARS 2013–14 TO 2015–16

ALL SUBJECTS	STATE SPECIAL ED	DALHART ISD SPECIAL ED	STATE ECON DISAD	DALHART ECON DISAD	STATE ELL	DALHART ELL
2013–14	59.0%	40.0%	69.0%	59.0%	57.0%	32.0%
2014–15	43.0%	56.0%	69.0%	62.0%	55.0%	36.0%
2015–16	39.0%	35.0%	67.0%	61.0%	57.0%	45.0%

NOTE: Data includes all grades.
SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2013–14 to 2015–16.

where students are, not the front of a curriculum guide. They accept and build upon the premise that learners differ in important ways… and accept and act on the premise that teachers must be ready to engage students in instruction through different learning modalities, by appealing to differing interests, and by using varied rates of instruction along with varied degrees of complexity." In a differentiated classroom, teachers encourage a student to compete against himself as he grows and develops, rather than competing against other students.

Laura Robb, in What is Differentiated Instruction? an article published in Differentiating Reading Instruction, 2008, lists some key principles that form the foundation of differentiating instruction:

- Ongoing, formative assessment: Teachers continually assess to identify students' strengths and areas of need so they can meet students where they are and help them move forward.

- Recognition of diverse learners: The students we teach have diverse levels of expertise and experience with reading, writing, thinking, problem solving and speaking. Ongoing assessments enable teachers to develop differentiated lessons that meet every students' needs.

- Group work: Students collaborate in pairs and small groups whose membership changes as needed. Learning in groups enables students to engage in meaningful discussions and to observe and learn from one another.

- Problem solving: The focus in classrooms that differentiate instruction is on issues and concepts rather than "the book" or the chapter. This encourages all students to explore the big ideas and expand their understanding of key concepts.

- Choice: Teachers offer students choice in their reading and writing experiences and in the tasks and projects they complete. By negotiating with students, teachers can create motivating assignments that meet students' diverse needs and varied interests.

Dalhart ISD should identify and implement an overall research-supported approach to address the needs of special populations in the district's DIP and align that approach to the individual campus plans as appropriate.

The district should identify professional development needs and budget for training of the selected instruction for all

teachers at all grade levels. If the district chooses to implement differentiated instruction, they should perform the following tasks:

- assign the responsibility of implementing differentiated instruction to the executive director of student services;

- survey teachers and administrators to determine their level of understanding of differentiated instruction;

- identify a best practice model for differentiated instruction;

- provide districtwide training for the differentiated model for teachers and administrators;

- provide follow-up coaching opportunities for teachers to support the implementation of differentiated instruction;

- include differentiated instruction as a part of the annual professional development focus and align to current staff development opportunities; and

- include the training in the district and campus plans to ensure implementation and evaluation of the process.

Since the district has a training budget, this recommendation could be implemented with existing resources.

SPECIAL NEEDS STUDENTS (REC. 13)
Dalhart ISD does not provide co-teaching support to special education and general education teachers.

Dalhart ISD serves the majority of its special education students through the inclusion model. Under the inclusion model, students with special needs spend most or all of their time in classrooms with non-special needs students. Either designated paraprofessionals or certified special education teachers serve special education students in the general education classroom. Staff state that, based on a review of Individualized Education Program (IEP), there are at least 73 students receiving inclusion services in the general classroom.

In Dalhart ISD, the special education teacher or paraprofessional goes into the classroom and teaches or assists special education students with instructional activities without training, collaboration or planning with the general education teacher. Interviews and a review of district documents show that there are no written procedures for inclusion and there has been little to no formal training in

inclusion for any of the special education or general education staff. The director of special education stated that five staff attended an Inclusion Solution Conference in August 2015, however the district has not provided formal inclusion training since that time.

Interviews with the superintendent, executive director of student services, and the director of special education reflect concern about the lack of a consistent inclusion model, and a lack of consistency in services. All three administrators stated that neither the special education staff nor the general education teachers embrace a true inclusion model, nor do they consistently plan or co-teach in the classroom. Without consistent and purposeful districtwide guidance and training in an inclusion model at all campuses, the specific needs identified in the IEPs of special education students are at risk of not being met. Conversely, poor implementation of the model may not yield positive results for students.

Studies have shown that co-teaching can be an effective for students with special needs, especially those with milder disabilities, including learning disabilities. According to the website of the Curry School of Education at the University of Virginia (UVA), co-teaching is becoming more common in schools as teachers and administrators understand the value of having two professionals share responsibility for instruction. They state that, "collaboration was thrust into the educational lexicon in the 1970's when mainstreaming became the popular approach for integrating students with special needs into the general education classroom and special education and general education teachers were forced to collaborate. Research has shown the students with disabilities benefited from teachers working together to make the curriculum more accessible to all students." UVA states the advantages of co-teaching include: increased adult attention to students; shared expertise among two or more teachers; shared responsibility for instruction and management; increased opportunity to differentiate for students, and demonstrated improvement in student achievement. The National Education Association, in its article 6 Steps to Successful Co-Teaching: Helping Special and Regular Education Teachers Work Together, identify the following six steps to successful co-teaching for special and general education teachers:

- take time to establish a relationship;

- identify teaching styles and use them to create a cohesive classroom;

- discuss strengths and weaknesses;

- discuss IEPs and regular education goals;

- formulate a plan of action and act as a unified team; and

- take risks and grow as professionals.

Successful implementation of an inclusion model, as with the implementation of most instructional models, requires initial and ongoing professional development. In the publication, Professional Development for Inclusion, 1997, the Center for Children and Technology states that to implement and maintain a successful inclusion program, "professional development is supported by the schools and the district." Campus and district administrators must be informed of the ongoing work and needs and must provide the necessary resources and support for the model.

Dalhart ISD should develop written procedures and provide training for the implementation of a districtwide inclusion model for all teachers of special needs students.

The director of special education should oversee the following implementation steps:

- identify an inclusion model;

- form campus inclusion implementation teams that include the principal of each campus;

- identify an inclusion training venue (either internally or externally to the district) and include the training in the annual professional development plan;

- require campus inclusion implementation teams to attend training;

- provide time during the daily instructional schedule for teams to plan together; and

- perform walk-through reviews during inclusion instruction.

The district should include the process in the district and campus plan to ensure implementation and evaluation. Since the district already has a training budget, this recommendation could be implemented with existing resources.

DISCIPLINARY ALTERNATIVE EDUCATION SCHOOL (REC. 14)
Dalhart ISD's Disciplinary Alternative Education Program (DAEP) lacks a process to meet the instructional needs of its students.

Dalhart ISD provides a DAEP, housed in the district's central office, for students who have exhibited behaviors prohibited in the general conduct violations section of the Dalhart ISD Student Code of Conduct. A full time teacher certified in physical education oversees the DAEP. This teacher has no content area certification. **Figure 2–14** shows the numbers of students placed in Dalhart ISD's DAEP from school years 2013–14 to 2015–16. Although the number of students placed in DAEP are relatively low, they have increased from six to 15 students per year during this period, a 150.0 percent increase.

FIGURE 2–14
DALHART ISD STUDENTS PLACED IN THE DISCIPLINE ALTERNATIVE EDUCATION PROGRAM
SCHOOL YEARS 2013–14 TO 2015–16

SCHOOL YEAR	STUDENTS PLACED
2013–14	6
2014–15	11
2015–16	15

SOURCE: Texas Education Agency, Public Education Information Management System, school years 2013–14 to 2015–16.

During onsite interviews, district staff stated that the DAEP follows the procedures outlined in the Student Code of Conduct and board policy. Parents are required to deliver and pick students up daily and to sign them in each morning. Students in grades kindergarten through grade six are exempt from placement at the DAEP; the program is exclusive to students in grades seven through 12 from the junior high, high school and XIT. According to Board Policy FOC (LEGAL), the district places students in the DAEP for either discretionary or mandatory reasons. Behaviors that may cause a student placement for discretionary reasons include:

- involvement in a public school fraternity, sorority, or secret society, including participating as a member or pledge, or soliciting another person to become a pledge or member of a public school fraternity, sorority, secret society, or gang;

- involvement in criminal street gang activity;

- any criminal mischief, including a felony;

- assault (no bodily injury) with the threat of imminent bodily injury; and/or

- assault by offensive or provocative physical contact;

Students must be placed in a DAEP for the following behaviors:

- engage in conduct relating to a false alarm or report (including a bomb threat) or a terroristic threat involving a public school;

- commit a felony, an assault or other grievous offense such as drug and alcohol use on school property or within 300 feet of school property as measured from any point on the school's real property boundary line, or while attending a school-sponsored or school-related activity on or off school property.

The campus behavior coordinators at Dalhart High School or Dalhart Middle School make the decision to remove a student from their home campus. When campus staff remove a student from the classroom for a DAEP offense, the campus behavior coordinator or appropriate administrator schedules a conference within three school days with the student's parent, the student, and the teacher. At the conference, the campus behavior coordinator or appropriate administrator informs the student orally or in writing, of the reasons for the removal and gives the student the opportunity to respond to the reasons for the removal. The campus behavior coordinator determines the duration of a student's placement in the DAEP on a case-by case basis. The length of stay correlates to the seriousness of the offense, the student's age and grade level, the frequency of misconduct, the student's attitude, and statutory requirements.

The Dalhart ISD Student Code of Conduct and Board Policy FOCA (LEGAL) states that during the required conference, the district will provide parents a written notice of the student's opportunity to complete the foundation curriculum courses the student was enrolled at the time of removal and which are required for graduation, at no cost to the student. During a review of documents and interviews with staff, there was no evidence that parents actually receive a written notice and the district was unable to provide a sample of a written notice.

Although there are no written procedures for consistent instructional practices for students assigned to the DAEP, district staff state that students who are placed in the DAEP for 20 days or more receive instruction using Plato, an online state-based curriculum. There is no evidence of collaboration or monitoring between the sending teacher and the DAEP staff regarding diagnostic placement in Plato to ensure that alignment of the student's work to the sending teacher's classroom instruction. According to district staff, students placed for less than 20 days receive daily assignments from the sending campus, delivered by a district courier. The

student completes the assignments, and the courier returns the assignments to the sending teacher for grading. There was no evidence of a mechanism for sending teachers to provide students feedback on those assignments. Further, students do not have access to a teacher certified to provide instructional support on the area of the assignment, or to ensure the student understands and completes the assignment.

The lack of alignment between the instruction a student received in the regular classroom and the Plato assignment, combined with the lack of direct instruction from a certified instructor, may ultimately impede a student's performance in one or more subjects. This risk is of special concern in subjects with rigorous conceptual hierarchy such as math and science. In addition, the practice deprives DAEP students the same instructional opportunities as students in the regular classroom.

The National Alternative Education Association publishes Exemplary Practices in Alternative Education: Indicators of Quality Programming, 2014, which include the following best practices related to instructional practices:

- students have access to the academic core curriculum at the nontraditional or alternate schools;

- teachers are highly qualified in the content area based on individual state standards;

- curricular options reflect, but are not limited to, those offered in the traditional educational setting;

- teachers identify and provide appropriate instruction designed to close gaps in student learning;

- differentiated instructional strategies are employed to accommodate for students with different backgrounds, individual learning styles (e.g. visual, auditory, and kinesthetic learners), and multiple intelligences;

- instruction integrates life skills (e.g., career preparation, citizenship, conflict resolution, decision making skills, problem solving, public speaking, self-management, social skills, teamwork, time management, decision making skills etc.) into the curricula and affords the student with opportunities to put the acquired skills into action;

- small group lessons in concert with project based learning are used to build social relationships by supporting collaboration and teamwork; and

- the curriculum is supported by access to a balance of up-to-date, well maintained collection of textbooks,

library media, technology, software, and instructional materials that are age and grade appropriate for all learners.

Dalhart ISD should develop and implement a process to ensure DAEP instructional alignment with the general education classroom.

The executive director of student services should establish a committee that includes appropriate staff from the junior high and high school campuses, the campus behavior coordinators, and the counselors. The committee should review discipline alternative school policies and current instructional practices for DAEP students to ensure that the district is complying with all policies and procedures and that students are receiving an instructional program aligned with the instructional program at the sending campus. The following steps support the implementation of this recommendation:

- The committee should review all DAEP policies and practices and create an instructional design and procedure manual that aligns instructional practices at the DAEP with those at the sending campuses.

- The committee should develop a job description for a teacher certified in one or more content areas to support students' instructional needs and serve as the teacher of record for the DAEP.

- The district should advertise the DAEP teacher position and representatives of the committee should assist in selecting a candidate for the committee to recommend to the superintendent.

The teacher should attend training as specified in Board Policy FOCA (LEGAL) to include the following:

- training on the education and discipline of students with disabilities who receive special education services;

- instruction in social skills and problem solving skills that addresses diversity, dating violence, anger management, and conflict resolution to teach students how to interact with teachers, family, peers, authority figures, and the general public; and

- annual training on established procedures for reporting abuse, neglect, or exploitation of students.

The committee should develop a process for monitoring and evaluating the implementation and success of the new DAEP process.

The fiscal impact assumes there will be no new cost for assigning a teacher certified in one or more content areas. Since the district has a training budget, 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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 2. EDUCATIONAL SERVICE DELIVERY							
9. Develop and implement a process for continuously monitoring the curriculum management system at all campuses.	($75,266)	($75,266)	($75,266)	($75,266)	($75,266)	($376,330)	$0
10. Develop and implement a comprehensive evaluation process for Bilingual, ESL, and MEP programs.	$0	$0	$0	$0	$0	$0	$0
11. Develop and implement a comprehensive gifted and talented program to meet the instructional needs of identified students.	$0	$0	$0	$0	$0	$0	$0
12. Identify and implement an overall research-supported approach to address the needs of special populations in the district's DIP and align that approach to the individual campus plans as appropriate.	$0	$0	$0	$0	$0	$0	$0
13. Develop written procedures and provide training for the implementation of a districtwide inclusion model for all teachers of special needs students.	$0	$0	$0	$0	$0	$0	$0
14. Develop and implement a process to ensure DAEP instructional alignment with the general education classroom.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**($75,266)**	**($75,266)**	**($75,266)**	**($75,266)**	**($75,266)**	**($376,330)**	**$0**

CHAPTER 3. HUMAN RESOURCES MANAGEMENT

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.

Dalhart Independent School District (ISD) operates the human resources (HR) function using a decentralized model. **Figure 3–1** shows the district's HR organization. The district distributes HR functions among the chief financial officer (CFO), executive director of student services, employee benefits specialist, payroll specialist, and principals.

FIGURE 3–1
DALHART INDEPENDENT SCHOOL DISTRICT
ORGANIZATION FOR HUMAN RESOURCES
SCHOOL YEAR 2016–17
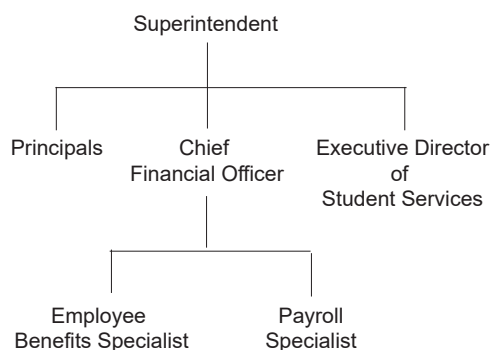
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

Dalhart ISD's HR function is responsible for the following staff activities:

- posting and updating position vacancy listings;
- conducting background checks of applicants;
- processing new staff;
- monitoring the licensure status for all certified staff;
- maintaining staff files; and
- assisting in the administration of staff compensation and benefits.

In school year 2016–17, Dalhart ISD employed 227.0 full-time-equivalent (FTE) positions at the district's five campuses and administrative building to provide services to 1,767 students. The five campuses include Dalhart Elementary School, Dalhart Intermediate School, Dalhart Junior High School, and Dalhart High School. Dalhart XIT Secondary School is located in the administrative building.

Figure 3–2 shows Dalhart ISD's actual payroll expenditure as a percentage of all funds compared to its peer districts. Peer districts are districts similar to Dalhart ISD that are used for comparison purposes. The peer districts compared to Dalhart ISD are Borger, Diboll, and Giddings. Dalhart ISD's payroll expenditures were the lowest compared to its peer districts for school year 2014–15. Dalhart ISD's payroll accounted for 76.4 percent of its total expenditures, which is the third highest among peer districts and is higher than the state average of 60.8 percent.

Figure 3–3 shows average base salaries by staff type for Dalhart ISD compared to those of peer districts. Dalhart ISD's average salaries for staff, support staff, administrative staff, and auxiliary staff are higher than its peer districts. Dalhart ISD's average salaries for all teachers, librarians, other noninstructional district staff, and total professional staff are lower in most cases compared to its peer districts.

Figure 3–4 shows Dalhart ISD staff counts by classification compared to those of its peer districts. In school year 2015–16, Dalhart ISD employed the fewest number of staff compared to its peer districts.

FIGURE 3–2
DALHART ISD ACTUAL PAYROLL EXPENDITURES AS A PERCENTAGE OF ALL FUNDS COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2014–15

CATEGORY	DALHART ISD	BORGER ISD	DIBOLL ISD	GIDDINGS ISD
Total expenditures (in millions)	**$14.3**	$19.3	$16.3	$15.6
Payroll expenditures (in millions)	**$10.9**	$16.2	$12.3	$12.4
Payroll as a percentage of total expenditures	**76.4%**	83.9%	75.7%	79.5%
Total Staff FTE (1) positions	**221.4**	312.5	289.4	266.9
Total Teacher FTE positions	**132.6**	201.7	147.8	143.3
Student Enrollment	**1,760**	2,738	1,930	1,942

NOTE: (1) FTE=full-time-equivalent positions.
SOURCE: Texas Education Agency, Public Education Information Management System, Actual Financial Data, school year 2014–15, and Texas Education Agency Snapshots, school year 2014–15.

FIGURE 3–3
DALHART ISD AVERAGE BASE SALARIES COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2015–16

CATEGORY	DALHART ISD	BORGER ISD	DIBOLL ISD	GIDDINGS ISD
Total Staff	**$42,352**	$37,477	$38,675	$39,505
Total Teaching Staff	**$44,948**	$47,232	$46,805	$46,761
Prekindergarten	**$42,920**	$43,731	$41,602	N/A
Kindergarten	**$44,393**	$47,429	$45,571	$53,300
Elementary school (grades 1 to 5)	**$46,595**	$47,638	$40,383	$49,216
Middle school (grades 6 to 8)	**$47,035**	$50,063	$45,345	$44,245
High school (grades 9 to 12)	**$46,228**	$48,723	$50,039	$48,349
All Grade Levels	**$45,035**	$47,963	$48,205	$47,387
Total Support Staff	**$56,775**	$53,366	$55,405	$56,522
Librarian	**$49,845**	$51,188	$55,849	$55,308
Other Noninstructional District Staff	**$52,473**	$63,309	$57,443	$71,750
Total Administrative Staff	**$81,842**	$75,824	$77,067	$73,347
Principal	**$73,876**	$74,731	$68,183	$65,207
Superintendent	**$143,790**	$152,758	$122,325	$108,001
Total Professional Staff	**$48,612**	$50,351	$49,446	$49,431
Auxiliary Staff	**$34,165**	$20,199	$22,644	$22,461

SOURCE: Texas Education Agency, 2015–16 Staff Salaries and Full-time-equivalent Counts–Excluding Educational Service Center Staff.

FIGURE 3–4
DALHART ISD STAFF CLASSIFICATION BY ROLES COMPARISON
SCHOOL YEAR 2015–16

STAFF	DALHART ISD	BORGER ISD	DIBOLL ISD	GIDDINGS ISD
Teachers	**129.1**	199.6	145.8	142.6
Support staff	**12.0**	37.6	18.3	15.0
Administrative staff	**11.3**	20	10	11.5
Educational aide	**36.0**	75.2	18.24	23.2
Auxiliary staff	**22.0**	104.7	94.9	71.2
Total	**210.4**	437.2	287.3	263.4

NOTE: Totals may not sum due to rounding.
SOURCE: Texas Education Agency, 2015–16 Staff Salaries and Full-time-equivalent Counts–Excluding Educational Service Center Staff.

Figure 3–5 shows the student-to-teacher ratios and student-to-staff ratios for Dalhart ISD and its peer districts. Dalhart ISD staffing ratios for students to teachers and students to staff are comparable to its peer districts. Dalhart ISD's student-to-teacher ratio is slightly higher than the average of other districts served by Regional Education Service Center XVI (Region 16) and lower than the state average ratio of 15.2. Dalhart ISD has a higher student-to-staff ratio than Diboll ISD and a lower ratio than Borger ISD and Giddings ISD.

FIGURE 3–5
STUDENT–TEACHER AND STUDENT–STAFF RATIOS COMPARISON
SCHOOL YEAR 2014–2015

AREA	STUDENT–TEACHER RATIO	STUDENT–STAFF RATIO
Dalhart ISD	**13.3**	**7.9**
Borger ISD	13.6	8.8
Diboll ISD	13.1	6.7
Giddings ISD	13.5	7.3
Region 16 (1)	13.1	7.1
State	15.2	7.7

NOTE: Regional Education Service Center XVI.
SOURCE: Texas Education Agency, Texas Education Agency Snapshots, school year 2014–15.

FINDINGS

♦ Dalhart ISD's human resources functions lack consistent and coordinated implementation.

♦ Dalhart ISD lacks a process to ensure that staffing decisions meet the educational needs of students and align with district strategic goals.

♦ Dalhart ISD has a high teacher turnover rate that is costly to the district.

♦ Dalhart ISD does not ensure that job descriptions are consistent with actual job duties, or contain information in accordance with industry standards.

♦ Dalhart ISD does not maintain staff files in accordance with state and federal requirements.

RECOMMENDATIONS

♦ **Recommendation 15: Define key leadership human resources roles and develop a comprehensive, administrative procedures manual for human resources operations.**

♦ **Recommendation 16: Use locally developed staffing allocation formulas or industry-standard guidelines to determine the appropriate number of staff positions.**

♦ **Recommendation 17: Develop a comprehensive plan to attract and retain qualified teachers.**

♦ **Recommendation 18: Develop a procedure to update and maintain accurate job descriptions for each staff position.**

♦ **Recommendation 19: Develop a comprehensive staff file management system.**

DETAILED FINDINGS

MANAGEMENT AND PROCEDURES (REC. 15)

Dalhart ISD's human resources functions lack consistent and coordinated implementation.

The district has not clearly defined HR responsibilities. Both district administration office staff and campus staff conduct HR tasks. The executive director of student services oversees the recruitment and retention of staff and staff development for teachers. The CFO oversees staff hiring and termination, accepting resignations, and setting and approving salaries. The employee benefits specialist carries out day-to-day HR responsibilities such as managing job postings, benefits administration, staff orientation, and initiating and maintaining staff files. The payroll specialist processes and records the district's payroll. Campus principals administer the majority of the campus-level HR responsibilities such as recruiting candidates, reviewing applications, interviewing applicants, and recommending applicants to fill open positions. Principals are responsible for managing discipline and grievance issues that occur with staff on their campuses. Principals conduct performance evaluations of teachers and manage independent mentoring programs. The superintendent oversees the hiring of staff and recommends staff to the Board of Trustees for approval.

The decentralized structure of Dalhart ISD's HR functions leads to confusion among staff regarding contact with HR concerns and questions. In a Dalhart ISD employee opinion survey in April 2016, 43.0 percent of staff said they did not have a way to express HR concerns to the district. Principals and teachers also reported not knowing whether to contact the CFO or the executive director of student services with questions regarding HR.

Dalhart ISD has no written procedures to provide administrators and principals with specific instructions on how to implement recurring HR activities. Such activities include recruitment, interviewing, benefits administration, staff orientation, and maintenance of staff records. Dalhart ISD publishes board policies on the district website. Board policies include legal and local policies that address the district's employment practices. The district's 2015–16 Employee Handbook also explains district policies that affect staff. However, no written procedures are in place to ensure consistency and coordination in the implementation of standard HR tasks.

The lack of leadership and written procedures has caused inconsistent implementation of some HR functions. For example, the process of filling a teacher vacancy is informal and varies among campuses. According to onsite interviews with staff, filling a teacher vacancy includes the following steps: the principal sends the letter of resignation to the CFO, the CFO notifies the employee benefits specialist, and the employee benefits specialist posts the vacancy to the district website and the Region 16 website. The principal then reviews candidate applications and initiates an interview process, which varies by school. When the principal selects a candidate, the principal makes a hiring recommendation to the superintendent to take to the board. After the board approves, the district offers the applicant the position. The process does not include steps or procedures for notifying payroll of changes in employment, or notification to principals when applicants submit resumes online. Additionally, the district does not consistently follow these hiring procedures. According to onsite interviews with staff, the district sometimes makes applicant employment offers before providing the recommendation to the superintendent or the board.

Informal and undocumented hiring procedures have resulted in gaps in communication among principals, department managers, supervisors, and campuses. For example, instances have occurred when one Dalhart ISD campus had hired an applicant, and another campus was trying to schedule an interview with the same applicant. This occurrence is possible because the elementary school and the intermediate school can hire from the same pool of applicants.

The lack of written administrative procedures also influences the operations of every HR activity, including the recruitment process, interviews, staff files, and notification to payroll at the end of employment. Inadequately documented procedures can impede the functions of a district, lower staff morale, and undermine confidence in leadership. The lack of documentation also means that procedural knowledge resides in individuals' memories, instead of in an accessible manual.

In small districts such as Dalhart ISD, district administration office staff are often required to perform multiple tasks. However, the district's lack of clearly defined expectations and a vision for the role of HR and its leadership hinders the coordination and implementation of important HR functions. For example, Dalhart ISD does not have a strategic plan for HR functions, written administrative operating procedures, coordination of HR functions among schools, or HR training for staff planning. The district has a district improvement plan (DIP) that considers staff, quality, recruitment, and retention, and also has campus improvement plans (CIP). However, the district lacks a strategic HR plan that integrates HR management strategies and systems to achieve the district's mission, strategies, and success while meeting the needs of staff and stakeholders. A lack of a strategic plan hampers the ability of the district to define or achieve its mission, and can result in an environment wherein staff, principals, and teachers lack a consistent message about the district's mission, vision, and goals for HR functions.

Principals do not receive adequate support to help guide strategic thinking and planning. During onsite interviews, staff reported communication challenges among principals and staff at the district administration office. Principals reported inconsistent support from the administration office and little support from their colleagues.

Effective school districts have comprehensive, documented operating procedures. Documented procedures help districts develop work standards, ensure consistency, and implement overall operational efficiency. Additionally, a detailed administrative procedures manual for operations preserves institutionalized knowledge if staff is absent or leaves the district.

These manuals supplement and clarify existing information, such as that found in employee handbooks, and they provide an internal guide for consistently implementing policies as intended. Standard contents of an HR procedural guidebook include procedures that address the following areas:

- recruitment;

- interviews and candidate selection;

- information on establishing and maintaining staff files and the handling of confidential information;

- payroll process;

- process for performance reviews and appraisals;

- competence and training standards;

- discipline and dismissals;

- grievance and complaint handling; and

- brief explanations of procedures for purchasing equipment, arranging travel, or receiving expense reimbursements.

The role of an HR department is vital to a school district's success; the efficiency and effectiveness of an HR department can determine whether qualified teacher candidates accept employment in the district. The University of Washington's Center on Reinventing Public Education published a report titled From Bystander to Ally: Transforming the District Human Resources Department. The report emphasizes the need for school districts to rethink how they use HR as a strategic tool to improve student performance. The report concludes that the transformation of a district's HR function requires administrative reforms to increase the department's capacity, and close attention from district leaders. Leadership is central to strategic human resource management.

Dalhart ISD should define key leadership HR roles and develop a comprehensive, administrative procedures manual for HR operations.

The superintendent should coordinate with the CFO and the executive director of student services to clearly define roles and responsibilities related to HR. The superintendent should centralize these duties within one position to the greatest extent possible to ensure consistency. The District Organization, Leadership and Management, and Educational Service Delivery chapters of this report address opportunities for improvement in the roles and responsibilities of the executive director of student services. The employee benefits specialist should then document these roles in each job description. The district should improve coordination with campus administrators and develop strategic tools to help facilitate the administration of HR functions throughout the district.

The superintendent should direct the CFO and the executive director of student services to meet with the employee benefits specialist, payroll specialist, and principals to determine which written procedures to develop first. Next, a writing team, including the CFO and the employee benefits specialist, should develop each procedure. As each procedure is completed and approved, the district should upload the procedure to the HR section of the Dalhart ISD's intranet. The operating procedures manual should contain the district's HR organizational structure and detailed procedures for the HR responsibilities performed by staff. The CFO should annually review and update the manual. The district should make HR policies and procedures readily accessible to staff, provide regular communication across the district, and ensure consistent implementation.

Since the time of the Legislative Budget Board School Performance Review Team's onsite review, the district has begun documenting certain HR procedures, including procedures for employee separation, hiring, employee data changes, and forms for exit interviews and personnel requisitions.

This recommendation could be implemented with existing resources.

STAFF PLANNING (REC. 16)

Dalhart ISD lacks a process to ensure that staffing decisions meet the educational needs of students and align with district strategic goals.

According to onsite interviews, each principal has the discretion to hire staff as needed. For example, if a principal decides the campus needs a teacher for English as a second language but not an interventionist, then the principal has the authority to make that decision. If a principal determines that the campus needs additional staff, the principal justifies the position to the superintendent. Board approval is required for every new hire. According to interviews, board approval can often delay the hiring process. The board has called nine special meetings to approve teacher contracts, but principals still report that the process can delay the hiring of staff.

At the time of the review, the district based staffing levels on the same number of FTE positions from the previous year. Dalhart ISD has not developed a staffing formula to determine whether each campus has the appropriate number of teaching, administrative, and support staff. The district also does not use staffing guidelines to determine the appropriate number of principals, assistant principals, or counselors in its campuses. According to interviews, Dalhart ISD has a general guideline for staffing at the elementary school level; the ratio is 16 students to one teacher for kindergarten, and 20 students to one teacher in grades one to four. The Texas Education Code, Section 25.112, requires kindergarten to grade four to maintain a maximum class size of 22 students per teacher. The statute does not develop

requirements for class size in grade five and greater. Although Dalhart ISD's student–teacher ratios comply with the statute, the district does not have a method to determine if the staffing ratios best suit the district's needs.

Figure 3–6 shows the staff count by campus at the time of the onsite review. Dalhart Elementary School and Dalhart High School have the same number of administrator positions as Dalhart Intermediate School and Dalhart Junior High School, even though they have almost twice as many students.

The lack of planning and coordination to determine campus needs and appropriate staffing results in two concerns. Dalhart ISD's staffing-level ratios are comparable to its peer districts and lower than the state average. However, the lack of a staffing formula prevents Dalhart ISD from determining whether campuses and the district administration office are appropriately staffed to address students' educational needs. Additionally, the lack of a staffing formula limits the district's ability to systematically identify strategies for meeting its goals and challenges. This lack of planning also hinders the district's ability to ensure that staffing decisions and related funding allocations are appropriately aligned with selected strategies.

Effective entities address staff planning with multiple approaches. According to the Bersin and Associates report The Modern Approach to Workforce Planning: Best Practices in Today's Economy, 2009, staff planning enables organizations to complete the following tasks:

- understand the core competencies available and evaluating the skills needed in the organization;

- analyze what-if scenarios, based on internal and external business conditions;

- align workforce planning activities with the overall business strategy, and;

- identify the criticality of job roles in the business strategy.

School districts could apply these standards to manage their HR functions. AdvancED, a nonprofit accrediting agency, lists specific indicators to determine if school districts have the resources to provide services to ensure success for all students. The agency's Indicator 4.1 states: "Qualified professional and support staff are sufficient in number to fulfill their roles and responsibilities necessary to support the school's purpose, direction, and the educational program." The indicator does not provide specific staffing standards. However, it evaluates whether school leaders use a formal, systematic process to determine the number of staff necessary to fill all the roles and responsibilities necessary to support the purpose, educational programs, and continuous improvement.

One method for managing staff needs is position control. Position control is a management tool that entities use to allocate financial resources to staffing needs. Clint ISD implemented position control by identifying each employment position in the district and the associated salary budgeted for the position. The district enters the number of approved positions per location into an information system, even if the position is vacant. Clint ISD linked their position control system to the annual financial budget and during each budget cycle, schools and administrators identify staffing needs. The business staff works with the superintendent, administrators, and schools to identify financial resources to fund their needs. District staff present the proposed position budget by school, department, and job-classification to the board for approval with the annual financial budget. When the district needs to fill a position, the Personnel Service Department reviews the approved position control database, and the superintendent approves the recommended new hire. According to staff of the Personnel Service Department, the process of board-approved position budgets has expedited the hiring process from several weeks to less than five days. Some board

FIGURE 3–6
DALHART ISD STAFF COUNT BY CAMPUS
NOVEMBER 2016

CAMPUS	ENROLLMENT	ADMINISTRATOR	COUNSELOR	CLERICAL	TEACHER	NURSE	AIDE
Dalhart Elementary School	588	2	0	2	42	1	19
Dalhart Intermediate School	241	2	1	1	19	0	7
Dalhart Junior High School	399	2	1	2	28	0	5
Dalhart High School	501	2	2	3	42	1	6
XIT Secondary School (1)							

NOTE: (1) The XIT Secondary School is excluded from this analysis.
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

members said that this streamlines the process by taking the hiring approval out of their hands. The position control process develops a means for the board to manage the quantity of people employed without micromanaging the hiring process.

Districts may also benefit from having a formal, standardized process for developing new positions or eliminating excess positions. Before joining AdvancED, the Southern Association of Colleges and Schools (SACS) Council on Accreditation and School Improvement (CASI) issued Public School Standards. Standard six of the publication includes staffing standards based on extensive research and best practices in schools to help districts develop and maintain quality schools. Many districts use SACS industry standards to equitably distribute staff as student enrollment increases or decreases. **Figure 3–7** shows SACS's staffing recommendations.

Figure 3–7 shows that Dalhart ISD is not consistent with recommended staffing standards for several positions. Dalhart Elementary School has a full-time assistant principal, two support staff, and no counselor positions; SACS recommends a half-time assistant principal, one counselor, one full-time support staff, and one half-time support staff for an elementary school of this size. Dalhart Intermediate School has a full-time assistant principal and a full-time counselor; SACS recommends no assistant principals and a half-time counselor for a secondary school of this size. Dalhart Junior High School has a full-time assistant principal and two support staff; SACS recommends a half-time

assistant principal, two full-time support staff, and one half-time support staff for a secondary school of this size. Dalhart High School has two full-time counselors; SACS recommends one full-time counselor, one half-time counselor, and four support staff for secondary schools of this size.

Dalhart ISD should use locally developed staffing allocation formulas or industry-standard guidelines to determine the appropriate number of staff positions.

The district should use industry staffing standards as a model to develop staffing guidelines that fit the profile of its students. To complete this recommendation, the CFO and superintendent should develop a process to integrate staff planning into Dalhart ISD's HR system and to use a staff formula. In this process, the district administration office should meet with principals individually and collectively to discuss school needs. After the district develops a system, the CFO and the employee benefits specialist should document the process in the HR manual. The district should train staff on the new standards and make the manual available to the public.

Applying the SACS standards, Dalhart ISD could reduce the number of positions and eliminate the salaries and benefits for those positions. For example, by eliminating two administrator positions with an average salary and benefits of $78,000 ($65,000 + $13,000), and adding one support staff position with an average salary and benefits of $28,800 ($24,000 + $4,800), the district could achieve an annual savings of $127,200 ($156,000 ($78,000 x 2) savings - $28,800 cost).

FIGURE 3–7
PUBLIC SCHOOL STANDARDS OF RECOMMENDED SCHOOL ADMINISTRATIVE STAFFING BY MEMBERSHIP 2005

MEMBERSHIP	LEVEL	1–249	250–499	500–749	750–999	1000–1249
Administrative Head	Elementary	1.0	1.0	1.0	1.0	1.0
	Secondary	1.0	1.0	1.0	1.0	1.0
Administrative or Supervisory Assistants	Elementary	0.0	0.0	0.5	1.0	1.5
	Secondary	0.0	0.5	1.0	1.5	2.0
Guidance Professionals	Elementary	0.5	0.5	1.0	1.5	2.0
	Secondary	0.5	1.0	1.5	2.0	2.5
Library or Media Specialists	Elementary	0.5	1.0	1.0	1.0	1.0
	Secondary (Middle School)	0.5	1.0	1.0	1.0	1.0
	Secondary (High School)	0.5	1.0	1.0	1.0	2.0
Support Staff for Administration, Library, Media, or Technology	Elementary	0.5	1.0	1.5	2.5	3.0
	Secondary	1.0	2.5	4.0	4.5	5.0

SOURCE: Southern Association of Colleges and Schools Council on Accreditation and School Improvement, Public School Standards, 2005.

However, no fiscal impact is assumed for this recommendation until the district has identified the appropriate number of positions to accomplish its mission; therefore, this recommendation could be implemented with existing resources.

TURNOVER RATE (REC. 17)

Dalhart ISD has a high teacher turnover rate that is costly to the district.

Dalhart ISD does not have a process to address its high rate of teacher turnover. On average, Dalhart ISD hires approximately 25 teachers per year. According to TEA Texas Academic Performance Reports, the teacher turnover rate in Dalhart ISD from school years 2012–13 to 2015–16 has ranged from 18.0 percent to 26.0 percent. By comparison, the statewide teacher turnover ranged from 15.3 percent to 16.6 percent during the same time. **Figure 3–8** shows a comparison of Dalhart ISD's teacher turnover rate to the peer districts and the state average for school years 2012–13 to 2015–16. Dalhart ISD has a higher teacher turnover rate than its peer districts in three of the four school years during this period.

Interviews with staff indicate that Dalhart ISD does not systematically address turnover and retention issues, and is not pursuing steps to reduce turnover. Although the executive director of student services assists staff recruitment by attending job fairs, the district does not have a written recruitment strategy. The district attends several job fairs per year and recruits from surrounding universities, including Texas Tech University and West Texas A&M University. The district posts vacancies on the district's website and with Region 16. Sometimes the district posts vacancies with organization specific groups. For example, when recruiting for a special education teacher, the district posted the position with the Texas Council for Administrators of Special Education. Dalhart ISD does have a stipend to address teacher shortages in specific areas such as math, science, bilingual, and special education.

Due to its high turnover rate, the district has a high percentage of beginning teachers compared to its peer districts and the state average. **Figure 3–9** shows the percentage of teachers that were new teachers in Dalhart ISD compared to peer districts and the state average for school year 2015–16. The percentage of new teachers at Dalhart ISD is higher than its peer districts and the state average. Dalhart ISD has fewer teachers with one to five years' experience than the state average and its peer districts.

Dalhart ISD does not have an induction program or standardized mentorship program for teachers or principals. Each campus operates an independent mentoring program. Teacher mentoring is conducted ad hoc without defined curriculum, goals, or program requirements. For example, at the high school, junior high school, and elementary schools, the principals assign new teachers with mentors. However, campus administration does not provide mentors with training and has no curriculum or scheduled time for

FIGURE 3–8
DALHART ISD TEACHER TURNOVER RATE COMPARED TO PEER DISTRICTS AND STATE AVERAGE
SCHOOL YEARS 2012–13 TO 2015–16

YEAR	DALHART ISD	DIBOLL ISD	GIDDINGS ISD	BORGER ISD	STATE
2015–16	**26.0%**	13.5%	16.4%	23.5%	16.5%
2014–15	**21.0%**	20.4%	20.3%	21.9%	16.6%
2013–14	**15.0%**	16.7%	12.8%	18.4%	16.2%
2012–13	**25.0%**	11.1%	11.3%	22.9%	15.3%

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2012–13 to 2015–16.

FIGURE 3–9
DALHART ISD NEW TEACHER HIRING RATE COMPARED TO PEER DISTRICTS AND STATE AVERAGE
SCHOOL YEAR 2015–16

YEAR	DALHART ISD	DIBOLL ISD	GIDDINGS ISD	BORGER ISD	STATE
Beginning Teachers	15.3%	4.7%	3.5%	11.0%	8.1%
1 to 5 Years' Experience	19.0%	22.5%	20.3%	31.5%	27.3%

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school year 2015–16.

mentoring. The intermediate school conducts a mentor training program and provides a designated time for mentors and mentees to meet.

The district and individual campuses do not adequately monitor or report teacher turnover rates. During onsite interviews, HR staff indicated that they were unaware of the district's exact turnover rate. District staff stated that teacher turnover is primarily due to Dalhart's rural location, athletic team coaching opportunities at other schools, and because teachers use Dalhart ISD as a training ground to become certified and then leave for districts where teachers are more highly paid.

Staff responsible for HR stated that they had a "handle on turnover" because they "knew everyone in the district and why they left." However, Dalhart ISD does not consistently administer exit interviews. Although the district has an exit interview worksheet online, the worksheet is rarely used, according to staff and principals; if exit interview worksheets are used, principals do not receive the information.

An anecdotal perspective of knowing why everyone leaves can be misleading, and based on inaccurate assumptions. Without exit interviews, school districts have inadequate information about the relevant factors influencing the turnover rate. The cost of teacher turnover to Dalhart ISD is substantial. A school district experiences teacher turnover costs at two levels: (1) the administrative office expends resources when recruiting, hiring, and processing new teachers; and (2) campuses incur costs to interview, hire, process, orient, and develop new teachers.

According to the National Commission on Teaching and America's Future (NCTAF) turnover calculator, the estimated average rate of turnover at Dalhart ISD costs the school district $288,250 per year. These estimates include the cost of recruiting, hiring, processing, and training a new teacher. In Dalhart ISD, teacher turnover is particularly problematic because of its rural location and the difficulty in finding qualified replacements.

Effective school districts improve teacher retention by monitoring turnover to understand and to respond appropriately to trends affecting district staff and students. In addition to monitoring turnover, quality of management is also an important factor in teacher retention. According to a Philadelphia Education Fund study, schools with low teacher turnover had principals who demonstrated the following skills and management practices:

- implementing a strong induction program that reflected the principal's personal involvement in meeting with new teachers, having her/his office open for conversations, assigning new teachers classroom rosters that were not heavily weighted with challenging students, and providing mentors early in the school year;

- overseeing a safe and orderly school environment with active support for teachers on disciplinary issues;

- maintaining a welcoming and respectful administrative approach toward all staff, the students, their parents and campus visitors;

- developing the leadership skills of campus staff; and

- providing materials and supplies to all teachers in a consistent, timely and inclusive manner.

Quality mentorship programs improve performance among new teachers and experienced teachers alike. Research by The National Foundation for the Improvement of Education highlights the role mentorship programs play in improving teacher retention.

Teacher retention is rarely about salary alone; studies have found that teachers leave environments that lack essential professional support. According to the Northeast Regional Resource Center in a report titled Keeping Quality Teachers, the Art of Retaining General and Special Education Teachers, high turnover rates occur in teaching environments that lack support from school leadership, organizational structure, positive workforce conditions, and induction and mentoring programs for new and experienced teachers.

Effective organizations monitor and track why staff leave. The Harvard Business School at Harvard University states that a strategic exit interview program provides insight into what staff are thinking, reveals problems in the organization, and sheds light on the competitive landscape. In shaping programs, the Harvard Business School recommends focusing on the following six goals:

- uncover issues relating to HR – many HR practices can influence a teacher's decision to leave, not just compensation;

- understand staff perceptions of the work, including job description, working conditions, culture, and peers; this understanding could help principals to improve staff motivation, efficiency, coordination, and effectiveness;

- gain insight into managers' leadership styles and effectiveness;

- learn about HR benchmarks such as salary and benefits at peer organizations; the district could gain insights into what campuses in other districts are offering coaches or teachers;

- foster innovation by soliciting ideas for improving the organization – exit interviews should go beyond the staff's immediate experience to cover broader areas, such as campus environment, operations, and morale; one emerging best practice is to ask every departing staff a question such as, "Please complete the sentence, 'I don't know why the campus doesn't _____' "; this approach may reveal trends; and

- develop lifelong advocates for the organization – a good exit interview is an opportunity to treat departing staff with respect and gratitude; this treatment may encourage them to recommend the district to potential staff in the future.

Numerous studies on teacher retention programs show that strong induction and mentorship programs contribute to teacher retention. Rockwall ISD developed a program to increase the success of and retention of beginning teachers. The Beginning Educators Successful Teacher (BEST) mentoring program seeks to improve the teaching performance of first year teachers and serves as an effective retention tool. The mentoring process focuses on a developmental process in which a new teacher and an experienced educator commit to working and learning together for the support and professional development of the new teacher. Mentors share teaching resources, classroom management techniques and provide emotional support. Mentors are encouraged to share materials and are cautioned not to judge or to control. Rockwall ISD has a campus mentor coordinator who recruits, matches and supports mentor/induction teacher relationships. The district mentor coordinator conducts an annual orientation for teacher mentors and provides resource materials. The mentor coordinator also observes teacher performance, but does not formally evaluate the performance.

The School Superintendents Association also provides guidance for successful mentorship programs. It highlights the following steps for success:
- a districtwide mentoring program is in place before the school year begins; at the initial meeting, mentors

meet with beginning teachers to set up goals and objectives for the year;

- new teachers need emotional support during trying times – effective mentors conceptualize mentoring in terms of formal and informal support for the new teacher; principals can provide formal, official support when warranted; the experienced peer should feel comfortable offering advice, guidance, and emotional support when needed;

- principals offer systematic, districtwide, professional development training throughout the first three years for new mentors and beginning teachers; districtwide training develops common mentoring practices so that new teachers assigned to different campuses during their second or third years have familiar mentoring experiences;

- principals provide training in four areas: (1) observation techniques; (2) methods to identify classroom issues; (3) developing expectations for the school year; and (4) communicating these expectations – with continuous training, mentors and new teachers will develop an understanding of expectations and how to effectively work together;

- principals encourage new teachers to observe their successful colleagues' classrooms – the effective model provides a structure for observing and learning good teaching techniques and opportunities to observe these techniques in practice; principals set up schedules for their own observations and for the mentors' observations of mentored teachers' classrooms; and

- principals schedule time during the school day for mentors and new teachers to meet, and space these meetings out during the school year – principals understand that new teachers need extra time to prepare the curriculum, develop grading protocols and configuration, become more computer literate, obtain answers to discipline questions, and acclimate themselves to the organization.

Efforts by the superintendent and the board to provide such support to the district's principals and teachers will save the district time and funding and could reduce teacher turnover and improve student achievement by providing novice teachers with support.

Dalhart ISD should develop a comprehensive plan to attract and retain qualified teachers.

The CFO should track turnover rates and annually calculate the cost of turnover, and the superintendent should report this information to the board. The district should also consistently conduct exit interviews to understand why teachers leave the district. The CFO should update the exit interview worksheet and require its use. The CFO and the employee benefits specialist should conduct exit interviews. The superintendent, CFO, executive director of student services, and the employee benefits specialist should review exit interviews, communicate findings to principals, and develop a plan to address employee retention.

The executive director of student services, in collaboration with the superintendent and campus principals, should develop a coordinated mentorship program with mission, goals, and objectives that use some of the best practice information previously described. The program should be structured to meet Dalhart ISD's specific needs. The executive director of student services and principals should develop a timeline for integration into schools.

Additionally, the superintendents should coordinate with principals to enhance communication and provide opportunities for leadership training. The district administration office should coordinate with principals to find training opportunities and encourage the sharing of best practices among each other. The superintendent also should support one-to-one meetings with and between principals.

Since the time of the onsite review, the district worked with TASB to develop a new exit interview form and began requiring staff to complete exit interviews. Additionally, the district has scheduled leadership and mentorship training for campus administration and the director of student services.

The fiscal impact assumes that the district reduces turnover by 30.0 percent. Applying Dalhart ISD's turnover rate of 25 teachers per year, the NCTAF teacher turnover calculator estimates that turnover costs the district $288,250 per year. Reducing the teacher turnover rate by 30.0 percent for three consecutive years and then maintaining a natural level of attrition, the district would save $86,475 ($288,250 x 0.30) during the first year of implementation, $60,533 ((288,250 - $86,475=201,775) x 0.30)) during the second year, and $42,373 ((201,775 - $60,533= 141,242) x 0.30)) during the third year. This analysis assumes that, after three years, the district will reduce teacher turnover to a natural level of attrition, which is turnover due to circumstances beyond the

district's control, such as family moves, birth of children, or retirement.

JOB DESCRIPTIONS (REC. 18)
Dalhart ISD does not ensure that job descriptions are consistent with actual job duties, or contain information in accordance with industry standards.

Job descriptions do not reflect actual roles and responsibilities, and not every job description uses the same format. For most job descriptions, Dalhart ISD uses the Texas Association of School Boards (TASB) personnel and legal services' job description template; however, not all departments use the template, and job descriptions include varying information. The review team analyzed 38 of the district's job descriptions. The district could not locate job descriptions for several positons, including the superintendent and the director of technology. Most of the district-level job descriptions have signatures indicating that district staff reviewed and approved their job descriptions from June 2016 to September 2016. However, campus-level staff reported an inconsistent review of job descriptions. Some staff said they reviewed their job descriptions during annual reviews and updated them accordingly; others stated that they had not seen their job descriptions in years.

Inconsistencies are apparent among job descriptions, job titles, and actual job responsibilities. For example, the district has four identified directors' positions: director of athletics, director of technology, director of maintenance, and director of transportation. However, the director of technology has no job description, and the director of transportation job description does not include a job title or use the TASB template. The lack of clarity in job descriptions contributes to the confusion and leadership deficiencies. According to interviews, both the CFO and the executive director of student services lead the human resources function. In interviews, district staff indicated that the executive director of student services is responsible for recruitment, and the CFO is responsible for wage and salary administration and leave administration. However, the job descriptions for each position do not reflect this delineation of responsibilities. The job description for the executive director of student services does not mention recruitment. Similarly, the job description for the CFO does not describe the HR tasks performed by this positon.

Additionally, existing job descriptions lack important industry standard information. For example, most job descriptions did not include pay grade or job classification

information, or whether board action is required to approve positions. Most positions at Dalhart ISD require board approval as Dalhart ISD Board Policy DC (LOCAL), states, "The board retains final authority for employment of contractual personnel."

Accurate, consistent, and well-reviewed job descriptions can help avoid discrimination claims, help to find and hire the right people for the right jobs, provide analysis for classifying staff appropriately, and set standards for performance appraisal. Effective job descriptions also allow job standards and the assignment of pay grades to be more easily set. Inconsistent and inaccurate job descriptions can be a barrier to effective personnel management, and may leave the district vulnerable to legal risks.

According to The National Law Review, job descriptions are addressed in the following federal statutes:

- Fair Labor Standards Act (FLSA) –FLSA requires overtime pay for more than 40 hours worked in a week by nonexempt staff. The exempt or nonexempt status of staff is determined, in part, on staff's duties. A written job description or title is not enough alone to satisfy the exempt requirements, but an accurate list of essential functions could provide documentation in confirming staff's exempt status;

- Americans with Disabilities Act (ADA) – It is a violation of the ADA to fail to provide reasonable accommodation to the known physical or mental limitations of a qualified individual with a disability, unless to do so would impose an undue hardship on the employer. The duty to accommodate relates to the staff's essential job duties. The disabled staff must be able to perform the essential functions of the job, with or without accommodation. If a disabled staff is unable to perform an essential function of the job, even with an accommodation, the employer is not required to retain the staff in that position. In this regard, it is important that a job description identify the position's essential functions;

- federal and state discrimination laws –Many state and federal statutes prohibit discrimination based upon a protected status. When faced with a claim of discrimination from staff, a well-written description could support the challenged decision, whether it is related to compensation, promotion, discipline, or discharge; and

- Family and Medical Leave Act (FMLA) –FMLA requires that the staff's healthcare provider certify that the medical condition for which the staff is seeking leave renders the staff unable to perform one or more job functions. FMLA further provides that, in accordance with specified conditions, an employer may require certification from the staff's healthcare provider recommending a return to work before the employer is required to return the staff to work following leave. To assist the provider in this assessment, the employer may attach a job description to the medical certification form. A complete and accurate list of essential functions enables the provider to give an informed opinion.

Although no federal or state law requires job descriptions, they are an important tool in effective organizational management. Job descriptions also facilitate compliance with applicable statutes and policies. A thorough job description outlines the necessary skills, training and education needed for the position. It also identifies the duties and responsibilities of the job. Job descriptions could serve as a basis for interviewing candidates, orienting new staff, and in evaluating job performance.

Preparing accurate job descriptions that reflect the actual job requirements and functions, and the existing job conditions, is a best practice. Business Management Daily, December 2013 provides the following checklist of questions that effective managers consider when drafting a job description:

- Does a job description exist for every position that you manage?

- Do you regularly review job descriptions and update them to reflect changes in staff responsibility?

- Do you provide staff with written copies of their job descriptions?

- Are job titles consistent throughout the organization? and

- For each position, ask the following questions about the job description:

  ◦ Is the job title accurate?

  ◦ Does the job title still reflect the position's responsibilities?

◦ Does the job description include appropriate skills, experience, and education needed for the position?

◦ Does it cite essential and nonessential job duties?

◦ Are job functions and performance standards presented in clear, easily understood terms? and

◦ Is it realistic?

Figure 3–10 shows an example of a job description template that includes industry standard information from the Society for Human Resource Management, a professional society for the HR field.

FIGURE 3–10
JOB DESCRIPTION EXAMPLE
2016

Job Title:	Prepared/Revised Date:
Division:	Approved By:
Job Classification:	Approved Date:
Pay Grade/Step:	Board Action Required: Y/N
Reports to:	

General Statement of Job:

Essential Duties and Responsibilities: (Other duties may be assigned)

Supervisory Responsibilities:

Qualifications:

Examples of Work:

Required Knowledge, Skills, Abilities:

Certificates, Licenses, Registrations:

Other Desirable Qualifications:

Physical Demands:

Work Environment:

Terms of Employment:

Evaluation Criteria:

SOURCES: Legislative Budget Board School Performance Review Team, 2016; Society for Human Resource Management, 2016.

Dalhart ISD should develop a procedure to update and maintain accurate job descriptions for each staff position. Updated job descriptions should provide an effective tool for communicating expectations to existing and prospective staff.

The CFO and the employee benefits specialist should conduct an inventory of all job descriptions. The district should develop and write job descriptions for any position that does not currently have one. The superintendent should direct district and campus leadership to review job descriptions with staff annually during each annual performance review to confirm that they accurately reflect the expectations of the position. The district should provide each staff with a copy of his/her current job description, either electronically or in hard copy.

Since the time of the onsite review, the district updated the job description for the CFO to include that position's HR-related duties.

This recommendation could be implemented with existing resources.

STAFF FILE MANAGEMENT (REC. 19)

Dalhart ISD does not maintain staff files in accordance with state and federal requirements.

The employee benefits specialist is responsible for developing, organizing and maintaining staff files. The employee benefits specialist has been responsible for staff files for two years. Before the employee benefits specialist's hire, a single position managed all HR documentation for 20 years. According to onsite interviews, the district did not provide sufficient oversight of this position, which led to inconsistent recordkeeping. Since school year 2013–14, the district has consolidated responsibility for these files with the employee benefits specialist. The district maintains the files on paper and does not use electronic records. According to onsite interviews, the district considered updating to electronic records, but files were too inconsistent and disorganized to convert to electronic files. The district also attempted to implement electronic contracts in school year 2012–13, but found the process burdensome and inefficient.

District staff use the TASB new-hire checklist to guide the development of staff files. This checklist may be a good resource for onboarding new staff. However, it is not adequate to use as a guide for maintaining staff files because it does not provide a comprehensive list of documents necessary to meet federal and state requirements. **Figure 3–11** shows the documents in the new-hire checklist.

The review team inspected a sample of staff files and found that the district does not consistently collect and file required federal and state documentation. Missing information in most files noted by the review team included; copies of contracts, letters of intent, staff appraisals or teacher performance evaluations, teacher schedules, documentation of highly qualified status, parental notifications, and documentation of professional development.

FIGURE 3–11
TEXAS ASSOCIATION OF SCHOOL BOARDS NEW-HIRE DOCUMENT CHECKLIST
JANUARY 2008

Before Employment

☐ All Employees	☐ Previous employers' alcohol-and drug screening test information (R,C)
☐ Application	☐ Upon Employment
☐ References	☐ Employee-signed receipt for written copy of district drug-free school or workplace policy (R)
☐ Criminal history check (R,C)	☐ District-completed Form I-9
☐ Professional Employees	☐ Statement concerning employment in a job not covered by Social Security (R)
☐ Credentials (valid Texas certificate, permit, or license) (R)	☐ Complete W-4 Form (R)
☐ Service record and any required attachments (R)	☐ Verification of official Social Security number (C)
☐ Official college transcripts	☐ Notice of reasonable assurance (noncontract employees only)
☐ Educational Aids	☐ New-hire report for submission to the state (R)
☐ Certification	☐ Public Access Option Form
☐ Official college transcript or NCLB assessment of skills	☐ Benefits enrollment forms
☐ Bus Drivers	☐ Professional Employees
☐ Proof that applicant is at least 18 years of age (R)	☐ Employee-signed receipt for contract and copy of employment policy
☐ Proof of valid driver's license (R)	☐ Teaching scheduling or other assignment record
☐ Pre-employment drug-screening test (R,C)	☐ Teacher-signed receipt for a copy of the Texas Education Code, Chapter 37, Subchapter A, regarding student discipline and related local board policy
☐ Post-offer employment physical (R,C)	☐ UIL Couches and Sponsors
☐ Driver's license check and proof of safe driving record (R)	☐ Professional Acknowledgement Form (R)
☐ Valid driver training certificate (R)	

NOTE: R=required; C=confidential.
SOURCE: Texas Association of School Boards, New Hire Document Checklist, January 10, 2008.

At the time of the onsite review, Dalhart ISD's staff files were not compliant with state statute and HR staff were not aware of the state and federal requirements for the files. For example, the files do not contain teacher performance evaluations as required by the Texas Administrative Code, Section 153.1021, and the Texas Education Code, Section 21.352.

Additionally, Dalhart ISD's practice of storing medical information in the files does not meet ADA requirements. ADA requires employers to keep medical records and staff medical information separate from nonmedical records in a locked cabinet with restricted access. In accordance with ADA, access to such medical information is restricted to staff that require this information, usually one designated position.

Developing a comprehensive staff file management system helps the district maintain accurate records and assists in compiling the documentation to meet federal, state, and local laws and regulations. Maintaining consistent and accurate files also reduces litigation exposure, protects staff, and improves processing efficiency. In addition, it is sound business practice to document the terms of each staff's employment relationship with the school district.

Several best practice approaches and standards help to ensure consistency in staff file management and compliance with applicable statutes and regulations. San Elizario ISD's HR Department developed a process for ensuring that staff records are complete and easily accessible. The department uses comprehensive checklists to enhance the accuracy and

consistency of staff records and to ensure that staff gathers all necessary information for compliance with federal, state, and local laws and regulations. HR staff use the staff folder checklists to consistently order and file the documentation in the staff records. This process helps staff quickly determine when folders are incomplete so that they can prioritize obtaining needed information to comply with all applicable laws and regulations.

San Elizario ISD also developed a filing system that uses color-coded tabs to categorize staff files. By categorizing files in this manner, the HR Department can locate, manage, and replace files efficiently while minimizing the risk of misfiling documents or files. HR stores files in easily accessible file cabinets and secures them with a fire-resistant locking door. Several legends posted in the file room identify the location of specific files.

Waxahachie ISD has also developed a comprehensive staff file management process. This process includes physical security, monitoring for content completeness, and periodic auditing to ensure compliance with federal and state law and local government retention regulations. The HR Department keeps critical files in a fireproof, cinderblock vault in locking file cabinets. The district segregates sensitive documents such

as immigration forms, medical information, and criminal histories from the staff files in a separate locking file cabinet. The HR Department secretary performs a self-audit of all files every other year to ensure inappropriate documents have not been included in the individual staff files.

Waxahachie ISD staff are required to collect and maintain certain forms that document compliance with federal and state regulations. In addition, employers must keep some of the information collected confidential such as medical information or criminal histories. Waxahachie ISD's staff file process ensures that the district has collected the documents required by law so that it does not incur any civil or criminal penalties.

TASB also provides guidelines for organizing staff records. **Figure 3–12** shows a list of state and federal requirements from the TASB HR Library.

In addition to updating staff files, effective districts are shifting to an electronic records system. Electronic files reduce the need for physical storage space and the need for staff to generate, file, locate, and update hard-copy records. Electronic files enable easier and immediate access to important files. They also reduce paper, reducing cost and

FIGURE 3–12
TEXAS ASSOCIATION OF SCHOOL BOARDS' RECOMMENDATIONS TO ORGANIZE STAFF FILES
2010

STATE REQUIREMENTS

Districts are required by state regulations to obtain copies of the following documents and place them in individuals or separate personnel files: (1)

- Signed employment contracts [TAC, §153.1021 (b)]
- Credentials (certificates and licenses) [TAC, §153.1021 (b)]
- Teacher service records [TAC, §153.1021 (b)]
- Teaching schedules or other assignment records [TAC, §153.1021 (b)]
- Teacher performance evaluation [TEC, §21.352]
- Absence from duty reports [TAC, §153.1021 (b)]
- Criminal history record information (must be obtained and reviewed, however, the district may not maintain a copy on file after the information is used) [the Texas Government Code, §411.097 (d)(3)]
- Records of adult education staff qualifications and professional development [TAC, §89.25 (a)(6)]
- Record of current certification in first aid, cardiopulmonary resuscitation, use of an automated external defibrillator, and health safety training for certain employees [TEC, §22.902 (c)]

FEDERAL REQUIREMENTS

Documents that must be obtained and kept on file to meet federal regulations include the following: (2)

- Documentation of highly qualified status and parental notification [No Child Left Behind Act)]
- Alcohol and drug screening test results and information for bus drivers from previous employers [Omnibus Employee Testing Act of 1991]
- Social Security statement (employment not covered) – Form SSA 1945
- Leaves and absences report and documentation [Family and Medical Leave Act]
- Exempt and nonexempt employee records including timesheets [Fair Labor Standards Act]
- Payroll withholding forms

FIGURE 3–12 (CONTINUED)
TEXAS ASSOCIATION OF SCHOOL BOARDS' RECOMMENDATIONS TO ORGANIZE STAFF FILES
2010

LOCAL REQUIREMENTS

Local needs determine other documents that must be placed in personnel files and may include the following:

- Employment applications
- References
- Transcripts
- Performance appraisal records for employees other than teachers
- Personnel action memorandums or forms (e.g. annual salary statements, benefits enrollment and beneficiary designation, leave authorization forms, performance awards, letters and order from the Internal Revenue Service and Attorney General's Office)
- Letters of reasonable assurance (for noncontract employees only)
- Personal identification data and emergency contact information
- Acknowledgement forms for receipt of specific documents (e.g., employment policies, employee handbook, acceptable use policy)
- Documentation of attendance at staff development

NOTES:
(1) TAC=the Texas Administrative Code; TEC=the Texas Education Code.
(2) SSA=U.S. Social Security Administration form.
SOURCE: Texas Association of School Boards, Human Resources Library, 2010.

environmental effects. Several school districts, institutions of higher education, and private companies—including Park Hill School District in Kansas, Rock Hill School District in South Carolina, the University of California, and Rice University's football team—are moving toward issuing electronic letters of intent and contracts. Electronic letters of intent would improve record accuracy, develop efficiencies through electronic routing and processing, eliminate the need for manual data entry, and eliminate paper transfers from office to office.

Dalhart ISD should develop a comprehensive staff file management system.

The district should update existing files to meet existing state and federal requirements. This process should include the following actions:

- the employee benefits specialist should remove confidential medical files and information from existing staff files and store them in a safe and secure location that remains locked when not in use;

- the CFO should designate a confidential custodian of medical information and records who only will provide the information to staff that require this information to perform their jobs;

- the CFO and employee benefits specialist should develop and implement a staff file checklist and compare the contents of existing files to the checklist, and obtain missing documents and purge unnecessary documents;

- the CFO should develop business procedures to conduct a regular review of all staff folders ; and

- the district should again explore the opportunity to make staff files electronic for minimal cost using standard off-the-shelf software. If the district determines that it needs to purchase an electronic system, it should include the cost as part of the next budget cycle.

Since the time of the onsite review, the district indicates that it has separated all medical files from staff files and stored the medical files in a locked cabinet. The district has also designated a custodian of confidential medical information.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 3. HUMAN RESOURCES MANAGEMENT							
15. Define key leadership human resources roles and develop a comprehensive, administrative procedures manual for human resources operations.	$0	$0	$0	$0	$0	$0	$0
16. Use locally developed staffing allocation formulas or industry-standard guidelines to determine the appropriate number of staff positions.	$0	$0	$0	$0	$0	$0	$0
17. Develop a comprehensive plan to attract and retain qualified teachers.	$86,475	$60,533	$42,373	$0	$0	$189,381	$0
18. Develop a procedure to update and maintain accurate job descriptions for each staff position.	$0	$0	$0	$0	$0	$0	$0
19. Develop a comprehensive staff file management system.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$86,475**	**$60,533**	**$42,373**	**$0**	**$0**	**$189,381**	**$0**

CHAPTER 4. BUSINESS SERVICES

An independent school district's business services functions include financial management, asset and risk management, and purchasing. Financial management involves administering the district's financial resources, budgeting, and planning for its priorities. Asset and risk management functions control costs by ensuring that the district is adequately protected against significant losses at the lowest possible cost. An independent school district's purchasing function is responsible for providing quality materials, supplies, and equipment in a timely, cost-effective manner.

Financial management is dependent on a district's organizational structure. Larger districts typically have staff specifically dedicated to financial functions, while smaller districts have staff with multiple responsibilities. Budget preparation and administration are financial management functions that are critical to overall district operations. These functions include 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.

Managing investments includes identifying those with maximum interest earning potential while safeguarding funds and ensuring liquidity to meet fluctuating cash flow demands. Forecasting and managing revenue include efficient tax collections to enable a district to meet its cash flow needs, earn the highest possible interest, and estimate state and federal funding. Capital asset management involves identifying a district's property (e.g.,

buildings, vehicles, equipment, etc.) and protecting it from theft and obsolescence. Insurance programs cover staff's health, workers' compensation, and district liability.

School districts in Texas are also required to follow federal and state laws and procedures applicable to purchasing. The purpose of competitive bidding requirements 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.

Dalhart Independent School District's (ISD) Business Department has five staff, including the chief financial officer (CFO), who oversees the department. The accounts payable specialist, employee benefits specialist, and payroll specialist have offices in the Central Administration Building. The CFO also supervises the Public Education Information Management System (PEIMS)/testing coordinator, but this position is officed at the high school campus. **Figure 4–1** shows the organizational structure of the Dalhart ISD Business Department.

For fiscal year 2017, Dalhart ISD's budget is $16.9 million. **Figure 4–2** shows Dalhart ISD's actual revenues and expenditures for school years 2013–14 to 2015–16 and budgeted revenues and expenditures for school year 2016–17. The top three expenditure categories during each of these years are instruction, plant and maintenance operations, and debt services.

FIGURE 4–1
DALHART ISD BUSINESS DEPARTMENT ORGANIZATION
SCHOOL YEAR 2016–17
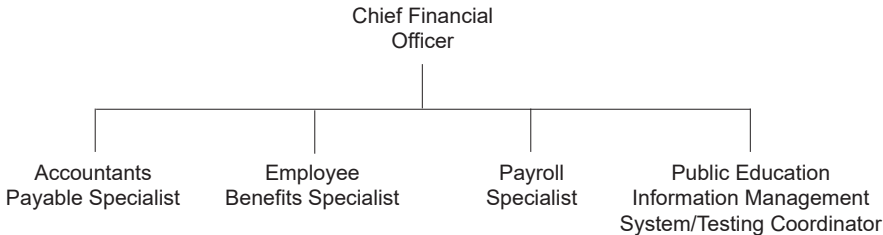
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

FIGURE 4–2
DALHART ISD REVENUE AND EXPENDITURES
SCHOOL YEARS 2013–14 TO 2016–17

	ACTUAL			
CATEGORY	2013–14	2014–15	2015–16	BUDGETED 2016–17
Revenue				
Local Tax	$8,944,679	$8,994,625	$9,634,032	$10,913,856
Other Local and Intermediate	$609,107	$767,544	$1,358,316	$370,158
State	$6,375,382	$5,559,436	$6,640,586	$5,299,976
Federal	$1,683,038	$1,783,362	$1,724,354	$595,725
Total Revenue	**$17,612,206**	**$17,214,967**	**$19,357,288**	**$17,179,715**
Expenditures				
Instruction	$7,372,954	$9,047,745	$8,605,271	$8,470,614
Library and Media Services	$460,753	$593,150	$500,587	$559,271
Curriculum and Staff Development	$1,138	$5,266	$1,474	$29,998
Instructional Leadership	$157,311	$303,975	$278,430	$181,619
School Leadership	$928,476	$1,086,982	$1,027,766	$1,018,351
Guidance and Counseling Services	$337,825	$478,841	$354,808	$343,588
Social Work Services	$0	$710	$1,444	$0
Health Services	$93,886	$175,227	$160,797	$114,426
Transportation	$235,638	$289,638	$276,985	$280,612
Food	$28,086	$926,331	$895,786	$870,356
Extracurricular	$581,990	$611,801	$602,593	$727,576
General Administration	$602,370	$694,206	$707,185	$685,186
Plant Maintenance and Operations	$1,486,745	$1,830,119	$2,278,001	$1,845,659
Security and Monitoring	$64,588	$71,142	$71,021	$77,606
Data Processing Services	$65,496	$55,333	$69,297	$60,028
Community Service	$5,000	$5,000	$5,000	$5,000
Debt Services	$1,939,579	$1,691,326	$1,729,164	$1,322,321
Capital Outlay	$69,912	$228,430	$359,273	$293,500
Total Expenditures	**$16,648,223**	**$18,095,222**	**$17,924,882**	**$16,885,711**

SOURCE: Texas Education Agency, Public Education Information Management System financial data, school years 2013–14 to 2016–17.

The Legislative Budget Board (LBB) School Performance Review Team selected three school districts, Borger ISD, Diboll ISD, and Giddings ISD, as peer districts for Dalhart ISD. Peer districts are school districts similar to Dalhart ISD used for comparison purposes. **Figure 4–3** shows the sources of the district's revenue by percentage of total revenue compared to peer districts for school years 2013–14 to 2016–17. The percentage of Dalhart ISD's revenue that comes from local sources is greater than Borger ISD's and

Diboll ISD's during this period, and is similar to the revenue of Giddings ISD. Dalhart ISD's local taxable property values are greater than those in Borger ISD and Diboll ISD, and are similar to values in Giddings ISD.

Figure 4–4 shows Dalhart ISD's expenditures by source compared to peer districts for fiscal years 2013 to 2015. The largest percentage of Dalhart ISD's expenditures is for instruction, which is consistent with its peer districts. The

FIGURE 4–3
DALHART ISD REVENUE BY SOURCE COMPARED TO PEER DISTRICTS
FISCAL YEARS 2013 TO 2015

DISTRICT AND CATEGORY	ACTUAL			
	2013–14	2014–15	2015–16	BUDGETED 2016–17
Dalhart ISD				
Percentage Revenue State	**36.2%**	**32.3%**	**34.3%**	**30.9%**
Percentage Revenue Local	**54.2%**	**56.7%**	**56.8%**	**65.7%**
Percentage Revenue Federal	**9.6%**	**10.4%**	**8.9%**	**3.5%**
Borger ISD				
Percentage Revenue State	52.7%	50.8%	50.2%	65.1%
Percentage Revenue Local	34.1%	35.8%	37.9%	32.7%
Percentage Revenue Federal	13.3%	13.4%	11.9%	2.3%
Diboll ISD				
Percentage Revenue State	67.5%	68.1%	64.3%	72.4%
Percentage Revenue Local	20.0%	20.1%	24.0%	21.6%
Percentage Revenue Federal	12.5%	11.2%	11.6%	5.9%
Giddings ISD				
Percentage Revenue State	31.4%	36.4%	37.2%	41.6%
Percentage Revenue Local	56.8%	55.3%	54.6%	53.5%
Percentage Revenue Federal	8.8%	8.3%	8.2%	4.9%

Note: Totals may not sum to 100.0 percent due to rounding.
Source: Texas Education Agency, Public Education Information Management System financial data, school years 2013–14 to 2016–17.

FIGURE 4–4
DALHART ISD EXPENDITURES BY SOURCE COMPARED TO PEER DISTRICTS
FISCAL YEARS 2013 TO 2015

DISTRICT AND CATEGORY	ACTUAL			
	2013–14	2014–15	2015–16	BUDGETED 2016–17
Dalhart ISD				
Instructional	**57.6%**	**55.9%**	**54.3%**	**55.5%**
District Administrative	**5.9%**	**6.5%**	**6.7%**	**6.1%**
School Leadership	**6.4%**	**6.7%**	**6.5%**	**6.7%**
Plant Services	**10.6%**	**11.8%**	**14.8%**	**12.6%**
Other	**19.5%**	**19.0%**	**17.7%**	**19.1%**
Borger ISD				
Instructional	61.2%	59.6%	59.3%	57.6%
District Administrative	5.0%	6.0%	5.7%	7.0%
School Leadership	4.5%	4.8%	5.1%	5.4%
Plant Services	8.7%	8.2%	8.4%	9.1%
Other	20.8%	21.4%	21.5%	20.9%
Diboll ISD				
Instructional	53.2%	54.3%	54.2%	53.4
District Administrative	8.5%	8.0%	8.2%	8.8%

FIGURE 4–4 (CONTINUED)
DALHART ISD EXPENDITURES BY SOURCE COMPARED TO PEER DISTRICTS
FISCAL YEARS 2013 TO 2015

DISTRICT AND CATEGORY	ACTUAL			
	2013–14	2014–15	2015–16	BUDGETED 2016–17
School Leadership	5.6%	6.0%	5.6%	6.2%
Plant Services	11.6%	10.1%	10.6%	11.6%
Other	21.2%	20.6%	21.4%	20.0%
Giddings ISD				
Instructional	54.3%	55.0%	55.2%	55.0%
District Administrative	9.8%	9.6%	10.0%	10.1%
School Leadership	5.5%	5.4%	5.3%	5.7%
Plant Services	11.0%	10.5%	10.4%	10.9%
Other	19.3%	19.5%	19.1%	18.3%

NOTE: Totals may not sum to 100.0 percent due to rounding.
SOURCE: Texas Education Agency, Public Education Information Management System financial data, school years 2013–14 to 2016–17.

district also spends approximately the same percentage of its budget as its peers on plant services. Plant services include building maintenance, mechanical maintenance, warehousing, grounds maintenance, energy management, printing, athletic field maintenance, and facility safety maintenance. From school years 2013–14 to 2016–17, Dalhart ISD's expenditures in district administration were lower than those in two peer districts. Dalhart ISD's expenditures on school leadership, which includes expenditures used for directing and managing a school campus, are consistently higher.

Figure 4–5 shows Dalhart ISD's fund balance for fiscal years 2011 to 2015. A fund balance is the amount of district assets of value greater than liabilities. These assets could include investments, delinquent taxes, accounts receivable, and inventories. TEA recommends a minimum unrestricted fund balance of approximately two and one-half months of operating expenditures. Dalhart ISD's fund balance met this standard for fiscal year 2015. Dalhart ISD shifted its fiscal year to end June 30 for 2015.

FIGURE 4–5
DALHART ISD FUND BALANCES
FISCAL YEARS 2011 TO 2015

YEAR END DATE	AMOUNTS (IN MILLIONS)
June 30, 2015	$2.4
August 31, 2014	$1.1
August 31, 2013	$0.5
August 31, 2012	$1.3
August 31, 2011	$1.5

SOURCE: Dalhart ISD Audit Reports, fiscal years 2011 to 2015.

School districts in Texas are rated on two financial systems: the Financial Integrity Rating System of Texas (FIRST) and Smart Score. FIRST is the state's school financial accountability rating system intended to ensure that public schools are held accountable for the quality of their financial management practices and for the improvement of those practices. The goal of FIRST is to encourage Texas school districts to provide the maximum allocation possible for direct instructional purposes. **Figure 4–6** shows Dalhart ISD's FIRST rating compared to its peer districts for school years 2013–14 to 2015–16. Dalhart ISD received the same FIRST ratings as its peers each of the previous three years.

FIGURE 4–6
FINANCIAL INTEGRITY RATING SYSTEM OF TEXAS (FIRST)
RATINGS COMPARED TO PEER DISTRICTS
SCHOOL YEARS 2013–14 TO 2015–16

DISTRICT	2013–14	2014–15 (1)	2015–16 (2)
Dalhart ISD	**Superior**	**Pass**	**A**
Diboll ISD	Superior	Pass	A
Borger ISD	Superior	Pass	A
Giddings ISD	Superior	Pass	A

NOTES:
(1) The school year 2014–15 Financial Integrity Rating System of Texas grading scale gave schools grades of either pass or substandard achievement.
(2)   In the school year 2015–16 Financial Integrity Rating System of Texas grading scale, A is equal to superior.
SOURCE: Texas Education Agency, Financial Integrity Rating System of Texas, school years 2013–14 to 2015–16.

The Smart Score, operated by Texans for Positive Economic Policy, is a ratings system that measures academic progress and spending at Texas' school districts and campuses. The Smart Score ratings range from one to five stars, with five being the best, indicating a district's success in combining cost-effective spending with the achievement of measurable student academic progress. Academic and spending ratings are very low, low, average, high, or very high. The district and campus Smart Score calculations use three-year averages for more stable and persistent measures with less year-to-year volatility. The 2016 Smart Score results are based on data from school years 2012–13 to 2014–15. **Figure 4–7** shows Dalhart ISD's 2016 Smart Score ratings compared to its peer districts. Dalhart ISD has a lower Smart Score than any of the peer districts.

The CFO prepares a cash flow forecast to estimate the district's expenditures monthly and for the year, although the forecast does not include projected revenues. The CFO bases the cash flow forecast on the previous year's revenue, the number of students entered into the budget projections during the district's annual budget development process, and the projected average student attendance rate. The CFO uses the forecast to predict when cash shortfalls would be likely to occur. This forecast enables the district to transfer funds from investment pools to cover projected cash shortfalls, thereby retaining the maximum investment possible in the checking accounts at the depository bank.

The CFO also performs accounting tasks, bank reconciliations, oversight of the activity fund account, and monitoring of the district's bank accounts and investments. The CFO monitors the bank accounts and posts transactions daily, as necessary. The CFO reviews the district's investment policy annually so that the district remains in compliance with Dalhart ISD's board policies and state guidelines.

Dalhart ISD staff have the option of choosing health insurance coverage through the Teacher Retirement System of Texas ActiveCare plan. Dalhart ISD staff are eligible to participate in a cafeteria plan for pretax benefits, pursuant to the U.S. Internal Revenue Code, Section 125. The law authorizes eligible staff to pay certain insurance premiums—including disability, accidental death and dismemberment, cancer and dread disease, dental, and additional term life insurance—on a pretax basis. The district also offers group rates on dental, life, cancer, vision, and disability coverage through the First Financial Group of America, the district's third-party administrator. First Financial also provides online enrollment and consulting services for staff benefits.

Dalhart ISD uses the Texas Enterprise Information System (TxEIS) to manage financial transactions, including recording cash deposits and issuing disbursements, such as checks and direct deposits. TxEIS also has a PEIMS component that generates all state-mandated reports. Regional Educational Service Center XVI (Region 16) provides Dalhart ISD with support for TxEIS.

The CFO also serves as the director of purchasing for Dalhart ISD. This position is responsible for managing contracts with third-party vendors who provide services to Dalhart ISD. In this role, the CFO handles the daily oversight of the terms, conditions, and expectations set in the contracts, and the evaluation of the contracted vendors' performance. Due to its geographical distance from large, commercial centers, the district makes purchases from local vendors when possible, facilitating the timely delivery of goods and services.

For all purchases, Dalhart ISD uses the disbursed purchasing method, whereby multiple purchasers submit purchase order requests for the district. **Figure 4-8** shows Dalhart ISD's purchasing procedures.

FIGURE 4–7
TEXAS SMART SCORE DATA AND RANKINGS COMPARED TO PEER DISTRICTS
2016

DISTRICT	SMART SCORE	COMPOSITE ACADEMIC PROGRESS QUINTILE	SPENDING INDEX
Dalhart ISD	**2**	**Very Low Academic Progress**	**Average Spending**
Diboll ISD	3	High Academic Progress	High Spending
Borger ISD	2.5	Average Academic Progress	High Spending
Giddings ISD	3.5	Very High Academic Progress	High Spending

SOURCE: Texans for Positive Economic Policy, 2016 Smart Scores.

FIGURE 4–8
DALHART ISD PROCEDURES TO INITIATE A PURCHASE ORDER
SCHOOL YEAR 2016–17

1. Originator fills out a requisition request form obtained from the district website

2. The requisition request will be forwarded to the campus secretary (or the person in your department that submits requisitions in the Texas Enterprise Information System)

3. Requisition is submitted by requestor

4. Requisition is approved by first approver

5. Requisition is approved by chief financial officer

6. After all approvals are complete, the requisition is now a purchase order (PO)

7. Business Department prints approved POs and sends a copy to the requestor

8. Requestor orders, purchases, or forwards the PO to the originator to order or purchase the product

9. When goods are delivered, the pink copy of the PO is signed by the receiver and forwarded to the Business Department for payment

Source: Dalhart ISD Purchasing Manual, school year 2016–17.

Board Policy CH (LOCAL) grants the superintendent the authority to make purchases of less than $25,000 without board approval. The policy further delegates to the superintendent or a designee the authority to determine the method of purchase. The methods of purchase can include either competitive bidding or competitive sealed proposals. Board Policy CH (LOCAL) also requires that all district purchases be consistent with administrative and purchasing policy and procedures. The superintendent delegates the daily responsibilities of purchasing to the CFO. The Texas Education Code, Section 44.031, outlines the competitive bidding requirements to stimulate competition and ensure that the district acquires services and goods at the best possible prices.

Dalhart ISD has developed and implemented a purchasing procedure manual, which the district provides to all staff with a signature return as proof of receipt. The purchasing manual is comprehensive, and it includes documentation of every form, step, and approval required for a valid purchase order.

The district does not have a warehouse or use central receiving. Instead, it uses just-in-time delivery, and purchased items are stored in the areas in which the work is performed.

Dalhart ISD's external auditor issued unqualified opinions during the last five years' financial audits. The auditor found no instances of noncompliance and made no comments involving internal controls or other material weaknesses in the district's financial management.

ACCOMPLISHMENT

♦ Dalhart ISD refinanced its construction bonds, resulting in significant savings for the district.

FINDINGS

♦ Dalhart ISD lacks comprehensive written procedures to guide the daily functions and activities of the Business Department.

♦ Dalhart ISD's budget development process does not effectively incorporate input from campus and community stakeholders, nor does it align with district and campus improvement plans.

♦ Dalhart ISD lacks sufficient cross-training of its Business Department staff.

♦ Dalhart ISD's Business Department lacks effective internal controls and segregation of duties.

♦ Dalhart ISD does not efficiently invest its cash assets.

♦ Dalhart ISD lacks an effective process to manage and safeguard all district assets.

♦ Dalhart ISD does not effectively monitor its contracted services.

RECOMMENDATIONS

♦ **Recommendation 20: Develop comprehensive written procedures for each operation of the Business Department.**

♦ **Recommendation 21: Develop and implement a budget development process that incorporates input from campus administrators, campus and district planning committees, and the public, and that aligns with campus and district improvement plans.**

♦ **Recommendation 22: Accelerate cross-training for essential Business Department functions.**

♦ **Recommendation 23: Review the roles, responsibilities, and duties of each staff in the Business Department, and develop a system enabling the segregation of their duties to ensure effective internal controls that will deter and prevent fraud, theft, and financial impropriety in accordance with board policy.**

♦ **Recommendation 24: Diversify the district's investments to ensure the safety of district funds and maximize returns while maintaining the liquidity needed for daily operations.**

♦ **Recommendation 25: Develop and implement a comprehensive inventory process for all fixed assets.**

♦ **Recommendation 26: Develop and implement a formal contract management process with written procedures and practices to identify all district contracts, centrally capture and monitor contract requirements, and evaluate vendor performance.**

DETAILED ACCOMPLISHMENT

CONSTRUCTION BONDS

Dalhart ISD refinanced its construction bonds, resulting in significant savings for the district.

In 2014, the district employed a financial advisor to assist in refinancing its Series 2006 construction bonds. When the bonds were authorized and sold, they had interest rates ranging from 4.3 percent to 5.1 percent. When refinanced, the bonds had interest rates ranging from 0.3 percent to 2.9 percent. The reduced interest rates yielded savings to the district of more than $700,000 compared to the previous rates for the bonds. This savings represents a present value savings of 16.4 percent for the district, with a 3.0 percent break-even point for refinancing the bonds. The maturities for the bonds remained the same, and the Office of the Attorney General approved all of the documentation for the

bond refinance. In 2015, Standard & Poor's credit ratings service raised the Dalhart ISD rating from negative to stable, validating the district's positive financial condition.

DETAILED FINDINGS

BUSINESS DEPARTMENT OPERATING PROCEDURES (REC. 20)

Dalhart ISD lacks comprehensive written procedures to guide the daily functions and activities of the Business Department.

Board Policy CB (LOCAL) mandates that "the superintendent shall develop and enforce financial management systems, internal control procedures, procurement procedures, and other administrative procedures as needed to provide reasonable assurance that the district is complying with requirements for state and federal grants and awards." However, the district does not have written procedures to guide all Business Department functions. Although the district has a comprehensive purchasing manual, it lacks documented procedures to govern its payroll, accounts payable, accounting, employee benefits, activity funds, cash handling, and textbook purchasing operations. The Business Department relies on oral communication and the knowledge of staff who have held their positions for several years. The CFO acknowledged that the Business Department lacks written procedures and stated that they are in the process of developing them for the Human Resources Department, the payroll specialist, and the PEIMS/testing coordinator.

During onsite interviews, staff stated that the district has not clearly delineated the daily responsibilities of Business Department staff, which has caused confusion among both district staff and the broader community. For example, some Dalhart ISD staff were uncertain of how the textbook procurement process works and who is responsible for the different aspects of the process. Many staff also indicated they were not clear who can see the district's budget, when they can see it, and at what level of detail. This confusion among Dalhart ISD staff sometimes resulted in significant delays that interrupted providing educational services, including, for example, completing lessons for students needing specific equipment or materials, or counselors having the materials they need to support student groups and individual students needing counseling assistance.

The LBB publication Banks to Bonds: A Practical Path to Sound School District Investing, 1999, states that written procedures should implement the board policy's intent and

ensure that the district adheres to all laws and administrative rules. Banks to Bonds also states that procedures should provide systematic instructions for all staff and consolidate the district's institutional knowledge in documented procedure, rather than in the memories of key staff.

Karnack ISD has an updated business procedures manual that covers all areas of its business operations, contains business forms and instructions, and includes student activity fund procedures. The business procedures manual communicates policies and procedures to district staff, provides systematic procedures, and serves as a useful training tool for staff. The business manager and superintendent update the business procedures manual annually. The business manager also reviews the procedures contained in the manual with new staff that are assigned business-related responsibilities and provides a copy of the manual to the staff as a reference guide. By using documented business procedures, Karnack ISD provides a smooth transition for staff assigned to new jobs, use the manual as a training tool for new district staff, provide a consistent method for processing transactions, hold staff accountable, and communicate expectations for complying with the business procedures manual.

Dalhart ISD should develop comprehensive written procedures for each operation of the Business Department.

The CFO and other key stakeholders should develop a Business Department procedures manual that details all Business Department duties. This manual should incorporate the existing procedures manual so that there are not separate manuals and one document contains all pertinent Business Department information. After a draft of the manual is complete, the CFO should obtain feedback on the draft from all Business Department staff. Upon completion, the Business Department should disseminate the business procedures manual to all campus administration offices.

Business Department staff should conduct trainings on the business procedures manual with campus-level and district-level office staff. The CFO should review and revise them annually, or whenever significant changes occur.

This recommendation could be implemented with existing resources.

BUDGET PLANNING AND DEVELOPMENT (REC. 21)

Dalhart ISD's budget development process does not effectively incorporate input from campus and community stakeholders, nor does it align with district and campus improvement plans.

The district has not documented its budget planning and development process. According to the district's superintendent, the budget calendar drives the budget planning process. **Figure 4–9** shows the budget calendar prepared by Dalhart ISD for the development of the school year 2016–17 budget.

FIGURE 4–9
DALHART ISD BUDGET TIMELINE
SCHOOL YEAR 2016–17

January 28, 2016	Board review of proposed budget timeline for 2016–17
February 8, 2016	Budget planning meeting with district leadership team, including the following items:
	• discuss budget goals for school year 2016–17;
	• discuss potential facility expenditures and capital purchases;
	• review of Budget Manual for 2016–17;
	• review of student average daily attendance for fall 2015;
	• review of Public Education Information Management System staff, budget, and student data for fall 2015; and
	• review of current year budget by function, object, and program intent codes
February 17, 2016	Principals and directors meeting, including the following item:
	• review of budget timeline for 2016–17
February 22, 2016	Budget planning meeting with District Leadership Team Campus Allocations for 2016–17, including the following items:
	• staff allocations for 2016–17; and
	• discuss salary and benefits proposals for 2016–17
February 24, 2016	Principals and district leadership team meeting, including the following item:
	• budget training

FIGURE 4–9 (CONTINUED)
DALHART ISD BUDGET TIMELINE
SCHOOL YEAR 2016–17

April 1, 2016	Principals and administrators submit their proposed budgets (line item and new program budgets) to the superintendent;
	Principals and administrators submit their staffing plans and staff full-time-equivalent position reports; and
	prioritized list of major projects are due to superintendent to include costs associated with proposed school programs, building and grounds, equipment, and technology projects
April 4, 2016	Superintendent, designee, or chief financial officer begins to compile proposed budget for 2016–17
April 11, 2016	• Administrative review of major projects and new program budgets; and • review of salary, stipend, and extra-duty pay schedules
April 29, 2016	Receive certified estimated tax values from Dallam and Hartley Central Appraisal District
May 4, 2016	Principals and District Leadership Team Meeting, including the following item: • review of proposed 2016–17 budget
May 17, 2016	Budget workshop with Board of Trustees
June 10, 2016	Notice of budget adoption published in local newspaper and posted on district website
June 21, 2016	Public hearing on proposed 2016–17 budget • board adopts budget for 2016–17; and • board approves final budget amendments for school year 2015–16
July 25, 2016	Receive certified tax values from Dallam and Hartley Central Appraisal District
August 23, 2016	Board adopts tax rate and approves Certified Appraisal Roll for 2016

SOURCE: Dalhart ISD, November 2016.

Although the budget calendar indicates involvement from campus administrators, during onsite interviews, staff indicated that the CFO and superintendent develop the budget with minimal input from campus staff. Campus principals indicated they receive budget worksheets from the district Administration Office in April to develop a general budget, and the Administration Office bases the budget on an amount already set for them by the CFO and superintendent. The CFO and superintendent indicated that they use the previous year's budgeted and expended data and make additions or deductions to develop the budget worksheet as a reference for the campuses. The budget calendar also identifies a public hearing on the proposed budget. Ten Dalhart residents who were not Dalhart ISD staff attended this hearing. Onsite interviews with staff indicated that the hearing was the only involvement the public had in the budget development process.

The district's budget development process also does not link spending to the priorities and needs of the district based on the campus improvement plans (CIP) and the district improvement plan (DIP). All campuses must develop a CIP each year as required by the Texas Education Code, Section

11.253. The CIP is a one-year plan that sets the campus's educational objectives and notes how the campus will allocate resources and time in the school year to meet the determined objectives. The Texas Education Code, Section 11.251, requires districts to develop a DIP and have it approved by the board annually. Districts develop DIPs to improve school performance by developing annual goals, objectives, and strategies based on analysis of student achievement, graduation rates, retention rates, and other federal and state accountability indicators. The CIPs and the DIP are critical in providing direction for the district through annual goals and priorities. During onsite interviews, both the CFO and the superintendent related that they base the budget on the prioritized needs of the district. However, the district leadership team determines the prioritizations based on projected revenue rather than the district goals of the CIPs and DIP.

Additionally, Dalhart ISD's budget development process does not follow state and local requirements or documented best practices for site-based budgeting. This type of budgeting enables input by teachers, administrators, other campus staff, and community members. Site-based budgeting gives these

stakeholders the ability to make decisions affecting their campus and the district by formulating campus and district goals, objectives, and plans, utilizing pertinent student data. TEA cites site-based budgeting as a best practice in the development of a district's budget. The Texas Education Code, Section 11.253(e), requires that "campus-level committees shall be involved in decisions in the areas of planning, budgeting, curriculum, staffing patterns, staff development, and school organization." In addition, Dalhart ISD Board Policy CE (LOCAL) states that "in the budget planning process, general educational goals, specific program goals, and alternatives for achieving program goals shall be considered, and input from the district- and campus-level planning and decision-making committees." Dalhart ISD has two types of site-based committees, the District Education Improvement Committee (DEIC) and Campus Improvement Committees (CIC). The DEIC is composed of campus-level professionals who advise the superintendent in establishing and reviewing the district's educational goals, objectives, and major districtwide classroom instructional programs. Each campus at Dalhart ISD also has a CIC, which is composed of staff who assist in the planning, operation, supervision, and evaluation of each campus' educational programs. During onsite interviews, the superintendent acknowledged that the district does not use the DEIC nor CICs in goal setting and decision-making as related to the Dalhart ISD budget.

The lack of inclusion from site-based committees has led to disconnection between district administration and campus-level staff regarding staff's access to and knowledge of the budget. For example, the CFO and superintendent both reported that district leaders have full access to their respective budgets and know for what they may expend funds. However, during onsite interviews, campus and department leadership indicated that they were unsure of their places in the budget process. They also stated that they are unsure how to access their budgets, what specifically their budgets included, and what they could spend. Furthermore, the superintendent stated that every campus and department returned funds to the district from their budgets at the end of the previous budget year. Yet, campus and department leadership expressed concerns about not receiving all the funding they felt they needed.

TEA states that site-based budgeting enables more flexibility than traditional budgeting by centralizing decision-making. The development of campus and district annual budgets in successful districts are a part of ongoing planning processes at

those levels. TEA states that successful districts structure the budget preparation process and guidelines through interaction between the board and the superintendent, delegating budget responsibilities among district administrators and individual campuses (site-based).

Galena Park ISD integrates its site-based decision-making processes with long-term enrollment and facility planning to drive its budget development process. The district begins developing its budget by conducting a comprehensive needs assessment that includes input from campus and community stakeholders and site-based committees. The Galena Park ISD budget process employs a continuous improvement cycle and reporting format that ensures the district aligns the budget with its DIP and CIPs.

Liberty Hill ISD uses a vertically and horizontally aligned budget preparation process that involves district stakeholders.

The vertical budgeting process includes multiple meetings and discussions between the campus administrators and the district leadership team, which include representatives from general administration, business, and curriculum and instruction. The process is also coordinated horizontally at the campus and district levels, including coordinated efforts of grade-level committees, subject-area committees, campus leadership, and the campus site-based decision-making committees. The horizontal district budget development includes discussions among campuses, district-level departments, and the superintendent.

Dalhart ISD should develop and implement a budget development process that incorporates input from campus administrators, campus and district planning committees, and the public, and that aligns with campus and district improvement plans.

The superintendent and CFO should develop a district budget committee that consists of the campus principals, representatives from the campus and district committees, selected teachers, and selected community members. A starting point would be including members of the CICs and the DEIC. These committees contain a cross section of staff and community members, and their involvement would provide greater input into the development of the district's budget. This budget committee should develop written procedures that guide the budget development process. The procedures should ensure that the budget development process involves the site-based decision-making committees and district and community stakeholders. The procedures should define the roles and responsibilities of each of these

individuals and committees. Furthermore, the budget committee should ensure that the budget development process links the district's spending priorities back to the DIP and the CIPs so that the district allocates resources to achieve strategic objectives. After completion, the CFO should present the procedures to the board for approval. Then, the CFO should communicate the new budget development process to all Dalhart ISD staff. The CFO should train all individuals and committees involved in the budget development process.

This recommendation could be implemented with existing resources.

CROSS-TRAINING (REC. 22)

Dalhart ISD lacks sufficient cross-training of its Business Department staff.

The number of staff in Dalhart ISD's Business Department is comparable with the staffing patterns of its peer districts. However, Dalhart ISD's Business Department staff perform their duties in vertical isolation of each other. For example, the district does not have a process to train staff, other than the accounts payable specialist, regarding the accounts payable functions. Nor does the district have a process to train staff other than the payroll specialist to implement the district's payroll functions. The payroll specialist previously had the accounts payable duties and responsibilities; however, the district has no process to ensure that future staff are also cross-

trained on Business Department functions. If staff leave the district or are absent for an extended period, no staff other than the CFO has the knowledge or ability to conduct the district's accounts payable or payroll functions. **Figure 4–10** shows a summary of Dalhart ISD's Business Department functions that staff have not been cross-trained to perform.

Additionally, no staff is cross-trained to handle the administrative duties of the CFO including his responsibilities for investments; management of the Food Services, Maintenance, and Transportation departments; and the CFO's accounting function.

Considering the small size of Dalhart ISD's Business Department, deficiencies in cross-training increase the risk that critical processes could be delayed or performed inaccurately if staff leave the district or are unable to perform their duties. Effective cross-training ensures that critical functions would continue when staff who regularly perform the tasks are unavailable or leave the organization.

An article in Area Development magazine, Winter 2013, sets the following guidelines for developing a successful cross-training program master plan:

- identify the specific critical tasks for which cross-training is needed;

- identify the proper staff who will be capable of performing the cross-training tasks;

FIGURE 4–10
DALHART ISD BUSINESS DEPARTMENT DUTIES
SCHOOL YEAR 2016–17

ACCOUNTS PAYABLE PAYROLL

- Checks and approves vouchers for payment.
- Answers vendor inquiries.
- Prepares accounts payable checks.
- Maintains accounts payable files.
- Compiles composite reports from individual reports of subordinates required by management or government agencies (assisting with Internal Revenue Service Reporting of 1099 forms).
- Responsible for recording and reconciling year-end accounts payable accruals.
- Reconciles outstanding accounts payable balances to the general ledger.
- Assists with monthly financial statement closeouts.
- Ensures accounts payable complies with district policies and state and federal guidelines.
- Assists with the year-end audit.
- Provides hand written checks to vendors.
- Provides contractors' payments and job cost reporting for capital projects.

- Reviews, or directs review of, newly hired workers' names, rates of pay, and occupations, and modifies wage rates and occupations of staff on payroll.
- Records, or directs recording of, new or changed pay rates in payroll register and computer files.
- Directs computation of pay according to district policy.
- Directs compilation and preparation of other payroll data such as pension, insurance, sick leave, and credit union payments.
- Reviews and approves payroll deductions.
- Maintains an understanding of the Fair Labor Standards Act and ensures compliance of this act to all payroll.
- Reviews payroll to ensure accuracy.
- Prepares and issues paychecks.
- Organizes records of leave pay and nontaxable wages.
- Maintains electronic time-keeping system.
- Reviews payroll to ensure accuracy.
- Assists with the monthly reconciliation of all payroll liability general ledger accounts.

SOURCE: Dalhart ISD, Business Department, November 2016.

- explain the reason for cross-training, and identify benefits to staff to address any apprehension or assumptions that may exist (both among staff being trained and staff whose job function is being cross-trained);

- allocate adequate funds, time, training materials, and training facilities to accomplish the cross-training;

- reduce the workload to the extent possible during the training process, because it will take the new person longer to become proficient at a task;

- develop a recognition and reward program for staff who satisfactorily complete cross-training;

- present cross-training as an integral part of the overall professional staff development plan; and

- plan for periodic cross-training skills updates or refresher training sessions.

Dalhart ISD should accelerate cross-training for essential Business Department functions.

The CFO should develop and implement an action plan, with requisite procedures and processes, to ensure that each staff in the Business Department is cross-trained in each function of the Business Department. The action plan should incorporate the recommended cross-training steps outlined by the U.S. Small Business Administration and Area Development. The CFO should confer with the Business Department staff to develop, plan and schedule for cross training the payroll and accounts payable functions. The cross-training should occur during nonpeak times and should be repeated as often as necessary until staff adequately learn other positions' job functions.

This recommendation could be implemented with existing resources.

INTERNAL CONTROLS (REC. 23)

Dalhart ISD's Business Department lacks effective internal controls and segregation of duties.

Board Policy BJA (LOCAL) states that the superintendent is to "maintain a system of internal controls to deter and monitor for fraud or financial impropriety in the district." However, the Business Department does not comply with board policy by effectively segregating duties. Segregation of duties refers to a measure of control in which no position is responsible for more than one related task. This practice reduces errors and develops a system of checks and balances. To ensure financial integrity, districts typically designate certain tasks to separate positions.

However, the Business Department does not effectively segregate the duties of Dalhart ISD's payroll specialist, accounts payable specialist, and employee benefits specialist to prevent the possibility of fraud, theft, or other financial impropriety. In each of these functions, staff has access to the entirety of the district's business operations software system. This access provides staff the ability to enter a new staff and execute a paycheck to that staff, or to add a new vendor and approve payment for the vendor. For example, the payroll specialist enters all Dalhart ISD staff data into the payroll system, and establishes and executes the district's payroll. Similarly, the accounts payable specialist enters all data for vendors and vendor invoices and executes payments of the invoices. In each of these examples, no other district staff approves the work in payroll or accounts payable before the finalization of payments.

The CFO regularly reviews big picture processes such as monthly budget analysis, monthly cash flow analysis, and the functions of the Maintenance and Transportation departments. Yet, Dalhart ISD has no formal process for reviewing the everyday functions of Business Department staff. The CFO does attempt to validate some of the Business Department staff's work to catch errors. For example, after the initial input of all staff data into the payroll system, the CFO reviews the work to ensure accuracy. Additionally, the CFO spot checks the records for the district's payroll at random times during the year. However, during onsite interviews, Business Department staff said, "the CFO was very busy, and they try not to bother him too much."

The LBB School Performance Review Team did not identify examples of improprieties, and there have been no signs or symptoms of fraud, theft, or financial impropriety on the part of Business Department staff. However, there are no basic internal controls to prevent such activity. Without effective internal control processes and procedures, staff have the ability to enter fictitious staff in the payroll system and send their payments to personal direct-deposit bank accounts. Staff could also increase the rate of pay of an existing staff without proper authorization. Likewise, Business Department staff have the ability to develop an unauthorized vendor, a fictitious purchase authorization number, and to issue unauthorized payments. There is a risk that these activities could go undetected for some time without consistent review. Additionally, without segregation of duties

and internal controls staff may become 'project blind', leading to errors and irregularities in their work.

Marquette University's Risk Unit stated that segregation of duties is one of the most effective internal controls to help prevent staff errors and fraudulent activity. A Cornell University finding on the improper segregation of the duties in a business department stated that "segregation of duties is an internal control intended to prevent or decrease the occurrence of innocent errors or intentional fraud." The finding also noted that effective segregation of duties could be accomplished only by ensuring that no individual has control of all phases of a transaction or department transactions. Additionally, Cornell University encourages departmental management to take a more active role to achieve separation of duties by checking the work done by others as the knowledge that others will check their work is enough to prevent the possibility of fraud, theft, and financial impropriety.

The University System of Georgia (USG) acknowledges that, although a high level of segregation of duties is a best practice for which to strive, limited staff sizes often hinder achieving this goal. A small business department should seek the best possible level of segregation of duties by verifying that no one staff performs both the authorization and verification or reconciliation functions for the same transactions. Additionally, according to USG, segregation of duties needs a process for managerial review.

Figure 4–11 shows a best practice checklist for maintaining internal controls in an organization's payroll process.

Dalhart ISD should review the roles, responsibilities, and duties of each staff in the Business Department, and develop a system enabling the segregation of their duties to ensure effective internal controls that will deter and prevent fraud, theft, and financial impropriety in accordance with board policy.

The CFO should develop written procedures for segregating the duties of Business Department staff. The district should base these procedures on existing board policy and best practice. The CFO should use job descriptions and responsibilities to develop a matrix of the critical functions that the district should segregate. This information should include who performs that function or role, and who will assume the function or role to ensure segregation. The CFO should include a timeline in the matrix that identifies critical junctures for each function where cross-checks and sign-offs are required. Because the Business Department has a limited number of staff, each will be involved in the segregation of duties within the department.

This recommendation could be implemented with existing resources.

DISTRICT INVESTMENTS (REC. 24)

Dalhart ISD does not efficiently invest its cash assets.

Dalhart ISD's Board Policy CDA (LOCAL) requires district officials to observe the investment management objectives of safety, liquidity, and yield within legally allowable investments. The policy gives the district the ability to invest in a variety of investment options. However, Dalhart ISD

FIGURE 4–11
BEST PRACTICE CHECKLIST FOR PROTECTING INTERNAL CONTROLS FOR PAYROLL
2016

ACTION	STAFF RESPONSIBLE	FINAL REVIEW
Responsible for modifying employee master File		
Approves modifications to employee master file		
Prepares payroll file for processing		
Approves payroll file		
Generates payroll checks		
Distributes payroll checks or initiates direct deposits		
Reviews and approves final payroll report		
Records payroll expense in the general ledger		
Reconciles payroll subsidiary module to the general ledger		

SOURCE: University System of Georgia, Segregation of Duties Matrix, December 2016.

does not diversify its investments to ensure maximum yield and the safety of district funds. Diversification is a key component of financial safety because it protects a portfolio from fluctuations that may occur in a particular market sector. Without sufficient diversification, an investment portfolio is more sensitive to market fluctuations, resulting in additional risk and potential negative consequences for the district's investment portfolio.

Dalhart ISD's investment of excess cash is concentrated in two investment entities, the Lone Star Investment Pool and the First State Bank of Stratford. The district's investment team consists of the superintendent and CFO, with all investment decisions monitored daily by the CFO. During onsite interviews, the CFO indicated that the district's use of only one investment pool and one depository bank was a matter of convenience.

The district had excess cash equal to $2.1 million as of August 31, 2016, with approximately 92.6 percent isolated in one local government investment pool (LGIP), Lone Star. LGIPs are state government investment pools offered to public entities for the investment of public funds. The district also has

$2,105.0 invested in the TexPool LGIP. This small amount remains to keep the account open, but Dalhart ISD does not deposit money into TexPool.

Figure 4–12 shows Dalhart ISD's investments as of August 31, 2016.

Dalhart ISD maintains six checking accounts in its depository bank, First State Bank Stratford. The depository bank is the official bank of record for the district. The accounts are specific to particular functions within the district. The depository bank pays an interest rate of 0.6 percent on all deposits in these accounts, up to $1 million. The district's six-month certificate of deposit (CD) with First State Bank of Stratford has an interest rate of 0.4033 percent. **Figure 4–13** shows the accounts in the district's depository bank as of July 31, 2016.

Although LGIPs are considered safe investments, they are not without risk. For example, in 1994 the bail out of the TexPool investment fund cost Texas taxpayers an estimated $97 million. Dalhart ISD's practice of investing most of its cash assets in a single LGIP could negatively affect the

FIGURE 4–12
DALHART ISD INVESTMENTS BY TYPE
AUGUST 31, 2016

ENTITY	TYPE	BALANCE
Lone Star Investment Pool		
General Operating Fund	Corporate Overnight Plus Fund	$1,223,166
	Corporate Overnight Fund	$460,697
	Government Overnight Fund	$15
Interest and Sinking Fund	Corporate Overnight Plus Fund	$45,906
	Corporate Overnight Fund	$55,964
	Government Overnight Fund	$1,123
Workers' Compensation Fund	Corporate Overnight Fund	$40,193
	Government Overnight Fund	$47
Activity Fund	Corporate Overnight Plus Fund	$51
	Corporate Overnight Fund	$170,890
Total Lone Star Investment Pool		**$1,998,052**
TexPool		
Operating Fund		$1,980
Workers' Compensation Fund		$125
Total TexPool		**$2,105**
First State Bank of Stratford	Certificate of Deposit (1)	**$145,886**

NOTE: (1) Six-month certificate of deposit.
SOURCE: Dalhart ISD, August 2016.

FIGURE 4–13
DALHART ISD BANK ACCOUNTS AND BALANCES AT FIRST STATE BANK, STRATFORD AND DALHART BRANCHES
JULY 31, 2016

ACCOUNT	TYPE	BALANCE
General Operating	Checking	$536,959
Interest and Sinking	Checking	$4,110
Cafeteria	Checking	$6,362
Workers' Compensation	Checking	$889
Payroll Clearing	Checking	$9,452
Activity	Checking	$54,599

SOURCE: Dalhart ISD, July 2016.

district's cash flow if market fluctuations cause the Lone Star Investment Pool's rate of return to decrease. The district could also face long-term financial problems if Lone Star were to suffer a catastrophic failure. Furthermore, failure to maximize the funds deposited daily in the district's depository bank results in lost potential revenue for Dalhart ISD because the interest rate paid on district revenues secured in the depository bank is higher than interest rates paid by LGIPs.

Dalhart ISD's investment practices are consistent with district policy. However, the concentration of excess cash into a limited number of available investment resources is not consistent with best practices. Finance experts Roger Wohlner and Ken Faulkenberry stated in a U.S. News and World Report website article that "investment diversification is a portfolio strategy combining a variety of assets to reduce the overall risk of an investment portfolio." They also state, "Investment diversification is one of the basic building blocks of a solid portfolio." The LBB's publication Banks to Bonds: A Practical Path to Sound School District Investing states that "to create a diversified portfolio, investment officers must understand some basic principles and then use their judgment to apply those principles to their situation." The publication names three major categories of diversification—by maturity, by issuer, and by type—and notes that the diversification of investments "requires thoughtful consideration." The LBB publication observes that following the rules of diversification will not ensure a school district does not experience a loss; however, it does minimize the risk of fluctuating values and income.

Dalhart ISD should diversify the district's investments to ensure the safety of district funds and maximize returns while maintaining the liquidity needed for daily operations.

The CFO should contact each of the three LGIPs to begin the process of becoming a member of the pool, as the district is already a member of Lone Star and TexPool. **Figure 4–14** shows the investment rates of the LGIPs approved and conducting business in the state of Texas.

The difference among the rates offered by the separate pools and within the individual pools shown in **Figure 4–14** is not considered significant enough to preclude the use of additional LGIPs for diversification purposes. By adding additional local government investment pools to the district's investment portfolio, the district will strengthen the priority of safety, liquidity, and yield identified in board policy.

FIGURE 4–14
TEXAS INVESTMENT POOLS AND RATES OF RETURN
DECEMBER 2016

LOCAL GOVERNMENT INVESTMENT POOL	POOL	RATE
Texas CLASS	Texas CLASS	0.850%
	Texas CLASS Government	0.390%
Texas Term	TexasDaily	0.450%
TexPool	TexPool	0.430%
	TexPool Prime	0.734%
Lone Star	Corporate Overnight	0.716%
	Government Overnight	0.403%
	Corporate Overnight Plus	0.712%
TexSTAR	TexSTAR	0.414%

SOURCES: Local government investment pool websites, December 2016.

Dalhart ISD should also maximize daily deposits in the district's checking account at its depository bank. The district should diversify its investments as equitably as possible between as many options as possible.

This recommendation could be implemented with existing resources.

ASSET MANAGEMENT (REC. 25)

Dalhart ISD lacks an effective process to manage and safeguard all district assets.

Dalhart ISD maintains two types of fixed assets. Board Policy CFB (LOCAL) defines capital assets as district assets that are valued at more than $5,000. These assets often include

building and improvements, equipment, and vehicles. The second type is controlled assets. TEA's FASRG defines controlled assets as "personal property that is durable but does not meet the school district's criteria for capitalization as a capital asset. Controlled assets have a useful life longer than one year." TEA further states that these items are tangible, and that they may be reasonably identified and controlled through effective and efficient inventory systems. Examples of controlled assets include computers, audiovisual equipment, textbooks, calculators, desks, and physical education equipment. Dalhart ISD maintains fixed assets that total $33.8 million.

Dalhart ISD lacks a process to tag, track, and inventory its fixed assets. When the district receives a capital asset, the CFO notes it in a log, and the district's external auditor later records the asset into the district's capital asset listing during the audit process. The district does not tag capital assets; however, the CFO notes the general location of the asset in the log. Other than the log of capital assets, Dalhart ISD does not maintain any additional information regarding capital assets owned by the district. Similarly, with the exception of the computers and other technology purchased by the Technology Department, the district does not have an inventory system to identify and track controlled assets. When the Technology Department purchases assets, Technology Department staff tag and log those assets into a spreadsheet.

Board Policy CMD (LEGAL) mandates that the district conduct an annual physical inventory of the following assets:

- all currently adopted instructional materials that have been requisitioned by and delivered to the district;

- all non-adopted instructional materials purchased with funds from the Instructional Materials Allotment (IMA); and

- all technological equipment purchased with funds from the IMA.

The district does not fully account for any of these inventories except for the informal inventory of technology assets held by the Technology Department.

Board Policy CFB (LEGAL) mandates that "to provide accurate information for the annual audit of the district's fiscal accounts, the district shall maintain inventories of its assets as recommended and directed by the FASRG." The FASRG recommends that one district staff oversee the valuing and monitoring of inventory, and another staff be

responsible for accounting for the related transactions of the inventory. It also directs districts to conduct inventories annually, utilizing an actual physical count of the items listed in the inventory. There is no written documentation showing that Dalhart ISD conducts any inventory of its fixed assets. The LBB School Performance Review Team confirmed that the district lacks processes for adequately inventorying fixed assets during onsite interviews with staff. Additionally, Dalhart ISD has no staff other than the CFO assigned inventory of its fixed assets. Without a functional districtwide fixed asset inventory process, Dalhart ISD cannot accurately account for its fixed assets.

Dalhart ISD's Business Department uses the TxEIS software package for the daily business functions of the department. TxEIS contains a module to maintain accurate accounting of the district's capital and controlled assets. The module could assist with maintaining all schedules, calculations, distribution codes including historical depreciation. Depreciation of capital assets is the method used to account for the reduction in the value of an asset, and allocate that loss during the useful life of the asset. Assets typically are written off when fully depreciated and disposed. TxEIS can retrieve items from the district's financial database automatically, mass update inventory records, check inventory in and out, require an audit trail, and forecast replacement needs through asset management reports. The software also can handle the annual depreciation schedule and book capital assets in the system. However, at the time of the onsite review, Dalhart ISD was not using these features.

Without taking physical inventories of the district's fixed assets, Dalhart ISD cannot ensure that all its assets can be located and accounted for. The district cannot determine if or when items are lost or stolen. In the event of theft or waste, without proper documentation of inventory, the district is unaware of which staff are responsible and when and where the loss occurred. This lack of documentation may present additional risks if the district lacks the information required to file an insurance claim for a missing or stolen asset. Furthermore, the lack of a tagging and tracking system prevents Dalhart ISD from easily accounting for fixed assets. Consequently, information reported on district financial statements could inaccurately reflect the value of fixed assets in the district.

The CPA developed a fixed asset best practices process to assist districts in developing an effective and efficient fixed assets management system. These best practices represent a comprehensive solution to deficient fixed assets management

systems and suggest steps to develop and maintain an effective system. **Figure 4–15** shows the fixed asset inventory best practice steps as outlined by the CPA. Dalhart ISD does not follow any of these best practices.

The Texas Association of School Business Officials (TASBO) provides training in all areas of fixed-asset management best practice. The association offers a training workshop, Accounting for Fixed Assets, which addresses the types of fixed assets and how to record properly each type. Additionally, the workshop discusses other topics such as capitalization, valuation, and depreciation.

Dalhart ISD should develop and implement a comprehensive inventory process for all fixed assets.

The inventory for Dalhart ISD should include an efficient and effective tagging and tracking system that will identify, record, track, and assist in proper disposal of fixed assets. District staff should then manually affix tags to the assets and record the location of the asset. Designated staff should then enter these assets into TxEIS. The district should implement an inventory system for fixed assets using the asset management module already available in TxEIS. Dalhart ISD should contact other districts served by Region 16 that are using this module for advice, information, and counsel. The district should also determine whether Region 16 has an existing user support group for the asset module that they could join.

FIGURE 4–15
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS BEST PRACTICES FOR FIXED ASSET INVENTORY 1999

Preliminary Steps

- Identify individuals in the district who will have key fixed asset responsibilities and establish the nature of such responsibilities.
- Devise policies and procedures governing capitalization thresholds, inventory, accounting, staff accountability, transfers, disposals, surplus and obsolescence, and asset sale and disposition.
- Determine district fixed asset information needs and constraints.
- Determine the hardware and software necessary to effectively manage the system.

Establishing the Fixed Asset Management System

- Adopt a proposal setting up the fixed asset system including adoption of formal policies and procedures.
- Develop positions and job descriptions for those with fixed asset responsibilities.
- Determine the design of the fixed asset inventory database and develop standard forms to match the format of computerized records.
- Provide training as necessary.
- Identify specific fixed assets at less than the capitalization threshold that should be tracked for information purposes and safeguarding.
- Budget the amount necessary to operate the fixed assets management system adequately.

Implementing the Fixed Asset Management System

- Inform all departments of the requirements, policies, and procedures of the fixed assets system.
- Ensure that assets to be tracked on the system have been identified and tagged.
- Enter information into the fixed assets database.
- Assign appropriate values to the assets in the database.
- Establish location codes and custodial responsibility for fixed assets.

Maintaining the Fixed Asset Management System

- Enter all inventory information into the automated fixed asset system as fixed assets are received.
- Assign tag numbers, location codes, and responsibility to assets as the district receives them.
- Monitor the movement of all fixed assets using appropriate forms approved by designated district personnel.
- 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.
- 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

SOURCE: Texas Comptroller of Public Accounts, "Getting a Fix on Fixed Assets," City and County Financial Management, May 1999, Vol. 15, Issue 2.

Dalhart ISD should also develop written procedures that outline the district's fixed asset inventory process. The CFO should align the procedures with Dalhart ISD board policies for fixed asset management. The procedures should include:

- definitions and examples of controllable assets the district wishes to track;

- methods for identifying controllable and capital assets, such as bar coding;

- staff responsibilities and accountability for assets;

- inventory database(s) used for record keeping, including procedures for making hard copy and electronic backups;

- frequency of physical inventories, such as annual or semiannual, including procedures for transferring assets from one location to another;

- procedures to follow when assets cannot be located, including responsibilities for making reports to police and the district's insurance carrier, as appropriate;

- procedures to follow when the district disposes of assets that are no longer useful or needed, including procedures for making deletions from inventory records; and

- procedures to follow when assets are donated to the district.

The CFO should participate in online asset management training regularly offered by TASBO. The CFO is a member of TASBO, and therefore, the training would be at no additional cost to the district. The principals and other Administration Office staff should also take advantage of the TASBO trainings. Dalhart ISD should also assess whether the district would require the assistance of a third party company that specializes in fixed asset inventory, tagging, and tracking to set up their initial fixed asset system. Dalhart ISD should make the decision after the district assigns inventory accounting and control to a specific staff in the district, and after the developing and implementing a program for managing fixed assets.

No fiscal impact is assumed for this recommendation. However, the district could incur costs if the district needs a third party inventory management company to complete the task. The cost of developing and implementing an effective and efficient inventory system cannot be determined until Dalhart ISD defines the scope of the implementation project.

CONTRACT MONITORING (REC. 26)

Dalhart ISD does not effectively monitor its contracted services.

Dalhart ISD's CFO is responsible for the procurement of bids through the district's procurement process and the oversight and evaluation of vendor contracts. However, the district has no formal process to monitor the requirements of the district's contracts or the performance of vendors. Additionally, the district does not follow any formal criteria or guidelines when deciding on approving or renewing district contracts. The district also has no formal performance monitoring procedures that staff who receive services from vendors must follow.

During onsite interviews, the CFO indicated that he reviews all contracts and has the final authority to determine renewal or non-renewal. The CFO further stated that he does not conduct cost/benefit analyses of the district's contracted services when deciding to renew the contract. He states the district renews contracts as long as there are no perceived problems with the vendor. The CFO also stated that, to his knowledge, the district has not terminated any contracts during his tenure.

While onsite, the LBB School Performance Review Team determined that several Dalhart ISD contracts with vendors were not dated, were not signed, or had expired; however, the district continues to receive services from these vendors. **Figure 4–16** shows the contracts that Dalhart ISD presented to the review team, the date the district signed them into effect, the renewal stipulation in the contract, whether it is a valid contract (at the time of review), and either the termination date or the process by which the contract may be terminated. **Figure 4–16** also shows the professional services used by Dalhart ISD without a contract in place.

Without proper contract oversight, Dalhart ISD exposes itself to potential fraud and abuse by contract vendors. These abuses could include substandard service, overspending on services, noncompetitive pricing, overcharging for items, and not getting the best value for the district's investment. Furthermore, if Dalhart ISD does not appropriately document and monitor contract performance and evaluation, the district may not be able to avail themselves of legal remedies in case of breach of contract, unsatisfactory performance by a vendor, or any other loss to the district resulting from a service contract or provider.

The Comptroller of Public Accounts, Statewide Procurement Division, offers a list of the responsibilities of a contract

FIGURE 4–16
DALHART ISD CONTRACTED AND NONCONTRACTED SERVICE PROVIDERS
FISCAL YEARS 2013 TO 2016

CONTRACT	RENEWAL DATE	AUTOMATIC RENEWAL	VALID	SERVICE	AMOUNT
Southwest Foodservice Excellence, LLC	March 1, 2016	Yes	Yes	Food service	$0 (1)
GCA K–12 Education Services, Inc.	May 30, 2014	Yes	Yes	Custodial services	$560,879
Dallum County Appraisal District	December 16, 2013	No	No – The contract expired in December 2015	Property appraisal	$218,094
Interquest Detection Canines	April 5, 2016	No	Yes	Drug dog detection	$3,000
Kile & Co., P.C.	March 24, 2015	No	No – The contract expired in June 2015	External audit services	$35,500
Regional Educational Service Center XVI (Region 16)	August 6, 2016	No	Yes	Educational and professional leadership services	$116,924
Claborn Heating and Air, Inc.	None	Yes	No – The contract is not dated	Heating, ventilation, and air-conditioning services	$26,400
Walsh Gallegos Treviño Russo & Kyle, P.C.	May 17, 2016	Yes	Yes	Legal services	$1,000 retainer
Frontline – Automated Educational Substitute Operator	August 31, 2015	Yes	Yes	Electronic employee control system	$3,630/year; $3,000 start-up
Frontline – VeriTime	August 31, 2015	Yes	Yes	Electronic clock	$3,000/year; $2,000 start-up
Professional service providers without service contracts					
Underwood, Wilson, Berry, Stein, and Johnson, P.C.				Legal services	Billed per hour
Riney & Mayfield, LLP				Architect and engineering services	$1,591 paid in 2011
Crenshaw Consulting Group, LLC				Architect and engineering services	$23,859 paid in 2012

NOTE: (1) The first two years of the food service contract guaranteed a financial loss.
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

manager. **Figure 4–17** shows the primary responsibilities of a contract manager, and whether or not Dalhart ISD is conducting these duties. This list is a guide for all contract managers, not a comprehensive list.

In accordance with the State of Texas Contract Management Guide, 2016, a key function of contract administration is monitoring the contract vendor. This monitoring includes ensuring that the vendor fulfills the legal obligations of the contract and demonstrates adequate performance in all duties set forth in the contract. The Texas A&M University System Contract Management Handbook, 2016, states that

"contract monitoring may be viewed as a preventative function, an opportunity to determine the contractor's need for technical assistance, or a valuable source of information concerning the effectiveness and quality of services being performed." The handbook stresses to consider the following aspects when determining what to monitor:

- how the organization will know it received what it is paying for;

- how the organization will know that the contractor is complying with the terms of the contract; and

FIGURE 4–17
PRIMARY RESPONSIBILITIES OF A CONTRACT MANAGER AND DUTIES CONDUCTED BY DALHART ISD
SCHOOL YEAR 2016–17

RESPONSIBILITY	CONDUCTED BY DALHART ISD
Participating in developing the solicitation and writing the draft documents (contract administration must be considered during this initial process)	Yes
Consulting with legal counsel to address any legal concerns or issues	Yes
Considering whether the contractor's compensation structure is appropriate for the work (during solicitation development)	No
Serving as the point of contact for disseminating work instructions to the contractor/vendor	Yes
Receiving and responding to communications between the agency and the contractor	Yes
Managing, approving, and documenting any changes to the contract	Yes
Managing any state (or district) property used in contract performance (e.g., computers, telephones, identification badges, etc.)	Yes
Identifying and resolving disputes with contractor in a timely manner	No
Implementing a quality control/assurance process	No
Maintaining appropriate records	No
Documenting significant events	No
Monitoring the contractor's progress and performance to ensure goods and services conform to the contract requirements	No
Exercising state (or district) remedies, as appropriate, when a contractor's performance is deficient	No
Inspecting and approving the final product/services by submitting a written document accepting the deliverables	No
Monitoring the budgeting/accounting process to ensure sufficient funds are available	No
Verifying accuracy of invoices and authorizing payments consistent with the contract terms	No
Performing a contract closeout process ensuring the contract file contains all necessary contract documentation, formal acceptance documented, and documenting lessons learned	No

SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Texas Comptroller of Public Accounts, Statewide Procurement Division, December 2016.

• how the organization will know that the contract is complete and determine closure.

FASRG states that a system for the evaluation of vendors and their performance is important to support an effective purchasing function. The guide also states that effective school districts attempt to develop an open and professional relationship with vendors, but that if a problem occurs, it is important to document the problem using these best practices:

• note the date with an accurate description of the problem;

• contact the vendor with specifics on how the problem needs to be corrected;

• provide written notification to the vendor if problem persists, and restate the problem and desired

resolution, include breach of contract notification with associated cancellation of the contract; and

• contact legal counsel if the problem is not resolved using these steps.

Dalhart ISD should develop and implement a formal contract management process with written procedures and practices to identify all district contracts, centrally capture and monitor contract requirements, and evaluate vendor performance.

The district's CFO should develop a document identifying all contracts with specific details outlined, and post it on the district's website for easy staff review and implementation. The CFO also should develop an evaluation criteria matrix and associated training that will enable district staff to fully evaluate the implementation of, provisions for, and accounting for the performance of the contract vendor's

services provided to the district. This matrix should include a contract review checklist to ensure that staff do not overlook an item with associated confirmation options identified. Items in the checklist should include: term of contract; years of contract; renewal provisions; dispute resolution; termination clause; payment terms; severability and confidentiality clauses; certificates of insurance and any related bonds; criminal history; and how the district obtained the services. The district should monitor the requirements of each contract, and oversee and evaluate vendor performance. Dalhart ISD also should ensure that it formally contracts with all professional service providers to ensure protection against unwarranted work, loss of district revenue, and potential legal disputes. Additionally, Dalhart ISD should encourage the CFO to attend training for the oversight, management of contracts, and evaluation of contract vendors.

The management of Dalhart ISD's contracted services are discussed further in the Food Services and Facilities Management chapters of this report.

The fiscal impact of this recommendation assumes a onetime cost of $475. With the CFO's existing membership in TASBO, the TASBO Contract Management Procedures webinar training will cost $75. The CPA's Statewide Procurement Division provides Texas contract management certification training for a fee of $400.

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		2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 4. BUSINESS SERVICES								
20.	Develop comprehensive written procedures for each operation of the Business Department.	$0	$0	$0	$0	$0	$0	$0
21.	Develop and implement a budget development process that incorporates input from campus administrators, campus and district planning committees, and the public, and that aligns with campus and district improvement plans.	$0	$0	$0	$0	$0	$0	$0
22.	Accelerate cross-training for essential Business Department functions.	$0	$0	$0	$0	$0	$0	$0
23.	Review the roles, responsibilities, and duties of each staff in the Business Department, and develop a system enabling the segregation of their duties to ensure effective internal controls that will deter and prevent fraud, theft, and financial impropriety in accordance with board policy.	$0	$0	$0	$0	$0	$0	$0
24.	Diversify the district's investments to ensure the safety of district funds and maximize returns while maintaining the liquidity needed for daily operations.	$0	$0	$0	$0	$0	$0	$0
25.	Develop and implement a comprehensive inventory process for all fixed assets.	$0	$0	$0	$0	$0	$0	$0
26.	Develop and implement a formal contract management process with written procedures and practices to identify all district contracts, centrally capture and monitor contract requirements, and evaluate vendor performance.	$0	$0	$0	$0	$0	$0	($475)
TOTAL		**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**($475)**

CHAPTER 5. FOOD SERVICES

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 operation may also offer catering services 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 two primary models of organizing food service operations are self-management and contracted management. 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.

Dalhart Independent School District (ISD) participates in the NSLP and the SBP, collectively referred to as Child Nutrition Programs (CNP). Two campuses, the elementary and intermediate schools, offer free breakfast to all students, regardless of eligibility category, through the Universal Free Breakfast Program (UFB). The elementary school cafeteria staff deliver breakfasts in coolers and thermal bags for Breakfast in the Classroom (BIC), and intermediate cafeteria staff serve breakfast to students in the cafeteria. The district claims reimbursement for meals according to each student's eligibility category.

The district's Food Services Department uses the contracted management model. In school year 2014–15, Dalhart ISD

contracted with Southwest Foodservice Excellence, a food service management company (FSMC). District staff with food service responsibilities include the Chief Financial Officer (CFO) who is the FSMC contract manager, and an employee benefits specialist whose food service duties include eligibility, reimbursement claims, and monitoring the FSMC. The FSMC staff includes a regional director of operations who supports multiple districts, a director of dining services, four cafeteria managers, and 12 hourly cafeteria workers. **Figure 5–1** shows the organization of the district's food service operation.

FIGURE 5–1
DALHART ISD FOOD SERVICES DEPARTMENT
ORGANIZATION
NOVEMBER 2016
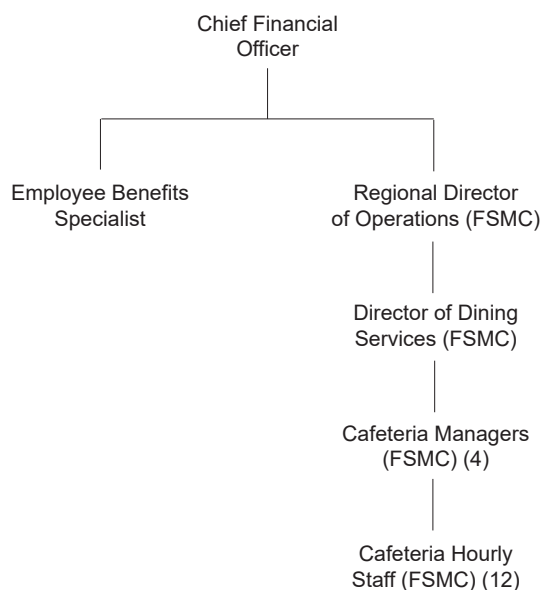
NOTE: FSMC=Food Service Management Company.
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

Due to turnover, the FSMC hired four different directors of dining services from school years 2014–15 to 2016–17. The responsibilities of the FSMC director of dining services include:

- ensuring all food and products are consistently prepared and served according to the recipes, portioning, cooking, and serving standards of the FSMC;

- controlling cash and other receipts by adhering to cash-handling and reconciliation procedures in accordance with the FSMC's and the district's policies and procedures;

- making employment and termination decisions;

- filling in where needed to ensure customer service standards and efficient operations;

- preparing and submitting all required paperwork, including forms, reports, and schedules in an organized and timely manner;

- scheduling labor as required by using meals per labor hour (MPLH) while ensuring that all positions are staffed when and as needed, and labor cost objectives are met; and

- understanding and complying with all applicable federal, state, county, and municipal laws, regulations and rules, including those that pertain to health, safety, and labor requirements for FSMC and district staff, customers, and operations.

The FSMC manages the CNP at all five of the district's campuses. Dalhart ISD has four kitchens and cafeterias, and the high school staff deliver food to the alternative education site. At the high school, the district operates an open campus during lunch and allows students to leave during the one-hour lunch. The remaining four sites operate a closed campus and the district does not allow students to leave the campus during the meals.

Figure 5–2 shows the contract terms between the FSMC and the district. The FSMC administers the NSLP, the SBP, a la carte, adult meals, and catering. The district retains responsibility for oversight and management of the CNP, including eligibility applications and reimbursement claims.

Federal reimbursements fund the Food Services Department for free, reduced-price, and full-price meals, state matching funds, local revenue from meal sales, and a la carte sales. The Food Services Department also provides catering services at the request of the administration. Dalhart ISD receives an additional $0.06 for every reimbursable lunch served because it has met the nutrition standards of the Healthy, Hunger-Free Kids Act of 2010, legislation that authorizes funding and sets policy for USDA's core CNP.

FIGURE 5–2
DALHART ISD CONTRACT TERMS WITH FOOD SERVICE MANAGEMENT COMPANY
SCHOOL YEARS 2014–15 TO 2016–17

TERMS AND CONDITIONS	FOOD SERVICE MANAGEMENT COMPANY (FSMC)	DALHART ISD
Operation of the following programs in conformance with the agreement with Texas Department of Agriculture:		
National School Lunch Program	X	
School Breakfast Program (Breakfast in the Classroom, Universal Breakfast)	X	
A la Carte, Adult Meals, Catering, Contract Meals	X	
Vending (applies only to FSMC supplied vending machines)	X	
Concessions (applies only to concessions operated by FSMC)	X	
(Other programs stipulated, but not operating in Dalhart ISD at present) Fresh Fruit and Vegetable Program, After-school Care Program	X	
Signature Authority (application, free and reduced-price policy statement and monthly claim for reimbursement)		X
Responsibility for free and reduced-price applications, maintenance of eligibility roster, and verification		X
Maintain control and monitor the food service operation of the FSMC		X
Supervise the food service program to ensure compliance		X
Maintain all records necessary, in accordance with regulations	X	
Advisory Board consisting of students, teachers, and parents to assist in menu planning	X	X

Sources: Legislative Budget Board School Performance Review Team, November 2016; Dalhart ISD and Southwest Foodservice Excellence Contract, school years 2014–15 to 2016–17.

The food service operating budget for school year 2015–16 included $910,000 in revenue and $940,000 in expenditures, with expenditures exceeding revenue by $30,000.

In school year 2015–16, the average daily participation (ADP) in the NSLP was 47.2 percent of total enrollment, and the ADP in the SBP was 36.6 percent of enrollment. According to TDA, 60.7 percent of the students enrolled in school year 2015–16 qualified for free or reduced-price meals.

FINDINGS

♦ Dalhart ISD lacks adequate financial oversight of the FSMC.

♦ Dalhart ISD does not monitor the FSMC's use and crediting of USDA-donated foods.

♦ Dalhart ISD lacks a formal process to regularly evaluate and provide oversight of vendor staffing levels.

♦ Dalhart ISD does not monitor and promote maximum participation in the CNP.

♦ Dalhart ISD lacks effective CNP procedures to ensure compliance with state and federal regulations.

RECOMMENDATIONS

♦ **Recommendation 27: Develop and implement a process to provide comprehensive financial oversight of the FSMC.**

♦ **Recommendation 28: Develop and implement written procedures and assign district staff to monitor the food service management company's use and crediting of the district's USDA-donated foods.**

♦ **Recommendation 29: Develop and implement a formal process to regularly evaluate and provide oversight of vendor staffing levels.**

♦ **Recommendation 30: Develop and implement procedures to monitor meal participation rates by campus and adopt strategies for increasing participation in the SBP and the NSLP.**

♦ **Recommendation 31: Develop and implement comprehensive procedures to ensure the district's CNP comply with state and federal regulations.**

DETAILED FINDINGS

FINANCIAL OVERSIGHT OF FOOD SERVICE MANAGEMENT COMPANY (REC. 27)

Dalhart ISD lacks adequate financial oversight of the FSMC.

In school year 2013–14, Dalhart ISD issued a request for proposals (RFP) for an FSMC to manage the district CNP. The district received two initial responses, but only one company completed all requirements and made a bid. In July 2014, the district contracted with Southwest Foodservice Excellence, an FSMC. According to onsite interviews, the district contracted with an FSMC to improve the operations of the Food Services Department, which incurred financial losses in previous years.

The FSMC contract for services is cost-reimbursable. With this type of contract, the district reimburses the FSMC for all necessary and reasonable costs to operate and administer the CNP. Allowable costs include labor and benefits, food purchases, and additional supplies. The CFO expressed that the district chose to issue a cost-reimbursable RFP after consulting other districts and determining that it would be the best option. **Figure 5–3** shows the expenses each entity is responsible for within food services in school year 2014–15 and subsequent renewal years.

The FSMC develops a budget by using data from the previous year, and presents the district with total revenue and total expenditures for approval. The FSMC contract also includes a yearly management fee and administrative fee. In the contract renewal for school year 2016–17, the administrative fee was $44,600 and the management fee was $15,272.

The CFO indicated that he meets monthly with the FSMC director of dining services to review the prior month's financial statements. The FSMC provides Dalhart ISD with financial reports that include information regarding net sales, food costs, labor costs, miscellaneous costs, and the net profit and loss statements. The CFO compiles the CNP monthly financial data for the financial report to the board.

The FSMC purchases food and supplies for the district's CNP and sends monthly invoices to Dalhart ISD for reimbursement of expenses. However, the district lacks a formal procedure to validate the charges on the invoices and risks overpayment to the FSMC due to error or fraud. For example, a review of the FSMC's October 2016 invoice indicates the FSMC did not include documentation to substantiate all charges to the district. The FSMC's invoice billed the district for food, paper, and kitchen expenses

FIGURE 5–3
DALHART ISD FOOD SERVICE MANAGEMENT COMPANY CONTRACT - PROGRAM EXPENSE RESPONSIBILITY
SCHOOL YEARS 2014–15 TO 2016–17

DESCRIPTION	FOOD SERVICE MANAGEMENT COMPANY (FSMC)	DALHART ISD
Food:		
Food purchases	X	
Commodity processing charges	X	
Processing and payment of invoices	X	
Labor:		
FSMC Staff:	X	
Salaries/wages, fringe benefits, retirement payroll taxes	X	
Workers' Compensation and Unemployment Compensation	X	
District Staff (1):		
Salaries/wages, fringe benefits and insurance, retirement, payroll taxes		X
Workers Compensation and Unemployment Compensation		X
Other Expenditures:		
Paper/disposable supplies	X	
Cleaning/Janitorial supplies		X
Uniforms	X	
Office Supplies	X	
Printing	X	
Promotional Materials	X	
Equipment Replacement:		
Nonexpendable		X
Expendable	X	

NOTE: (1) District Staff refer to Dalhart ISD staff with Food Services Department responsibilities, such as the Chief Financial Officer and Employee Benefits Specialist, and any potential Dalhart ISD staff. The FSMC employed all Food Services Department kitchen staff for school years 2014–15 to 2016–17.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016, and Dalhart ISD and Southwest Foodservice Excellence Contract, school years 2014–15 to 2016–17.

totaling $56,511. However, a review of the receipts showed the FSMC total documented expenses as $55,769. The FSMC billed Dalhart ISD $742 in unsubstantiated charges, or an average of $39 a day for each of the 19 service days. Because the district did not conduct a price validation and paid the invoice, the district may have paid the FSMC for goods and services it did not receive. The district also does not have a procedure to verify that the FSMC submits only allowable costs as detailed in the contract.

The district engages in limited monitoring of the FSMC's performance. The employee benefits specialist, with assistance from the director of dining services, conducts onsite monitoring of each site, but the district does not conduct an independent review of the FSMC. The CFO also completes a monthly performance-rating report card that primarily reviews customer service performance. However, the district report card is not contractually required, and the district has not developed written performance measures to determine whether the FSMC is providing high quality and fiscally

responsible services. There are no district standards to measure the FSMC's administrative or operational efficiencies.

District staff indicated that they conducted an analysis of profit and loss for previous years of the district's CNP and a comparison with neighboring districts' CNP financial data to determine the financial benefit of contracting with an FSMC. However, the district did not assess options for various management and consulting models prior to soliciting an FSMC contract. During onsite interviews, district staff indicated that the renewal process for the FSMC contract did not involve a comprehensive cost benefit analysis. The district decided to renew the contract because the average losses were less than the losses under self-management.

Figure 5–4 shows the district's general fund transfers into the CNP account from school year 2012–13 to school year 2014–15 to supplement the CNP losses. While the school year 2014–15 general fund transfer was significantly less than the transfers were the years the district self-operated, school year 2014–15 expenditures exceeded revenues by $69,657.

FIGURE 5–4
DALHART ISD GENERAL FUND TRANSFERS TO CHILD NUTRITION PROGRAMS
SCHOOL YEARS 2012–13 TO 2014–15

DALHART ISD	2012–13	2013–14	2014–15 (1)
Operating transfers in from General Revenue	$123,789	$104,503	$69,657

NOTE: (1) First year of contracted management with a food service management company.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Texas Education Agency, Public Education Information Management System, school years 2012–13 to 2014–15.

Although the district's school year 2015–16 Administrative Review (AR) did not include findings related to FSMC oversight, the district risks TDA citing the district for not sufficiently monitoring the FSMC. During an AR, TDA evaluates whether the district retains control of the nonprofit school food service account and overall financial responsibility for the CNP. If TDA finds and documents deficiencies in these areas, TDA could issue the district a corrective action plan that outlines the actions the district should take and documentation the district should provide to TDA to demonstrate that all findings are resolved.

The district's lack of a process to analyze the costs and benefits of contracted food service management and contract renewals could result in the district accepting contract terms that could include excessive costs for FSMC management and administrative fees.

TDA's 2017 Food Service Management Company (FSMC) Monitoring Form offers guidance for districts to monitor FSMC operation of the CNP, and the checklist includes best practice financial and accounting questions. In addition, the USDA published Contracting with Food Service Management Companies: Guidance for School Food Authorities, a best practice tool for districts to use for FSMC oversight. This publication includes evaluation criteria for financial accountability procedures and procurement requirements. Appendix F of the publication, Sample Instructions and Checklist for FSMC Contract Review, includes the following questions specifically for FSMC cost reimbursement contracts:

- Has the [district] audited the food and non-food invoices to assure that bills sent reflect actual expenses?

- Has the [district] audited time reporting forms to assure only actual hours worked are billed to the [district]?

- Are allowable costs paid from the nonprofit school food service account net of all discounts, rebates, and other applicable credits accruing to or received by the FSMC?

- Is the FSMC transparent in their identification of all rebates, discounts, and applicable credits, and the FSMC provides sufficient information to permit the [district] to identify allowable and unallowable costs?

- Are all bills monitored to assure that the FSMC has not double-billed or included costs that are now allowed by the contract?

Dalhart ISD should develop and implement a process to provide comprehensive financial oversight of the FSMC.

The CFO should develop written procedures that identify the ongoing financial monitoring tasks necessary to monitor the financial performance of the CNP. Dalhart ISD may adopt the sample FSMC monitoring form provided by USDA or TDA.

The procedures should require the district to collect and review key FSMC financial performance indicators. The procedures should also provide a schedule for the performance

of monitoring tasks to ensure the district reviews financial information on an ongoing basis. The procedures should provide steps for the review of the following performance indicators:

- financial position (statement of revenue and expenditures, balance sheet, budget variances, fund balance);

- percentage of cost by category to total revenue (operating ratios);

- meal cost (plate cost, food cost per meal, labor cost per meal, commodity value per meal);

- accurate invoicing of all cost reimbursements to the FSMC, including monitoring changes in costs over time;

- participation rate (by program and eligibility category); and

- productivity (MPLH, revenue to variable cost).

The CFO, working with the FSMC regional director of operations and the FSMC director of dining services, should confirm expense and revenue records, including time and attendance records. The district should verify the FSMC only submits allowable costs for reimbursement and provides sufficient documentation to support the invoiced charges. Dalhart ISD should validate the FSMC's monthly invoice before making payment.

The CFO should develop written procedures for conducting cost-benefit analyses prior to contracting or renewing contracts with a FSMC. The procedures should include a comparison with estimated costs for self-management, consulting, and contracted management models. Procedures for contract renewals should include analysis of financial goals and a comparison of projected and actual financial performance of an FSMC. Prior to the next contract renewal, the district should develop written performance goals for the FSMC and standards for the district's evaluation of the FSMC's performance.

The fiscal impact assumes that Dalhart ISD will reduce costs from unsubstantiated charges from the FSMC, resulting in an estimated annual savings of $7,020 ($39 average charge per day x 180 school days).

USDA-DONATED FOODS (REC. 28)

Dalhart ISD does not monitor the FSMC's use and crediting of USDA-donated foods.

All schools participating in the NSLP are eligible to receive USDA-donated foods. The USDA's Food Distribution Program supports American agricultural producers by providing nutritious, USDA-purchased food to nutrition programs in public schools. In addition, processing of donated foods allows school districts to contract with commercial food processors to convert raw bulk USDA-donated foods into more convenient, ready-to-use products. USDA-donated foods, formerly known as the commodity foods program, help the district lower food costs by providing domestically produced foods to the CNP. The district selects foods for campuses to supplement commercially purchased products. According to USDA, on average, USDA-donated foods account for approximately 15.0 percent to 20.0 percent of the cost of a student meal.

The district's contract with the FSMC stipulates that the FSMC will use the maximum amount of USDA-donated foods and credit the district for the value of all USDA-donated foods it receives for use in the meal service, including entitlement and bonus foods, as well as the value of USDA-donated foods contained in processed products. According to the initial contract and subsequent renewals, the " FSMC must itemize, in a separate line item in the regular monthly billing to [the district], the savings resulting from the use of donated commodities based on the market value of all USDA-donated commodities received for use in [the district's] food service."

The contract also details the district's responsibilities for oversight of the use and crediting of the value of USDA-donated foods. Exhibit M of the FSMC contract states that the district "must strictly monitor the agreement throughout the year to ensure that they receive the full value of credits, discounts, and rebates and are in compliance with federal regulations." Exhibit M further clarifies that the district's monitoring activities will include, but not be limited to the following:

- identify the person within the [district] that will be responsible for oversight;

- designate the position that will monitor the credits, discounts, and rebates;

- examine the invoices and other documentation provided by the FSMC as agreed to in the contract;

- determine the percentage of credits, discounts, and rebates reported in relation to the value of food purchased early in the contract year as a benchmark for future comparison;

- calculate the average credit-purchase proportion received, or as applicable discount or rebate;

- examine products to ensure that to the maximum extent practicable, domestic commodities are purchased; and

- visit storage facilities to observe the origins of purchased food printed on food labels and case units.

The district does not monitor the FSMC's use and crediting of the value of its USDA-donated foods. District staff were unable to provide documentation that the district conducted any of the USDA-donated foods monitoring activities outlined in the FSMC contract. According to onsite interviews, district staff were unaware of procedures to monitor USDA-donated foods. The CFO had no knowledge or documentation related to the crediting or use of USDA-donated foods by the FSMC. The FSMC director of dining services was new to the position and had not found any documentation of USDA-donated food transactions or deposited products with commercial food processors.

The FSMC monthly invoices listed total USDA-donated foods credits on the cover page; however, the review team was unable to verify that the FSMC accurately applied the credits to the costs the FSMC billed to the district. The review team evaluated the FSMC's summary financial statements for school years 2014–15 and 2015–16. The summary financial statements provided no evidence of separate, line item credits accounting for the value of USDA-donated foods used in either school year. Invoices from commercial food processors indicate a discount for raw bulk USDA-donated foods, but the invoices submitted by the FSMC to the district do not clearly document that the FSMC credited the discount to the district.

Due to the lack of district oversight and documentation, the district cannot determine if the FSMC correctly credited the district for all of the USDA-donated foods' value since the inception of the FSMC contract in school year 2014–15.

Failure to ensure that the FSMC accurately allocates USDA-donated foods values to the district increases the risk that the district loses resources that could reduce food costs. TDA, district staff, FSMC staff, and the onsite review confirmed that the district receives USDA-donated foods. **Figure 5–5** shows the value of commodity allocations for Dalhart ISD according to TDA from school years 2014–15 to 2016–17.

FIGURE 5–5
DALHART ISD COMMODITY ALLOCATIONS SCHOOL YEARS 2014–15 TO 2016–17

DALHART ISD	2014–15	2015–16	2016–17	TOTAL
Commodity allocation	$49,033	$53,738	$55,465	$158,236

SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Texas Department of Agriculture, District Entitlement Information for Public Information Request 16-1021, October 2016.

The USDA provides a monitoring tool for districts to use for best practices in FSMC oversight. This guide states that under a cost-reimbursable contract, the school district "must conduct extensive independent monitoring of the costs incurred under the contract" and that "contract performance monitoring must prioritize the … credit for the value of USDA-donated foods received." The USDA oversight tool includes recommended ongoing monitoring tasks, documentation, and reporting for the district to conduct to effectively monitor the use and crediting of USDA-donated foods. Best practices include comparing average use, credits, and rebates to benchmarks established early in the year and to the previous year's data.

The USDA-donated foods Toolkit for Child Nutrition Programs is a collection of resources to assist child nutrition professionals to use their USDA-donated foods effectively. Regional Education Service Center XVI (Region 16) Child Nutrition Specialists also serve as a resource for developing and evaluating the district's procedures for monitoring USDA-donated food use and crediting.

The district should develop and implement written procedures and assign district staff to monitor the food service management company's use and crediting of the district's USDA-donated foods.

The CFO should require the FSMC to provide documentation of the use and crediting of USDA-donated foods, including invoice rebates from commodity processors, since school year 2014–15 and analyze the documentation to verify the FSMC credited the correct annual values to the district. If the CFO observes any discrepancies, the district should follow the FSMC contract's process for resolution of the discrepancies.

The CFO and employee benefits specialist, with the support of Region 16 Child Nutrition Specialists, should develop written procedures for monthly and annual monitoring tasks related to USDA-donated foods, both regular and processed. The CFO should prepare and review reports comparing the

use and crediting of donated foods to benchmarks from the beginning of the year and previous years. The district's written procedures should address all contractually required monitoring tasks and best practices from the USDA's best practice monitoring tool.

The district should designate the employee benefits specialist as the monitor of the district's USDA-donated foods and provide related training through Region 16 and free online webinars offered by the USDA.

This recommendation could be implemented with existing resources.

VENDOR STAFFING LEVELS (REC. 29)

Dalhart ISD lacks a formal process to regularly evaluate and provide oversight of vendor staffing levels.

FSMC labor and benefits are allowable costs that the district reimburses to the FSMC. Industry standard practices and Dalhart ISD contract terms and conditions identify evaluation and oversight of staffing levels as key mechanisms to control costs and deliver services. The contract stipulates that Dalhart ISD and the FSMC mutually agree upon staffing levels.

During school year 2013–14, the district self-operated the CNP. Labor costs in school year 2014–15, the first year of the FSMC contract, represent 44.3 percent of the CNP revenues. However, labor costs increased in school year 2015–16, year two of the FSMC contract, to 51.5 percent of the CNP revenues. Industry standards outlined in School Food and Nutrition Management recommend labor costs that do not exceed 40.0 percent of CNP revenue. **Figure 5–6** shows that

the Food Services Department's labor costs have consistently been higher than the industry standard from school years 2013–14 to 2015–16.

Figure 5–7 shows Dalhart ISD Food Services Department's and peer districts' labor and benefit costs as a percentage of revenue. Peer districts are districts similar to Dalhart ISD that the review team used for comparison purposes. From school years 2012–13 to 2015–16, Dalhart ISD labor and benefits as a percent of revenue averaged 50.6 percent, which was higher than the industry standard of 40.0 percent and higher than the peer districts' average labor and benefits as a percent of revenue of 37.2 percent and 41.1 percent.

Meals per labor hour (MPLH) is a common productivity measurement for school kitchens, calculated by dividing the total meal equivalents (ME) for a given period by the total number of productive paid labor hours for the same period. Effective districts calculate MPLH for each cafeteria site to determine staffing levels and set performance goals. Although the FSMC provides the district with MPLH reports, the district does not use this information to collaborate with the FSMC to allocate labor hours or set MPLH goals. In addition, the FSMC MPLH calculations are districtwide, rather than site based, and the ratios used to calculate the MEs do not align with industry standards.

According to industry standards, one ME equates to one reimbursable lunch. All other sources of revenue such as reimbursable breakfasts, snacks, and a la carte have a conversion factor to calculate the equivalent of one ME. This conversion factor is the meal equivalent ratio (MER). Industry

FIGURE 5–6
DALHART ISD FOOD SERVICES DEPARTMENT LABOR AS A PERCENTAGE OF CHILD NUTRITION PROGRAM REVENUE
SCHOOL YEARS 2013–14 TO 2015–16

FOOD SERVICE	2013–14 (1)	2014–15 (2)	2015–16 (3)
Labor and Benefits	$446,639	$381,006	$441,140
Revenue	$848,614	$860,143	$857,169
Labor and Benefits as a Percent of Total Revenue	52.6%	44.3%	51.5%

NOTES:
(1) School year 2013–14 revenue figures obtained from Texas Education Agency (TEA) Public Education Information Management System (PEIMS) Access Database Financial Data and include donated foods' values from US Department of Agriculture (USDA). School year 2013–14 represents labor and benefits for district staff, not contracted staff.
(2) School year 2014–15 revenue figures obtained from TEA PEIMS Access Database Financial Data include USDA-donated foods' values
(3) School year 2015–16 revenue figures combine revenue as stated in the Food Service Management Company Financial Statement June 2015–16, with an estimated commodity value based on prior usage of 99.0 percent and Texas Department of Agriculture (TDA) District Entitlement Information for Dalhart ISD for school year 2015–16. TEA PEIMS Access Database Financial Data were not available for this timeframe.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Texas Education Agency, Public Education Information Management System Access Database Financial Data, school years 2013–14 and 2014–15; Southwest Foodservice Excellence Financial Statements, school years 2014–15 and 2015–16; Texas Department of Agriculture, District Entitlement Information for Public Information Request 16-1021, October 2016.

FIGURE 5–7
DALHART ISD LABOR AND BENEFITS AS A PERCENTAGE OF CHILD NUTRITION PROGRAM REVENUE COMPARED TO PEER DISTRICTS
NOVEMBER 2016

DISTRICT (1)	2012–13	2013–14	2014–15	2015–16 (2)	AVERAGE
Borger ISD	36.3%	36.0%	39.4%	N/A	37.2%
Diboll ISD	43.5%	38.9%	40.8%	N/A	41.1%
Dalhart ISD	**53.8%**	**52.6%**	**44.3%**	**51.5%**	**50.6%**

NOTES:
(1)   Giddings ISD was not included because complete labor data was unavailable.
(2)   School year 2015–16 revenue figures are based on revenue as stated in the Food Service Management Company Financial Statement June 2015–16, plus an estimated commodity value based on a school year 2014–15 usage rate of 99.0 percent and Texas Department of Agriculture (TDA) District Entitlement Information for Dalhart ISD for school year 2015–16.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Texas Education Agency, Public Education Information Management System Access Database Financial Data, school years 2012–13 to 2014–15; Southwest Foodservice Excellence Financial Statements, June 2014–15 and June 2015–16; Texas Department of Agriculture, District Entitlement Information for Public Information Request 16-1021, October 2016.

standards determine MEs from meal count categories and other sources of revenue using the following MERs:

- Lunch: 1 lunch = 1 ME

- Breakfast: 3 breakfasts = 2 MEs

- Snacks: 3 snacks = 1 ME

- A la carte = dollar amount of sales divided by free reimbursement rate (set in FSMC contract as $3.258)

The FSMC reports do not use best practice MERs and have inconsistent calculations within their reports. For example, in the weekly profit and loss report, the FSMC-formulated MPLH calculations use MERs of one breakfast equal to one ME and one snack equal to one ME and inconsistent versions of the MER to convert a la carte revenue to MEs. Additionally,

the hours worked report used the incorrect MER of one breakfast to one ME. The FSMC incorrectly calculated MPLH for the month of October resulting in 16.9 MPLH. **Figure 5–8** shows Dalhart ISD's MPLH calculated by the review team using industry standards and the MPLH calculations provided by the FSMC. Dalhart ISD's industry standard calculation of 14.4 MPLH represents a 14.8 percent difference in overall productivity compared to the FSMC's MPLH calculation.

Figure 5–9 shows sample staffing guidelines for a convenience system based on MPLH published in School Food and Nutrition Service Management for the 21st Century. Dalhart ISD's production type is a convenience system of meal service because it uses processed food items and disposable trays.

FIGURE 5–8
DALHART ISD MEALS PER LABOR HOUR (MPLH) CALCULATIONS
NOVEMBER 2016

MEAL TYPE	STUDENTS AND ADULTS SERVED	INDUSTRY STANDARD MEAL EQUIVALENT RATIOS (1)	DALHART FSMC MEAL EQUIVALENT RATIOS (2)	INDUSTRY STANDARD MEAL EQUIVALENTS	DALHART FSMC MEAL EQUIVALENTS	LABOR HOURS	INDUSTRY STANDARD MPLH	DALHART FSMC MPLH
Lunch	17,282	1=1	1=1	17,282	17,282			
Breakfast	16,736	3=2	1=1	11,157	16,736			
A la carte	$12,296	$3.258=1	$3.258=1	3,774	3,774			
Total				**32,213**	**37,792**	**2,239**	**14.4**	**16.9**

NOTES:
(1)   Industry standard calculations based on School Food and Nutrition Service Management for the 21st Century, Sixth Edition, 2014.
(2)   FSMC=Food Service Management Company.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Dalhart ISD, November 2016; Southwest Foodservice Excellence, Dalhart Hours Worked Report, November 2016; School Food and Nutrition Service Management for the 21st Century, Sixth Edition, 2014.

FIGURE 5–9
MEALS PER LABOR HOUR FOR LOW AND HIGH PRODUCTIVITY
2014

MEAL EQUIVALENTS	CONVENIENCE SYSTEM MEALS PER LABOR HOUR	
	LOW PRODUCTIVITY	HIGH PRODUCTIVITY
up to 100	10	12
101–150	11	13
151–200	12	14
201–250	14	15
251–300	15	16
301–400	16	18
401–500	18	19
501–600	18	19
601–700	19	20
701–800	20	22
801 and up	21	23

SOURCE: School Food and Nutrition Service Management for the 21st Century, Sixth Edition, 2014.

These guidelines reflect a highly organized operation with a strong standardized management system.

Figure 5–10 shows Dalhart ISD site-based productivity compared to industry standards. Productivity at all campuses is lower than minimum industry standards.

Higher-than-average labor costs directly affect the district's CNP budget. When CNP funds are insufficient to cover costs, the district supplements the CNP account with general revenue funds, as Dalhart ISD has done each school year since at least school year 2012–13.

When labor costs are at or above 40.0 percent, and MPLH falls below industry standard minimums, a district's CNP will experience financial challenges that can compound annually. Dalhart ISD needs consistent labor productivity calculations and reports to evaluate and recommend cost-effective staffing levels.

Best practices dictate that districts develop 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's 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:

FIGURE 5–10
DALHART ISD SITE-BASED PRODUCTIVITY COMPARED TO INDUSTRY STANDARD
SCHOOL YEAR 2015–16

CAMPUS	DAILY MEAL EQUIVALENTS PRODUCED	KITCHEN MEALS PER LABOR HOUR (MPLH)	INDUSTRY STANDARD MINIMUM MPLH (1)
Elementary	887	15.32	21
Intermediate	252	6.03	15
Junior High	406	10.40	18
High School (2)	244	6.64	14

NOTES:
(1)   Industry standard refers to low productivity MPLH for convenience system operations presented in School Food and Nutrition Service Management for the 21st Century.
(2)   Dalhart High School kitchen also served Dalhart XIT Secondary School.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Southwest Foodservice Excellence, Dalhart Hours Worked Report, November 2016; School Food and Nutrition Service Management for the 21st Century, Sixth Edition, 2014.

- planned safe and efficient work methods to maximize the food service program productively;

- work schedule guidelines and productivity benchmarks, such as MPLH are developed and implemented to meet operational goals; and

- work schedules are reviewed, evaluated, and revised as participation and programs change.

Dalhart ISD should develop and implement a formal process to regularly evaluate and provide oversight of vendor staffing levels.

Dalhart ISD should require the FSMC to use standard MEs, measure local productivity, and monitor current staffing. The district should consider obtaining a model process from a high-performing peer district that can be adapted to the needs of Dalhart ISD while local staff develop and establish a Dalhart ISD specific process.

Working with the FSMC regional director of operations and the FSMC director of dining services, Dalhart ISD should determine acceptable productivity levels based on menu structure, service structure, and equipment constraints. The district should coordinate with the FSMC to determine the number of labor hours needed at each campus based on the productivity level applicable, relative to best practice guidelines. The district and the FSMC should determine at which sites to revise staffing levels to align with meal equivalent guidelines. Dalhart ISD should implement periodic site observations to

review the FSMC recommendations for the number of staff needed at each site, making adjustments as necessary.

Dalhart ISD should compare productivity levels and MEs to industry standards to determine appropriate staffing levels. To reduce CNP financial losses, Dalhart ISD should coordinate with the FSMC to reduce labor costs.

Figure 5–11 shows the district could save $44 daily in labor costs by reducing labor hours by 3.0 percent. The district should continue to decrease labor costs 3.0 percent each year for four years until total labor costs decrease from the school

FIGURE 5–11
DALHART ISD PROJECTED SVINGS FROM IMPLEMENTED INDUSTRY STANDARD OVERSIGHT OF FOOD SERVICE MANAGEMENT COMPANY
NOVEMBER 2016

FACTORS	OCTOBER 2016
Labor Hours	2,239
Total Labor Cost (1)	$28,066
Service Days	19
Average Daily Labor Cost	$1,477
Average Daily Labor Costs with 3.0 Percent Labor Decrease	$1,433
Total Daily Savings	**$44**
Total Yearly Savings (2)	**$7,920**

NOTE:
(1) Total labor includes salaries, taxes, benefits, and Food Service Management Company fees ($22,906 in labor costs + $5,160 for payroll tax, benefits, and fees = $28,066 for total hourly labor in October 2016).
(2) Total yearly savings for 180 service days.
SOURCE: Legislative Budget Board School Performance Review Team; Southwest Foodservice Excellence, Dalhart Hours Worked Report, November 2016.

year 2015–16 level of 51.5 percent to below the recommended industry maximum of 40.0 percent of total CNP revenue.

The fiscal impact assumes Dalhart ISD and the FSMC will decrease labor costs by $7,920 ($44 average daily labor savings x 180 service days) for each year from school years 2017–18 to 2020–21.

PARTICIPATION (REC. 30)

Dalhart ISD does not monitor and promote maximum participation in the CNP.

The district does not monitor participation in the CNP, solicit feedback from stakeholders about the quality of food services, involve students in the CNP, or have an eligibility process that removes obstacles to participation.

Although the FSMC contract stipulates that the FSMC will promote participation in the CNP, the district does not require the FSMC to develop comprehensive participation reports or set participation goals. The review team analyzed monthly claims data for school years 2013–14 to 2015–16, and for September and October of school year 2016–17, to assess participation trends. **Figure 5–12** shows Dalhart ISD's average daily breakfast participation as a percentage of enrollment. Districtwide, breakfast participation decreased by 5.0 percent from school years 2013–14 to 2016–17.

Figure 5–13 shows Dalhart ISD's average daily lunch participation as a percentage of enrollment. Lunch participation decreased each year at most campuses. Districtwide, average daily lunch participation decreased from 50.6 percent in school year 2013–14 to 42.9 percent in school year 2016–17.

FIGURE 5–12
DALHART ISD AVERAGE DAILY BREAKFAST PARTICIPATION AS A PERCENTAGE OF ENROLLMENT
SCHOOL YEARS 2013–14 TO 2016–17

CAMPUS	2013–14	2014–15	2015–16	2016–17 (1)
Elementary	82.4%	81.4%	78.8%	68.1%
Intermediate	42.6%	31.5%	31.5%	50.5% (2)
Junior High	20.4%	13.1%	17.4%	22.0%
High School	5.9%	7.3%	7.6%	5.9%
XIT Secondary School	31.6%	14.3%	18.2%	14.9%
Districtwide	**40.9%**	**36.3%**	**36.6%**	**35.9%**

NOTES:
(1) Dalhart ISD, September 2016 and October 2016, Texas Unified Nutrition Programs System, Claims for Reimbursement Summary, September 2016 and October 2016.
(2) Dalhart Intermediate School began offering Universal Free Breakfast in school year 2016–17.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Dalhart ISD, school years 2013–14 to 2016–17, Texas Unified Nutrition Programs System, Claims for Reimbursement Summary, school years 2013–14 to 2016–17.

According to TDA's school year 2015–16 statistics for districts offering CNP, average daily participation was 1,787,208 for the SBP and 3,128,915 for the NSLP. Using the Texas Education Agency's school year 2015–16 statewide enrollment reports for all districts, statewide average daily participation as a percentage of total enrollment was approximately 33.7 percent for the SBP and 59.0 percent for the NSLP. As shown in **Figure 5–12**, 36.6 percent of Dalhart ISD students participated in the SBP in school year 2015–16, which exceeded the state average. The elementary school had the highest percentage of student participation in the SBP at 78.8 percent, and the high school had the lowest, with only 7.6 percent of students participating. Additionally, as shown in **Figure 5–13**, 47.2 percent of Dalhart ISD students participated in the NSLP during this period, lower than the state average. The elementary school had the highest percentage of student participation in the NSLP at 60.8 percent, and XIT Secondary had the lowest with 18.2 percent of students participating. Dalhart ISD has not made efforts to increase lunch and breakfast participation at campuses with low participation.

Four of Dalhart ISD campuses are closed, but the high school campus is open for students during the lunch period. Students may leave the campus for 60 minutes to go home, or purchase food from local restaurants or grocery stores. This policy may contribute to the high school's low participation in the NSLP. Additionally, junior high school staff reported that many parents bring in outside food for their students at lunch, which could also contribute to the junior high's participation rate in the NSLP being lower than the state average. The district implemented free breakfast at the intermediate school in school year 2015–16 and at the elementary school prior to school year 2012–13, which increased participation at those campuses.

In addition to not monitoring participation data, Dalhart ISD has limited knowledge of student and parent perceptions of food taste and quality. The district does not survey students, parents, or staff about the district's food service quality. The CFO indicated that the district receives fewer food services complaints than when the district used a self-management model. However, the review team's food service survey of campus staff and parents indicated high levels of dissatisfaction with the taste, appearance, and temperature of foods, as well as the time for meal service. Overall, parents had the lowest levels of satisfaction with the district's food services. According to the Legislative Budget Board survey, 47.5 percent of parents surveyed disagreed or strongly disagreed with the statement that "cafeteria food looks and tastes good." **Figure 5–14** shows the review team's survey results.

The district's low participation at some campuses could be due to the district not involving students in menu planning, designing the cafeteria atmosphere, or implementing participation incentives. The district does not maintain a student advisory board to solicit input and improve quality.

Another obstacle to meal participation is the eligibility process for free and reduced-price lunches. The district provides paper applications in English and Spanish at open house events and sends eligibility documents home with all students. However, the district does not offer incentives for completing applications, online applications, or applications in all languages spoken within the district community. In addition, district staff do not follow-up with parents who do not complete applications or parents they believe have made errors in the applications that affect eligibility, such as entering monthly income as weekly income. According to onsite interviews, district staff have limited knowledge about

FIGURE 5–13
DALHART ISD AVERAGE DAILY LUNCH PARTICIPATION AS A PERCENTAGE OF ENROLLMENT
SCHOOL YEARS 2013–14 TO 2016–17

CAMPUS	2013–14	2014–15	2015–16	2016–17 (1)
Elementary	67.8%	61.9%	60.8%	62.1%
Intermediate	63.2%	64.3%	57.4%	49.6%
Junior High	51.2%	52.0%	52.3%	40.8%
High School	23.0%	36.1%	29.5%	21.3%
XIT Secondary School	37.6%	28.0%	18.2%	21.2%
Districtwide	**50.6%**	**51.9%**	**47.2%**	**42.9%**

NOTE: (1) 2016–17 Dalhart ISD, Texas Unified Nutrition Programs System, Claims for Reimbursement Summary, September 2016 and October 2016 only.
SOURCES: Legislative Budget Board School Performance Review Team, November 2016; Dalhart ISD, school years 2013–14 to 2016–17, Texas Unified Nutrition Programs System, Claims for Reimbursement Summary, school years 2013–14 to 2016–17.

FIGURE 5–14
DALHART ISD FOOD SERVICES SURVEY RESULTS
NOVEMBER 2016

SURVEY QUESTION	GROUP	RESPONDENTS	STRONGLY AGREE OR AGREE	NO OPINION	STRONGLY DISAGREE OR DISAGREE
Cafeteria food looks and tastes good.	Campus Staff	100	45.0%	27.0%	28.0%
	Parents	343	25.4%	27.1%	47.5%
Cafeteria food is served at appropriate temperatures	Campus Staff	100	48.0%	32.0%	20.0%
	Parents	343	35.6%	45.8%	18.7%
There is adequate time for meal service.	Campus Staff	100	60.0%	10.0%	30.0%
	Parents	343	43.4%	16.3%	40.2%

NOTE: (1) Percentages may not sum to 100.0 percent due to rounding.
SOURCE: Legislative Budget Board School Performance Review Team, November 2016.

incentive programs and strategies to increase participation in the CNP.

Dalhart ISD's lack of oversight of participation data leaves the district unable to analyze and address the causes of decreased participation. The district is unable to effectively monitor and hold the FSMC accountable for reaching participation goals that could increase the profitability of the FSMC contract. With low participation, Dalhart ISD does not receive the full amount of potential federal and state revenues to support the food service operation.

Low participation in the CNP means that a significant number of students do not receive the nutritional benefits made available through the SBP and the NSLP. According to the national organization Food Research and Action Center, studies conclude that participation in school breakfast is associated with improved math grades, attendance, and punctuality. Students who eat breakfast show improved cognitive function, attention, and memory. Research shows that children who eat breakfast at school, closer to class and test-taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. They found that school breakfast participation is associated with a lower body mass index (an indicator of excess body fat), lower probability of being overweight, and lower probability of obesity. Similarly, the NSLP has continued to grow as an integral part of the local education program. Educator comments, as identified by the USDA Food and Nutrition Service, further assert that children who do not eat properly are very hard to discipline. Conversely, students who receive

a nutritious lunch have shown a marked improvement in attitude.

Best practices dictate that the district remove barriers to student participation in the SBP and the NSLP so that students receive the nutritional benefits of the CNP. To increase meal participation, effective food service departments prepare nutritious food that appeal to students. Elgin ISD developed menus that not only meet the nutritional needs of students, but also serve as a marketing tool for the department to attract customers. Elgin ISD provides students and teachers with a variety of menu selections that include fresh fruits and healthy choices. The food is prepared and served in a comfortable atmosphere.

By improving customer service and food selections and establishing a more appealing cafeteria atmosphere for students, Del Valle ISD increased student participation in its CNP. These efforts included updating the menu with new selections and establishing a new food court. The district increased its federal reimbursements and ensured the students received adequate nutrition as accorded by the NSLP and SBP.

The Institute of Child Nutrition (ICN), part of the School of Applied Sciences at the University of Mississippi, is a federally funded national center dedicated to applied research; education and training; and technical assistance for CNP. ICN stresses the importance of establishing and monitoring performance indicators, such as participation rate by program, to evaluate the effective financial management of a food service operation. Districts may state performance

indicators in dollars, percentages, or ratios to facilitate the analysis process.

ICN also stresses that food service department administrators must have accurate information about the average number of students who will participate in the school lunch and breakfast programs on a daily basis as a foundation for making decisions regarding staffing needs, food and supplies purchases, and food production schedules. Knowing the average participation during a given time period can assist food service department administrators in making better financial management decisions that strengthen their programs' resources. The district can use ADP as a forecasting tool to reduce inefficiency with labor hours and overproducing food, or to reduce customer dissatisfaction because of inadequate staff or not enough food.

Dalhart ISD should develop and implement procedures to monitor meal participation rates by campus and adopt strategies for increasing participation in the SBP and the NSLP.

The district should use meal participation rates to inform decision making for staffing, purchasing, and production scheduling. The CFO should require the director of dining services to develop a report that compares the current month's participation rates by campus to the prior month's participation rates. In addition, this report should compare these participation rates to the rates from the same month of the previous year. The report should also include year-to-date participation. This report would help identify trends and allow the CFO to advise the director of dining services to make cost control adjustments. The director of dining services should distribute copies of the report to the respective cafeteria managers and to the district's business office. The CFO should include participation goals by campus for the FSMC contract renewal. The CFO should develop and implement monitoring procedures to hold the FSMC accountable for meeting participation goals.

The CFO should coordinate with the FSMC to identify methods, such as surveys and focus groups, for regularly soliciting feedback from stakeholders and to hold the FSMC accountable for high quality services. The district should establish and oversee the FSMC's participation in a student advisory board. The district should encourage the FSMC to interact with the students as customers, share information, learn from them, and promote their ownership in the program.

Based on feedback from students, parents, staff, and a student advisory board, the district should have the FSMC modify menus to incorporate favorite foods that the students enjoy to increase the number of students who participate. The FSMC could involve the students in menu planning activities to allow them to feel involved. For example, one student involvement strategy is to hold student competitions for designing new recipes. The district and the FSMC could collaborate to feature the winning student recipe in the menu and to advertise the competition and winning recipe in campus newsletters and on the district website.

In addition, the district could involve students and the community in ways to decorate the cafeterias. Students could brainstorm and implement ways to provide an inviting environment in their respective cafeterias. In addition to providing a more appealing setting, students would experience a greater sense of school pride because of their contributions.

Some strategies that might increase SBP participation include the following:

- advertise the availability of the Universal Free Breakfast Program at the elementary and intermediate sites throughout the school year. Information could be shared on the district's website and via brochures and menus that are provided to students and parents; and

- implement second-chance breakfast: The district could allow students time after their first-period class for breakfast. The district could serve breakfast from the cafeteria or carts in the hallway after first period, allowing students who arrive late or are not hungry first thing in the morning to receive a healthy breakfast.

Strategies that might increase NSLP participation include the following:

- monitor plate waste and make appropriate menu adjustments as required;

- use marketing skills and knowledge of the FSMC to market programs;

- ensure that all items on the menu are available to all students: If the same group of students, typically the last students served, continuously do not have the same selection as the students served earlier, students are more likely to either not eat or bring lunch from home;

- advertise the benefits of nutritious school lunches; and

- consider closing the high school campus to increase participation.

To remove obstacles to participation, the district should also increase efforts to certify eligible students. The district should develop second-party check procedures for certifying eligibility and consider automating the current process. The district could follow up with nonresponsive households or those with apparent application errors, advertise and promote the process for assisting parents with applications prior to the start of the school year, offer incentives for application completion, offer and advertise online applications in all languages spoken in the community, and provide assistance for those households with limited English-speaking abilities.

Since the time of the review, the district indicated that the FSMC conducted student surveys at the high school and junior high campuses.

This recommendation could be implemented with existing resources. Opportunities exist for increased revenue, especially at the high school, if the campus changes to a closed-campus model.

FOOD SERVICES DEPARTMENT PROCEDURES (REC. 31)
Dalhart ISD lacks effective CNP procedures to ensure compliance with state and federal regulations.

Once Dalhart ISD contracted with an FSMC, the district administrative staff assigned all CNP responsibilities to the awarded vendor. During onsite interviews, district staff stated that they have limited knowledge of CNP regulations and that the FSMC operates the program because they are the experts. However, the district has not developed Food Services Department written procedures to guide its CNP responsibilities and ensure district compliance with all contractual, state, and federal regulations.

The review team observed issues with the four following processes that lack written procedures to ensure program compliance:
- Meal Counting and Claiming;

- CNP Program Changes and Approval;

- Breakfast in the Classroom (BIC); and

- Advisory Group Implementation.

Dalhart ISD does not have a written procedure that describes how staff should verify that meal counts reported to TDA for reimbursement claims are accurate. The FSMC's site-based managers generate reports from Nutrikids, an automated point-of-sale system. These reports document the number of breakfasts and lunches served each day, by school and eligibility category. Managers also generate an edit check report from the automated system. The edit check process is an industry-standard review of meals claimed by category to ensure that the number of meals claimed does not exceed the number of students approved for benefits. The numbers on the meal count report and the edit check report should match.

At the end of the month, the employee benefits specialist uses the district-level automated system to produce a report. This report consolidates each site's daily meal counts into total monthly meal counts and reviews edit checks to ensure the daily attendance by category is not exceeded by meals claimed. However, the FSMC managers do not send the edit check reports to the Business Department, and the district does not verify the accuracy of the meal counts by comparing point-of-sale reports to site-generated reports prior to submission to TDA.

Dalhart ISD does not have a formal procedure to ensure the district submits proposed changes to the CNP to TDA for approval prior to implementation.

The district submits an Attachment B, "Policy Statement for Free and Reduced-price Meals Attachment B: Meal Count/ Collection Procedure(s)," to TDA to notify them of program changes. TDA uses this form to review and approve program changes the district intends to make prior to implementation. An Attachment B describes the meal counting and claiming process implemented by the district. Through each campus' program application in the Texas United Nutrition Programs System (TX-UNPS), the district identifies which sites and meal services will participate in offer versus serve (OVS). OVS is a provision of the CNP that allows students to decline food items. OVS provisions allow students to take three items at breakfast, as long as one item is one-half cup fruit or juice.

The district provides breakfast meals at no cost to students enrolled in the elementary and intermediate schools. In addition, the FSMC serves elementary school breakfasts in the classroom, use the classroom as the POS, and allows students to decline two items. During meal observation, most students did not select all menu food items. According

to the district's Attachment B, TDA has not approved the district to serve meals at no charge, nor to serve meals in the classroom. TDA has not approved the district to use the classroom as a POS, and has not approved the elementary school or the intermediate school for implementation of OVS. This means that each student must take all menu items, including a grain, one-cup fruit, and eight fluid ounces of milk.

Dalhart ISD lacks written procedures for BIC. The review team's observations of BIC revealed insufficient training and written procedures that resulted in staff not following compliant POS and meal counting procedures.

The FSMC does not document annual training provided for BIC processes and procedures, for either FSMC staff or the teachers who are responsible for POS in the classrooms. According to the regional director of operations, the FSMC held one staff training on BIC procedures in school year 2015–16. She indicated the FSMC had not provided training to the teachers in school year 2016–17 regarding BIC, OVS, or general meal-service requirements.

For BIC, the POS is usually at the point where the student selects the meal and returns to his seat, while at the same time, the teacher marks the roster to document the meal service. During the review team's onsite observation, teachers counting breakfast meals served in the classroom did not conduct meal counts at a compliant POS.

The review team observed inconsistencies in the process for recording meal counts for reimbursement claims. The review team observed some teachers using attendance rosters as the meal count for BIC. Some teachers mark their rosters once a week and some teachers do not mark rosters at all. In addition, some teachers reported that they mark rosters based on class attendance rather than whether the student receives a reimbursable meal. In addition, many teachers did not identify the student breakfast selections as an essential component of counting reimbursable meals. If the student was present and selected one item, teachers counted them as having received a reimbursable breakfast. Interviews with district staff indicated that the district was unaware that meal counts were not accurate for BIC.

The district does not have written procedures to establish and maintain an FSMC advisory group.

According to the district contract, the district must establish and the FSMC must participate in an advisory group that includes FSMC staff, students, teachers, and parents to

assists with menu planning, evaluation, and wellness policy development. Neither the district nor the FSMC produced documentation to support the existence of an advisory group.

If Dalhart ISD does not effectively monitor the performance of the FSMC and provide sufficient oversight of the CNP, the district risks that TDA may cite the district for violations of state and federal regulations governing the programs during the course of an annual review.

Because the district contract with the FSMC is a cost-reimbursable contract, food service-specific procedures are operationally critical. Without these procedures, the district may not receive high quality, cost effective food services from the FSMC. Procedural standards help ensure the district meets state and federal CNP requirements. The effects of insufficient procedures could include:

- eligibility application errors occurring with greater frequency;

- the district incurring findings and corrective action plans during a TDA Administrative Review (AR) of the program;

- TDA requiring the district to submit a revised claim for reimbursement;

- lost CNP reimbursement from inaccurate or improper meal counts; and

- lost opportunities to develop advisory board partnerships to promote the health and well-being of district students.

Industry standards in school food service dictate that established written procedures are essential in order to operate and monitor an efficient, successful organization. Since 1994, the School Nutrition Association (SNA) has undertaken an initiative called Keys to Excellence: Standards of Practice for Nutrition Integrity, 2014, designed to assist schools in achieving program integrity. Most recently revised in 2014, the Keys to Excellence provides 67 best practices that specifically address the observed examples identified at Dalhart ISD. More than just a list of best practices, the Keys to Excellence provides an organization like Dalhart ISD national standards for quality programs and a framework for developing effective written procedures for the CNP.

Dalhart ISD should develop and implement comprehensive procedures to ensure the district's CNP comply with state and federal regulations.

The Dalhart ISD CFO, as FSMC contract manager, should establish a workgroup to examine gaps in local procedures compared to best practice procedures like those in the SNA Keys to Excellence. The workgroup should address identified procedural gaps by developing and implementing a procedures manual. The procedures manual should include, but not be limited to:

- meal counting and claiming procedure, including verifying district-generated reports with site-generated reports;

- procedures for annually reviewing TDA's Attachment B and each campus' program application in TX-UNPS, which should be updated before implementing any changes in practices or procedures;

- BIC procedures for staff training, POS, and meal reimbursement claims; and

- procedure for establishing and maintaining an FSMC advisory group.

With the help of experienced food service staff, such as the Region 16 Child Nutrition Specialist, as well as the FSMC director of dining services and regional director of operations, the workgroup should have a first meeting in the early part of school year 2017–18 to determine next steps and the need for the involvement of additional key stakeholders.

The district should consider obtaining model procedures from a high-performing peer district that can be adapted to the needs of Dalhart ISD. The district should use SNA Keys to Excellence and existing peer district procedures as models to maximize workgroup effort and efficiency. Dalhart ISD should modify these models to meet district-specific needs.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 5. FOOD SERVICES							
27. Develop and implement a process to provide comprehensive financial oversight of the FSMC.	$7,020	$7,020	$7,020	$7,020	$7,020	$35,100	$0
28. Develop and implement written procedures and assign district staff to monitor the food service management company's use and crediting of the district's USDA-donated foods.	$0	$0	$0	$0	$0	$0	$0
29. Develop and implement a formal process to regularly evaluate and provide oversight of vendor staffing levels.	$7,920	$7,920	$7,920	$7,920	$0	$31,680	$0
30. Develop and implement procedures to monitor meal participation rates by campus and adopt strategies for increasing participation in the SBP and the NSLP.	$0	$0	$0	$0	$0	$0	$0
31. Develop and implement comprehensive procedures to ensure the district's CNP comply with state and federal regulations.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$14,940**	**$14,940**	**$14,940**	**$14,940**	**$7,020**	**$66,780**	**$0**

CHAPTER 6. TECHNOLOGY MANAGEMENT

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 improvement 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.

The Dalhart Independent School District (ISD) Technology Department provides support for five campuses with 1,767 students and provides districtwide high-speed broadband Internet access to 146 classrooms. According to responses during onsite interviews, the district has a 2:1 student-to-computer ratio and a 1:1 teacher-to-computer ratio. All students have equitable access to computers, software, and Internet. Each classroom is equipped with at least the minimum resources required by the teacher. The district

provides tablet storage carts that teachers can share between classrooms and campuses as required. The Technology Department provides updated software, hardware, and maintenance to the local area network (LAN) for the transfer of resources between teacher and student. Regional Education Service Center XVI (Region 16) offers off-site resources via a 20MB Ethernet connection. The district has approximately 2,000 devices connected to the LAN with storage and software access. Black/white and color printers are located throughout the district accessible to all staff and students. A Centrex telephone system with fax capabilities is available to all staff. The system routes calls to a direct extension giving the district an efficient use of equipment. In addition, the administration logs all external long distance calls for auditing purposes.

The technology director, who reports to the superintendent, leads the Dalhart ISD Technology Department. The role of the technology director includes planning for, budgeting, procuring, installing and managing the technical infrastructure, computer applications and technical support. The assistant technology director reports to the technology director. This position is responsible for computer repair and software installation for district computers. The assistant technology director oversees two technology specialist positions. One technology specialist supports printers and manages technology purchase orders. The other technology specialist handles the installation of computers, printers and projectors. **Figure 6–1** shows the Technology Department organization for school year 2016–17.

FIGURE 6–1
DALHART ISD TECHNOLOGY DEPARTMENT
ORGANIZATION
SCHOOL YEAR 2016–17
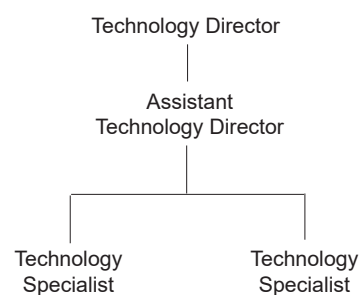
SOURCES: Legislative Budget Board Review Team; Dalhart ISD, November 2016.

The Technology Department's work order system drives most of the daily work for this team. For the work order system, the district uses Eduphoria, a computer application that tracks requests from customers (work orders) and provides reports on work order status and statistics. Users enter requests for assistance or service into the work order system. The technology director monitors the work order system and assigns new work orders to the appropriate staff. Work orders from teachers that involve instructional technology come into this system as well, and the instructional technology specialist processes those work orders.

The Dalhart ISD technical infrastructure includes a data center in the administration building where all servers, the firewall, the web filter and directory services are located. Additionally, the district has leased a 10-gigabit fiber line from the administration building to a switch near the Dalhart Junior High School. From that building there is a leased one-gigabit fiber line to Dalhart High School, Dalhart Junior High School, and Dalhart Elementary School. The Dalhart Intermediate School has a district-owned one-gigabit fiber line directly from the administration building. Dalhart ISD

contracts with XIT Telecommunication & Technology, Ltd Company for its Internet access.

Dalhart ISD upgraded its wireless its network in school year 2014–15 using E-rate funds. Dalhart High School and Dalhart Elementary School have an access point in each classroom, while Dalhart Intermediate, Dalhart Junior High School, and XIT Secondary School (alternative) have the capability to have an access point in each classroom if the need arises.

Dalhart ISD uses Microsoft Windows-based operating systems for the servers and personal computers. The servers are on Windows Server 2012, with the exception of one Linux virtual server. In 2016, the district began transitioning to the Windows 10 operating system for desktop computers. This transition is nearly complete for the teacher and student computers. The district's goal is to complete this transition during school year 2016–17.

Figure 6–2 shows the Technology Department budget, excluding staff salaries, for school years 2015–16 and 2016–17. The total amount of $319,300 is an increase from school

FIGURE 6–2
DALHART ISD TECHNOLOGY DEPARTMENT BUDGET
SCHOOL YEARS 2015–16 AND 2016–17

DESCRIPTION	2015–16	2016–17
Prepaid Applications	$0	$0
Computer Supplies - Dalhart High School	$22,000	$25,000
Computer/Technology - XIT Secondary School	$1,000	$1,000
Computer Supplies - Junior High School	$16,000	$18,000
Computer Supplies - Dalhart Elementary School	$16,000	$16,000
Computer Supplies - Dalhart Intermediate School	$16,000	$16,000
Internet Supplies	$10,000	$25,000
Postage - Computer Repair	$100	$100
Internet Software	$38,000	$38,000
General Supplies – Dalhart High School	$10,000	$0
Technology Equipment (Replacement)	$50,000	$147,000
Region 16 Video	$10,000	$12,200
Technology Office Supplies	$4,000	$3,000
Computer Equipment/Capital Outlay	$15,000	$15,000
Technology Coordinator Travel	$2,000	$3,00
Total	**$210,100**	**$319,300**

Source: Dalhart ISD, November 2016.

year 2015–16, when the budget was $210,100. The technology director indicated that the increase for school year 2016–17 was for replacing technology equipment. The Technology Department purchased and deployed 370 laptop computers in the schools, and replaced two application servers in the data center.

Dalhart ISD uses the Texas Enterprise Information System (TxEIS) for managing student and financial information. Before school year 2015–16, the district hosted the system internally on servers in the data center. Dalhart ISD moved from this locally hosted version of TxEIS to the same system hosted by Region 16. This move to a hosted version reduces the burden on the Technology Department. The Technology Department maintains the district's servers and upgrades the software; Region 16 now provides this for TxEIS as part of the contract services. TxEIS is a web-based, integrated system that supports both operational and student data transactions. TxEIS supports such processes as accounts payable and receivable, payroll, purchasing, human resources, and student information management. During school year 2015–16, the annual contract total for managing the student and financial information was $42,300. **Figure 6–3** shows the 16 administrative and instructional applications used by Dalhart ISD.

In school year 2015–16, Dalhart ISD began contracting with Region 16 for technology and network assistance. Region 16 provided recommendations to Dalhart ISD for the technology infrastructure. These recommendations included new servers for the active directory services, cabling upgrades/replacement in the schools, and data backup for disaster recovery, firewall upgrade, and server consolidations. The district has addressed all of these recommendations with the exception of the cabling recommendation. This work is in progress. Dalhart was expecting bids from contractors for cabling the junior high school during school year 2016–17. Since the time of the onsite review, according to the district, the cabling project for the junior high school is complete.

ACCOMPLISHMENT
♦ In 2015, Dalhart ISD applied for and received additional Category 2 funds from the E-rate program.

FINDINGS
♦ The Dalhart ISD Technology Department lacks documented procedures for all technology functions.

FIGURE 6–3
DALHART ISD ADMINISTRATIVE AND INSTRUCTIONAL COMPUTER APPLICATIONS
SCHOOL YEAR 2016–17

SOFTWARE	DESCRIPTION
TxEIS	Student Information System and financial system
Eduphoria	Used for appraisals, work orders, lesson plans
DMAC	Data management for assessments
Aesoponline	Absence and Substitute scheduling
Destiny	Library Checkout system
Rosetta Stone	English as a Second Language Learning
Nutrikids	Cafeteria Management
Fitnessgram	Physical Fitness Assessment Reporting
Plato	Credit Recovery
Istation	Computer based assessment and instruction
Accelerated Reader	Monitoring reading practice
Think Through Math	Online tutoring
Staar 1	Performance Standards
TEKS Resource System	Curriculum Management System
Epson Interactive Projector	Interactive projector tools
Elmo Imagemate/ Hovercam Flex 10	Document camera tools

SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

♦ Dalhart ISD lacks controls to ensure that the security of its data and servers are adequate.

♦ The Dalhart ISD Technology Department is not effectively using its work order system to meet customer expectations for timeliness and quality of service.

♦ The Dalhart ISD Technology Department has not fully implemented its technology plan and stakeholders are not involved in the planning process.

RECOMMENDATIONS
♦ **Recommendation 32: Develop a technology procedures manual, including KPIs.**

♦ **Recommendation 33: Improve the data center physical security and develop procedures to reduce the risk of data losses.**

♦ **Recommendation 34: Develop staff training and procedures to improve the work order system processes.**

♦ **Recommendation 35: Review and revise the technology plan and involve key stakeholders in the process.**

DETAILED ACCOMPLISHMENT

E-RATE FUNDS

In 2015, Dalhart ISD applied for and received additional Category 2 funds from the E-rate program.

E-rate is the commonly used name for the Schools and Libraries Program of the Universal Service Fund. The Universal Service Administrative Company (USAC) administers the program in accordance with the direction of the Federal Communications Commission (FCC). The program provides discounts to assist U.S. schools and libraries to obtain affordable telecommunications and Internet access. It is one of four support programs funded through a universal service fee charged to companies that provide interstate and/or international telecommunications services.

USAC organizes the services available for funding discounts into five service types in two categories. Category 1 includes data transmission services, Internet access, and voice services, including broadband connectivity and basic access to the Internet. It also includes local and long-distance wired telephone service, voice over Internet protocol, and cellular phone service. Category 2 includes internal connections, managed internal broadband services, and basic maintenance of internal connections, including devices located at the sites that are necessary to transport information to classrooms (e.g., access points, routers, hubs, and wiring). This category also includes third-party management and repair and device upkeep.

In 2015, the district had broadband and Internet access; however, the wireless infrastructure needed repairs. The recently hired technology director knew that, in 2014, the original E-rate program had a change in eligible services and an increase in the available funds for distribution starting in 2015. The technology director applied for and received E-rate funds for basic maintenance of internal connections, a

Category 2 service type to cover the repair and upkeep of eligible products. This was the first time the district applied for the Category 2 E-rate discounts. The technology director used data from the work order system to identify the trend and document the effects of poor cabling. **Figure 6–4** shows an image of cabling in need of upgrade at the Dalhart Junior High School.

FIGURE 6–4
CABLING AT DALHART JUNIOR HIGH SCHOOL
NOVEMBER 2016

SOURCE: Legislative Budget Board School Performance Review Team, November 2016.

Most of Dalhart ISD's major technology initiatives are standalone projects that have funds planned and allocated as approved. The district used the additional E-rate funds to upgrade the wireless infrastructure in the schools. For school year 2015–16, USAC disbursed $297,719 Dalhart ISD. This was a substantial increase (182 percent increase) from the total amount disbursed in school year 2014–15, which was $105,433. **Figure 6–5** shows the E-Rate disbursement amounts for the previous five school years.

DETAILED FINDINGS

TECHNOLOGY DEPARTMENT PROCEDURES (REC. 32)

The Dalhart ISD Technology Department lacks documented procedures for all technology functions.

The Technology Department completes tasks based on specific strengths of staff. **Figure 6–6** shows the tasks that each Technology Department staff typically completes.

The Technology Department does not have a procedures manual for technology functions. There are no written, reviewed, and approved procedures to guide Technology Department staff in the performance of their duties.

FIGURE 6–5
DALHART ISD E-RATE FUNDS
SCHOOL YEARS 2010–11 TO 2015–16

SCHOOL YEAR	REQUESTED AMOUNT	COMMITTED CATEGORY 1	COMMITTED CATEGORY 2	TOTAL COMMITTED	TOTAL DISBURSED	REMAINING BALANCE	PERCENT OF UTILIZATION
2015–16	$298,848	$67,232	$199,812	$298,779	$297,719	$1,059	100.0%
2014–15	$108,613	$108,613	$0	$108,613	$105,433	$3,180	97.0%
2013–14	$96,619	$96,619	$0	$96,619	$96,619	$0	100.0%
2012–13	$103,073	$103,073	$0	$103,073	$99,797	$3,276	97.0%
2011–12	$83,128	$83,128	$0	$83,128	$80,422	$2,706	97.0%
2010–11	$89,477	$89,477	$0	$89,477	$85,763	$3,714	96.0%

SOURCE: Texas Education Agency, November 2016.

FIGURE 6–6
DALHART ISD TECHNOLOGY STAFF AND WORK ORDERS RESPONSIBILITIES
NOVEMBER 2016

JOB TITLE	WORK ORDERS RESPONSIBILITIES
Technology Director	Network, Servers, User and Email Accounts, Web filter, Assigning Work orders.
Assistant Technology Director	PC repair, Software installations.
Technology Specialist	Printers, Purchase Orders
Technology Specialist	Installation of computers, projectors, printers

SOURCE: Dalhart Technology Department, November 2016.

Examples of missing procedures include processing work orders, acquiring software, installing software, controlling configuration, recovering from a disaster, resetting a password, disposing of surplus equipment, setting up access and security for new staff, relocating equipment, and accepting donated hardware. In addition, the district lacks operational manuals, standards for technology purchases, and donation guidelines for hardware and software.

The Dalhart ISD Technology Department does not have key performance indicators (KPIs) to improve overall technology services. The Technology Department does not routinely monitor technology-related data (e.g., statistics for the work orders), although it is available. The technology director stated that since the department is small, staff is aware of where their problems and areas of focus are without the need for data analysis in the form of regularly monitored KPIs. The review team's interviews with teachers in Dalhart ISD indicated a lack of consistency in how well the Technology Department met their expectations in completing work order requests. The Technology Department does not routinely monitor KPIs to anticipate needs such as Internet bandwidth increases or to identify cabling or network bottlenecks in campuses.

The absence of a procedures manual and KPIs are detrimental to a technology organization's effectiveness. Technology Department staff lack performance standards and are required to learn expectations by word of mouth, or by asking questions of other staff. This may result in variation in how Technology Department staff performs the same functions. Without documented procedures for the network, staff may not have the knowledge to troubleshoot network issues. In some emergency situations, such as a local disaster (for example, a flood or fire that renders the data center unusable), a lack of a procedure for how to acquire, image and put into production a replacement data center could result in an extended outage of the entire network for the campuses and administration offices.

The lack of a procedures manual leaves the district vulnerable to the loss of institutional knowledge when veteran staff leave the district. It also makes it difficult for staff to fill in for each other during extended absences if the procedures they routinely follow are not documented and available. Procedures are also important for documenting how to conduct work in compliance with applicable legal or policy requirements.

Without KPIs to measure organizational performance, the district cannot ensure that the services provided by the

central office departments to schools are improving or maintained at a satisfactory level. While small technology departments often understand what their primary challenges are without using data analytics, data in the form of KPIs could identify trends and issues that might otherwise go unnoticed. Customers of the Technology Department do not know what they should expect in terms of the time to resolve work orders. What may seem reasonable to one teacher (e.g., a five-day response time) may be unacceptable to another teacher; KPIs enable a department to monitor their performance by objective measures.

Documented procedures and KPIs are an important asset to a technology department. They are useful in training and orienting new staff. They capture institutional knowledge for how to perform certain tasks. They help ensure a certain level of consistency, service-level expectation, and quality of work performance. They provide guidance for how to handle situations that occur only infrequently (such as accepting donated hardware). Documented procedures help protect the organization against the loss of institutional knowledge. Procedures become a resource for answering the frequent "how to" or "how do I" types of questions that staff may have in the course of their work. Importantly, in the event of an emergency (such as the loss of the data center or a breach in security) documented procedures help to minimize chaos and ensure an orderly recovery that meets the needs of the organization.

Typical technology procedure manuals contain a full range of procedures that cover both the routine and the rare work occurrences. **Figure 6–7** shows a typical table of contents for a policy and procedure manual for technology.

Dalhart ISD should develop a technology procedures manual, including KPIs.

The technology director, with support from the Technology Department staff, should first develop a comprehensive list of topics that should be included in the procedures manual. The technology director should develop guidelines for procedures that explain what should be included in them. The technology director should assign the writing of procedures to each Technology Department staff. The technology director should review these procedures. Once all procedures are completed, the technology director should compile them into a manual.

The technology director should coordinate with the superintendent to develop a draft set of KPIs and accompanying target services levels. The KPIs should address

the following metrics: percentage of work order tickets completed within the target service level; percent network availability; percent of time network utilization exceeds 75 percent of capacity, and customer satisfaction regarding technology work orders. The Technology Department should review the KPIs with the principals and representative teachers to ensure it meets their needs and expectations. After the KPIs are developed, the technology director should report actual results against the KPIs on a regular basis.

This recommendation could be implemented with existing resources.

DATA CENTER (REC. 33)

Dalhart ISD lacks controls to ensure that the security of its data and servers are adequate.

The data center at Dalhart ISD is located in the central office facility within the offices of the technology staff. The data center is located in the rear of the technology offices in a dedicated room that is approximately 10 feet by 20 feet in area. The data center at Dalhart ISD contains computer servers necessary to run applications and maintain data that are important to the operation of the district. The existing placement of the data center in the administration building, offers continuous access to servers hosting important student and staff data files.

The existing risks associated with the data center servers fall into five primary categories. **Figure 6–8** shows these categories, why they are important, the onsite fieldwork observations of the review team, and potential risks associated with the data center.

Figure 6–9 shows the applications that the data center supports. Each serves a critical function within the district.

The loss of the firewall and active directory services in the data center would cause the loss of the use of the network for campuses and the central office. While access to hosted systems would be possible through external Internet connections (for example from staff home Internet connections), the district network would not be available for use by administrators or students. All systems used by the district (even those hosted externally to the district) would be unusable from within the school buildings and central office until services are restored. The loss of the use of the content filter would suspend all student use of the network until the filtering system is restored.

FIGURE 6–7
TECHNOLOGY SERVICES POLICIES, PROCEDURES AND STANDARDS MANUAL FROM GUILFORD COUNTY SCHOOLS 2016

SECTION	CONTENT
Introduction	
Board Policies	Acceptable Use Policy
Help Desk	Technology Contact Person , Reporting Computer Problems or Requesting Technical Assistance , Reporting Emergencies, Requesting Password Resets, Requesting Data Cabling,
Hardware	Hardware Purchasing Standards, Minimum Standards for Networked Computers, Computer Repair, Computers for Additional Classrooms, Relocation of Equipment, Disposal of Surplus Equipment, School-based Programs involving Technology, Computer Donations, Employee-Owned Hardware, Checkout of School Computers, In-Home Servicing of Your Personal Computer.
Software	Standard Software, Approved Software, Request for Software to be Reviewed and Added to Approved List
	Personally Owned Software, Screen Savers, Third-party Email or Messenger Services.
Network Access/Email	Establishing Network Access and Email Accounts for Employees, Remote Access, Name Changes for Network Access and Email Accounts, Closing Accounts for Retirements, Resignation or Terminations, Establishing Network Access and Email Accounts for Non-Employees, Requesting Password Resets, Logoff and Timeout Policy, Security Policy, Filtering and Access to Information, Personal Use of Email, Management of Email Accounts, Mass Distribution of Email, Release of Email Addresses, Confidential Information and Use of Email, Privacy of Email, Data Cabling Requests – Moves/Adds/Changes, Data Cabling Requests – Building Renovations and New Construction, Reporting Network Outages or Other Emergencies, Network Access of Mobile Units.
Technology Applications Review Committee (TARC)	Issues That Must Be Approved By the TARC, Requesting Approval of the TARC
Appendices	A. Acceptable Use Policy, B. Who To Call List, C. Help Desk Documents, Troubleshooting Procedures, Password Reset Request Form, Work Order Request Form, D. Hardware Documents, E. Standard and Approved Software List, F. TARC Application Forms, G. In-Home Service Technicians.

Source: Guilford County, North Carolina; Guilford County Schools Technology Services Policies, Procedures and Standards Manual, 2016.

Loss of the use of the applications listed in **Figure 6–9** for an undetermined period could inconvenience staff who would be unable to access their work files on the file server. Loss of the use of these applications would also affect the library and food services operations.

Unlocked doors and vulnerability from the external window in the data center increase the risks of unauthorized access to the data center with the potential for theft or destruction of digital information and/or hardware. Compromised or stolen servers could constitute a Family Educational Rights and Privacy Act (FERPA) violation if unauthorized parties access personally identifiable data.

Figure 6–10 shows industry best practices for mitigating the risks identified for the Dalhart ISD data center.

Dalhart ISD should improve the data center physical security and develop procedures to reduce the risk of data losses.

Dalhart ISD should take the steps, shown in **Figure 6–11**, to improve the data center security and procedures to reduce the risk of data loss and server operations.

The fiscal impact assumes that the district purchases the equipment necessary to provide additional power backup time and modifications to the data center to improve security. This will result in a total one-time cost of $5,850. The estimated cost of a backup power supply unit is $5,000. The cost to add a door lock is approximately $200 ($105 for a keypad lock and $95 for installation). Strengthening window security is estimated to cost approximately $650 for the security bars and installation.

TECHNOLOGY SUPPORT (REC. 34)

The Dalhart ISD Technology Department is not effectively using its work order system to meet customer expectations for timeliness and quality of service.

The Dalhart ISD Technology Department has a work order system to help manage the work requests. The district uses a computer application that enables users to enter requests for assistance and to assign and track work orders. The application tracks work order requests from customers and provides reports on work order status and statistics. The technology

FIGURE 6–8
DALHART ISD DATA CENTER RISKS AND ONSITE OBSERVATIONS
NOVEMBER 2016

DATA CENTER RISK CATEGORY	REVIEW TEAM ONSITE OBSERVATIONS	POTENTIAL RISKS
Physical security: Physical security is important to ensure that there is no theft of expensive server equipment in the data center and to avoid unauthorized access to the data or the applications in the data center.	The door into the data center has no lock and there is no log for tracking entry or exit. The data center has one exterior wall, in which there is a large window. Data centers, due to their data-sensitive nature and high-value equipment, do not typically have windows that are on the outer walls of the building because they pose an additional physical security risk.	There is an increased risk of break-in and theft of hardware, damage to servers or unauthorized access to data or applications.
Fire suppression: Data centers represent potential fire hazards given the amount of electrical power and connections that are present in the facility. Fire detection and suppression are important to have in a data center to prevent a disaster.	A fire extinguisher is located just inside the entry to the data center, with an inspection within the past 12 months. However, the room does not have any form of automated fire suppression equipment that is separate from the normal building system. The data center does not have a maintenance bypass and emergency power–off (EOF) switch.	A fire alarm activated in another part of the building could ruin expensive equipment in the data center due to water damage. In addition, firefighters will not be able to shut down the power quickly during a fire to avoid getting an electrical shock from the data center equipment. The technology director cannot quickly shut down power from a distance to avoid electrocution of a staff member inside the data center.
Power backup: Loss of electrical power in a data center results in the temporary inability to use the systems and data in the facility and may result in damage to equipment components from a sudden loss or surge of power. Power backups are important to a data center to ensure continued availability of the systems and data but more importantly to ensure time for an orderly shutdown and startup of equipment to prevent damage to components.	The data center as a single power supply/backup unit with a 5.7-minute backup time (fully loaded) and 12.5 minute (with half load). In the event of a power outage, this is the amount of time available to ensure an orderly shutdown of the servers to avoid hard-shutdowns and potential damage to hardware components.	If the technology staff is not present or there is not time to shut down all systems, there is a risk that the hard shutdown of the servers may result in loss of some server capability. The Technology Department had not tested the shutdown process to determine if this is sufficient time for an orderly shutdown of all servers/devices in the data center.
Climate control: The computer equipment in data centers heat. Ambient air temperatures in a data center could rise quickly if cooling equipment fails to operate properly. The computer equipment in data centers require that temperature and humidity levels remain within tolerance levels to prevent damage from overheating or static electricity. Climate controls are important to ensure proper temperature and humidity within the data center.	The data center has a single air vent in the ceiling of the room, which may meet the cooling needs of the room on an 80-degree day (ambient air temperature was 65 degrees). An ambient temperature/humidity alarm/notification device is in place. The Technology Department has not developed and documented procedures for handling loss of cooling.	Temporary loss of cooling capacity to the data center (while power remains on) could result in high ambient air temperatures that could have a detrimental effect on computer hardware, and extreme temperatures could result in irreparable damage to certain server components. If the situation occurs in off hours and no intervention occurs, the loss of one or more servers is possible.
Disaster recovery: Recovering from the loss of a data center or the failure of major computer equipment components therein requires a great deal of planning and preparation to ensure that this does not result in an extended period of time during which the servers and applications in the data center are unavailable.	Each night Region 16 backs the data center over the Internet; Region 16 then backs their files up to their own remote site. Dalhart ISD has access to the backed up servers as needed to restore files. The Technology Department has not developed a disaster recovery plan to address the replacement of equipment. The Technology Department has no plan for how the district should replace the equipment and made operational in the event of a disaster. Under the Region 16 disaster recovery service, the equipment replacement is not covered.	Without a disaster recovery plan, the district could lose the use of the computer network for a long period.

Source: Legislative Budget Board School Performance Review Team, November 2016.

FIGURE 6–9
DALHART ISD DATA CENTER APPLICATIONS
NOVEMBER 2016

APPLICATION	DESCRIPTION	IMPORTANCE TO DISTRICT
Active Directory (Directory Services)	Manages identity information required to enable access to Dalhart systems	Critical to daily operations and access to systems for all staff
Nutrikids	Food services system	Has personally identifiable data (PID) on its data files which must be safeguarded to ensure student data privacy
Destiny	Library management system	Important to library operations
Security firewall	The firewall prevents unauthorized access to the district's network.	This is critical to protect Dalhart ISD data from being accessed or destroyed by outside entities
Content filter	The content filter ensures that students cannot access inappropriate sites through the Dalhart network	The Children's Internet Protection Act requires a content filtering as a district policy to enable student access to the network. Without an operational content filter, use of the network by students must be restricted.
Timeclock	Time clock system	This system not currently used but contains historical data that is sometimes accessed
Local weather station server	Reports weather data to local station	Not important to the district, but important to the local station
Local file server for staff	Contains data files that belong to Dalhart staff	May contain important files, however these may also be retrieved from Region 16 backup
Staff desktop and laptop backups	Contains backups of Dalhart staff laptops and desktops	May be important backups, however these may also be retrieved from Region 16 backup

SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

director is the only staff who can access the work order system. The Technology Department staff does not see the work orders until the technology director assigns them via email; they do not know what is in the ticket queue, or how long it has been there. As soon as they get the emails from the technology director, staff coordinate among themselves that day's work for who is processing work orders for which campus and when. Once the issue is resolved, the technology director closes the ticket and sends an email to the customer with the opportunity to reply by rating their level of satisfaction.

The Technology Department staff indicated that work orders might be in the technology director's electronic inbox for a few days prior to assignment. Therefore, teachers sometimes prefer to approach staff directly with their work order needs to bypass this delay. Although the district has the work order system in place, the district does not require all staff to submit support requests through the work order system. Although the Technology Department has requested campus staff to submit to the work order system, they continue to request assistance from Technology Department staff verbally when Technology Department staff are on campus. Since the technology specialist can address work orders that are not in the system, they are not capturing all information related to technology issues in the work order system.

According to onsite interviews, when the technology director installed the work order system the Technology Department met once a week to discuss how it fixed recurring issues, how to increase customer satisfaction, ideas for reducing ticket volumes and the analysis of trend data. However, staff indicated that the frequency of these meetings has been inconsistent. Additionally, the technology director has not conducted any organized/structured cross training of the Technology Department staff to ensure that they can perform all tasks in the event of absences or staff turnover.

Figure 6–12 shows Technology Department work order statistics for July 1, 2016, to November 16, 2016. These statistics include average resolution time, work orders opened and closed, and satisfaction ratings. Average resolution times ranged from 20 days and three hours for the elementary school, to approximately five days for each of the other schools. Districtwide, the average time to resolve a work order is 11 days and 7 hours.

Figure 6–12 shows that the districtwide average rating for customer satisfaction was 92.0 percent. Average satisfaction ratings ranged from 95.0 percent for the high school to 88.0 percent for the elementary school. Although the satisfaction ratings appear to be high, onsite interviews with teachers indicated that the Technology Department does not consistently meet teachers' expectations for timeliness and

FIGURE 6–10
DATA CENTER RISK MANAGEMENT BEST PRACTICES
NOVEMBER 2016

DATA CENTER RISK CATEGORY	BEST PRACTICES
Physical security	All entrances to the data center secured with either a key or combination lock. A log to record all who enter the data center. Entry into the data center is restricted to only those with a legitimate business need or role in the data center. A Technology Department staff escorts visitors and contractors that enter the data center. The data center is located in an area with no windows to outside walls.
Fire suppression	The data center has a heat and smoke detection system installed in accordance with National Fire Protection Association (NFPA) 72E below raised floors and other areas.
	The data center sprinklers are alarmed and activated with a different set of controls from the rest of the building to prevent smoke or fire in other areas of the building from dumping water on expensive electrical equipment unnecessarily. The data center has a maintenance bypass and EOF switch.
	Suppression systems for data centers may include: NFPA 75 standard firewalls;
	Sprinkler systems;
	Chemical systems;
	Manual pull stations; and
	Portable fire extinguishers.
Power backup	The data center has power-conditioning equipment used and integrated with an uninterruptable power supply (UPS) system. The UPS power 100 percent of the equipment until an alternate power supply (such as a diesel generator) kicks in or until the servers shut down in an orderly fashion. The size of the power equipment "peak" load or fault overload conditions and is continually online to filter and condition power. If a UPS is not used, then the panel provides a surge protection with a stand-alone isolation/regulation transformer.
	The data center has a monitor and alarm/notification system for power outages. Procedures are in place and tested to ensure an orderly shutdown and startup of all equipment in the data center. The shutdown and startup procedure that a staff member could activated and monitored remotely.
Climate control	Ambient temperature/humidity alarm/notification devices are in critical locations in the data center such as on the racks close to servers and on the data center walls. Ambient air temperatures and relative humidity levels are within the equipment manufacturer specifications to minimize equipment overheating and electrostatic discharge. Procedures are in place and tested to ensure an orderly shutdown and startup of all equipment in the data center in the event of a climate control issue such as high ambient air temperature. The shutdown and startup procedure activated and monitored remotely.
Disaster recovery	A disaster recovery plan is in place. The plan includes procedures explaining how to access the data backups, where and how to obtain replacement servers, who to notify in the event of the loss of the data center, how to notify key individuals of the situation, how to restore the data and applications, how and what to test before placing the restored system into production.

Source: Gartner Research Publication, April 22, 2005.

quality of service. While some teachers expressed satisfaction with the services, others were not satisfied with the timeliness of the service or the ability of the technology staff to correct the problem on the first try. Principals indicated their level of support from the Technology Department was acceptable. However, they did note that some of their staff experienced longer wait times for the Technology Department to address their service requests.

The technology director indicated that departmental staff lack training and updated skills to address all work orders, mainly because they have not been trained in recent years. In addition, the technology director has not conducted a regular review of the work order data to discern trends or proactively identify and resolve root causes of recurring problems.

The Technology Department does not have job descriptions for Technology Department staff. Staff files only contained a signed document with written job expectations for each of

FIGURE 6–11
DALHART ISD DATA CENTER RISK CATEGORIES AND IMPLEMENTATION STEPS
NOVEMBER 2016

DATA CENTER RISK CATEGORY	IMPLEMENTATION STEPS
Physical security	The technology director should secure all entrances to the data center with either a key or combination lock and develop a procedure to record the names of all who enter the data center. All entry into the data center should be restricted to only those with a legitimate business need or role in the data center. A Technology Department staff member should escort all visitors and contractors that need to access the data center. The technology director should also secure the outside window to minimize the possibility of entry by unauthorized staff.
Fire suppression	The technology director should ensure all portable fire extinguishers are maintained and inspected regularly and confirm that alarms that activate the data center sprinklers are working separately from the rest of the building to prevent smoke or fire in other areas of the building from dumping water on expensive electrical equipment unnecessarily. The technology director should also install an automated fire suppression system that includes a maintenance bypass and EOF switch.
Power backup	The technology director should test monitor and alarm/notification system for power outages and that there are procedures in place and tested to ensure an orderly shutdown and startup of all equipment in the data center. In addition, the technology director should test the shutdown and startup procedures by activating and monitoring remotely within the window of time provided by the battery backup. If additional time is required for an orderly shutdown, the technology director should consider additional external battery packs for the existing power supply unit and/or a backup power supply unit.
Climate control	The technology director should test the monitor, alarm/notification system for climate control issues (for both high ambient air and high humidity), and that there are procedures in place and tested to ensure an orderly shutdown and startup of all equipment in the data center.
Disaster recovery	The technology director should develop a disaster recovery plan for the data center and the entire Dalhart ISD network. The plan should include detailed procedures explaining how to access the data backups, where and how to obtain replacement servers, who to notify in the event of the loss of the data center, how to notify key individuals of the situation, how to restore the data and applications, how and what to test before placing the restored system into production.

SOURCE: Legislative Budget Board School Performance Review Team, November 2016.

FIGURE 6–12
DALHART ISD TECHNOLOGY DEPARTMENT HELPDESK WORK ORDERS STATISTICS
JULY TO NOVEMBER 2016

REQUESTOR	DAYS OPEN	AVERAGE RESOLUTION TIME	CLOSED	OPENED	REQUEST/HOUR	SATISFACTION
District Average	14	11 days 07 hours 42 minutes	684	659	0.6300	92.0%
Administration	1	06 days 10 hours 22 minutes	28	28	0.0260	N/A
Curriculum	0	17 days 03 hours 58 minutes	4	4	0.0037	N/A
Elementary School	3	20 days 03 hours 52 minutes	226	201	0.2100	88.0%
High School	3	05 days 08 hours 31 minutes	152	154	0.1400	95.0%
Intermediate School	2	05 days 06 hours 42 minutes	106	107	0.0980	93.0%
Junior High School	5	05 days 06 hours 47 minutes	138	141	0.1300	92.0%
Maintenance	0	07 days 04 hours 57 minutes	2	1	0.0019	N/A
Special Education	0	07 days 10 hours 51 minutes	7	7	0.0065	100.0%
Technology	0	04 days 04 hours 54 minutes	2	2	0.0019	100.0%
Secondary School	0	42 days 08 hours 30 minutes	19	14	0.018	89.0%

SOURCE: Dalhart ISD, Technology Department, November 2016.

the technology staff. The review team was unable to analyze the staff experience and education to determine if these were consistent with requirements written in the job description.

To provide technical support in areas departmental staff lack training, Dalhart ISD has a contract with Region 16 that includes software and servers support. The district pays three consultants to assist staff by phone or to provide remote support.

Teachers may use technology less frequently and less effectively if the Technology Department does not support the technology or provide prompt service. An average of 11 days and seven hours for work order resolution may cause some teachers to work without necessary technology for extended periods. Additionally, the lack of regular external training and internal cross training for staff results in an expanding skills gap within the Technology Department and diminishes its ability to quickly resolve work orders.

Work order systems provide a wealth of information about the overall performance of the technical infrastructure. Recurring problems, such as slow response on a particular school's network (or even on a particular wing of a school), or repeated repairs for a certain type of vintage hardware, or repeated requests for assistance with a certain software system are indications of an underlying root cause. Slow network response may be indicative of network design or infrastructure/cabling issues. Recurring problems with a software system may indicate the need for additional user training. In addition to troubleshooting, this information is useful for planning and budgeting purposes.

The following are best practice measures and strategies for helpdesk operations as prepared for the Arizona Department of Education by the Center for Educational Leadership and Technology (CELT). Some measures and strategies are applicable to small Technology Departments such as Dalhart ISD. The practices below refer to calls to a service desk, which Dalhart ISD does not have; however, technology staff do visit with the customers. The district should consider visits from technology staff the equivalent of a call in the best practices described in the helpdesk measures and accompanying strategies from the Arizona Department of Education. **Figure 6–13** shows examples of measures and strategies for a first visit resolution and subsequent visits required to resolve the work order. These measures require the technology staff to capture data for all calls. Data include information about who made the call, the nature of the problem, date and time of the call, who responded to the call

duration of the call, time to resolve the problem, customer satisfaction with the result, and call wait time for the customer.

Dalhart ISD should develop staff training and procedures to improve the work order system processes.

The technology director should develop categories and service levels for the types of work orders. For example, a Category 1 work order might be one that affects teaching or is causing work stoppage for a business process. The service level for such a request might be two business days. The technology director should begin to track the work orders according to category and monitor that the staff meet the service levels. The technology director should empower the team to make front-line decisions and coordinate among themselves to maximize the benefit from their planned time onsite with customers. Technology staff should use this information to conduct regular de-briefings on the types of work orders, trends, and ideas for reducing ticket volumes and improving customer satisfaction. The technology director should also proactively seek out trends, related issues, and recurring problems to learn from the resulting data. The technology director should require that the technology staff capture the ticket information on all work order requests and require that all support requests go through the work order system. The technology director should document the new work order process and procedures, and monitor and regularly report work order statistics to all staff.

The technology director should work with the Technology Department staff to improve the skills to apply to the work order process. This includes training the staff on the work order process, the use of measures, and helpdesk best practices. The technology director should allow the technology staff time for cross training every month to share skills. The technology director should develop a schedule of cross-training sessions and topics organized by priority as determined by data in the work order system.

The technology director should also plan for additional resources to be available during periods when work order demand is high, such as the beginning of the school year. The data contained in the district's work order software is a resource to identify peak demand times and anticipate when they will occur in the coming months. The technology director should identify the need for additional support from Region 16 to address peak demand times for the work order process.

FIGURE 6–13
ARIZONA DEPARTMENT OF EDUCATION HELPDESK MEASURES AND STRATEGIES
OCTOBER 2015

MEASURES	RESOLUTION RATE	STRATEGIES
First-call (tier 1)	70.0%	Analyze types of calls that go to tier 2. Rank order by frequency of occurrence. Determine which of the highly occurring calls can the staff addressed with additional training for the helpdesk.
Second-call (tier 2)		If the first-call resolution rate is high because the issues require relatively simple solutions, such as password reset, then address the root cause (e.g., put in self-serve password reset) and re-evaluate.
Third-call (tier 3)		Anticipate new types of calls – use the configuration/change management process to forewarn of potential helpdesk calls from application or system changes. Where possible, train the helpdesk on new releases of software and anticipated problem areas for customers
Defines first-call (tier 1) rate by helpdesk support person and second-call (tier 2) and third-call (tier 3) by support person and type of issue.		
Customer Satisfaction Provides an option for each ticket to close with a customer satisfaction survey. Break this measure into customer satisfaction by helpdesk person, type of call, and tier level (if resolved at tier 2 or tier 3).	95.0%	Share customer satisfaction rating with helpdesk staff, tier 2 and 3 each month. Recognize and reward highest achieving staff each month. Monitor for consistently low rates for individuals and types of calls. Coach the staff as needed if call satisfaction is consistently low. Provide customer service training to all helpdesk staff, tier 1 and 2
Customer Calls Customer calls answered by the helpdesk within an developed time threshold	99.0%	Analyze and report call volume data over time to determine periods of high call volume – such as return from holidays, report card time, state reporting windows and following new software releases. Have additional helpdesk staff on call for such anticipate high-volume periods. Track the helpdesk staff utilization by staff. Balance the call types and volumes to ensure a proper mix of helpdesk skills to match call volumes.
Average time to resolve calls These are the calls were re-categorized from tier 1 calls to tier 2 or 3.	95.0%	Monitor the data for tier 2 and 3 problem tickets at each staff meeting. Discuss trends where call types are averaging greater than 2 days. Discuss remediation for these call types. Share average call closure data with each tier 2 and 3 support person. Set targets and discuss remediation strategies for long closure times.
Number of calls that last more than 15 minutes Helpdesk staff, caller, and type of problem should track calls that last more than 15 minutes.	0.0%	Analyze the data to determine whom these calls are from and determine whether these calls effectively constitute supplemental training calls for staff that need additional training. Require training for these callers before approved to be the district point of contact. Develop a policy that calls that approaching 15 minutes are to move to tier 2.
Helpdesk Meeting Meet with the helpdesk team regularly and review performance and metrics.	0.0%	Use team discussion and ideas to identify and initiate efforts to eliminate the source of calls. Encourage helpdesk staff to go into every call with a positive, friendly attitude toward the caller and seek to understand the details of their issue/request, asking the right questions and actively listening. Empower the team to make front-line decisions and coordinate best practice processes. Conduct weekly; if not daily team de-briefings on the types of calls, trends, ideas for reducing call volumes and improving customer satisfaction. Proactively seek out trends, related issues and recurring issues and learn from the resulting data. Capture the ticket information on all calls. Require that all support requests go through the helpdesk. Implement a digital customer assistant to handle the low effect, repetitive calls with self-service.

NOTE: Resolution Rate is calculated as a percentage of target.
SOURCE: Arizona Department of Education, October 2015.

The technology director should develop a schedule of training classes for the year for each technology staff. The technology director and the human resources director should develop job descriptions for each of the technology staff. These job descriptions would detail job requirements and performance expectations, and help determine areas in need of training

when staff do not meet the expectations or requirements. Once the technology director identifies training needs, the director could consider which training options to use. The technology director should explore online training for staff to acquire technical skills in a just-in-time manner. Once the technical skill need is identified (e.g., desktop and device management, enterprise security, Windows server, etc.), the technology director should explore online courses that are available and should first consider sites that provide free online tutorials.

The technology director should budget for and purchase online training subscriptions for the Technology Department staff. Such subscriptions are available for less than $80 per month per staff. This rate would represent a cost of $2,880 per year of online subscriptions for three staff ($80 x 3 x 12).

TECHNOLOGY PLANNING PROCESS (REC. 35)

The Dalhart ISD Technology Department has not fully implemented its technology plan, and stakeholders are not involved in the planning process.

Dalhart ISD's Technology Department has a technology plan for school years 2015–16 to 2017–18. The technology director and the superintendent developed the plan in April 2015. Although the plan includes a reference to a Technology Planning Committee, the technology director has not established the committee. The plan is extensive, with over 50 strategies, and includes strategies assigned to the superintendent, curriculum director, administrators, principals, special education staff, librarians, teachers, instructional technology staff and the Technology Department. The existing plan does not articulate measures or key performance indicators (KPIs), which prevents the technology director from monitoring the results of the plan. No comprehensive update or progress report for the plan was available to the review team; however, the technology director provided a one-page report with the Technology Department accomplishments. Each of these accomplishments correlated to a strategy in the technology plan. **Figure 6–14** shows the Technology Department's documented accomplishments for school years 2014–15 to 2016–17.

During onsite interviews, principals indicated that technology purchases for their campuses did not align with the technology plan, and that their ability to influence these purchasing decisions was limited. There was no plan oversight or regular communication process for linking efforts such as purchases described in the plan with the ongoing technology decisions and purchases in the district.

The overall goals of the plan include the following:

- **Goal 1:** To develop a collaborative learning environment in which teachers could use technology consistently and appropriately throughout all grade levels, supporting student academic achievement and engagement;

- **Goal 2:** Implement a quality professional development program for all staff to promote technological literacy while providing strategies for technology integration to ensure student academic success and digital responsibility;

- **Goal 3:** Administration, leadership, and support will provide effective leadership in integrating technology into curriculum and insure that technology literacy connects teachers and staff to data, content, resources, expertise, and learning experiences that enable and inspire more effective teaching for all learners; and

- **Goal 4:** Continue to maintain and increase the capacity of our network infrastructure.

Achieving these goals requires the close involvement of the principals, teachers, instructional technology specialist, and librarians in the day-to-day implementation of the technology plan. Without such engagement, technology in the classrooms will not achieve the degree of consistent use and integration with the curriculum described in goals one and three.

Many organizations, both public and private, conduct strategic planning relative to their mission and vision. However, many organizations lack the ability to transform strategic plans into either actionable projects (or initiatives) and ongoing performance measures that could be tracked and monitored to produce the results needed by the organization.

A best practice approach for implementing strategic plans is a Plan-Do-Check-Act model, presented in the Transformation Plan Oversight Committee Guidebook for Establishing and Sustaining a Transformation Plan Oversight Committee Process, which the CELT developed for Saint Louis Public Schools in 2015. This approach calls for:

- developing the plan with input and representation from the schools and curriculum areas (e.g., "Plan");

- continuously working on the strategies of the plan (e.g., "Do");

FIGURE 6–14
DALHART ISD TECHNOLOGY DEPARTMENT ACCOMPLISHMENTS
SCHOOL YEARS 2014–15 TO 2016–17

SCHOOL YEAR 2014–15	SCHOOL YEAR 2015–16	SCHOOL YEAR 2016–17
• E-rate for wireless networks • New Web filter • New Website	• LAN support contract with (Region 16)New work order system • Five-year replacement plan for equipment • One-to-one dual credit program for students at the high school • New domain controller • New file server • New email domain • Windows 10 upgrade for all student and teacher computers • Cabling for new wireless access points • Moved from flat network to multiple virtual local area networks (VLANs)	• Purchased and deployed 370 laptop computers in the schools • Added two new application servers

Source: Dalhart ISD, Technology Department, November 2016.

- periodically checking progress on the plan and the results of the measures that track the plans results (e.g., "Check");

- acting (e.g., "Act") on the things learned during the "Check" process, which may include changes to strategies, assignments, timelines or resources; and

- keeping the plan updated with periodic reviews and planning activities involving the originators/owners of the plan (e.g., return to "Plan").

Figure 6–15 shows the best practice known as the Plan-Do-Check-Act model. This model includes strategies for making a plan, enacting and executing a plan, making sure items are completed in the plan, and revising the plan as needs change.

Dalhart ISD should review and revise the technology plan and involve key stakeholders in the process.

The technology director, with support from the superintendent, should establish the Technology Planning Committee, involving all participants who have a responsibility for a strategy in the existing plan, including principals, teachers, parents, students, and administrators. The technology director and the instructional technology specialist should facilitate a comprehensive plan update to the full committee for all strategies in the plan at a coordinated meeting of the committee. The technology director and the instructional technology specialist should then revise the plan to reflect the existing status of each action item, and any new strategies needed. Using the committee, the technology director and the instructional technology specialist should develop measures to monitor the actual progress of the plan.

The technology director should also discuss with the committee the upcoming projects, initiatives and/or acquisitions that are resulting from the plan to ensure proper understanding and participation by all appropriate parties. Such updates could be conducted at regular intervals (i.e., quarterly) with the committee, adjusting the overall plan as appropriate with consideration given to feedback from the committee.

This recommendation could be implemented with existing resources.

FIGURE 6–15
PLAN-DO-CHECK-ACT MODEL FOR TECHNOLOGY PLAN IMPLEMENTATION
2015
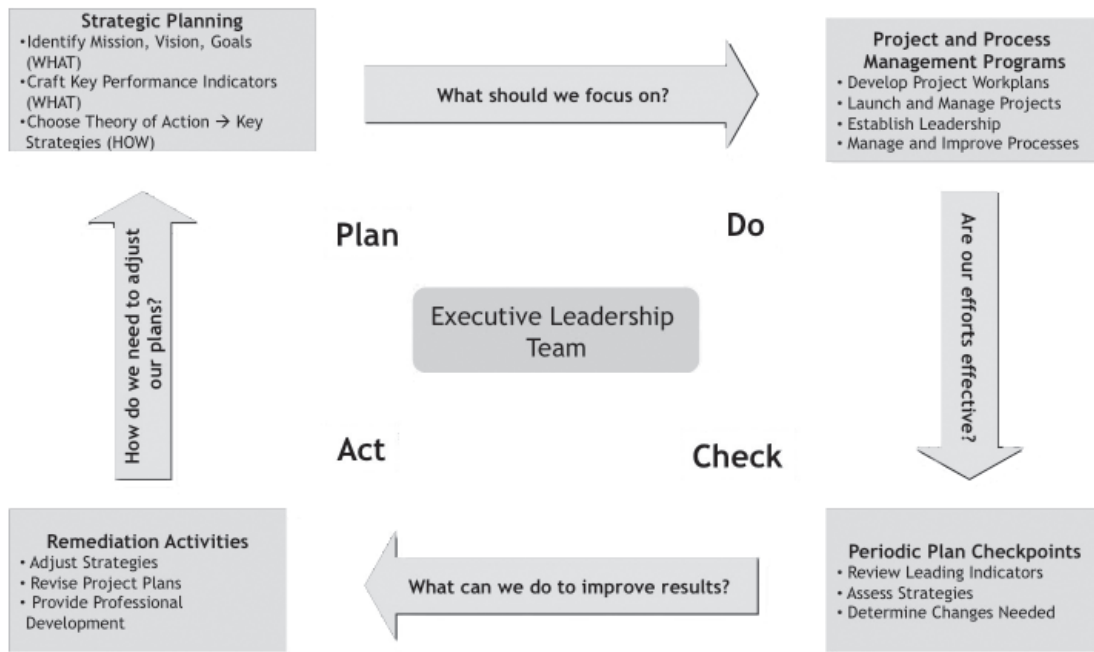
SOURCE: Center for Educational Leadership and Technology, Guidebook for Establishing and Sustaining a Transformation Plan Oversight Committee Process, as developed for Saint Louis Public Schools, 2015.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 6. TECHNOLOGY MANAGEMENT							
32. Develop a technology procedures manual, including KPIs.	$0	$0	$0	$0	$0	$0	$0
33. Improve the data center physical security and develop procedures to reduce the risk of data losses.	$0	$0	$0	$0	$0	$0	($5,850)
34. Develop staff training and procedures to improve the work order system processes.	($2,880)	($2,880)	($2,880)	($2,880)	($2,880)	($14,400)	$0
35. Review and revise the technology plan and involve key stakeholders in the process.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**($2,880)**	**($2,880)**	**($2,880)**	**($2,880)**	**($2,880)**	**($14,400)**	**($5,850)**

CHAPTER 7. 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.

The Dalhart Independent School District (ISD) Transportation Department is managed by the director of transportation, who reports to the district's chief financial officer (CFO). In addition to the director of transportation, the district has one full-time-equivalent (FTE) fleet maintenance assistant (who is also a bus driver) and a pool of 22 bus drivers. Of the pool of 22 bus drivers, two drivers are part-time. The rest of the drivers are full-time district staff with other positions in the district who drive bus routes as needed.

Figure 7–1 shows the organizational structure of the Dalhart ISD Transportation Department.

The Transportation Department serves the routes to and from school each day and coordinates transportation for athletics and extracurricular trips. The Dalhart ISD bus parking and maintenance facility is adjacent to the XIT Secondary School and within one mile of all other campuses. The bus parking and maintenance facility includes two maintenance buildings and a parking facility surrounded by a security fence. The bus drivers are required to park in adjacent on-street parking. The two maintenance buildings provide space for three work bays, each large enough to accommodate the maintenance of the largest bus in the fleet. In addition, the junior high school has a maintenance bay that is part of the auto mechanics shop program. Students in the auto mechanics shop program perform most maintenance services for the bus fleet. Dalhart ISD contracts for repairs of major component failures and tire servicing.

FIGURE 7–1
DAHART ISD TRANSPORTATION DEPARTMENT ORGANIZATION
SCHOOL YEAR 2016–17
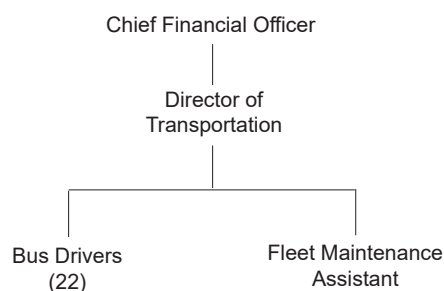
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

Local and state transportation sources fund the Dalhart ISD school transportation program. To receive state funding, Dalhart ISD must annually submit the School Transportation Route Services Report and School Transportation Operations Report to TEA. These reports include information on the number and type of students transported; this information is applied to a state formula that generates an annual allocation of state funds. These reports show that Dalhart ISD provided regular and special services transportation for approximately 167 students across all grade levels in school year 2014–15. The district transports students to five campuses on eight regular education routes. All of the district's five campuses are located within one mile of each other in the city of Dalhart.

Dalhart ISD provides school bus regular route service using a single-tier routing system in which each bus operates one route in the morning and one route in the afternoon. This single-tier approach is possible because of the close proximity of the five campuses and school bell-times occurring within a 20-minute period. The regular route program is composed of four buses serving the rural sections of Dalhart ISD (the area more than two miles from the campuses) and four buses serving the urban

section (the area within the two miles of the campuses, frequently referred to as the hazardous service area). Seven of the eight buses serve all grade levels, and unload and load at all five campuses. One bus, operating in the urban area, serves only elementary students in the Kelly Hill Park area. The bus picks up students at the Methodist Church and transports them to the elementary school. Because of the volume of riders in the Kelly Hill Park area, the district needs a second bus to serve the park, which allows Dalhart ISD to separate the elementary students from other grades. Dalhart ISD serves the urban area with four buses because the buses pick up and drop off all students at only three parks and the Methodist Church; no residential stops exist. The morning bus routes first unload at the intermediate school, then the alternative school, then the elementary school, then the junior high school, and last the high school. The buses follow this same order in the afternoon for loading at the campuses.

At the time of the onsite review, Dalhart ISD's school bus fleet included eight route buses, eight activity buses, and one spare, lift-equipped route bus. **Figure 7–2** shows the designated use and service type of each bus, the volume of service each route bus provides during each trip and which campuses are served by each route bus.

FIGURE 7–2
DALHART ISD SCHOOL BUS USE, ROUTE, AND SERVICE DATA, NOVEMBER 2016

BUS NUMBER	DESIGNATED USE	SERVICE TYPE/ AREA	ROUTE MILES ONE WAY	RIDERSHIP EACH TRIP	CAMPUSES SERVED	ROUTE STOPS EACH TRIP
28	Route	Hazard (Urban)	1.6	35 to 40	Elementary	1
10	Route	Hazard (Urban)	3.5	45 to 65	All Campuses	1
30	Route	Hazard (Urban)	3.7	23 to 28	All Campuses	1
32	Route	Hazard (Urban)	5.2	35 to 45	All Campuses	1
13	Route	Regular (Rural)	36.5	15	All Campuses	7
15	Route	Regular (Rural)	51.5	12	All Campuses	6
25	Route	Regular (Rural)	79.5	15	All Campuses	6
80	Route	Regular (Rural)	28.5	23 to 26	All Campuses	7
8	Route Spare					
20	Activity					
29	Activity					
52	Activity					
61	Activity					
62	Activity					
21	Activity					
2	Activity					
4	Activity					

SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

The district also has 24 vehicles that are not school buses. These vehicles include trucks, vans, a few trailers, and one tractor. In most cases, the district assigns these vehicles to specific district functions or staff. Students in the auto mechanics shop program also perform maintenance for these vehicles.

The total operating costs for the Transportation Department in school year 2014–15 were $268,357. During the same year, Dalhart ISD received $46,403, or 17.3 percent of total operating costs, in state funding for transportation. This amount includes both the regular program and special program allotments.

The key measures of cost effectiveness for a student transportation operation include the annual cost per student transported, the annual cost per active route bus, the daily cost per active route bus, and the number of students transported per active route bus. **Figure 7-3** shows key cost effectiveness and operating efficiency metrics for the Dalhart ISD Transportation Department.

FIGURE 7–3
DALHART ISD KEY MEASURES OF TRANSPORTATION COST EFFECTIVENESS
SCHOOL YEAR 2014–15

MEASURES	AMOUNT
Annual Cost Per Student Rider	$1,606.93
Annual Cost Per Route Mile	$1.51
Annual Cost Per Active Route Bus	$13,417.85
Daily Cost Per Active Route Bus	$74.54
Average Students Per Active Route Bus	8.35

SOURCES: Texas Education Agency School Transportation Operations and School Transportation Route Services Reports, school year 2014–15, Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

Figure 7–4 shows the key measures of the peer districts' transportation services compared to Dalhart ISD. Peer districts are districts similar to Dalhart ISD that are used for comparison purposes. The peer districts for Dalhart ISD are Diboll, Giddings, and Borger ISDs. The review team calculated these metrics using the total number of buses reported in the school year 2014–15 TEA School Transportation Operations and School Transportation Route Services Reports for each district. **Figure 7–4** shows that Dalhart is more efficient than its peers in all of the key measures of cost effectiveness except cost per student rider. Dalhart ISD's cost per student rider is $1,606.93, which is significantly higher than the peer district average of $758.95. The higher cost is the direct result of Dalhart ISD's very low population density in the service area beyond two miles. In low population density areas like Dalhart ISD, the transportation program is required to transport fewer students over more miles; this is reflected in the cost per route mile of $1.51, a very low cost when compared to peer districts.

TEA allocates transportation funding for regular program students using 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. Cost per mile is based on data submitted in the School Transportation Route Services Report and the Student Transportation Operations Report. TEC determines that linear density of bus routes is the number of regular riders carried per mile of regular bus routes during the school year. TEA provides state funds for transportation based on

FIGURE 7–4
DALHART ISD AND PEER DISTRICTS OPERATING DATA COMPARISON
SCHOOL YEAR 2014–15

DISTRICT	COSTS	BUSES	HOME TO SCHOOL STUDENT RIDERS	COST PER STUDENT RIDER	ANNUAL COST PER BUS BASED ON TOTAL BUSES	COST PER ROUTE MILE	AVERAGE STUDENTS PER BUS
Diboll ISD	$733,027.00	26	1,055	$694.81	$28,193.35	$3.64	40.58
Giddings ISD	$607,496.00	25	955	$636.12	$24,299.84	$3.20	38.20
Borger ISD	$707,679.00	31	649	$1,090.41	$22,828.35	$3.05	20.94
Peer Average	$682,734.00	27	886	$770.58	$25,107.18	$3.29	32.81
Dalhart ISD	**$268,357.00**	**20**	**167**	**$1,606.93**	**$13,417.85**	**$1.51**	**8.35**
Over (Under) Peer District Average	($414,377.00)	(7)	(719)	$836.35	($11,689.33)	($1.78)	(24.46)

SOURCES: Texas Education Agency, School Transportation Operations and School Transportation Route Services Reports, school year 2014–15.

the lower of the actual cost per mile based on expenditures and total mileage, or the maximum amount determined in one of the seven density groupings established by TEA. **Figure 7–5** shows the linear density groups and maximum allotment per mile used by TEA.

FIGURE 7–5
TEXAS EDUCATION AGENCY LINEAR DENSITY GROUPS
SCHOOL YEAR 2014–15

LINEAR DENSITY GROUPS	MAXIMUM ALLOTMENT PER MILE
2.400 and above	$1.43
1.650 to 2.399	$1.25
1.150 to 1.649	$1.11
0.900 to 1.149	$0.97
0.650 to 0.899	$0.88
0.400 to 0.649	$0.79
Up to 0.399	$0.68

SOURCE: Texas Education Agency, School Transportation Allotment Handbook, effective school year 2014–15.

In school year 2014–15, Dalhart ISD's cost per mile for regular program students was $1.28, and its linear density was 0.17. Based on the reported annual regular program mileage of 67,025 and the linear density allotment rate of $0.68, the district received an allotment of $45,577 in school year 2014–15. School districts may receive an additional amount of up to 10.0 percent of its regular transportation allotment for the transportation of children living within two miles of the school they attend who would be subject to hazardous traffic conditions if they walked to school. Dalhart ISD reported 4,377 hazardous area service miles as part of annual regular program mileage. The allotment for special program transportation has reported annual mileage of 765 and an allotment of $1.08 per mile for a total of $826. **Figure 7-6** shows transportation allotments per mile for regular and special program school transportation.

FINDINGS

♦ The Dalhart ISD Transportation Department lacks written procedures to ensure safe and effective transportation service delivery.

♦ The Dalhart ISD Transportation Department's annual school bus inspections do not comply with state law and the vehicle inspection and repair program is not sufficient to ensure the safe and secure operation of fleet vehicles.

♦ The Dalhart ISD Transportation Department does not maximize participation in all available transportation training increasing the risk to student safety.

♦ The Dalhart ISD Transportation Department's lack of staff planning has resulted in the accrual of excessive bus driver overtime.

RECOMMENDATIONS

♦ **Recommendation 36: Develop and implement a transportation procedure manual to address all school transportation operations.**

♦ **Recommendation 37: Develop and implement a comprehensive vehicle inspection and repair program in accordance with state law and industry standards.**

♦ **Recommendation 38: Develop and implement a Transportation Department training program to address the training needs of staff and students.**

♦ **Recommendation 39: Develop and implement a Transportation Department recruitment program and develop two additional part-time bus driver positions.**

FIGURE 7–6
DALHART ISD TRANSPORTATION ALLOTMENT CALCULATION
SCHOOL YEAR 2014–15

PROGRAM	SUBPROGRAM	ANNUAL MILEAGE	ALLOTMENT PER MILE	TOTAL ALLOTMENT
Regular Program	Home to School/ School to Home	67,025	$0.68	$45,577
Special Program	Home to School/ School to Home	765	$1.08	$826
Total Allotment				**$46,403**

SOURCE: Texas Education Agency School Transportation Operations and School Transportation Route Services Reports, school year 2014–15.

DETAILED FINDINGS

PLANNING, POLICIES, AND PROCEDURES (REC. 36)

The Dalhart ISD Transportation Department lacks written procedures to ensure safe and effective transportation service delivery.

Transportation Department staff rely on institutional knowledge and instruction from the director of transportation for guidance on how to perform their daily duties. The Transportation Department has not developed a staff manual or any written procedures to guide transportation staff in the performance of their duties. The district also provides little information to parents and students regarding transportation operations. Dalhart ISD does not have job descriptions for bus drivers.

The Transportation Department has one planning document, which is a plan for vehicle fleet replacement. This plan lists all district-owned vehicles and identifies the planned active status of each vehicle and the bus purchase plans to school year 2021–22.

The only written policies available to transportation staff and to parents are the policies set forth in the Board of Trustees (Board) Policy Manual, which the district publishes on its website. This manual contains applicable Dalhart ISD policies, and references state and federal laws and regulations for school district operations. A number of the items included in the board policies relate to school transportation. However, the Transportation Department does not have written plans and procedures to guide the daily operation of the school transportation program to comply with board policies and applicable state and federal codes. **Figure 7–7** shows a comparison of the transportation-related board policies and the Transportation Department's practices and procedures. Although the district has board policies related to school bus maintenance and inspection, emergency evacuation drills, and the scheduling of vehicles for extracurricular activities, the district has not developed any written procedures to guide the implementation of these policies.

Because of inadequate school transportation plans and procedures, Dalhart ISD risks safety hazards to its students and staff, and less effective and efficient operations. The lack of written policies and procedures could result in confusion among transportation stakeholders. Stakeholders include school bus drivers, district office staff, campus administration and staff, students, parents, and community members. Without transportation policies and procedures, stakeholders do not have the guidance that defines roles, responsibilities, and service-level expectations; and ensures the safety of students. Decisions are at the discretion of staff, which raises concerns about consistency and accountability and places transportation operations at risk of failing to meet industry standards for service and safety.

FIGURE 7–7
A COMPARISON OF DALHART ISD BOARD OF TRUSTEES TRANSPORTATION POLICIES TO TRANSPORTATION DEPARTMENT PRACTICES AND PROCEDURES
NOVEMBER 2016

BOARD POLICY MANUAL	TRANSPORTATION DEPARTMENT PRACTICES AND PROCEDURES
Board Policy CNB (LEGAL) School buses operated by the district shall be maintained and inspected as required by Texas Transportation Code Chapter 548.	The Transportation Department does not comply with Transportation Code Chapter 548. The director of transportation, who does not have the required inspector certification, performs annual inspections.
	The Transportation Department does not have any written school bus maintenance and inspection procedures to ensure bus safety and compliance with state law.
Board Policy CNC (LEGAL) Pursuant to the safety standards established by Department of Public Safety (DPS) under Texas Education Code Section 34.002, the district may conduct a training session for students and teachers concerning procedures for evacuating a school bus during an emergency	Dalhart ISD has no procedures to train students and staff in the emergency evacuation of school buses operated by the district.
	Dalhart ISD has no plan that schedules evacuation drills on school buses, and the district does not conduct evacuation training.
Board Policy CNB (LOCAL) The superintendent or designee shall develop administrative regulations for requesting, scheduling, and using district vehicles for extracurricular activities, field trips, and other school-related purposes.	Dalhart ISD has no documented procedures for requesting, scheduling, and using district vehicles for extracurricular transportation.
	Staff use the "Help Desk" function of the district's Eduphoria software to make requests for vehicles, but there are no written documents guiding the use and operation of this service.

Sources: Legislative Budget Board School Performance Review Team; Dalhart ISD Board Policy Manual, November 2016.

Dalhart ISD's school transportation program transports students at speeds of up to 60 miles per hour, and loads and unloads students on highways with traffic moving at 75 miles per hour. The absence of clearly defined bus operating procedures may have contributed to unsafe operating practices observed at Dalhart Intermediate School and at Dalhart Junior High School during the onsite review. **Figure 7–8** shows examples of unsafe transportation operating practices observed by the review team compared with school transportation best practices.

School transportation programs that maintain a procedure or policy document more effectively and efficiently deliver safe and on-time services and are prepared to address all needs. Since 1949, nationwide school transportation experts have worked to develop best practices that ensure student safety as the key mission of school transportation services. School transportation professionals, under the leadership of the National Congress on School Transportation, meet once every five years to improve and update the best practice document known as the National School Transportation Specifications and Procedures. The Board's Policy Manual references this document. **Figure 7–9** shows the content of a best practice school transportation procedures manual. Dalhart ISD has no written documentation addressing this content.

Dalhart ISD should develop and implement a transportation procedure manual to address all school transportation operations.

The superintendent should direct the CFO to convene a special work group composed of the director of transportation, a school administrator, and a school bus driver to develop a subject list, by priority, of transportation policies and procedures to include in the transportation procedure manual. The work group should review the following

resource documents: Dalhart ISD Board Policy Manual; the Dalhart ISD Student Handbooks; 16th National Congress on School Transportation, National School Transportation Specifications and Procedures, 2015; and similar documents adopted by other school districts in the state. Dalhart ISD should request the assistance of Regional Education Service Center XVI (Region 16) to identify additional resource documents. Once the work group finalizes the subject list, the work group should use the same resource documents to develop a table of contents for each subject.

Dalhart ISD should use the text and figures from best practice resource documents instead of writing original text, both to avoid unnecessary costs and to ensure best practices. The district can use these identified subjects, table of contents, and related text and figures to construct Dalhart ISD's school transportation policy and procedure manual. The work group should develop guidance for any topics not included in the best practice resource documents. Once a draft of the procedure manual is completed, the district should establish a staff review team to ensure that manual complies with board policies and applicable state and federal codes. The superintendent should present the draft transportation policy and procedure manual to the board for adoption. The director of transportation should train district and campus staff on the implementation of the transportation procedures manual.

This recommendation could be implemented with existing resources.

VEHICLE INSPECTION (REC. 37)
The Dalhart ISD Transportation Department's annual school bus inspections do not comply with state law and the vehicle inspection and repair program is not sufficient to ensure the safe and secure operation of fleet vehicles.

FIGURE 7–8
TRANSPORTATION OPERATING PRACTICES OBSERVED DURING ONSITE REVIEW
NOVEMBER 2016

OBSERVATIONS	SAFETY BEST PRACTICE
At Dalhart Junior High School, the review team observed buses unloading and loading in areas not designated for unloading and loading.	Local school officials establish passenger vehicle loading and unloading points at schools that are separate from the school bus loading zones.
At Dalhart Junior High School, the review team observed buses weaving through traffic to access the loading/unloading area.	Buses load and unload in the designated loading/unloading zone. Buses park for loading/unloading parallel to the curb and as close as possible to the student walkway.
The review team observed a bus with a designation poster sign covering a bus window. This sign blocked the view of the bus driver.	The passenger window nearest the loading door does not have anything that obstructs the view of the driver.

SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

FIGURE 7–9
BEST PRACTICE SCHOOL TRANSPORTATION PROCEDURES MANUAL (SAMPLE CONTENT)
2015

SECTION	SUBSECTIONS
School Bus Inspection	Inspection Procedure Inspection Schedule, Duties, and Roles Out-of-Service Criteria
Operations	Staffing Roles and Responsibilities When to Use Charter Buses Providing Drivers Essential Information About Student Riders Use of Special Bus Lighting and Signaling Equipment On Bus Harassment, Dealing with Weapons and Drugs Drivers Manual All Applicable State and Federal Laws School Bus Motor Vehicle Rules and Regulations Pre- and Post-Trip Inspections Bus Evacuation Post-Accident First Aid Student Management Seating and Occupant Restraints
Parent/Guardian Responsibilities	Assure Alignment with other District Policies Safe Riding Guidelines Teach Kindergarten to Grade 4 the Safety Rules Monitor Bus Stops
Selection and Training of Drivers	Application Accepting Criteria Checks Required Physical Exam Pre-Service and In-Service Training Program Physical/Mental Preparedness
Staffing and Training of Maintenance and Service Staff	
Routing and Scheduling	
Maintenance Equipment	
Preventive Maintenance Program	
Emergency and Rescue Procedures	
Extracurricular Trip Operations	
Security and Emergency Preparedness	
Facilities and Parking	

Source: 16th National Congress on School Transportation, National School Transportation Specifications and Procedures, 2015.

Dalhart ISD gives all district vehicles a preventive maintenance check every three months and inspects the school buses annually pursuant to Federal Motor Carrier Safety Administration regulations. High school students enrolled in the district's auto mechanics program complete the quarterly preventive maintenance checks and the annual inspections. The director of transportation instructs and supervises the preventive maintenance checks and annual inspections performed by the students; however, the director is not certified by the Texas Department of Public Safety to perform mandatory annual vehicle inspections. The auto mechanics students also perform basic repairs to district vehicles. These students are in training and have no maintenance certifications. The director of transportation is a National Institute for Automotive Service Excellence (ASE) certified mechanic. The ASE is an independent non-profit organization that works to improve the quality of vehicle repair and service by testing and certifying automotive

professionals. Although the director of transportation has the ASE certification, the director is not certified as an ASE School Bus technician. Both the inspector certification and the ASE School Bus Technician certification are critical to the safety of the Dalhart ISD school transportation program and compliance with state laws.

Figure 7–10 shows laws, regulations, and industry standards for school bus inspections. **Figure 7–10** shows that Dalhart ISD's vehicle inspection and repair program does not conform to state law or industry standards. For example, Texas Transportation Code Chapter 548 requires school buses to have a certified annual inspection; however, the

director of transportation is not certified to conduct these inspections.

Dalhart ISD does not require Transportation Department staff to check each bus before trips for potential safety and security threats. The fleet maintenance assistant cleans and fuel the school buses daily. This staff is a certified school bus driver trained in the operating systems of a school bus. The job description for this position does not require the staff to perform a safety and maintenance check while they are cleaning and fueling the buses. Further, Dalhart ISD school bus drivers do not conduct pre- and post-trip school bus inspections. Pre- and post-trip inspections are visual checks

FIGURE 7–10
GUIDELINES FOR VEHICLE INSPECTIONS
NOVEMBER 2016

SOURCE	REQUIREMENT
Texas Transportation Code Section 548.101	The department (1) shall require an annual inspection. The department shall set the periods of inspection and may make rules with respect to those periods. The rules must provide that:
	(1) a vehicle owner may obtain an inspection not earlier than 90 days before the date of expiration of the vehicle's registration; and
	(2) a used motor vehicle sold by a dealer, as defined by Section 503.001, must be inspected in the 180 days preceding the date the dealer sells the vehicle.
Texas Transportation Code Section 548.005	A compulsory inspection under this chapter may be made only by an inspection station, except that the department may:
	(1) permit inspection to be made by an inspector under terms and conditions the department prescribes.
National Highway Traffic Safety Administration, Uniform Guidelines for State Highway Safety Programs	School buses should be maintained in safe operating condition through a systematic preventive maintenance program.
	All school buses should be inspected at least semiannually. In addition, school buses and school-chartered buses subject to the Federal Motor Carrier Safety Regulations of the Federal Highway Administration (FHWA) should be inspected and maintained in accordance with those regulations (49 Code of Federal (CFR) Regulations Parts 393 and 396).
	School bus drivers should be required to perform daily pre-trip inspections of their vehicles, and the safety equipment thereon (especially fire extinguishers), and to report promptly and in writing any problems discovered that may affect the safety of the vehicle's operation or result in its mechanical breakdown. Pre-trip inspection and condition reports for school buses and school-chartered buses subject to the Federal Motor Carrier Safety Regulations of FHWA should be performed in accordance with those regulations (49 CFR 392.7, 392.8, and 396).
National School Transportation Specifications and Procedures 2015	Staff conducting school bus safety inspections must be knowledgeable in the mechanical components of a school bus and be aware of all the applicable construction standards, laws, rules and all other requirements of their jurisdiction.

NOTE: (1) The department is the Texas Department of Public Safety.
SOURCES: Texas Transportation Code, Chapter 548; National Highway Traffic Safety Administration, Uniform Guidelines for State Highway Safety Programs, November 2016; 16th National Congress on School Transportation, National School Transportation Specifications and Procedures, Revised Edition, 2015.

by the bus driver of the interior and exterior of the bus to ensure safety features (tires, lights, windshield wipers, etc.) of the bus are operational and that the passenger compartment is free from unauthorized individuals. The department does not have a procedure to require bus drivers to perform these inspections. There is also no check-off system to record inspections, review the findings, and determine appropriate action to repair issues or verify compliance.

While using the auto mechanics program to maintain and inspect district vehicles reduces costs to Dalhart ISD and provides an excellent training opportunity for students, the lack of oversight by an appropriately certified inspector does not provide assurance that vehicles are safe to operate. Without a comprehensive vehicle inspection and repair program staffed by certified and experienced staff, the Transportation Department cannot ensure the consistency, safety, efficiency, and accountability of its operations.

The absence of a robust vehicle inspection and repair program increases the safety risks to the students, particularly in light of the magnitude of the district's transportation operation in terms of ridership and mileage. In school year 2016–17, Dalhart ISD's school transportation program was responsible for the operation of 17 school buses and 24 other vehicles and trailers. Each day, these vehicles operate at highway speeds and stop on roadways to load and unload students at 60 stops.

Figure 7–11 shows the operating miles, ridership, and highway bus stops for regular route service and extracurricular service. On average, the buses transport students over 440 route miles per day, a total of 79,200 miles per school year. The extracurricular buses operate an average of 17,217 miles per month transporting students to locations as far as 407 miles away. The buses that transport these students are continuously exposed to safety risks when traveling or stopping on roadways and unsecured parking areas away from Dalhart ISD.

School transportation programs that operate under procedures with a multi-level inspection and repair program and fully certified and experienced mechanics increase the security and safety of their fleet and the on-time delivery of the students. A best practice inspection and repair program defines in detail the following:

- what must be inspected;

- what the pass/failure criteria are for each item inspected;

- the action taken for all failed items;

- what certifications are required for the person completing the inspection;

- how the inspection system is being verified; and

- what system is in place to retain the inspection/repair records over the life of the vehicle.

FIGURE 7–11
DALHART ISD VEHICLE SAFETY RISK EXPOSURE
NOVEMBER 2016

OPERATING TYPE	OPERATING MILES	RIDERSHIP	HIGHWAY BUS STOPS
Extracurricular Service (1)			
Monthly (2)	17,217	1,881	
Total School Year (2)	**154,953**	**16,929**	
Route Service			
Regular	202	158	26
Hazardous	18	67	4
Total Daily Morning or Afternoon	**220**	**225**	**30**
Total Daily (3)	**440**	**450**	**60**
Total School Year (3)	**79,200**	**81,000**	**10,800**

NOTES:
(1)   The extracurricular data is based on the 148 extracurricular trip reports from September 1 to November 10, 2016;
(2)   A month was calculated to be 30 days, a school year was calculated to be nine months;
(3)   Daily route service data is calculated by doubling the daily morning or afternoon data and daily route service data is multiplied by 180 school days to calculate a school year.
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

The program must also have a method for reviewing the inspection/repair records for each inspector and vehicle to assure competence of the inspection program and safety/security of the vehicle.

The inspection of school buses during fueling is a best practice preventive action against criminal activity. Likewise, pre- and post-trip school bus inspection by the driver is the first

opportunity before and after operating each bus route to identify safety issues or anything out of the ordinary. For example, drivers can check that no one is hiding on the bus and that no potentially dangerous items have been attached to or left on the bus, before students board the vehicle. **Figure 7–12** shows the elements of a best practice four-step vehicle inspection program.

FIGURE 7–12
BEST PRACTICE INSPECTION AND REPAIR STEPS FOR SCHOOL TRANSPORTATION
2015

STEP	WHO/WHAT/WHEN
STEP ONE	
School Bus Pre- and Post-Trip Inspection	Completed before and after each trip
	Completed by the driver before and after each trip.
	A checklist is provided by the district.
	The driver walks the exterior and interior of the vehicle checking each item on the checklist.
	The driver records on the checklist the operating status of each item, in compliance or not in compliance.
	Checklist items are valued as to their impact on safety; if an item is a major safety system and is not functioning the bus is placed in an "out-of-service" status (such items would be the traffic control system (the STOP sign and flashing lights) or the crossing gate systems (the bar attached to front bumper that deploys to encourage students to walk away from the front bumper of the bus)
	Out-of-service items must be repaired before the vehicle can be operated.
	The driver records the inspection on the checklist and after each trip submits the record to the director of transportation.
	The director of transportation schedules any identified repairs or servicing.
	The completed checklists are retained to review the long-term maintenance history of the vehicle and to verify compliance with this requirement.
STEP TWO	
Fueling Check Inspection and Repair	Completed during the fueling of the vehicle.
	The person completing the fueling conducts the inspection.
	A checklist is provided by the district; this list is limited to items that can be quickly checked but require tools or the opening of component compartments, including: vehicle fluid levels, fluid leaking, and tire pressure and status.
	The inspector checks each item on the checklist.
	The inspector records on the checklist the operating status of each item, in compliance or not in compliance.
	If repairs or serving are needed, they are immediately done.
	If an item cannot be completed before the next scheduled use of the vehicle, the director of transportation determines if the problem will place the vehicle in out-of-service status.
	The inspector records all findings and actions taken on the checklist and after fueling submits the record to the director of transportation.
	The completed checklists are retained to review the long-term maintenance history of the vehicle and to verify compliance with this requirement.

FIGURE 7–12 (CONTINUED)
BEST PRACTICE INSPECTION AND REPAIR STEPS FOR SCHOOL TRANSPORTATION
2015

STEP	WHO/WHAT/WHEN
STEP THREE	
Quarterly Vehicle Inspection and Repair	Completed every three months, but is superseded by the annual inspection.
	Scheduled and completed by the director of transportation.
	A checklist is provided by the district.
	The inspector checks each item on the checklist.
	The inspector records on the checklist the operating status of each item, in compliance or not in compliance.
	Items not in compliance are repaired before the vehicle can be operated.
	The inspector records the findings on the checklist and retains the record.
	The director of transportation schedules any identified repairs or servicing that cannot be immediately completed.
	The completed checklists are retained to review the long-term maintenance history of the vehicle and to verify compliance with this requirement.
STEP FOUR	
Annual Vehicle Inspection	Completed annually on the anniversary of the vehicle being placed into service.
	Scheduled by the director of transportation.
	A checklist is provided by the Federal Motor Carrier Safety Administration; this checklist includes very detailed inspection of all operating system, including requiring the internal components of the wheel and braking systems to be inspected.
	A certified inspector must be used.
	The inspector checks each item on the checklist.
	The inspector records on the checklist the operating status of each item, in compliance or not in compliance.
	The inspector records the findings on the checklist and provides a copy of the inspection document to the director of transportation.
	The director of transportation schedules any required additional repairs or servicing.
	The completion of repairs or servicing may need to be verified by the inspector.
	The completed checklists are retained to review the long-term maintenance history of the vehicle and to verify compliance with this requirement.

SOURCE: The 16th National Congress on School Transportation, National School Transportation Specifications and Procedures, 2015.

Dalhart ISD should develop and implement a comprehensive vehicle inspection and repair program in accordance with state law and industry standards.

The director of transportation should complete the ASE School and Transit Buses certification and take the necessary steps in accordance with Transportation Code Section 548 to become a certified state inspector. Dalhart ISD should develop a repair verification program that will assure that all inspection and repair work by students is checked by a certified ASE School and Transit Buses mechanic before the vehicles are allowed to return to operation.

The superintendent should direct the CFO to require the director of transportation to develop the inspection and repair plan, procedures, and guidelines to implement the

four-step best practice shown in **Figure 7–12**. Dalhart ISD should request that Region 16 assist and offer available resources to the director of transportation in developing these plans, procedures, and guidelines. The district should request that Region 16 provide copies of similar multi-step inspection programs used by other Texas school districts.

Dalhart ISD can develop a four-step inspection program using resources in the National School Transportation Specifications and Procedures, and resources provided by Region 16. The CFO should set a schedule for the development of the inspection and repair program over the next six months, and meet with the director of transportation monthly to review progress and provide input.

When a draft of the four-step program is completed, the district should convene a staff review team that includes the director of transportation, selected school bus drivers, and the CFO, to ensure that the documents fulfill district needs and comply with state law. Once the district finalizes the program, the director of transportation should present it to the superintendent for approval. Once approved, the director of transportation should train school bus drivers and staff.

The fiscal impact assumes the director of transportation will become a state certified inspector and will become a certified ASE School Bus Technician. This will result in a total one-time cost of $295 ($25 state inspector fee + $270 ASE testing and registration fees). The recommended four-step vehicle inspection and repair program could be implemented with existing resources.

TRAINING AND SAFETY (REC. 38)

The Dalhart ISD Transportation Department does not maximize participation in all available transportation training increasing the risk to student safety. Without adequate training, bus drivers may lack the knowledge to operate the transportation program as safely as possible.

At the time of the onsite review, the director of transportation had not received available training in school transportation management and operations. Further, the director of transportation is not a member of a professional organization such as the Texas Association for Pupil Transportation (TAPT), the Texas Association of School Bus Technicians (TASBT) or the National Association of Pupil Transportation (NAPT).

Similarly, district bus drivers have limited opportunities for training. Bus drivers do not receive training beyond the state-required courses for certification and recertification of school

bus drivers. Each school bus driver attends an initial 20-hour training program to receive a school bus driver certification. Each driver also receives an eight-hour recertification course every three years. Region 16 offers both of these courses. While the certification courses provide the basic information needed to operate a school bus, the training does not address the unique designs and traffic patterns of the school transportation loading and unloading areas at the five Dalhart ISD campuses. In addition, the lack of refresher training beyond the recertification training increases the risk that bus drivers are not appropriately following procedures taught during the certification courses. **Figure 7–13** shows a comparison of the training programs offered by Dalhart ISD and some available through the Regional Education Service Center IV (Region 4) program.

Opportunities also exist for the district to provide training to students and staff. The district does not provide training on safety best practices to campus staff responsible for the school loading and unloading zones. Dalhart ISD also does not provide training to prepare students for school bus emergencies. Although state law does not require mandatory school bus emergency evacuation drills, Board Policy CNC (LEGAL) cites the Texas Education Code, Section 34.002, and provides the following guidance for conducting emergency evacuation drills:

- Pursuant to the safety standards established by the Texas Department of Public Safety (DPS) under the Texas Education Code 34.002, the district may conduct a training session for students and teachers concerning procedures for evacuating a school bus during an emergency;

- A district that chooses to conduct a training session is encouraged to conduct the school bus emergency evacuation training session in the fall of the school year. "fall" is defined as July 1 to December 31. The district is also encouraged to structure the training session so that the session applies to school bus passengers, a portion of the session occurs on a school bus, and the session lasts for at least one hour;

- The training must be based on the recommendations of the most recent edition of the National School Transportation Specifications and Procedures, as adopted by the National Congress on School Transportation, or a similar school transportation safety manual;

- Immediately before each field trip involving transportation by school bus, the District is encouraged to review school bus emergency evacuation

FIGURE 7–13
SCHOOL TRANSPORTATION TRAINING PROGRAMS
DECEMBER 2016

DALHART ISD TRAINING	TRAINING PROGRAMS AVAILABLE FROM REGIONAL EDUCATION SERVICE CENTER IV
Texas Department of Public Safety School Bus Driver Certification Course: 20 hours	Texas Department of Public Safety School Bus Driver Certification Course: 20 hours
Texas Department of Public Safety School Bus Driver Recertification Course: 8 hours	Texas Department of Public Safety School Bus Driver Recertification Course: 8 hours
Dalhart ISD Student Code of Conduct	Child Passenger Safety Training
Dalhart ISD Student Handbooks	School Bus Driver Trainer Academy
	Shop Supervisor Academy
	Transportation Administrator Workshop
	Assessing and Evaluating School Bus Driver Records
	Avoiding the Section 504 Avalanche
	Federally Mandated Supervisor Drug and Alcohol Training
	Out-of-Sight, Out-of-Mind
	School Bus Driver Distraction
	Student Management – Creating a Bus Safety Culture

SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016; Regional Education Service Center IV, December 2016.

procedures with the school bus passengers, including a demonstration of the school bus emergency exits and the safe manner to exit; and

• Not later than the 30th day after the date that the district completes a training session, the district shall provide DPS with a record certifying the district's completion of the training.

Without training, the director of transportation may not be as informed about best practices for mitigating risk and maximizing the safety of Transportation Department operations. The director of transportation also lacks the ability to transfer information from trainings to staff and students. Drivers only receive basic training once every three years. The lack of training on emergency evacuation drills leaves students and staff unprepared for emergencies. Students also lack the information to understand how to: safely wait for the school bus until it arrives, safely board and ride the school bus, safely evacuate the school bus if the need should arise, and safely exit and move away from the school bus.

While there are many possible and helpful topics for pre-employment and annual in-service training, the following is a list of best practice training topics for school bus drivers and directors of transportation:

• pre-service and in-service training programs (Texas DPS School Bus Driver Certification Course);

• legal issues and a review of local policies, plans, and procedures related to school transportation and general school operations;

• loading and unloading procedures (providing maximum safety for passengers during loading and unloading, with special training for managing students with disabilities and students that must be secured in wheelchairs);

• how to reduce costly school bus idling;

• cell phone and electronic communication device restrictions in accordance with applicable regulations, laws, and local policies;

• driving in the school unloading and loading zone;

• avoiding road rage;

• avoiding distracted driving;

- managing aggressive driving;

- accident investigation and management procedures;

- complying with bloodborne pathogens/first aid protocols;

- managing bullying on the school bus;

- sexual harassment prevention;

- drug and alcohol compliance (including pre-employment, post-accident testing, random testing, and reasonable suspicion testing pursuant to the Omnibus Transportation Employee Testing act of 1991);

- reporting by bus drivers of prescription and over-the-counter drug use to supervisors;

- emergency and disaster preparedness;

- managing confidential records;

- requirements for reporting inappropriate behavior of other adults, including Dalhart ISD staff;

- handling threating situations (such as school bus held hostage);

- use of personal protective equipment;

- proper use of child safety restraint systems;

- student management (ensuring the safety, welfare, and orderly conduct of passengers while in the bus);

- railroad crossings procedures;

- compliance with the Individuals with Disabilities Education Act;

- pre-service and in-service training requirements for drivers of Head Start passengers pursuant to 45 Code of Federal Regulations 1310;

- techniques for safe driving, including mirror use and adjustment, smooth starts and stops, use of emergency brake, turning, and backing;

- defensive driving skills;

- techniques for reference-point driving;

- techniques to identify and avoid practices that result in driver-related vehicle abuse;

- training for managing emergencies that happen when the bus is on route, including driving emergencies, emergency evacuations, and use of emergency equipment;

- training for safely running a route, including entrance to and departure from the bus garage and yard, following a route sheet or map, use of global positioning systems, entrance to and departure from school zones, mechanical difficulties, and breakdown;

- training for fueling buses and handling/preventing fuel and other hazardous materials spills;

- training for laws, policies, and procedures specific to activity trips, including interstate transportation regulations and understanding applicable authorities;

- maintaining unobstructed bus driver sight zones when in the bus driver seat;

- physical/mental preparedness to adequately perform required duties;

- communicating effectively with school staff, students, parents, law enforcement officials, and the motoring public;

- routing and scheduling guidelines;

- staff management;

- evaluation of transportation;

- liability in school transportation;

- completing required state and district reports; and

- maintaining a clean and uncluttered bus with unobstructed access to emergency exits.

Many of these topics are available as a one-day pre-service, prior to the start of school; or during in-service sessions that the district provides two or three times during the school year.

Dalhart ISD should develop and implement a Transportation Department training program to address the training needs of staff and students.

The Dalhart ISD superintendent should direct the CFO to require the director of transportation to develop a training program for all staff. The director of transportation should contact Region 16 for assistance in designing and delivering a comprehensive training program. Region 16 should be able

to assist with the training program segments shown in **Figure 7–13** available from Region 4.

Dalhart ISD should use the materials provided in the National School Transportation Specifications and Procedures and the training resources of Region 16, TASBT, TAPT, and NAPT. When a draft program is completed, the director of transportation should form a staff review team to ensure that the program meets staff needs. Once the district finalizes the program, the director of transportation should provide it to the superintendent for approval.

The director of transportation should attend available workshops on school transportation management. The director of transportation should become a member of the TAPT and attend their meetings. The director of transportation should also become a member of the NAPT. Many of the NAPT professional development series (PDS) courses could be taken online; others are taught at the meetings held by the TAPT and the NAPT annual summit. The NAPT also offers free webinars throughout the year for its members.

The director of transportation should provide a minimum of 10 hours of annual in-service training to the bus drivers. The director of transportation should include in the training: five hours of instruction covering a review of the Texas DPS School Bus Driver Recertification Course; Dalhart ISD school transportation plans, policies, and procedures; school bus evaluation; and five hours of elective subject matter from a variety of the best practice training opportunities. Each year, the five hours of elective subject matter should cover different topics. This would result in a training program over five years that totals 25 hours and covers a wide range of training topics. The 10 hours of annual training should supplement the required eight-hour Texas DPS School Bus Driver Recertification Course. The majority of this training should occur in a one-day session held within one week of the beginning of the school year. The director of transportation should hold additional quarterly training sessions to include a staff meeting to discuss issues and receive a training presentation on a selected training topic of recent interest.

The director of transportation could obtain elective training materials from Region 16 and from the National Highway Traffic Safety Administration School Bus Driver In-service Safety Series. Topics in this series include Driver Attitude, Student Management, and Vehicle Training, Knowing Your Route.

The transportation director and the bus drivers should train students on the following procedures:

- procedures for students waiting at the bus stop, loading and unloading at bus stop, riding the school bus, and loading and unloading in the school zone;

- seating safely and securing carry-ons in the school bus;

- rules for managing the school bus danger zone: students should stay at least 12 feet from the sides of the bus, are not to cross behind the bus, and should cross the roadways at least 12 feet in front of the bus;

- school bus evacuations at least twice a school year (this includes all eligible students including students with special needs); and

- procedures for how students with disabilities should load and unload the bus and be secured in wheelchairs.

The training program for students and school staff should take one classroom period each semester. Half of the one-period training should be a classroom presentation, and the other half of the training should be a practice of the emergency evacuation of a school bus.

The fiscal impact assumes the director of transportation will become a member of the TAPT and the NAPT, an annual cost of $135 in membership fees. The fiscal impact also assumes that the district will pay bus drivers $9 per hour to attend 10 hours of district training per year, resulting in an annual cost of $1,980 ($9 x 10 hours) x 22 bus drivers). The total annual fiscal impact is a cost of $2,115 ($135 + $1,980).

STAFFING (REC. 39)

The Dalhart ISD Transportation Department's lack of staff planning has resulted in the accrual of excessive bus driver overtime.

Dalhart ISD has an adequate number of school bus drivers to operate its regular daily route service. The pool of school bus drivers comprises full-time staff that include the director of transportation, coaches, teachers, paraprofessionals, and school administrators cross-trained and certified to operate a school bus, and two part-time staff. Dalhart ISD pays all non-exempt positions a $25.00 regular hourly rate to drive the bus.

One of the two part-time drivers is available to work not more than four hours a day. The director of transportation

and all coaches are required to have a school bus driver certification and to operate school buses when needed. However, Dalhart ISD lacks enough drivers for extracurricular trips to avoid paying overtime. The limited availability of one of the part-time drivers leaves only one part-time driver available to drive 4 to 4.5 hours of extracurricular service each day without incurring overtime hours. According to the CFO, the existing staffing structure results in an average of 80 overtime hours per month. This overtime results in a cost of approximately $2,584 a month at an average overtime rate of $32.30 per hour, or $23,256 for the nine-month school year. These 80 overtime hours account for 14.0 percent of all driver hours worked in the district. During onsite interviews, the CFO and the director of transportation recognized that the district lacks an adequate number of drivers to control the costs to the district of driver overtime pay.

In an effort to reduce overtime pay, the CFO reduced the non-school bus driving work hours of one driver to eliminate some of the overtime work. According to onsite interviews, the shortage of part-time drivers makes it difficult to reduce overtime. Dalhart ISD must compete with other school districts and commercial vehicle operations for skilled staff; however, district does not have a recruiting plan for the Transportation Department.

Driver shortages are a challenge in many school districts. According to an October 2016 NAPT survey of 1,053 school districts, only 1 percent of districts reported no problem with driver shortage. It is a best practice among school districts to conduct continuous school bus driver recruiting activities. Effective recruiting programs employ a variety of methods to attract applicants. Methods include word-of-mouth in which districts encourage staff to contact qualified associates to apply. Another strategy is to advertise job announcements in the local print and TV/radio media, on signs in schools, and at the bus facility. Some districts give presentations to church and community groups. Another method is for the district to park a bus at businesses and community or school events with attached posters or banners advertising positions. Districts also use parked buses to welcome applicants on board to discuss the job and complete an application. Effective transportation departments also use a special job application form for school bus drivers. Use of a bus driver specific form helps transportation department staff quickly determine if the applicant's experience meets the job requirements. During the interview and hiring process, districts that ask applicants how they learned of a job

opportunity are able to better optimize future advertisement efforts.

Dalhart ISD should develop and implement a Transportation Department recruitment program and develop two additional part-time bus driver positions.

While there are no daily driver shortages, additional part-time drivers would spread the regular daily driving needs among a wider pool of drivers to reduce or eliminate overtime. The recruiting program should use best practice advertisement activities presented above, as needed. Dalhart ISD should strive to attract applicants with the district's reputation, the qualities that set the district apart from other employers, the culture, and efficiency of the Dalhart ISD team.

Dalhart ISD should also implement the use of a special application form for school bus driver applicants. This form should be designed to assist the applicant to understand the requirements of the job and Dalhart ISD in determining whether the applicant qualifies for consideration. This form helps ensure the applicant and the district are efficient in the vetting process.

Dalhart ISD should avoid filling the new part-time driver positions with staff who have other full-time Dalhart ISD positions to work and drive more than 10 hours in a given day. This would reduce the risk of excessive overtime, and mitigate the risk of driver fatigue to help ensure the safety of students and staff.

The fiscal impact assumes the district develops and fills two additional part-time school bus driver positions to eliminate the 80 hours of overtime per month, an estimated 720 hours per nine-month school year. The fiscal impact assumes an annual savings of $5,256. The savings will be generated from paying the part time drivers the regular bus driver rate of $25 per hour for 720 hours per year, instead of paying full-time staff an average overtime rate of $32.30 per hour for 720 overtime hours per year ($23,256 - $18,000 = $5,256). The fiscal impact assumes there is no new cost for the work hours of the two new staff because their hours will replace but not exceed existing hours worked.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 7. TRANSPORTATION							
36. Develop and implement a transportation procedure manual to address all school transportation operations.	$0	$0	$0	$0	$0	$0	$0
37. Develop and implement a comprehensive vehicle inspection and repair program in accordance with state law and industry standards.	$0	$0	$0	$0	$0	$0	($295)
38. Develop and implement a Transportation Department training program to address the training needs of staff and students.	($2,115)	($2,115)	($2,115)	($2,115)	($2,115)	($10,575)	$0
39. Develop and implement a Transportation Department recruitment program and develop two additional part-time bus driver positions.	$5,256	$5,256	$5,256	$5,256	$5,256	$26,280	$0
TOTAL	**$3,141**	**$3,141**	**$3,141**	**$3,141**	**$3,141**	**$15,705**	**($295)**

CHAPTER 8. FACILITIES 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 is dependent on a district's organizational structure. Larger districts typically have staff dedicated to support facilities management, and smaller districts may have staff with dual roles. For example, staff may be responsible for custodial and groundskeeping tasks. Facilities planning establishes district priorities, allocates resources and funds, and identifies milestones. Planning is based on student enrollment, campus and building capacity, condition of facilities, 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.

Dalhart Independent School District (ISD)'s facilities include: four school campuses, including one elementary school, one intermediate school, one junior high school, and one high school; an administration building, which also houses the XIT Secondary School, the alternative school campus; one bus parking and maintenance facility; and two buildings housing the Dalhart Area Child Care Center (DACCC). Dalhart High School, the district's newest campus, opened in school year 2009–10. The district also built a new stadium with associated athletic facilities near the high school, which first were used for school year 2011–12. Dalhart ISD had no future construction planned at the time of the onsite review.

Dalhart ISD's maintenance director manages the Maintenance Department and reports to the chief financial officer (CFO), who oversees district facilities. The maintenance director supervises five staff responsible for daily maintenance activities across district facilities. Three of the maintenance staff have specialized training, including

one general contractor, one certified electrician, and one staff certified in pesticide usage.

For custodial services, Dalhart ISD contracts with GCA Services Group's K–12 Education Division to clean the district's four campuses, the district administration building, and the DACCC. A custodial manager, who works for GCA, supervises 16.75 full-time-equivalent positions, including five custodial leads who directly oversee the four campuses and the administration building. The CFO is the contract manager for the GCA contract. **Figure 8–1** shows the Dalhart ISD staff responsible for facilities.

FIGURE 8–1
DALHART ISD FACILITIES AND MAINTENANCE STAFF
NOVEMBER 2016
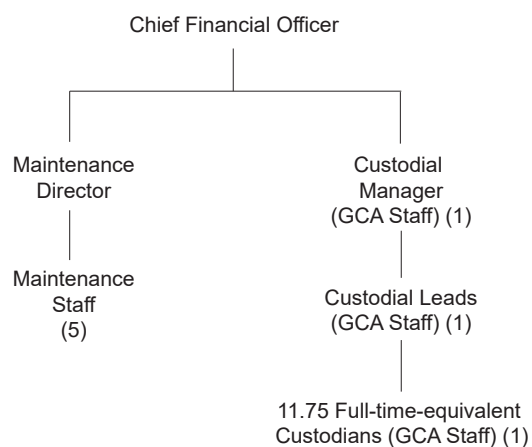
NOTE: (1) GCA= GCA Services Group's K–12 Education Division.
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

The district performs most maintenance work internally. Dalhart ISD also contracts with Claborn Heating and Air, Inc., in Dalhart to provide ongoing maintenance to heating and cooling systems. This contract includes monthly service for general maintenance, emergency response, and air quality checks. **Figure 8–2** shows Dalhart ISD maintenance and operations budgets for school years 2013–14 to 2015–16. Associated costs for maintenance have gradually increased during the past three years in both totals and percentage of total district expenditures, due to a roof replacement at the junior high school and parking lot repairs.

FIGURE 8–2
DALHART ISD MAINTENANCE AND OPERATIONS EXPENDITURES
SCHOOL YEARS 2013–14 TO 2015–16

YEAR	EXPENDITURES (IN MILLIONS)	PERCENTAGE OF TOTAL EXPENDITURES
2013–14	$1.5	12.0%
2014–15	$1.8	13.2%
2015–16 (1)	$2.1	15.4%

NOTE: Expenditures are budgeted, not actual.
SOURCE: Texas Education Agency, Public Education Information Management System, November 2016.

FINDINGS

♦ Dalhart ISD lacks the management and oversight to effectively analyze, plan, and implement facility maintenance and improvements across the district.

♦ Dalhart ISD does not have a consistent level of quality in custodial operations.

♦ Dalhart ISD ineffectively manages facility use by the residents of the community and does not solicit community input to ensure adequate facilities planning and decision making.

RECOMMENDATIONS

♦ **Recommendation 40: Develop and implement a formal process to manage district facilities.**

♦ **Recommendation 41: Adopt cleanliness standards and modify the performance management process for the custodial contract.**

♦ **Recommendation 42: Develop and implement facility use procedures and a process to elicit community input on facilities construction, use, and management.**

DETAILED FINDINGS

FACILITIES MANAGEMENT AND OVERSIGHT (REC. 40)

Dalhart ISD lacks the management and oversight to effectively analyze, plan, and implement facility maintenance and improvements across the district.

Dalhart ISD does not conduct annual audits or inspections of district facilities. Furthermore, the district has not conducted a districtwide facility needs assessment to assess facility conditions and evaluate subsequent capital needs of existing facilities. Dalhart ISD's Board of Trustees has not

adopted a long-range facilities master plan to guide construction projects or equipment replacement. This lack of planning and oversight can lead to deficiencies in the maintenance of district's facilities. While onsite, the Legislative Budget Board School Performance Review Team observed the following issues:

• broken sidewalks and stairs, including hazardous steps directly outside of the main entrance of the district administration building;

• insulation falling from the ceiling in the music room of Dalhart Intermediate School;

• broken exterior doors;

• broken windows;

• playground facilities that do not have sufficiently padded landing zones;

• large amounts of garbage around district facilities, including the district administration office; and

• poorly landscaped and maintained campus entrances.

Dalhart ISD's lack of effective facilities management also extends to how the district addresses daily facility issues. The maintenance director uses an online management system for work orders to address maintenance needs at district facilities. District staff submit work orders through the online program. Maintenance staff and the CFO receive email notifications when staff request a repair and when a repair is completed. District staff reported an improvement in the average time of repairs and a decrease in unaddressed work orders since the district adopted the management system. However, the district does not maximize the system's analytical potential. During onsite interviews, the CFO expressed an adequate understanding of general trends in facilities maintenance from scanning email notifications. The CFO stated that the majority of requests were for minor electric and plumbing repairs. However, the district does not produce any summary reports of maintenance activities or analyze trends in work orders. The Maintenance Department also does not have a system to prioritize work orders. The maintenance director and CFO do not track work orders or individual performance of maintenance staff to develop training and expand existing skills based on facility needs.

By basing the majority of the maintenance tasks on work orders, the district is engaging in reactive maintenance. Reactive maintenance is the practice of only servicing

equipment and facilities components when they malfunction or break. In onsite interviews, staff indicated that the district does not have a preventive maintenance plan for facilities and equipment. Preventive maintenance is taking planned actions to retain an item at a specified level of performance by performing repetitive, scheduled tasks to prolong system operation and use. These tasks could include inspection, cleaning, lubrication, service, and replacement conducted at regularly scheduled intervals, based on average statistical or anticipated lifetime or both.

Dalhart ISD's ineffective management of facilities is in part a result of a systematic lack of sufficient information collection and analysis in relation to facilities. Dalhart ISD's maintenance director and CFO collect limited facilities data and generate few facilities management reports. Facilities data that the district does not collect include the following examples:

- facilities inventories showing square footage of buildings, occupancy versus capacity rates, and original construction date and dates of major renovations;

- existing facility condition report;

- information on campus-based energy conservation initiatives;

- list of deferred maintenance;

- work order reports; and

- customer satisfaction reports.

The limited facilities data that is available, including required state and federal reports, is not consolidated, compiled into management reports, communicated with stakeholders, or made easily available through an inventory system. For example, hard copies of product warranties and asbestos reports are stored at different locations at each campus. Although the district records utility bills, it does not develop summary reports of use by facility. Dalhart ISD has no documented planning process that was used for previous construction, and no data collection or planning process related to possible future construction. This type of comprehensive and specific facilities planning information is essential to inform planning and management processes in facilities, including addressing deferred maintenance or long-term improvements or additions to facilities.

Dalhart ISD also does not have a written procedures manual that clearly defines facilities processes and the duties of maintenance staff. The district does not have a clear process to determine whether to outsource maintenance work or to complete repairs in house. The maintenance director indicated that, for safety reasons, typically he outsources any electrical work that involves more voltage than changing lightbulbs. The CFO expressed concerns that some outsourced repairs were within the skill range of district staff. Dalhart ISD's facilities management issues include little communication, and no formal communication process, between the maintenance director and CFO. The maintenance director and the CFO or the superintendent have no regularly scheduled meetings. The superintendent or the CFO make decisions regarding facilities; the maintenance director has little involvement.

Without effective management and oversight of facilities, Dalhart ISD may experience a number of negative results. Failure to identify facility condition and needs, and a lack of a facilities master plan, may leave the district unable to make effective short-term and long-term decisions about facilities. Ongoing deficiencies in maintenance could cause safety issues and negative perceptions of district facilities among students and the community. Engaging in reactive maintenance, rather than having an effective plan for preventive and deferred maintenance, could result in unexpected equipment failure or a reduction in the effective lifetime of equipment and facilities. Lack of data collection and analysis leaves the district unable to track productivity; identify staff training needs; and develop efficient plans for replacements, renovations, and additions to facilities and equipment. The district does not make effective, data-driven decisions about its facilities. Insufficient procedures and communication in the Maintenance Department could result in additional costs related to unnecessary outsourcing, inefficient use of staff time, or lowered staff productivity.

Best practices in facilities planning and management require adequate assessment, monitoring, and oversight of operational data to inform district policy and practice. Irving ISD developed a best practice to assess facility needs by conducting an annual facilities assessment. This assessment serves as the foundation for short-term and long-term facilities management decisions. The annual findings inform overall decisions regarding maintenance and construction and provide a high level of transparency. The district is a model for sustainable practices in facilities planning and management processes. At the heart of these processes is a

comprehensive method of assessing basic campus facility needs. **Figure 8–3** shows the Irving ISD process for facility needs assessment.

The publication Planning Guide for Maintaining School Facilities, by the National Center for Education Statistics (NCES), states that the purpose of a work order management system is to handle requests as effectively as possible and to meet the district's basic information requirements. The publication also provides a process that effective districts can use to enhance their work order systems. The process includes the following steps:

- give all work a priority rating;

- record all labor, parts, and supplies on the work order;

- develop a process to inspect the work to ensure that work is performed to district standards;

- seek feedback from the requester to understand the level of customer satisfaction with the work completed; and

- record all information about the request in a data bank for historical and analytical use (e.g., for determining the annual cost of building maintenance).

The NCES Planning Guide for Maintaining School Facilities also states that a comprehensive facility maintenance program is a school district's foremost tool for protecting its investment in school facilities. Moreover, preventive maintenance is the cornerstone of effective maintenance initiatives. The guide notes: "Breakdown (Reactive) maintenance is not in the best interest of the taxpayer, the maintenance department, or students and staff. … On the other hand, regularly scheduled equipment maintenance not only prevents sudden and unexpected equipment failure, but also reduces the overall

life-cycle cost of the building." NCES resources include plans to help establish preventive maintenance protocols and schedules.

NCES provides a handbook for school districts that provides guidance for establishing facilities data systems. NCES outlines the major categories for facilities data classification that districts should collect and monitor. The handbook includes detailed data elements for each category and recommended responses for each data element. NCES recommendations for data categories include the following guidance:

- facilities identification – used to identify, classify, and inventory district facilities; include relevant information about the name, location, age, and size of district buildings and grounds;

- facilities condition – help describe the condition and safety of a building or site, and its various components and systems;

- facilities construction – used to describe the site preparation and construction of a facility;

- facilities design – used to assess a facility's design for purposes of education, sustainability, community use, and efficiency of operation and utilization;

- facilities utilization – capture information on how space is used, and help describe the activities undertaken in a building, regardless of its intended use;

- facilities management – describe key work standards and processes in the operation and capital project management of district facilities; and

FIGURE 8–3
IRVING ISD FACILITY NEEDS ASSESSMENT PROCESS STEPS, 2007

STEP	PROCESS
Initial Needs Assessment	The district contacts and requests the campus principals to submit a needs assessment of their campuses. The maintenance, food service, and technology departments provide assessments of each campus relative to their needs. The district compiles information into a needs assessment form.
Needs Assessment	The district schedules meetings at each campus with the principals. The meeting participants discuss and refine identified needs to produce a Phase I Needs Assessment Study document.
Citizens Needs Assessment	After the Board of Trustees reviews and accepts the needs assessment, the board appoints a Citizen's Task Force to assess the needs. This group then schedules a meeting with each building principal and discusses applicable needs. The district then prepares a report to the board for acceptance.
Final Needs Assessment	The district prepares a final report based on available funding. This process involves an administrative committee meeting with each building principal to prioritize needs. The district submits a final report to the board for acceptance.

Source: Irving ISD, Facilities Services, 2007.

- facilities budget and finance – focus on revenue; operating and capital costs; public and private finance information; and other data relevant to district facilities management, operation, construction, and financing.

NCES also provides best practices for developing a written facilities procedures manual. The Planning Guide for Maintaining School Facilities suggests that a facilities procedures manual should contain, at a minimum, the following information:

- a mission statement;
- purchasing regulations;
- accountability measures;
- asbestos procedures;
- repair standards;
- vehicle use guidelines;
- security standards; and
- work order procedures that staff are trained to use.

Dalhart ISD should develop and implement a formal process to manage district facilities.

Dalhart ISD should evaluate each major building system and its anticipated life expectancy, and develop a long-range facility maintenance program to plan for replacement thereof at the end of each system's useful life. To effectively develop a facilities master plan, Dalhart ISD should adopt a formal facility master planning process. Using input from the campus principals, the custodial and maintenance staff, the maintenance director, the CFO, and the superintendent, the district should begin determining future improvements. Development of the facilities master plan should include the following key steps and considerations:

- conduct a comprehensive districtwide facilities needs assessment to determine the status of buildings and systems and identify existing and future needs;
- review and analyze deferred maintenance work to validate its necessity;
- identify needs for safety, accessibility, and energy improvements;
- determine the training necessary to ensure that maintenance staff could implement and support planned improvements;

- establish facility priorities to maintain the district's facility investments and educational programming priorities to provide learning environments that meet the district's changing curriculum;
- implement a method of tracking maintenance requests and work, and use that data to inform decision making and to gain stakeholder support;
- identify funding sources for the work; and
- implement a process for the ongoing monitoring of the plan.

The maintenance director should adopt NCES best practices to enhance the district's work order management system. The maintenance director should analyze data from the work order management system to prioritize work orders and identify staff training needs. The maintenance director should develop a prioritized list of deferred maintenance. The director should generate recurring work orders for necessary preventive maintenance tasks and incorporate these tasks into the normal workload of the maintenance staff.

The maintenance director and the CFO should coordinate to develop a timeline and procedures to compile and analyze facilities data. The maintenance director, with oversight of the CFO, should consolidate and catalog all existing data, including hazardous material abatement plans and product warranties. Using NCES best practices, the maintenance director and CFO should identify key data that are not available, and develop a timeline for acquiring the additional data. The CFO should determine if contracting with a facilities professional for data collection would be necessary.

The CFO and maintenance director should draft a facilities procedures manual. Existing manuals prepared by facility planning associations or area school districts could serve as models for this procedures manual. Facilities procedures should include work orders, safety standards, major types of maintenance work, and outsourcing. The maintenance director should meet with staff to discuss the contents of the manual and conduct training to implement the procedures.

Additionally, the CFO should develop an effective, multilevel communication and reporting structure for the district. Maintenance staff should either be dedicated to an individual facility or jointly conduct a quarterly intensive review of all facilities using formal checklists. Maintenance staff should report all existing issues at the facilities to the maintenance director.

The maintenance director should consolidate facilities condition reports for meetings with campus administrators. The maintenance director's reports should include all facilities needs categorized by urgency and estimated costs. The maintenance director should establish urgency prioritization based first on student and staff safety, followed by instructional needs. The director should assign the lowest priority to all other improvements, including aesthetics. The CFO should review maintenance reports and share the priorities with the superintendent and the board. The outcome should be a board-approved chronological timeline and plan of action based on urgency as determined by the multilayer process.

After the district prioritizes and addresses existing needs, facilities staff should continue to engage in the ongoing process of quarterly, multilevel meetings to maintain oversight of facilities. The maintenance director and CFO should communicate plans of action to stakeholders, including campus administrators.

The CFO and maintenance director should have biannual progress reporting meetings, with the CFO reporting updates to the superintendent and board following each meeting. The CFO should provide an annual facilities report for all stakeholders, including representatives to district groups involved with facilities and the Dalhart community.

This recommendation could be implemented with existing resources.

CUSTODIAL OPERATIONS OVERSIGHT (REC. 41)

Dalhart ISD does not have a consistent level of quality in custodial operations.

Since June 2014, Dalhart ISD has contracted with GCA for custodial services at all district facilities. The vendor employs 16.75 full-time-equivalent custodial positions to clean the district's four campuses and the district administration building. The custodial staff report to custodial leads at each building. The custodial leads each report to one onsite custodial manager, who oversees the district custodial services for the vendor. In accordance with the contract specifications, the team of custodians are responsible for daily cleaning of each district facility extending to the outside curb of Dalhart ISD buildings.

During onsite interviews, the CFO indicated he decided to research outsourcing custodial services in school year 2013–14 to address complaints about service and issues with overstaffing. The district conducted a basic cost/benefit analysis and concluded that outsourcing custodial services would benefit the district. District benefits include lowering costs, increasing direct supervision of custodial staff, and eliminating district responsibility for workers compensation benefits. GCA was the only company that responded to the district's request for proposal. Dalhart ISD contracted with GCA for a one-year term for school year 2014–15 for $552,003, with the option for annual renewals. Dalhart ISD renewed the contract for school years 2015–16 and 2016–17, with costs remaining constant at $552,003 for each year. Dalhart ISD lacked an effective process to analyze the subsequent renewals. The CFO indicated that he did not conduct a cost/benefit analysis of the contracted services when deciding to renew the contract. The CFO stated he determined that the contract seemed to be working and had no major issues; thus, he decided to renew the contract.

The district's process for contract oversight and performance monitoring does not ensure that the district receives consistent and effective custodial services. Although the maintenance director managed custodial services before outsourcing, the CFO is solely responsible for all oversight and performance monitoring for the custodial contract.

The custodial manager stated that she visits the CFO approximately every two weeks to review custodial performance. The custodial manager meets weekly with the custodial leads for each campus, and they reported that they find it easy to communicate with the manager and receive any assistance needed. The custodial manager also indicated that she is in daily contact with campus principals, who can send her text messages for quick responses to custodial needs. When issues arise, the custodial manager noted that campus staff communicate with campus administrators, who in turn contact the custodial manager to address the problem. The CFO also indicated that he communicates frequently with the custodial manager about specific issues, especially through text messages. District and contracted custodial staff indicated that informal communication is effective; however, Dalhart ISD's custodial contract does not formally establish communication and performance monitoring procedures.

The contract for custodial services stipulates that a joint review committee would meet quarterly to review the contract service provider's performance. The committee consists of three Dalhart ISD representatives and three representatives from the service provider. District staff were unable to provide documentation that Dalhart ISD established the committee or conducted these quarterly reviews.

Every month, campus principals complete a Report Card for Custodial Services to assess the performance of the contract service provider. The principals grade the custodians A to D in the following categories:

- hallways clean (vacuumed if applicable) and floor shiny;

- cafeteria clean and floors shiny;

- classrooms cleaned nightly;

- restrooms cleaned and stocked nightly; and

- management responsiveness to issues.

The form also includes space for the principals to provide comments. However, the administrators do not have performance or cleanliness standards upon which to base their grades. The custodial manager shares the report cards with the vendor and the CFO.

The contractor tabulates and reports the results of the principals' report cards. District staff were unable to provide the review team with the method used to tabulate the scores, or the formula the district uses to convert the scores from letter grades to numerical ratings. The CFO receives the report cards, but district staff were unable to describe the consequences for unacceptable scores. The CFO indicated that he did not receive report cards during the first two years of the contract, but that he receives and periodically reviews them now.

Onsite interviews with staff identified inconsistent opinions regarding the quality of service and the responsiveness of custodial staff. Feedback from Dalhart ISD staff included the following issues:

- district staff indicated differing perceptions of building cleanliness, and campus administrators' feedback on the existing level of service ranged from very high for Dalhart High School to comparatively low for Dalhart Intermediate School;

- interviews with custodial management detailed a lack of standardized specificity regarding requests and feedback from campus administrators. Comments included on the monthly report card reportedly often lack the detail needed to make the requested changes. Limited detail about specific locations and particular issues leaves custodial staff searching for the source of the negative feedback without the information needed to address the issue;

- district staff reported a lack of consistency in the speed and quality of response to areas rated low on the monthly report card; for example, a ranking on floor cleanliness may remain low for several months without evidence of improvement; and

- campus administrators reported different understandings of the requirements for the level of cleanliness from the exterior of the building to the curb. Consequently, the review team observed varying levels of exterior cleanliness across the campuses. For example, the review team observed substantially more litter from the front entrance to the curb at Dalhart Junior High School than at other locations.

When district staff do not effectively monitor vendor performance, the district cannot assure the board and other stakeholders that it is expending district resources wisely and efficiently. Dalhart ISD's process of approving payments for contracted services without ensuring that these services are performed effectively further exposes the district to potential waste and loss.

Irving ISD employs several best practices that improve quality and responsiveness. The operations manager chairs the Operations Communications Council, which meets monthly and provides a forum for the staff to air concerns, complaints, and recommendations. Through this process, Irving ISD ensures a high level of centralized oversight and sufficient direct feedback to promote effective ongoing performance. As a result, the district displays especially high satisfaction results from staff and the community.

The educational facilities organization APPA provides best practices for facilities management. This organization publishes the Custodial Staffing Guidelines for Educational Facilities, including a concept called five levels of cleanliness, which details a simple approach to assessing building cleanliness. **Figure 8–4** shows the key indicators for each of APPA's five levels of cleanliness.

Dalhart ISD should adopt cleanliness standards and modify the performance management process for the custodial contract.

To improve district oversight, the CFO should conduct a cost/benefit analysis before soliciting custodial contracts or contract renewals to ensure that the district is using its financial resources efficiently. The CFO should assign the maintenance director to oversee all aspects of the vendor's custodial contract performance. The director should address

FIGURE 8–4
APPA CLEANLINESS STANDARDS FOR EDUCATIONAL FACILITIES
NOVEMBER 2016

LEVEL	INDICATORS
Level 1 – Orderly Spotlessness	• Floors and base molding shine and are bright and clean; colors are fresh; • no buildup in corners or along walls; • all vertical and horizontal surfaces have a freshly cleaned or polished appearance and have no accumulation of dust, dirt, marks, streaks, smudges, or fingerprints; • lights all work, and fixtures are clean; • washroom and shower fixtures and tile gleam and are free of odor; supplies are adequate; and • trash containers and pencil sharpeners hold only daily waste and are clean and free of odor.
Level 2 – Ordinary Tidiness	Same as Level 1 with the following exceptions: • No more than two days' worth of dust, dirt, stains, or streaks on floors and base molding; and • dust, smudges, and fingerprints are noticeable on vertical and horizontal surfaces.
Level 3 – Casual Inattention	• Floors are swept or vacuumed clean, but may have stains upon close observation; a buildup of dirt or floor finish in corners and along walls can be seen; • dull spots or matted carpet in walking lanes; streaks or splashes on base molding; • all vertical and horizontal surfaces have obvious dust, dirt, marks, smudges, and fingerprints; • lamps all work, and fixtures are clean; and • trash containers and pencil sharpeners hold only daily waste and are clean and free of odor.
Level 4 – Moderate Dinginess	• Floors are swept or vacuumed clean, but are dull, dingy, and stained; a noticeable buildup of dirt or floor finish can be seen in corners and along walls; • a dull path or obviously matted carpet in the walking lanes can be seen; base molding is dull and dingy with streaks or splashes; • all vertical and horizontal surfaces have conspicuous dust, dirt, marks, smudges, and fingerprints; • lamp fixtures are dirty, and some lamps (up to 5.0 percent) are burned out; • trash containers and pencil sharpeners have old trash and shavings; they are stained and marked; and • trash containers smell sour.
Level 5 – Unkempt Neglect	• Floors and carpets are dull, dirty, scuffed, or matted; a conspicuous buildup of old dirt or floor finish can be seen in corners and along walls; base molding is dirty, stained, and streaked; gum, stains, dirt, dust balls, and trash are broadcast; • all vertical and horizontal surfaces have major accumulations of dust, dirt, smudges, and fingerprints, all of which will be difficult to remove; lack of attention is obvious; • light fixtures are dirty with dust balls and flies; many lamps (more than 5.0 percent) are burned out; and • trash containers and pencil sharpeners overflow; they are stained and marked; trash containers smell sour.

Source: APPA, November 2016.

all issues associated with the cleanliness of district facilities. The maintenance director should develop a data collection and reporting structure that reports to the CFO, and ultimately to the superintendent and the board in regular meeting reports. The CFO and maintenance director should establish clear, written procedures addressing custodial needs and regular performance management meetings among contracted and district staff. The CFO and maintenance director should oversee the establishment of the joint review committee defined within the vendor contract, and monitor

that the committee meets quarterly to monitor the performance of the vendor's custodial services.

To assess quality of service, the maintenance director should modify the APPA cleanliness standards as appropriate and adopt a method to align the vendor report card to these standards. This method should include an assessment rubric communicated to all site-based administrators and vendor management. This change should enable campus administrators and other district staff to have a common understanding of report card grades, and to make performance judgements based on standardized criteria. The maintenance

director should coordinate with the CFO to amend the custodial services contract before the next renewal to add the cleanliness standards rubric to the contract. The vendor should be required to train custodial staff on the associated standards to ensure that the vendor meets all expectations consistently across district facilities. Together, the director and vendor should reevaluate the cleaning procedures to ensure that all facilities meet the cleanliness standard.

To provide an additional level of accountability and performance monitoring, the CFO, superintendent, and maintenance director should participate in quarterly site visits to evaluate that all facilities meet the cleanliness standards. These positions should report the results to the board.

This recommendation could be implemented with existing resources.

COMMUNITY INPUT ON FACILITIES CONSTRUCTION AND MANAGEMENT (REC. 42)

Dalhart ISD ineffectively manages facility use by the residents of the community and does not solicit community input to ensure adequate facilities planning and decision making.

The district holds a prominent position within the Dalhart community. In addition to educating students, many community and individual activities take place on district property and use district facilities.

Dalhart ISD Board Policy GKD (LOCAL) defines standards for nonschool use of district facilities. The policy includes basic requirements for scheduling, use agreements, fees for use, and required conduct. District staff indicated that community residents who wish to use district facilities contact the superintendent's secretary. The secretary indicated that if the facility is available, she rents it to the requesting individual or organization. The secretary does not request approval from the superintendent; however, she checks facility availability with the relevant campus principal. She provides community users with an electronic access key fob that permits them to access only the reserved facility at the reserved time. The superintendent's secretary stated that the district rents the facilities for $7.50 per hour, but it does not charge the Boy Scouts of America or Girl Scouts of the USA organizations. The secretary described the process as collecting money, writing a receipt, and giving the money to the accounts payable specialist.

A review of Dalhart ISD's process for community use of district facilities revealed several inefficiencies. Board Policy

GKD (LOCAL) states that the superintendent will publish a schedule of fees for facility use. However, no written documentation of the fee schedule exists, nor does the district publish the information on the district website for community access. Facility rental charges also fail to account for associated costs, such as administrative, custodial, and security staff time; energy usage; and wear to facilities. Furthermore, the district does not have a complete list of internal and external spaces available for rent, or a priority system for scheduling community use of facilities. Additionally, Dalhart ISD lacks any policies or procedures that specifically address security for community events, including whether the district provides security or how the district approves privately hired security staff. The district also lacks any policies or procedures that specify insurance requirements for outside groups.

During onsite interviews, campus staff and community residents discussed inconsistent district procedures and practices regarding public use of district facilities. District staff use facilities without having to follow the same approval process as community residents. Onsite interviews also indicated that some community users rent the older gym facility, but instead walk through the building and use the newer gym.

In addition to insufficient and inconsistent procedures regulating community use of existing district facilities, Dalhart ISD does not effectively solicit community input for long-term facility planning and decision making. The CFO indicated that the district has a strategic planning committee, but that the group never addressed facilities. The district has not used existing groups with community representation to solicit input for future facilities construction, renovations, additions, closures, consolidations, or relocations. Dalhart ISD also has not established any community forums, surveys, or planning groups to address long-term plans related to district facilities.

Even though the district and the community are closely connected, perceptions of the quality of practices related to facilities management and use differs greatly. The review team conducted a survey of district staff, campus staff, and parents to assess the level of satisfaction with Dalhart ISD facilities. **Figure 8–5** shows survey results regarding the perceptions of stakeholders. Among parents who responded, 16.4 percent agreed that the district effectively solicits input from stakeholder groups when planning for facilities, compared to 61.9 percent of district staff and 34.0 percent of campus staff. Among responding parents, 58.9 percent

FIGURE 8–5
DALHART ISD FACILITIES SURVEY RESULTS
NOVEMBER 2016

SURVEY QUESTION	GROUP	RESPONDENTS	STRONGLY AGREE OR AGREE	NO OPINION	STRONGLY DISAGREE OR DISAGREE
The district effectively solicits input from various stakeholder groups (e.g., parents, citizens, students, faculty, staff, and the board) when facility planning.	District Staff	21	61.9%	14.3%	23.8%
	Campus Staff	100	44.0%	25.0%	31.0%
	Parents	342	16.4%	26.6%	57.0%
Schools are clean, and buildings are properly maintained.	District Staff	21	66.7%	14.3%	19.0%
	Campus Staff	100	56.0%	12.0%	32.0%
	Parents	343	58.9%	10.2%	30.9%
Emergency maintenance is handled promptly.	District Staff	21	76.2%	23.8%	0.0%
	Campus Staff	100	62.0%	19.0%	19.0%
	Parents	342	42.1%	29.2%	28.7%

NOTE: Percentages may not sum to 100.0% due to rounding.
SOURCE: Legislative Budget Board School Performance Review Team, November 2016.

responded that campuses are clean and well-maintained, compared to 66.7 percent of district staff. In addition, 42.1 percent of parents responded that the district handles emergency maintenance promptly, compared to 76.2 percent of district staff and 62.0 percent of campus staff.

Insufficient procedures for community use of district facilities can result in lost opportunities for additional revenue and community involvement. By authorizing inappropriate use of facilities, failing to establish insurance requirements, and renting facilities without use agreements, Dalhart ISD's security could be vulnerable. The district could be liable for injuries or damages to facilities. When the district does not consistently hold all staff and external users accountable for following procedures for facility use, the result could be an appearance of unfairness. This appearance of unfairness could lead to a sense of distrust of the district within the community. The lack of establishing a well-researched, comprehensive fee schedule could result in lost revenue for the district.

Investments made in facility construction and maintenance require public funds and public support. One consequence of not involving and assessing the perceptions of the local community was a public rejection of the stadium bond in school year 2012–13. The local community did not support the bond, and the district made the decision to move forward with maintenance and operations funds. Failure to effectively involve and solicit input from the community could lead to continued difficulty passing bonds for construction or major renovations.

Eanes ISD established best practices that effectively regulate the nonschool use of district facilities. Eanes ISD annually publishes a list of all district facilities and specific interior and exterior spaces that are available for community use. District facilities staff oversee applications and procedures for facility use, but campus principals have the authority to approve availability of facilities on the campus and to schedule events. Eanes ISD also establishes nine priority groups with regard to use of district facilities. In accordance with district policies, organizations or representatives that fail to follow regulations are ineligible for use of facilities. Eanes ISD develops and publishes a schedule of fees each year that includes charges for use of buildings, staff, security, equipment rental, utilities, and disposal services. Eanes ISD established clear guidelines for insurance requirements by priority group and consistent application procedures.

Irving ISD developed a comprehensive process for facilities planning that serves as a best practice for effective management. One of the key components of the process is to ensure widespread community input on facilities planning. The district established a task force to inform and steer decisions concerning facilities. The district uses the information resulting from the process to stay in alignment with the concerns of local residents. This information enables the district to better understand the needs of the surrounding community and to develop a base of support for future decisions. This level of collaboration and transparency can further develop a strong bond between a district and the community.

Dalhart ISD should develop and implement facility use procedures and a process to elicit community input on facilities construction, use, and management.

The CFO, with input from the maintenance director, the community, and campus administrators, should develop and implement procedures for district facility use by the community. The procedures should include the following components: a prioritized list of user groups; a list of all internal and external spaces available for rent in all district facilities; a comprehensive fee schedule that includes all associated costs of use; and consistent application, use agreement, and insurance documentation requirements. Dalhart ISD should publish and communicate the updated procedures with all stakeholders to help district staff and external community users to understand the updated process.

The CFO should require the maintenance director to develop and implement a community advisory group, similar to Irving ISD. The group should meet regularly to review information regarding facilities management, and the resulting feedback should be widely shared with relevant district staff, the superintendent, and the board. The advisory group should consist of representatives for stakeholders, including parents, local government, the business community, and local groups that use district facilities.

The district should use the resulting information to inform planning for facilities construction, management, and use and should serve as a platform for gaining community support for future decisions in these areas.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 8. FACILITIES MANAGEMENT							
40. Develop and implement a formal process to manage district facilities.	$0	$0	$0	$0	$0	$0	$0
41. Adopt cleanliness standards and modify the performance management process for the custodial contract.	$0	$0	$0	$0	$0	$0	$0
42. Develop and implement facility use procedures and a process to elicit community input on facilities construction, use, and management.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 9. SAFETY AND SECURITY

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 could 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, and 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 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 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. Elementary and Secondary Education Act, Title IV, Part A, encompasses communication systems, fire protection, playground safety, facility safety, environmental regulations, and emergency operation planning.

Dalhart Independent School District (ISD) employs a chief of police, who reports directly to the superintendent. The chief is a certified law enforcement officer with arrest authority. He has been in the position since August 2016. In addition, campus principals coordinate with the superintendent regarding safety issues such as emergency drills and preparedness. **Figure 9–1** shows the Dalhart ISD staff responsible for the safety and security function.

FIGURE 9–1
DALHART ISD SAFETY AND SECURITY STAFF NOVEMBER 2016
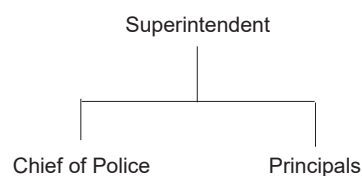
SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

The Dalhart ISD chief of police is responsible for some campus-level and district-level security duties, including the following duties:

- maintaining a visible law enforcement presence at each campus;

- addressing crime and disorder problems and drug activities occurring in or around the district;

- taking action against unauthorized persons on district property;

- working with campus staff to enhance security measures; and

- serving as a liaison between the district and the local police and providing information to students and district staff about law enforcement matters.

FINDINGS

♦ Dalhart ISD does not have a safety and security organizational structure to effectively monitor, direct, and mitigate all facets of safety and security.

♦ Dalhart ISD does not have effective safety and security processes related to visitor management, campus access, and use of video surveillance.

♦ Community input on safety and security issues is insufficient to ensure adequate planning and decision making.

RECOMMENDATIONS

♦ **Recommendation 43: Assign district safety and security responsibilities to the district chief of police, form a district safety and security committee, and address outstanding safety and security concerns.**

♦ **Recommendation 44: Develop and implement procedures to improve visitor management controls, secure access to campuses, and make effective use of video surveillance.**

♦ **Recommendation 45: Develop and implement a process to collect community input on safety and security issues to support common understanding and planning.**

DETAILED FINDINGS

ORGANIZATIONAL STRUCTURE (REC. 43)

Dalhart ISD does not have a safety and security organizational structure to effectively monitor, direct, and mitigate all facets of safety and security.

The district does not have a department or assigned staff responsible for districtwide organization and management of safety and security. Although the district employs a chief of police, his responsibilities focus on law enforcement and management of district police functions, not on safety and security management. For example, his duties include enforcing all laws and ordinances within the scope of Dalhart ISD Board of Trustees policies, and to investigate criminal activities that occur within the district's jurisdiction. The chief has no responsibility regarding the district's safety planning or emergency preparedness. Rather than having coordinated district support and oversight of safety and security, each campus has independent crisis response plans, preparedness drill scheduling and reporting, and emergency procedures. Furthermore, Dalhart ISD lacks a formal process for staff to communicate or report safety and security issues. This lack of coordination and oversight results in campus principals communicating and reporting separately to the superintendent, but not with each other. The chief of police communicates informally with staff, campus administrators, district leadership, and external stakeholders. The district has

not established a district safety and security committee, as required by the Texas Education Code, Section 37.109.

During school year 2013–14, the district contracted with Edwards Risk Management to conduct safety and security audits for each campus. This contract was in accordance with the Texas Education Code, Section 37.108(b), which requires school districts to conduct safety and security audits at least once every three years. Although the district filed the required safety and security audit documents with Texas State University's Texas School Safety Center (TxSSC), it has not resolved all the issues reported in the audit report. For example, in November 2016, the Legislative Budget Board (LBB) School Performance Review Team confirmed that the following safety and security concerns remain in the district:

- central reporting anti-intruder alarms (panic button/s) are not a security feature used at district campuses;

- not all district facilities have fire alarms that are connected to local fire departments;

- fire zones are not clearly marked at all of the district's facilities;

- not all key staff within the district have been trained in the National Incident Management System and the Incident Command System;

- exterior doors for all campus buildings are not systematically numbered around each building;

- some playgrounds and recreation areas are not fenced to restrict unauthorized access;

- most classroom doors in the district do not have the ability to be locked from the inside;

- most occupied classroom doors were found to be unlocked while classes were in session;

- not all classroom windows throughout the district have shades allowing the windows to be covered in the event of a lockdown;

- not all classroom door windows have a way to be covered in the event of a lockdown; and

- various unoccupied rooms throughout the district were unlocked and accessible.

At the time of the onsite review, the district's chief financial officer indicated that the district was in contact with the

Texas Association of School Boards to conduct the required audit for school year 2016–17. However, Dalhart ISD does not have a formal process for addressing audit recommendations. Since the time of the review, the district tasked the chief of police with overseeing the school year 2016–17 audit, for which he received training from the TxSSC.

The Texas Education Code, Section 37.108, requires school districts to have an emergency operations plan (EOP). Dalhart ISD has not finalized a districtwide EOP or provided staff with sufficient training in crisis prevention and response procedures. Rather, each campus has independently developed their own emergency procedures. During the onsite review, campus administrators and staff expressed limited knowledge about these procedures, including a lack of understanding about evacuation locations and reunification procedures following a potential disaster.

Dalhart ISD has also not developed a memorandum of understanding (MOU) with city or county emergency response specialists. The Dalhart Police Department chief of police indicated to the review team that the district has not coordinated or communicated an EOP with the police department. This lack of coordination limits the police department's ability to support the district effectively during an emergency. For example, each campus has independently developed lockdown procedures; no procedures are standardized for the entire district to provide emergency staff with a single response protocol or access to installed lockdown boxes.

Without district coordination and oversight, each campus independently conducts, schedules, and documents emergency preparedness drills. The Preparedness Drill Documentation Form is a form offered by the TxSSC that details the types of drills that school districts should conduct and the recommended frequency of the drills, including the following:

- fire drills – evacuation of a building in case of fire; at least once per month when school is in session, with at least one with an obstructed exit;

- lockdown drills – ordered when a dangerous person is on or near a campus; staff lock doors and close blinds; two recommended per year;

- severe weather drills – refers to any dangerous weather conditions that can cause damage or loss of human life; two recommended per year;

- shelter-in-place drills – rather than evacuate a building due to a hazardous material release or other event, students may move around inside the classroom; two recommended per year; and

- reverse evacuation drills – implemented when conditions inside the building are safer than outside; two recommended per year.

At the time of the onsite review, the district reported no drills conducted for school year 2016–17. Although the district had sufficient time remaining in the school year to complete required drills, district staff did not indicate a plan to conduct additional drills. Dalhart ISD is not meeting best practice standards for types and frequencies of emergency drills. The district reports too few, or no, evacuation and lockdown drills for the years reported. Campus administrators and district staff reported conducting some additional drills, including fire and lockdown drills, but campuses track drills independently and do not report to the district. Interviews with district and campus staff confirm that campuses are not conducting drills for severe weather, shelter-in-place, or reverse evacuation. This situation leaves staff and students underprepared during an emergency. **Figure 9–2** shows the frequency of district-reported emergency drills for each Dalhart ISD campus for school years 2014–15 and 2015–16. The district reported that no campuses conducted fire, severe weather, or shelter-in-place drills during this period.

FIGURE 9–2
DALHART ISD EMERGENCY DRILL FREQUENCY BY CAMPUS SCHOOL YEARS 2014–15 AND 2015–16

CAMPUS	DRILL	2014–15	2015–16
Elementary	Lockdown	1	1
	Evacuation	0	1
Intermediate	Lockdown	1	0
	Evacuation	0	0
Junior High	Lockdown	1	1
	Evacuation	0	0
High School	Lockdown	1	1
	Evacuation	0	0
XIT Secondary School	Lockdown	0	0
	Evacuation	0	0

Sources: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

A lack of disaster preparedness could negatively affect the district in the event of a crisis, such as severe weather and/or dangerous intruders on district property. The district does

not have a comprehensive plan for reuniting students with their parents in the event of an emergency, which could lead to disorganized remediation and rescue efforts.

The Texas Unified School Safety and Security Standards developed by TxSSC provide criteria to assist school districts in developing and implementing a comprehensive safety and security program. This program is consistent with those of other governmental, private, and volunteer organizations to help districts provide a safe, secure, and supportive environment for all students, staff, and visitors. **Figure 9–3** shows TxSSC's Texas Unified School Safety and Security Standards.

FIGURE 9–3
FOUR PHASES OF EMERGENCY MANAGEMENT FROM THE TEXAS UNIFIED SCHOOL SAFETY AND SECURITY STANDARDS
NOVEMBER 2016

Prevention/Mitigation – coordinated actions taken to decrease the likelihood that an incident will occur or to reduce the loss of life or damage to property from any hazard or threat

Preparedness – coordinated actions taken to plan, equip, organize, train, exercise, evaluate, and improve capabilities

Response – coordinated actions taken to resolve an incident

Recovery – coordinated actions taken to restore the learning environment and support functions

Source: Texas School Safety Center, November 2016.

In addition to setting comprehensive standards for safety and security, TxSSC provides a detailed audit framework for Texas school districts to assess, monitor, and report on safety and security issues for the required audit every three years.

Dalhart ISD should assign district safety and security responsibilities to the district chief of police, form a district safety and security committee, and address outstanding safety and security concerns.

Before contract renewal, the district should change its chief of police job description to include management of district safety and security. The district chief of police job description could include minimizing management duties and aligning required tasks with the district's safety and security needs. The district chief of police should attend TxSSC trainings to gain additional district safety and security management knowledge.

The district should establish a safety and security committee. Committee membership should be sufficiently broad to encompass a range of campus interests and concerns.

Recommended positions for this committee include: the superintendent or superintendent's designee; the district chief of police; campus principals or designees from each campus; an administrative building representative; a community representative; and a local law enforcement or emergency response representative. The Dalhart ISD Safety and Security Committee should meet regularly and address outstanding safety and security concerns in the district.

This effort should include the following key components:

- overseeing the implementation of recommendations resulting from the school year 2013–14 safety and security audit and subsequent audits;

- coordinating required safety and security audit of the district's facilities every three years, using the Texas Unified School Safety and Security Standards as a guide, and reporting results to TxSSC;

- facilitating annual safety and security assessments to address ongoing issues;

- developing and implementing a comprehensive, multihazard EOP that reflects the specific needs of Dalhart ISD students, staff, and facilities;

- training staff on the EOP;

- monitoring of all five recommended emergency drills, including a process to schedule, conduct, and track drills at all district facilities;

- communicating procedures broadly through a targeted training schedule and supporting documents, including procedural manuals and quick reference guides; and

- coordinating with local first responders for planning and emergency training, including formulating an MOU inter-local agreement with local emergency response staff to improve interagency awareness of district issues and emergency response readiness.

Since the time of the review, the district indicated that the chief of police began district coordination and oversight of emergency preparedness drills with a spreadsheet to document drills. However, the monitoring of drills does not include a formal process to schedule, conduct, and track all five recommended drills at all district facilities.

This recommendation could be implemented with existing resources.

ACCESS CONTROL AND VISITOR MANAGEMENT (REC. 44)
Dalhart ISD does not have effective safety and security processes related to visitor management, campus access, and use of video surveillance.

Dalhart ISD's Board Policy GKC (LOCAL) requires that each campus post prominent notices that visitors are required to first report to the campus administrative office. The school year 2016–17 student handbooks outline similar campus procedures related to visitors. The Dalhart Elementary School procedure requires all visitors to enter through the front door, sign in, and receive a visitor pass. The Dalhart Intermediate School procedure requires all visitors to report to the office and obtain a visitor pass; after 8:10 am, office staff electronically unlock the main door to admit visitors. The Dalhart Junior High School and Dalhart High School procedures require visitors to report to the principal's office to sign in for a pass that visitors must wear while in the building. Both procedures also indicate that visitors must return the pass and sign out at the conclusion of the visit. The Dalhart XIT Secondary School procedure indicates that visitors must first report to the office to sign in, and that visitors must have permission from the principal to be on campus during the school day. The junior high and high schools have sign-out procedures for visitors.

All campuses have signage to direct visitors to the administrative office as required by board policy. Dalhart ISD equips each campus with an electronic visitor management system into which visitors type their names to log in and out. The system automatically prints a badge with the visitor's name visible. Although Dalhart ISD campuses require visitors to sign in, they are not required to provide documentation to verify identity. The district's visitor management system can run a background check on each guest via a scan of valid identification; however, this functionality is not active at any of Dalhart ISD's campuses.

Each campus is responsible for following procedures to ensure the security of students and staff; however, the LBB School Performance Review Team observed multiple opportunities to circumvent existing strategies. For example, the review team was able to enter the intermediate school cafeteria through an unlocked exterior door and via the main entrance through a door that staff typically control with a remote electronic lock. The review team was also able to access multiple additional buildings on school campuses and the administration building through unlocked doors, often remote from monitored areas.

The district's five campuses all address access control differently, with varied levels of effectiveness. The elementary school controls access to the campus by designating one point of entry through the main doors. All other perimeter doors remain locked. The reception desk and electronic visitor badging station are within direct line of sight of the main entrance. After the start of the school day, office staff electronically unlock a magnetic partition to admit visitors. During onsite interviews, members of the elementary school parent–teacher organization indicated they purchased this equipment for the campus. Adjacent to the school is a large recreational area, which contains swings and other playground equipment and is used for recess. The fencing in this area has an opening facing a street and is easily accessible. The review team observed that campus staff do not secure the alley used for student pickup and drop-off during the school day.

The intermediate school designates one point of entry controlled by a magnetic locking door with a buzzer system. After the start of the school day, office staff electronically unlock access to the campus for visitors. However, the reception desk and principal's office are not within line of sight of the main entrance, and no physical barrier prevents access to the main hallway. An unsecured, paved alley that vehicles or pedestrians could easily access during the school day intersects the grounds of the intermediate school, including play areas and paths to instructional facilities. Since the time of the review, district staff indicated that the district installed chains that block the alley after the start of the school day, and staff remove them before dismissal.

The junior high school designates one point of entry for visitors. When visitors enter the unlocked main doors, procedures require visitors to sign in immediately at the campus administrative office. However, no physical barrier prevents visitors from bypassing the office and entering main common areas, and no alarm alerts office staff when someone has entered the building. During onsite interviews, teachers indicated that some external doors have faulty locks that cannot be consistently locked and unlocked with their keys. As an additional access control, the junior high school recently installed a number of external electronic access doors.

The high school is the newest facility and the most geographically removed from the other campuses. The campus designates a primary entrance that remains unlocked during normal business hours, but many additional entry points remain unlocked. Procedure requires visitors to sign in at the office, and the entrance area is visible to office staff.

However, no alarm indicates a visitor has entered, and no physical barrier prevents access to main hallways and common areas when a visitor accesses the primary doors. During onsite interviews, district staff and community members indicated that students use multiple unlocked or propped doors throughout the day, especially those to athletic and other facilities outside of the main building. District staff indicated they were in the process of getting board approval for additional electronic access doors to install as an additional safety measure.

The administrative building contains district leadership and administrative staff offices and the XIT Secondary School. The facility has one main entrance that remains unlocked during the school day and has no electronic locking system. Campus procedure requires visitors to sign in at the office, but no alarm indicates a visitor's entrance through the main doors. When office staff are away from their desks, visitors could gain access to the facility without staff observing them. No additional barriers prevent access to the XIT Secondary School or administrative offices, including the superintendent's office.

Dalhart ISD has not reduced the number of doors that staff and students can open internally in the event of emergencies, but which cannot be opened from the outside. The district also does not use intercoms at the front entrances as an additional access control.

Dalhart ISD maintains some surveillance cameras at the junior high school and the high school; however, existing cameras do not effectively surveil all areas of the district.

Most campuses do not use electronic surveillance. None of the campuses has full coverage of hallways, bus loading areas, parent pickup and drop-off areas, recreational areas, and student gathering areas. Junior high and high school staff stated in onsite interviews that the number of functioning cameras was insufficient at both campuses. The district was unable to provide an inventory of surveillance equipment to the review team.

The review team observed some campus staff greeting and challenging strangers, but overall the district does not train staff to escort or report visitors to the main office. Dalhart ISD also has not made a districtwide effort to train students not to open the doors to strangers, students, or known adults. The district shares visitor procedures with parents in student handbooks given to students and published online, but has not emphasized educating parents about the importance of following access control procedures.

The district's custodial staff reported that they are required to secure all doors while they clean, but that some Dalhart ISD staff leave or prop doors open. The district does not provide all campus staff with proximity cards to use with card readers at most commonly used doors, although the junior high and high schools have a limited number of electronic access doors.

Figure 9–4 shows some examples of site-based safety and security issues related to visitor management, access control, and surveillance.

FIGURE 9–4
DALHART ISD EXAMPLE SECURITY ISSUES AFFECTING SAFETY AND SECURITY BY CAMPUS
NOVEMBER 2016

ISSUE	ELEMENTARY SCHOOL	INTERMEDIATE SCHOOL	JUNIOR HIGH SCHOOL	HIGH SCHOOL	XIT SECONDARY SCHOOL
Electronic badging station not set up to run background checks	X	X	X	X	X
Personal identification not required as proof of identity	X	X	X	X	X
No camera surveillance	X	X	(1)		X
No electronic locking system			X	X	X
No barrier to access into main hallway		X	X	X	X
Multiple open access points leading to other school facilities				X	X

NOTE: (1) Surveillance cameras not in working order.
SOURCE: Legislative Budget Board School Performance Review Team, November 2016.

Gaps in safety and security practice could increase the potential for emergencies and threaten the safety of Dalhart ISD students and staff. The district's existing campus access control and visitor management practices allow unauthorized visitors to gain access to campuses without detection. These circumstances increase the likelihood of an unnecessary crisis, placing potentially dangerous visitors in direct contact with students and staff.

National School Safety and Security Services (NSSSS), a national leader in safety and security consulting, provides the following practical guidelines for the most effective strategies for reducing and controlling campus access:

- designate one main entrance and post signage identifying it as the main entrance. Maintain visible signage on campus and on all doors directing visitors to the main entrance door. Some districts also post notices advising that individuals who do not follow visitation procedures may be charged with trespassing;

- develop a visitor sign-in, sign-out, and escort procedure;

- reduce the number of doors that staff and visitors may access from the outside. Do not chain doors or cause a fire hazard. However, provide doors that staff and students cannot open from the outside, but from which those inside can exit in the event of a fire or other type of emergency;

- reconfigure main entrance layout to provide a secondary set of secure doors and funnel all traffic into the main office before visitors can gain access into the campus. To heighten the security further, make the initial exterior door buzzer controlled with a camera and intercom, thereby requiring visitors to be buzzed in the first door, funneled through a second door (which could also be controlled electronically, if appropriate), and only then provided access into the main building;

- consider use of a camera, intercom, and buzzer at the main entrance of the campus, especially at elementary schools. Be sure to have the controls for these doors at the desk of each secretary, rather than at that of only one staff, if main office staff control the doors. Train the secretaries on proper procedures for allowing access;

- secure custodial entrances and delivery doors during and after school hours. Have custodial staff retain a log of deliveries to include the name of the vendor company; name of the delivery person; license plate of vehicle; date and time of arrival and departure; and associated information;

- require all doors to be closed and secured from the outside while custodial staff and after-hours staff work inside the building during evening and night hours;

- train all staff, including support staff, to greet and challenge strangers; train staff to report strangers to the office if they do not feel safe in approaching someone they believe to be an intruder;

- train students not to open doors to strangers, other students, or even adults they may know;

- educate parents about access control strategies and the importance of them following the rules;

- develop a routine maintenance and timely repair program for the doors;

- consider the use of proximity cards for staff with card readers at most commonly used doors such as teachers' parking lot entrances, main entrance, doors used for recess and playground activities, doors used for physical education class activities, etc.;

- use magnetic locks on doors so that they close more easily;

- many campuses, especially high schools and other larger facilities, use surveillance cameras to monitor and record entrance points; although most campuses do not have adequate funding to staff full-time monitoring of surveillance cameras, these cameras can serve as a deterrent and can provide a record of who was in the area.

Dalhart ISD should develop and implement procedures to improve visitor management controls, secure access to campuses, and make effective use of video surveillance.

The district should model its procedures on the steps provided by the NSSSS. The district should train all staff on these procedures after they have been developed. The superintendent and campus administrators should then ensure that all campuses and district facilities are complying

with the procedures. Additionally, Dalhart ISD should consider the following procedures as part of its safety and security measures:

- assess the need for an additional electronic visitor management system function that screens visitors against internal and external watch lists, including sex offender databases;

- review the district's electronic security system, maximize full implementation of existing systems, and expand electronic systems where necessary; and

- conduct needs assessments and make strategic recommendations and estimates for projects and equipment, including a prioritized order of implementation.

Examples of some of the projects that the district should consider when developing strategic recommendations for improvements include:

- access control and visitor management system configurations at designated points of entry into all facilities (e.g., buzzers, magnetic door locks);

- closed circuit televisions (CCTV) in three dimensions and at least two technical approaches (e.g., wireless and wired CCTV systems);

- perimeter control systems (e.g., fending, barrier placement, types of barriers); and

- physical facilities protection systems (e.g., intrusion detection, burglar alarm systems) and their potential integration with the facilities' installed fire alarm system.

Since the time of the review, the district indicated that it requires visitors to Dalhart ISD campuses to provide a state-issued identification, and that the visitor management system runs background checks to screen for registered sex offenders.

The fiscal impact assumes that the district could implement procedures with existing resources. No fiscal impact is assumed for the purchase of equipment until the district determines the best equipment and systems to meet the district's needs.

COMMUNITY INPUT ON SAFETY AND SECURITY ISSUES (REC. 45)

Community input on safety and security issues is insufficient to ensure adequate planning and decision making.

The LBB School Performance Review Team found no evidence that the district has any formal process for gathering community input on matters of safety and security. The review team conducted a survey of district staff, campus staff, and parents to assess the level of satisfaction with safety and security at Dalhart ISD. The survey results showed that parents typically believe the district has more safety and security problems than Dalhart ISD staff believe. For example, 71.4 percent of district staff and 68.0 percent of campus staff agreed that gangs are not a problem in the district, compared to 51.6 percent of parents. Concerning drugs, 23.8 percent of district staff and 34.0 percent of campus staff responded that drugs are not a problem, compared to 15.1 percent of parents. Among parent respondents, 30.1 percent agreed that students receive fair and equitable discipline for misconduct, and 42.9 percent agreed that students feel safe and secure at school.

Figure 9–5 shows survey results on the perceptions of the various stakeholders.

Onsite interviews also identified community concerns with safety and security. Community members identified the following issues:

- drug proliferation among the campuses;

- inconsistent discipline practices;

- a perceived increase in crime in the district; and

- hostile parents or individuals visiting campuses.

The different perceptions of district staff, campus staff, and parents of Dalhart ISD students demonstrates a lack of alignment and connection to the local community on these issues.

The consequences of misalignment or miscommunication with the local community can degrade the credibility of district leadership and erode confidence in the overall safety and security of Dalhart ISD schools. Failure to respond to negative perceptions and growing community concerns can result in public relations issues for the district.

The National Crime Prevention Council's (NCPC) School Safety and Security Toolkit: A Guide for Parents, Schools, and Communities, 2009, is a best practice resource that includes detailed strategies for collecting community input on safety and security issues. The guide recommends a community forum to gain insight into community perceptions and to ask for assistance in developing safety and security plans, and provides helpful detail on planning, advertising, and conducting the forum.

FIGURE 9–5
DALHART ISD SAFETY AND SECURITY SURVEY RESULTS
NOVEMBER 2016

STATEMENT	GROUP	RESPONDENTS	STRONGLY AGREE OR AGREE	NO OPINION	STRONGLY DISAGREE OR DISAGREE
Gangs are not a problem in this district.	District Staff	21	71.4%	19.0%	9.5%
	Campus Staff	100	68.0%	25.0%	7.0%
	Parents	339	51.6%	24.8%	23.6%
Drugs are not a problem in this district.	District Staff	21	23.8%	19.0%	57.1%
	Campus Staff	100	34.0%	17.0%	49.0%
	Parents	338	15.1%	8.9%	76.0%
Vandalism is not a problem in this district.	District Staff	21	23.8%	23.8%	52.4%
	Campus Staff	99	39.4%	17.2%	43.4%
	Parents	339	24.8%	18.3%	57.1%
Students receive fair and equitable discipline for misconduct. (2)	Campus Staff	100	57.0%	15.0%	28.0%
	Parents	339	30.1%	17.7%	52.2%
Students feel safe and secure at school. (3)	Parents	338	42.9%	16.6%	40.5%

NOTES:
(1)   Percentages may not sum to 100.0 percent due to rounding.
(2)   This question was not included on the district staff survey.
(3)   This question was not included on the district or campus staff surveys.
SOURCE: Legislative Budget Board School Performance Review Team, November 2016.

In addition to parents and district staff, the guide suggests inviting other community members to the forum such as business leaders, law enforcement officers, and public health professionals. It recommends inviting people in the community who have a valuable perspective on school safety and security, and the ability to influence public action, opinion, and policy decisions. For example, effective districts could invite:

- public health and mental health professionals;

- local emergency service and healthcare providers;

- local business owners and Chamber of Commerce members;

- adult trainers specializing in group processes or conflict resolution or youth trained in peer mediation;

- elected officials such as city council members and the mayor;

- local faith-based leaders;

- law enforcement staff;

- juvenile and family court judges or other juvenile justice staff;

- leaders of neighborhood crime watch units and crime prevention groups;

- staff from the state-level school safety center (TxSSC); and

- members of the media.

The NCPC provides detail on facilitating the forum and brainstorming sessions to identify and mitigate safety and security issues. The guide includes systematic processes and checklists to use and offers suggestions on follow-up activities. **Figure 9–6** shows a sample agenda for this type of meeting.

Dalhart ISD should develop and implement a process to collect community input on safety and security issues to support common understanding and planning.

The superintendent should direct the chief of police to develop and implement an annual community forum on Dalhart ISD safety and security issues. The invited group should include the categories suggested by NCPC, when appropriate, and follow action steps similar to those provided in the NCPC toolkit. The resulting information should inform planning for safety and security and should serve as a platform for gaining community support for future decisions in these areas.

FIGURE 9–6
NATIONAL CRIME PREVENTION COUNCIL SAMPLE AGENDA FOR COMMUNITY SAFETY AND SECURITY FORUM 2009

1. Welcome

2. Introduce action team, forum participants, and facilitators

3. Provide brief overview of the safety and security campaign

4. Clarify goals and ground rules for the forum

5. Review safety assessment data

6. Provide overview of problems and problem-solving process

7. Break into brainstorming groups

8. Prioritize problems (30 minutes)

9. Brainstorm and prioritize barriers (90 minutes)

10. Brainstorm and prioritize solutions (90 minutes)

11. Brainstorm potential resources (30 minutes)

12. Reconvene as a forum

SOURCE: National Crime Prevention Council, School Safety and Security Toolkit: A Guide for Parents, Schools, and Communities, December 2009.

To strengthen communication and trust with the community, the district should develop and implement the following strategies with the supervision of the superintendent and the direction of the chief of police:

- implement quarterly surveys of community groups to gain an ongoing assessment of community perceptions of safety and security activities – This process should use a stratified sampling methodology that targets particular community subgroups, such as specific neighborhoods, differing age groups, business owners, law enforcement, youth support services staff, or religious organizations;

- ensure additional community representation on district committees – Designate community membership on specific safety and security committees and general planning groups that are likely to address safety and security issues, such as general district strategic planning committees;

- develop a formal communications plan to inform the community in the event of an emergency at one of the campuses – The plan should determine the best methods to disseminate emergency information to the public including text messages, social media, the district website, and local media. The plan should disseminate essential information

in a manner that will reach the most community members, depending on the severity of the incident or emergency; and

- develop a speaker series to inform the community of safety and security issues – Local law enforcement, designated district staff, state officials, and community leaders each have a different perspective on the safety and security of the district; providing these perspectives educates the community while building trust that district leadership addresses concerns in these areas.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 9. SAFETY AND SECURITY							
43. Assign district safety and security responsibilities to the district chief of police, form a district safety and security committee, and address outstanding safety and security concerns.	$0	$0	$0	$0	$0	$0	$0
44. Develop and implement procedures to improve visitor management controls, secure access to campuses, and make effective use of video surveillance.	$0	$0	$0	$0	$0	$0	$0
45. Develop and implement a process to collect community input on safety and security issues to support common understanding and planning.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 10. COMMUNITY INVOLVEMENT

An independent school district's community involvement function requires communicating with and engaging stakeholders in district decisions, operations, and classrooms, as appropriate. District stakeholders include students, staff, parents, 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, campus-to-home communications, family and community engagement events, local media, the district's website, social media, and other technological tools.

A successful community involvement program addresses both the unique characteristics of the school district and the community. A high level of community involvement plays a critical role in school improvement and accountability. Community members and volunteers provide valuable resources that enrich and enhance the educational system. In turn, the community directly benefits from an informed citizenry, educated workforce, and future community leaders.

The Dalhart Independent School District (ISD) executive director of student services is responsible for overseeing community involvement, family engagement, public relations, and communications for the district. At the campus level, the principals manage community involvement, family engagement, and communications. **Figure 10–1** shows the district's community involvement organizational structure for school year 2016–17.

Since 2012, several dairy farms, potato farms, livestock producers, and food processing companies have expanded their Dalhart operations. The growth in commercial agricultural activity in the area has contributed to lower unemployment, higher property values, and a growing student population at Dalhart ISD.

Economic growth has also brought challenges to Dalhart, such as increased employment of migrant farm labor and resultant increases in the student mobility rate. The Dalhart ISD student population includes the following demographic groups: Hispanic (55.0 percent), economically disadvantaged (55.3 percent), at-risk students (35.4 percent), and English language learners (9.5 percent). Many of these students have parents who work 12-hour shifts at nearby dairies, farms, or factories. In addition, a growing number of migrant students speak only a Mayan language of Guatemala called K'iche', and Dalhart ISD often has difficulty finding interpreters. Like other small Title I school districts who serve a significant percentage of economically disadvantaged students, Dalhart ISD faces challenges engaging parents from diverse backgrounds, aligning community support with students' needs, and communicating the district's mission to the public.

ACCOMPLISHMENTS

♦ Dalhart ISD has a comprehensive center that provides early childhood education on the elementary school campus.

♦ Dalhart ISD's successful community partnerships led to the development of a dual credit college campus.

♦ Dalhart ISD employs effective technologies to communicate directly with parents.

FIGURE 10–1
DALHART ISD ORGANIZATIONAL STRUCTURE FOR COMMUNITY INVOLVEMENT
SCHOOL YEAR 2016–17
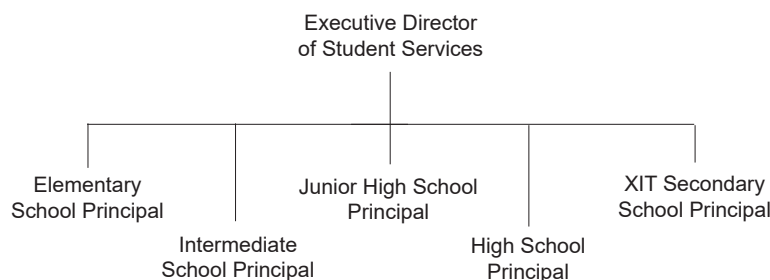
Sources: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

FINDINGS

♦ Dalhart ISD's community activities lack coordination and are delivered in an inconsistent method.

♦ Dalhart ISD lacks a strategic communication process resulting in the district missing critical opportunities to promote and support its mission.

♦ Dalhart ISD's public information policy lacks well-defined procedures to ensure continued compliance.

RECOMMENDATIONS

♦ **Recommendation 46: Perform needs assessments and coordinate community support at the district level with schools' needs.**

♦ **Recommendation 47: Develop and implement a districtwide public relations plan and conduct outreach to community and media accordingly.**

♦ **Recommendation 48: Develop an internal process for responding to public information requests, advertise the process clearly, and provide proper training of the public information officer to ensure compliance.**

DETAILED ACCOMPLISHMENTS

PARTNERSHIP WITH EARLY CHILDHOOD EDUCATION CENTER

Dalhart ISD has a comprehensive center that provides early childhood education (ECE) on the elementary school campus.

In 2006, Dalhart ISD collaborated with the Dalhart Area Child Care Center (DACCC) and provided space for the comprehensive center for ECE on the elementary school campus. DACCC, a 501(c)(3) nonprofit organization, uses two buildings on the campus. The childcare facility is 14,000 square feet in size, and it sits directly behind Dalhart Elementary School. The Making a Great Independent Child (MAGIC) afterschool program, also administered by DACCC, is housed in a temporary trailer on the elementary campus. Dalhart ISD agreed that the childcare center would pay $1 per year for cost sharing of land and the building. The superintendent and the elementary school principal are members of the center's board of directors.

DACCC houses childcare, Head Start, and prekindergarten programs, all in one facility. Head Start is a federal program to promote readiness for school among preschool-age

children in the U.S. In total, DACCC serves almost 100 children. Of these, about half of the children attend:

- childcare, from age six weeks;

- prekindergarten for ages 4 and 5; and

- Head Start for ages 3 and 4 in adjacent classrooms to prekindergarten.

The colocation of all three programs in the same facility, adjacent to the elementary school, is a model of comprehensive early childhood education. According to the National Association for the Education of Young Children, comprehensive approaches to ECE are critical for children living in poverty, multilingual children, and children of various ethnicities. Early educators serve a vital role in ensuring that children have access to developmentally appropriate, high-quality early education to prepare them for kindergarten.

In addition to the early childcare services at DACCC, about 40 school-age children attend the MAGIC afterschool program, which serves students up to age 11. The afterschool teachers meet the students in the elementary school cafeteria at dismissal and walk with them to the trailer that houses the MAGIC program. If weather permits, the children spend much of their time on the elementary school playground. Teachers provide a snack and help with homework, if necessary. MAGIC also provides summer care for children of interested parents.

Parents can pick up both the childcare and MAGIC participants at 5:30 pm, making it convenient for parents with siblings. This longtime community relationship resulted in a strong partnership that supports Dalhart ISD's students and their working parents.

PARTNERSHIP WITH JUNIOR COLLEGE AND SUCCESSFUL GRASSROOTS CAMPAIGN

Dalhart ISD's successful community partnerships led to the development of a dual credit college campus.

By collaborating with the City of Dalhart, Dallam and Hartley counties, and Frank Philips College (FPC), among other community partners, Dalhart ISD leaders contributed to a successful grassroots campaign that led to the November 2016 passage of a maintenance tax that will support a new FPC campus in Dalhart.

The Dalhart campus of FPC began to operate in 2012 out of the Dallam County Annex. Soon thereafter, FPC and

Dalhart ISD signed a Dual Credit Contractual Agreement for eligible Dalhart ISD juniors and seniors to enroll in post-secondary academic courses through FPC. Based on this cooperation, in 2015, the Amarillo Area Foundation donated $25,000 to FPC, which provided 45 laptop computers for every DHS student enrolled in the dual enrollment program. For school year 2016–17, 341 Dalhart ISD students enrolled in 14 dual credit courses with 1,809 possible credit hours earned.

Dalhart ISD also had a strong relationship with Community Connect, the Dalhart Education Foundation program that sponsored enrichment classes for adults and youth. Dallam County, Hartley County, the City of Dalhart, Dalhart ISD, and Dallam-Hartley Counties Hospital District jointly fund Community Connect. The program also relies on corporate and individual donations, which help to pay for student scholarships and camps. The foundation provided significant grants to Dalhart ISD, and the district provided Community Connect with space without charge. Effective spring 2016, Community Connect is now housed in FPC. Some Community Connect classes will continue to use Dalhart ISD's schools, and others will be housed in the new campus site.

In early 2016, the district recognized the need to build a new FPC campus in Dalhart due to increasing enrollment in the dual credit program. The City of Dalhart donated 32 acres of land near Rita Blanca Lake for the new campus. The Dalhart ISD superintendent participated in a coalition to support a tax proposal to fund the campus development. The coalition included area school superintendents, business leaders, Coon Memorial Hospital representatives, and FPC representatives. The Dalhart ISD superintendent, the executive director of student services, principals, and students canvassed neighborhoods and handed out flyers to promote passage of the tax to support the new college campus.

In November 2016, the voters of Dallam and Hartley counties passed the maintenance tax. The new campus will house 29 instructional spaces; a health science simulation lab; biology, chemistry, and life sciences labs; and a learning resource center. The involvement of Dalhart ISD staff and students played a key role in the passage of the tax for the new campus.

PARENT ENGAGEMENT

Dalhart ISD employs effective technologies to communicate directly with parents.

Dalhart ISD communicates with families by supplementing print communications with a variety of technological tools. Parent communications include the following tools:

- Campus leaders print and distribute weekly newsletters to parents. The elementary and intermediate schools include the newsletters in students' folders for parents, and the junior high and high schools give them to students during a set class period. The schools also post many of the newsletters on their social media pages;

- The district signs up all parents to the School Messenger system, which provides attendance and emergency communications by phone or email. The principal or secretary at a school can call parents immediately to locate a student who is absent or missing class and inform the parents;

- Parent Portal is an online application that provides parents with password access to view their students' grades and to support students' academic achievement. Principals direct all teachers to upload grades regularly into the electronic system, so that parents can review students' progress. Parents also receive weekly progress reports and grade reports every six weeks;

- Some teachers ask parents to sign up for texts or emails through the Remind 101 service, which are electronic reminders that teachers can send to parents about homework or tests. When parents respond to the texts, administrators can see the dialogue between parents and teachers, which helps administrators to provide feedback and oversight; and

- Dalhart ISD updates its websites and provides information for parents through social media. For example, the district and each campus host Facebook pages that provide parents and community members with photographs, videos, and information about the schools' activities. The high school also hosts pages on Twitter, Instagram, and Snapchat, to connect with students.

Dalhart ISD's innovative use of technological tools to communicate with parents has helped to boost parent participation at district and campus events. For example, based on sign-in sheets from Back-to-School Night in September 2016 and the Thanksgiving Luncheon in November 2016, the elementary and intermediate schools

reported more than 90.0 percent parent participation. In October 2016, more than 95.0 percent of elementary school parents attended parent–teacher conferences.

DETAILED FINDINGS

COMMUNITY PARTNERSHIPS (REC. 46)

Dalhart ISD's community activities lack coordination and are delivered in an inconsistent method.

Dalhart ISD has received extensive community support from various entities, including the Dalhart Education Foundation, religious organizations, businesses, civic institutions, and city government. **Figure 10–2** shows some examples of Dalhart ISD's diverse community support.

Although the district enjoys broad community support, Dalhart ISD does not coordinate community activities, donations, and services through a formal district effort. During onsite interviews, community business leaders indicated that they approached the district to offer their assistance. Individuals initiated contact to district staff they knew, such as family members, teachers who lived in their neighborhoods, or friends, and offered donations or services. Dalhart ISD's central administration does not provide coordination, integration, or guidance to its campuses regarding community involvement activities.

The lack of a consistent approach for initiating and organizing community support may cause Dalhart ISD to miss opportunities for assistance from the community. The district

FIGURE 10–2
DALHART ISD EXAMPLES OF COMMUNITY SUPPORT
SCHOOL YEAR 2016–17

COMMUNITY PARTNER	CONTRIBUTIONS
Area businesses	Area Farmers Insurance office donates one bicycle each month to support the Dalhart Elementary School attendance incentive program.
	First State Bank donates water bottles for concerts, concessions stand sales, and the Dalhart High School band.
	The Hilmar Cheese Company's annual scholarship program provides college or trade school tuition scholarships for children of district employees, children of the dairy farm families that ship milk to the district, and local students pursing agricultural degrees. Hilmar also donated $10,000 to the Snack Pack 4 Kids program.
	Project Graduation invites business leaders to volunteer to teach about insurance, finance, and other life skills at the high school once a week for a six-week program.
	United Grocery donated end-of-year supplies for an elementary school party.
	A local physician provides physicals for $5 to $10 to qualify Dalhart students to play sports.
	AgriVision Farm Management provides onsite English as a Second Language (ESL) classes for its employees and tutoring for their children, and childcare onsite.
	JBS Pork (formerly Cargill Pork) provides onsite ESL classes.
	Mazzio's Pizza donates backpacks and school supplies.
	Dalhart Christian sent thank-you notes and candy bars to support teachers.
	The Dalhart Realtor's Association donates attendance incentives.
	Other business partners include: Circle H Lab Tech, Dalhart Co-op, Dalhart Monogram, SPC, ShopKo, Iron Monkey, The Grill, Hartley County Extension Agents, Hartley County Game Warden, John Deere Kyle Grimsley, State Farm Insurance, First National Bank, and Paradigm Technologies.
	The Dalhart Chamber of Commerce includes a link to Dalhart ISD schools on its website and information about the schools in its directory and welcome packets.
	Eta Upsilon Sorority distributed $8,750 in scholarships, including, for example, $2,600 in teacher scholarships and $550 in scholarships to high school seniors.
	The Elks Club and Rotary Club donated scholarships to students.

FIGURE 10–2 (CONTINUED)
DALHART ISD EXAMPLES OF COMMUNITY SUPPORT
SCHOOL YEAR 2016–17

COMMUNITY PARTNER	CONTRIBUTIONS
High Plains Dairy Council	Hosts Dairy Day field trip for 125 grade four students to local dairies and provides buses to transport the students.
Dalhart Ministerial Alliance and individual churches	The First Baptist Church Recreation Outreach Center (ROC) provides a gym and game room for teenagers to socialize in after school every weekday. The ROC also has provided academic help for students. Youth ministers supervise activities at the ROC. The ROC hosts the Fifth Quarter social event after each high school football game.
	Snack Pack 4 Kids provides food for children that live in an environment where regular nutritious meals may be absent. Snack packs are sent home each Friday or on the last weekly school day.
	St. Anthony's Church provides space for high school students to tutor elementary students one hour before youth group meetings.
	New Life Fellowship provides a bus ministry that travels into the community, feeds children, and returns them to their homes.
	The Warmth of Grace coat drive collected 700 coats.
	Lincoln Street Baptist Church coordinates a food pantry and feeding program for students during the summer. During the month of July, church volunteers deliver 600 meals a day, five days a week, to homes.
	During the annual Trash Bash, volunteers clean up by the lake.
	One Heart is a group of churches that provides coats, shoes, and other necessities to students.
	Hillside Church donates backpacks and school supplies.
	Primera Iglesia Bautista and Templo Rios de Agua Viva, Asambleas de Dios, provide Spanish-speaking services.
Dalhart Education Foundation	The foundation awards grants to teachers for projects that exceed what the regular curriculum offers to students, such as glasswork art projects, science projects, and a butterfly project. The foundation also awards grants for technology. The foundation collects private donations and works with the Amarillo Area Foundation. During the past two school years, local contributions have totaled $50,000 each school year, and the Dalhart Education Foundation has matched those funds to total $100,000 to fund projects for the districts served. In 2016, the foundation changed its name to the Dallam and Hartley Counties Education Foundation as it expanded its service area to include the Texline, Channing, and Hartley school districts.
Amarillo Area Foundation	Donated $25,000 via the Dalhart Education Foundation in 2015 for 45 laptop computers for the Dalhart High School dual enrollment students.
Community Connect	Provides enrichment classes for children and adults, including ESL and General Educational Development (GED) classes, and safety classes onsite at the Hilmar Cheese Company. Dalhart ISD teachers who volunteer to teach the classes receive a stipend.
Dalhart City Government	Provided land for the new Frank Philips College campus, works with the schools on traffic safety issues, and partially funds the Dallam and Hartley Counties Education Foundation.
Rita Blanco Theatre	Field trips.
XIT Museum	The museum, which includes historical and period exhibits, collaborates with local schools and art teachers to offer a visiting artist program.
Dalhart Area Child Care Center (DACCC)	DACCC provides childcare for children ages six weeks to five years and provides Head Start and prekindergarten programs. It also houses the Dalhart ISD afterschool program.
Frank Phillips College (FPC)	Dual-enrollment program with DHS. Effective 2016, FPC also houses the Dallam and Hartley Counties Education Foundation and Community Connect.
4-H	The national, nonprofit organization for youth development provides school enrichment.

FIGURE 10–2 (CONTINUED)
DALHART ISD EXAMPLES OF COMMUNITY SUPPORT
SCHOOL YEAR 2016–17

COMMUNITY PARTNER	CONTRIBUTIONS
Services Providers	Texas State Department of Health and Human Services sets up a free immunization clinic once a month at Dalhart sites for anyone, including students, parents, and staff.
	The Dallam County Juvenile Probation Office donates backpacks and school supplies.
	The Lions Club donates glasses to students.
	Community organizations provide social services to Dalhart Intermediate School students, such as counseling, occupational therapy, physical therapy, and vision therapy.

SOURCES: Legislative Budget Board School Performance Review Team; Dalhart ISD, November 2016.

does not maximize all available community resources and forgoes some opportunities to meet certain campus and student needs. For example, an immunization clinic opens once a month, but the district does not include information about it in materials that are given to parents weekly. Consequently, the clinic serves few students. Similarly, the district has not advertised the Dallam and Hartley Counties Education Foundation to new teachers at orientation. As a result, new teachers may miss opportunities for foundation funding for school projects.

In another example, a teacher at the intermediate school ran a successful mentoring program that used community volunteers to mentor students in reading and comprehension. The program previously included more than 100 volunteers each year, and local businesses provided sponsorships. However, the teacher operated the program without the assistance of the district. When the teacher retired, the program ceased to exist.

According to the Federation for Community Schools, an Illinois-based group that provides support and a professional learning community, effective school districts use various assessments to improve community relations and increase parental engagement. These assessments may include the following tools:

- student needs assessment;

- parent needs assessment;

- teacher assessment, to identify classroom needs for student programs;

- community resource assessment;

- community eco map, a diagram that shows community relationships and connections; and

- community assessment, to identify community issues that affect families.

Child Trends is a nonprofit, nonpartisan research center that studies child development. In its 2014 publication Making the Grade: Assessing the Evidence for Integrated Student Supports, the organization suggests that effective schools systemically coordinate needs assessments with a community assets survey. These assessments are conducted through coordination of supports, integration within schools, community partnerships, and data collection and tracking. This comprehensive, integrated student supports approach enables an effective district to perform the following tasks:

- remove academic and nonacademic barriers to learning;

- increase the chances for students to succeed in school; and

- expand students' opportunities for positive youth development.

Establishing an advisory council or leadership committee is a best practice to provide open dialogue among district staff and community members, and to provide opportunities for community input into districtwide planning activities. Fort Bend ISD established and facilitated a Partners in Education Advisory Council to involve partners in setting and achieving goals and objectives. By including school and business partners, the committee provides input about key operational issues facing the district, participates in planning activities, and builds positive relationships in the district.

Dalhart ISD should perform needs assessments and coordinate community support at the district level with schools' needs.

Dalhart ISD principals should conduct comprehensive needs assessments to determine all the challenges that their schools have. Next, the executive director of student services should summarize all the schools' needs and align them with a survey of the community's assets. The district should repeat this process annually, enabling district and campus administrators to include potential community support when they are developing their district and campus improvement plans. **Figure 10–3** shows an example framework for aligning the students' needs with community assets.

This recommendation could be implemented with existing resources.

PUBLIC RELATIONS (REC. 47)

Dalhart ISD lacks a strategic communication process resulting in the district missing critical opportunities to promote and support its mission.

Dalhart ISD principals manage their own public relations and communications, without district guidance or support. The schools communicate with parents through weekly campus newsletters, emails, or texts from classroom teachers. The schools also post communications on campus websites and social media pages. However, no districtwide strategy for public relations or measurable goals is in place.

FIGURE 10–3
DALHART ISD EXAMPLE FRAMEWORK FOR ALIGNMENT OF SCHOOL NEEDS WITH COMMUNITY ASSETS

SCHOOL NEED	COMMUNITY ASSET
Housing for teachers	City government
	Economic development corporation
	Businesses
Quality of life improvements	Businesses – expanding retail or entertainment options in Dalhart
	Chamber of Commerce
	Economic development corporation
	City government
	Frank Philips College
Dalhart Grow-Your-Own Program for Teachers (1)	Community Connect
	Frank Phillips College – program for English as a Second Language (ESL) certification (including current teachers)
	Businesses
	Parents
	Head Start parents (especially fill the need for bilingual teachers)
	Regional Education Service Center XVI (Region 16)
Parenting programs	Community Connect and Frank Phillips College
	Region 16
	Businesses – providing programs onsite, and perhaps giving staff time during work hours to attend the ESL, General Educational Development (GED), or parenting classes
	Churches – providing ESL, GED, or parenting programs onsite
	Onsite ESL and parenting classes at places of business and onsite churches before or after Spanish-speaking church services or before or after youth group programs for their children
Afterschool or summer programs	Community Connect and Frank Phillips College
	Churches and the Dalhart Ministerial Alliance
	Businesses

FIGURE 10–3 (CONTINUED)
DALHART ISD EXAMPLE FRAMEWORK FOR ALIGNMENT OF SCHOOL NEEDS WITH COMMUNITY ASSETS

SCHOOL NEED	COMMUNITY ASSET
Mentoring or tutoring program	Churches
	Businesses
	City government
Wraparound services	Social service providers
	Churches
	City and county governments
	Migrant staff
	Hospital district
Significant financial resources	Dalhart ISD could choose one goal and conduct a large fund-raising campaign for the following options: • establish a parenting center or subsidize parenting programs; • update the Dalhart ISD website with online parenting resources; • set up an afterschool, tutoring, or mentoring program; • subsidize teacher housing or childcare; or • provide scholarships to Dalhart High School graduates who become teachers and return to Dalhart ISD.
Potential sponsorships	Dalhart ISD could ask businesses and other community groups to donate funds or act as sponsors for the following ideas: • welcoming signs for school entries; • food, snacks, or refreshments during parenting classes; • babysitting for small children during parenting classes; • funding to pay teachers a stipend for tutoring; or • funding to support the implementation of a home visitation program.
Public relations	High school newspaper
	Video making by high school students or adult volunteers, or adults who enroll in a Community Connect class – make videos showing the positive contributions of Dalhart ISD to the community (use the Dalhart Dairy Council video as a model)
	School magazine – sponsored by a local business
Cultural exploration	Learning about the Guatemalan families in the community that speak K'iche' through presentations, foods, and clothing in an informal setting, such as International Night– the event could be sponsored by Community Connect, in collaboration with Dalhart ISD, the City of Dalhart, and a local farm that employs many of the K'iche'-speaking residents

NOTE: The Grow-Your-Own Program also offers potential collaboration for substitute teachers, instructional aides, English as a Second Language-certified staff, and migrant recruiters.
SOURCES: Legislative Budget Board School Performance Review Team, December 2016; Dalhart ISD, November 2016.

Additionally, Dalhart ISD lacks a process to ensure that the district celebrates or communicates to the board or the public its accomplishments. Little evidence shows that Dalhart ISD distributes news releases or otherwise publicizes accomplishments in any strategic way to the public.

Dalhart ISD is also missing opportunities to promote and support the district's mission in the media. For example, the local Dalhart Texan newspaper covers school sports and events, and publishes photographs of Dalhart ISD students. However, the newspaper typically contacts the school or attends board meetings to obtain information. Although Dalhart ISD may ask the newspaper to inform the public about Registration Night or Back-to-School Night, the district rarely contacts the newspaper with story ideas. During onsite interviews, Dalhart Texan staff indicated that

the newspaper would welcome Dalhart ISD to contact the paper with story ideas. The Texan staff indicated willingness to publish district information regularly. Community representatives suggested that the local radio station was receptive to making public service announcements on air and could be a communication resource for Dalhart ISD.

At the time of the review, Dalhart ISD's website lacked a mission statement or message from the superintendent; it does not highlight Dalhart ISD's strengths, successful programs, or recent achievements. The campus websites are also inconsistent in their messaging. The intermediate school website include a principal's message. The elementary and junior high schools and XIT Secondary School websites include mission statements. The high school site does not feature either of these posts. The schools' websites have no links to Dalhart ISD's successful social media forums (e.g., Facebook and Twitter pages). During onsite interviews, parents stated that they check the calendar, bell schedule, and staff emails, but they did not use the schools' websites for anything else.

The Texas Education Code, Section 39.0545, requires all districts to evaluate their performance and the performance of each campus in community and student engagement. All school districts are required to assign a performance rating to the district and each campus for overall performance in seven

categories, including community and parental involvement. They are also required to post the ratings and compliance statuses for the district and each campus on the school district's website. Dalhart ISD does not comply with the requirement to post this information.

Without a process to manage public relations, Dalhart ISD does not address negative perceptions of the district. As described by one individual in the community, "There is a high level of dissatisfaction. There's a huge morale problem in the district. It's a toxic environment."

Even small concerns can erode morale and affect confidence in school leadership. For example, according to a parent survey given by the Legislative Budget Board (LBB) School Performance Review Team in October 2016, 60.8 percent of parents agreed that they are notified immediately if their children are absent from school. However, 61.3 percent of parents said they believe that the district fails to communicate in a timely manner. More than 40.0 percent of parents think their children's principal is an effective leader. However, only 18.3 percent of parents agree that the superintendent is an effective leader; 66.3 percent realize that teacher turnover is a critical issue; and 67.5 percent said they think that the district does not provide a high-quality education. **Figure 10–4** shows results of the LBB parent survey.

FIGURE 10–4
DALHART ISD PARENT SURVEY RESULTS SAMPLE
SCHOOL YEAR 2016–17

STATEMENT	AGREE OR STRONGLY AGREE	NO OPINION	DISAGREE OR STRONGLY DISAGREE
The school board allows sufficient time for public input at meetings	23.1%	40.6%	36.3%
The superintendent is an effective leader.	18.3%	22.3%	59.4%
The principal is an effective instructional leader.	40.1%	24.5%	35.5%
Board members and administrators do a good job explaining the district's use of tax dollars.	15.0%	29.5%	55.5%
The district's financial reports are easy to read and understand.	15.8%	39.4%	44.8%
The district's financial reports are readily available to parents and community members	15.6%	35.5%	49.0%
The district provides a high-quality education.	24.0%	8.5%	67.5%
The district communicates with parents in a timely manner.	29.3%	9.4%	61.3%
Parents are immediately notified if a child is absent from school.	60.8%	15.3%	24.0%
Teacher turnover is low.	12.0%	21.6%	66.3%

SOURCE: Legislative Budget Board School Performance Review Team, Parent Survey, October 2016.

These perceptions and concerns affect parents' decision making. For example, some Dalhart parents choose to send their children to schools in other towns. Four buses take 100 students who reside in the city of Dalhart to Hartley ISD, Channing ISD, and Texline ISD schools. In addition, 100 local elementary and intermediate school-age students attend St. Anthony Catholic School, and 84 local students in the same age group attend Dalhart Christian Academy. A parent may choose to send a child elsewhere for a variety of reasons, but perceived deficiencies in Dalhart ISD are strong reasons, according to onsite interviews with parents.

According to the National School Public Relations Association (NSPRA), the role of school public relations is to maintain mutually beneficial relationships between the school district and the stakeholders it serves, such as business leaders, community members, teachers, families, and students. Each school district has its own unique way of carrying out this role, but all successful public relations programs contain one common element: they are planned. NSPRA delineates the following four-step public relations process:

- researching the issues;

- developing an action plan;

- implementation; and

- evaluation.

NSPRA encourages schools to take charge of their images, and market their positions and messages in their communities. In addition, opportunities for genuine, two-way communications build trust and relationships, which are both critical to promoting and supporting the schools effectively.

Dalhart ISD should develop and implement a districtwide public relations plan and conduct outreach to community and media accordingly.

Working closely with the superintendent and principals, the executive director of student services should draft a public relations plan. It should include measurable goals and actionable implementation steps. **Figure 10–5** shows the recommended implementation steps for Dalhart ISD's public relations plan.

FIGURE 10–5
DALHART ISD RECOMMENDED IMPLEMENTATION STEPS FOR THE PUBLIC RELATIONS PLAN

STRATEGY	IMPLEMENTATION
Strengthen the message	Provide a framework for the Dalhart ISD public relations plan using the most recent mission and strategic vision and language already incorporated into the Dalhart ISD School–Parent Compacts and student handbooks. Use internal communications to ensure that all staff and board members know the vision statement and mission.
Support campus efforts to promote their schools	Develop and support a positive image of the district to promote Dalhart ISD. Develop a districtwide plan to announce successful initiatives, accomplishments, or positive examples of students' academic achievements. Support campuses in their current efforts, including providing guidance on ways to use social media and the Dalhart ISD website to promote schools.
Encourage community engagement	Improve transparency, community engagement, and two-way communications; and solicit public input by developing a districtwide process to disseminate information widely about Dalhart ISD events or special programs.
Meet with key communicators, stakeholders, and partners	Meet with key communicators, stakeholders, and current and potential partners. Develop a calendar and chart to ensure that a senior Dalhart ISD staff member attends the following meetings: monthly Chamber of Commerce meetings, City Council, joint County Commissioners, Dalhart Economic Development Corporation, Dallam–Hartley Counties Hospital District, and Dalhart Education Foundation. Reach out to the Dalhart Ministerial Alliance, and build relationships with the youth ministers. Reach out to business community leaders and build formal and informal relationships.
Reach out to local news outlets consistently	Make contact and build relationships with the local media sources, especially the *Dalhart Texan* newspaper reporters who cover school-related issues and the KXIT radio station that also reports about current events. Reach out to the local television news station, find out what material its reporters need (i.e., quality video footage), and support campus efforts to supply material. Reach out to the Chamber of Commerce to strengthen Dalhart ISD's presence on the chamber's website and establish a process to submit district news for publication in the chamber's newsletters and on its website.
Develop a process for handling change and controversy	Establish a process to manage changes to policies, long-standing controversial issues, and emergencies. Changing the elementary school dismissal time is an example of a change to a Dalhart ISD policy. School discipline is an example of a long-standing controversial issue. A student bringing a gun to school is an example of an emergency or pressing issue.

FIGURE 10–5 (CONTINUED)
DALHART ISD RECOMMENDED IMPLEMENTATION STEPS FOR THE PUBLIC RELATIONS PLAN

STRATEGY	IMPLEMENTATION
Evaluate and strengthen communications tools	Evaluate communications vehicles, including the Dalhart ISD district and campus websites and social media pages, text reminders used by classroom teachers to parents, and emails sent by the district office to inform people about board meetings. Conduct a survey to assess when community members are checking social media most often, who is looking at the website, and what is most popular.
Use websites as a public relations tool	Populate the district's website with the mission, information, and positive details about district schools. Post a personal message from the superintendent that welcomes community members and parents to Dalhart ISD. Link to the district's social media platforms on the home page of the website.
	Ensure that Dalhart ISD is fully compliant with statutory requirements pursuant to the Texas Education Code, Section 39.0545, that require posting the district's Texas Academic Performance Report to its website. This posting satisfies two objectives; it would comply with state law, and, concurrently, it would promote the district's accomplishments and transparently display how it reached its self-evaluated reports.

SOURCE: Legislative Budget Board School Performance Review Team, November 2016.

The executive director of student services should present the draft public relations plan to the board for an opportunity for a public hearing, review, suggested changes or clarifications, and approval. At the end of each school year, the district should review, evaluate, and update the plan as necessary. To implement the plan, senior Dalhart ISD staff—including the superintendent, the executive director for student services, and the chief financial officer (CFO)—should determine whose skills and availability best meets the roles assigned.

This recommendation could be implemented with existing resources.

PUBLIC INFORMATION REQUESTS (REC. 48)

Dalhart ISD's public information policy lacks well-defined procedures to ensure continued compliance.

In 2015, using the Texas Association of School Board (TASB) Legal Services, Dalhart ISD updated its comprehensive Board Policy GBAA (LEGAL) regarding Information Access – Request for Information. The policy includes the following relevant elements:

- the policy states, "A superintendent shall be the district's officer for public information. Each department head shall be an agent of the officer for purposes of complying with the public information laws";

- the district's policy requires that the officer promptly produce the information and, if the officer cannot produce the information within 10 business days, the officer shall certify in writing why it is unavailable or

when it will be available, consistent with the Texas Government Code, Section 552.221; and

- the district's policy indicates that public information can be provided in an "electronic medium," if requested as such (consistent with the Texas Government Code, Section 552.228) or referral to an exact internal location on a website maintained by the district and accessible to the public (consistent with the Texas Government Code, Section 552.221(b) to (b-2), and Section 552.226).

The Dalhart ISD superintendent has asked the CFO to serve as the public information officer (PIO). This assignment is consistent with the Texas Government Code, Sections 552.201 to 552.204, and its board policy. A public official may designate a public information coordinator to satisfy the training requirement for the official if the coordinator is primarily responsible for administering the responsibilities of the official or governmental body in accordance with the Texas Public Information Act (PIA).

Dalhart ISD received three public information requests in 2016. The first request, sent in separate emails on October 12 and October 13, asked for a list of Dalhart ISD employees with titles and positions. The second request asked for the same list, but also requested staff emails. The Dalhart ISD PIO sent the requested list, with the staff email addresses, in spreadsheet file format via email by October 21. This response was within the 10 business-day period cited in the legal policy. The district's handwritten Open Records Requests log included both requests, the requestors' names, the substance of the requests, and the requested and fulfilled dates.

A community member made the third request, sent it on October 18, and revised it on October 21. It requested all communications between the LBB and the elected representation of the Dalhart ISD regarding the November 2016 school review. After legal consultation, on October 28, the Dalhart ISD superintendent mailed a letter to the requestor with the requested information, thus satisfying the required 10-day response time. However, the PIO did not note this request on the district's Open Records Requests log.

Pursuant to the Texas Government Code, Section 552.205, the district's policy also requires the district's administrative offices to "prominently display a sign in the form prescribed by the attorney general… where it is plainly visible." However, neither the district office nor the campus offices display such a sign, nor does the Dalhart ISD website provide that information.

At the time of the onsite review, Dalhart ISD has complied with its public information policy in a timely manner. However, the district had not logged all the requests into a formal, electronically saved spreadsheet. Dalhart ISD does not have internal written procedures on how staff should implement the public information policy, nor does the district make the policy clear and accessible to requestors.

As a result of this informal process, Dalhart ISD staff could lose or misplace subsequent requests, especially if the number of requests were to increase. Furthermore, the lack of formal procedures reduces the perception of transparency, and poses a legal risk to the district. Without written procedures, new staff to the district may not know how to respond properly to the public information requests. The Texas PIA, as stated in the Texas Government Code, Chapter 552, provides clear guidance to public entities regarding their required responses to public information requests. For ease of district compliance, the Texas Education Agency (TEA) website provides links to a detailed PIA handbook and a printable, one-page sign to explain requestors' rights to district visitors, among other resources. Austin ISD has a best practice model for publishing information related to PIA requests on its website. Beaumont ISD also has a page for public information requests on its website, which includes an online PIA request form and a fee schedule.

The Office of the Attorney General offers a free, one-hour to two-hour, online training and certification (texasattorneygeneral.gov). Alternatively, TASB offers members a one-hour, online training for $65 (www.tasb.org). Such training will ensure that staff is knowledgeable about the proper dissemination of public and private data, which future issues may require legal counsel, and what steps would be appropriate as they set up an internal process.

Dalhart ISD should develop an internal process for responding to public information requests, advertise the process clearly, and provide proper training of the PIO to ensure compliance.

The Dalhart ISD superintendent should provide training to the PIO and any other department heads who may act as agents of the officer. This training would include sending the PIO for training through the Office of the Attorney General and through TASB.

Next, the district should develop and implement an internal procedure for the PIO or staff to officially log in the requests and note when the PIO or staff have sent responses to the requestor. The PIO should electronically maintain the log, along with a copy of what information has been sent to the requestor. If Dalhart ISD continues to receive only a few requests annually and handles them in a timely manner, no further evaluation or software should be necessary.

As the final step of the internal process, Dalhart ISD should develop a clear, systematic description of the process for community members to request public information. Pursuant to the PIA and district policy, the district office should "prominently display a sign" describing requestors' rights to public information. The district should upload this description to the Dalhart ISD website and the campus websites, with its own tab or menu listing that directs requestors to it. This one-page description should include the point of contact, a definition of public information that anyone can request, and the timeline to expect a response. TEA provides resources at tea.texas.gov/.

To improve communication with the community, the district should continue to upload information, the plans, and documentation onto its district website and the campus websites as appropriate.

The fiscal impact assumes the district PIO will complete the TASB online training for a onetime cost of $65.

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	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 10. COMMUNITY INVOLVEMENT							
46. Perform needs assessments and coordinate community support at the district level with schools' needs.	$0	$0	$0	$0	$0	$0	$0
47. Develop and implement a districtwide public relations plan and conduct outreach to community and media accordingly.	$0	$0	$0	$0	$0	$0	$0
48. Develop an internal process for responding to public information requests, advertise the process clearly, and provide proper training of the public information officer to ensure compliance.	$0	$0	$0	$0	$0	$0	($65)
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**($65)**