LEGISLATIVE BUDGET BOARD

Texas School for the Blind and Visually Impaired

Management and Performance Review

TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED

LEGISLATIVE BUDGET BOARD

June 30, 2017

William Daugherty
Superintendent
Texas School for the Blind and Visually Impaired

Dear Mr. Daugherty:

The attached report reviews the management and performance of the Texas School for the Blind and Visually Impaired's (TSBVI) educational, financial, and operational functions.

The report's recommendations will help TSBVI 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 TSBVI.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

The Legislative Budget Board engaged McConnell Jones Lanier & Murphy 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

/lc

cc: Joseph Muniz, President   Mary Alexander, Vice-President
        Michael Garrett, Member   Bobby Druesedow, Jr., Member
        Anne L. Corn, Ed.D, Member   Lee Sonnenberg, Member
        Caroline Kupstas Daley, Member   Michael Hanley, 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 as stated in the Texas Government Code, Section 322.016. The Legislative Budget Board's (LBB) School Performance Review team conducts comprehensive and targeted reviews of school districts, charter schools, and other state-funded public education entities' 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 school'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.

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

The Texas School for the Blind and Visually Impaired (TSBVI) is located in Austin. TSBVI provides a range of direct educational services to students, ages five to 22, who are blind, visually impaired, deaf-blind, and who may have multiple disabilities. TSBVI is unique as it is a school and also a state agency. In addition to providing educational services, TSBVI serves as a statewide educational resource center on blindness and visual impairment. The school provides a variety of educational services to families, students, programs, and professionals throughout the state. TSBVI admits students through a referral process initiated by a student's local school district and parents. School districts may not have the resources or staff to provide blind and visually impaired students with the level of resources and one-on-one education that students may need. School districts then refer these students to TSBVI to acquire the skills necessary to return to their local districts, typically within three years.

TSBVI's school year 2014–15 enrollment was 620 students, including 164 students in the Comprehensive Program, and 456 students in the Short-Term Program. TSBVI's Comprehensive Program is a regular school year, full-time program for kindergarten to grade 12. The program is primarily for residential students who live on campus Monday through Friday afternoon and travel home on the weekends and on holidays. In school year 2014–15, six day students who live in the Austin area were also enrolled in the Comprehensive Program. The Short-Term Program offers short-duration courses that last from three days to six weeks during the school year and in the summer. This program is available to students who are not enrolled in the Comprehensive Program. For school year 2014–15, students enrolled in the Comprehensive Program came from 110 school districts and all 20 regions. Students in the Short-Term Program for that school year came from 136 school districts and 18 regions.

In school year 2014–15, White students constituted 44.0 percent of student enrollment, Hispanic students constituted 40.0 percent, African American students constituted 14.0 percent, and Asian students constituted 2.0 percent of enrollment, respectively. Additionally, 93.8 percent of TSBVI's students were considered economically disadvantaged.

EDUCATIONAL OVERVIEW

TSBVI evaluates instructional programs based on annual goals and objectives specified in its Annual Improvement Plan. TSBVI develops this plan after completing a comprehensive needs assessment of teachers, staff, parents, and students' home districts regarding students and school progress on objectives and performance measures associated with student learning, program quality, staff quality, and compliance with federal and state laws.

TSBVI also evaluates its instructional programs through student performance on quality indicators developed as part of the memorandum of understanding (MOU) between TEA and TSBVI. The MOU requires that TSBVI annually evaluate students' academic progress on: state assessments; norm or criterion-referenced instruments; completion of courses, credits, and graduation requirements; progress in the attainment of student individualized education program

(IEP) goals and objectives; and nonacademic indicators such as attendance rates, dropout rates, and other measures of student success.

TSBVI developed performance indicators for students at the elementary and secondary levels, Modified Academics students, Alternative Academics students at elementary and secondary levels, and Experiences in Transition (EXIT) program students. Student performance is evaluated based on the increase of knowledge and skills and the generalization and application of skills. The following three-point scale is used to evaluate progress:

- 1 – none to minimal progress (0.0 percent to 9.9 percent increase in skills);

- 2 – moderate progress (10.0 percent to 19.9 percent increase in skills); and

- 3 – substantial progress (20.0 percent or greater increase in skills).

Figure 1 shows TSBVI's student performance on quality indicators for school years 2012–13 to 2014–15.

FINANCIAL OVERVIEW

TSBVI receives appropriations from the Legislature and uses state systems for accounting, payroll, and property management. As a state agency, TSBVI must adhere to the state's budget process, which occurs on a two-year cycle. After the Legislature makes biennial appropriations, each state agency prepares and files itemized operating budgets with the

Office of the Governor, Budget Division, and the LBB by December 1 of each fiscal year.

For the 2016–17 biennium, TSBVI was appropriated $47.6 million in All Funds, with 80.0 percent of its funding from state appropriations. **Figure 2** shows TSBVI's biennial appropriations for fiscal years 2014–15 and 2016–17 by method of finance.

Figure 3 shows appropriations for TSBVI by program for the 2016–17 biennium. Outreach resources and classroom instruction make up 49.0 percent of the appropriations, and support services, residential programs, and school administration make up the remaining 51.0 percent.

ACCOMPLISHMENTS

The LBB's school performance review team identified noteworthy accomplishments during its onsite review, based upon TSBVI's best practices.

OUTREACH DEPARTMENT

TSBVI's Outreach Program assists students, school districts, and families throughout the state. The Outreach Program provides information, training, and support to families of children with visual impairment, local school districts, and community organizations. The program offers stakeholders individualized meetings, workshops, conferences, videoconferencing, and web-based technologies. The Outreach Program services consult with teachers in local districts, meet with district and school staff, and visit families of students.

FIGURE 1
TSBVI STUDENT PERFORMANCE ON QUALITY INDICATORS BY INSTRUCTIONAL PROGRAM
SCHOOL YEARS 2012–13 TO 2014–15

INSTRUCTIONAL AREA	STUDENTS GIVEN PERFORMANCE INDICATOR ASSESSMENTS			STUDENTS MAKING MODERATE TO SUBSTANTIAL PROGRESS (SCORING 2.0 OR HIGHER)			PERCENTAGE OF STUDENTS MAKING MODERATE TO SUBSTANTIAL PROGRESS (SCORING 2.0 OR HIGHER)		
	2012–13	2013–14	2014–15	2012–13	2013–14	2014–15	2012–13	2013–14	2014–15
Elementary Academics	15	19	13	14	18	11	93.3%	94.7%	84.6%
Elementary Alternative Academics	8	6	7	7	6	5	87.5%	100.0%	71.4%
Experiences in Transition Program (EXIT)	36	39	36	36	35	35	100.0%	89.7%	97.2%
Modified Academics	26	25	24	16	19	10	61.5%	76.0%	41.7%
Secondary Academics	23	28	26	23	23	24	100.0%	82.1%	92.3%
Secondary Alternative Academics	38	27	29	32	25	20	84.2%	92.6%	69.0%
Total	**146**	**144**	**135**	**128**	**126**	**105**	**87.7%**	**87.5%**	**77.8%**

SOURCE: Texas School for the Blind and Visually Impaired (TSBVI), Performance Indicators Report, 2012–13, 2013–14, and 2014–15.
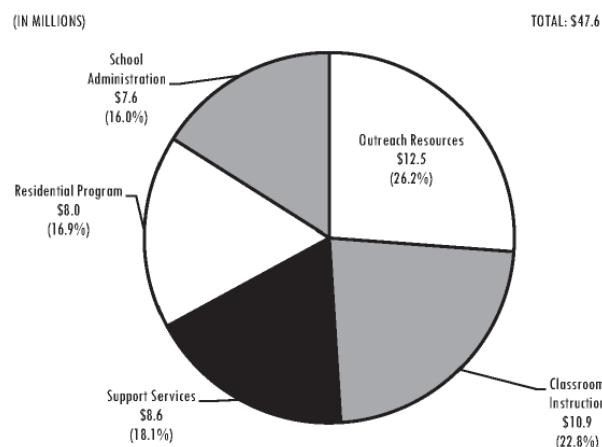
FIGURE 2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED BY METHOD OF FINANCE
2014–15 AND 2016–17 BIENNIA
(IN MILLIONS)

METHOD OF FINANCE	EXPENDED/BUDGETED 2014–15	APPROPRIATED 2016–17	BIENNIAL CHANGE	PERCENTAGE CHANGE
General Revenue Funds	$29.2	$29.0	($0.2)	(0.5%)
General Revenue–Dedicated Funds	$0.0	$0.0	$0.0	N/A
Federal Funds	$9.5	$9.6	$0.0	0.5%
Other Funds	$11.7	$9.0	($2.7)	(22.9%)
Total, All Methods of Finance	**$50.4**	**$47.6**	**($2.8)**	**(5.5%)**

SOURCE: Legislative Budget Board, Fiscal Size-Up, May 2016.

FIGURE 3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
APPROPRIATIONS BY PROGRAM
2016–17 BIENNIUM

SOURCE: Legislative Budget Board, Fiscal Size-Up, May 2016.

During school year 2014–15, Outreach staff presented or facilitated nearly 250 conferences and workshops in local districts, RESCs, and state and national conferences. TSBVI's Outreach Program also sponsored several statewide conferences and offered 50 videoconferences that were archived and made available on the TSBVI website.

DEVELOPMENT OF CURRICULUM FOR BLIND EDUCATION

TSBVI's Curriculum Department successfully develops curricula and resource guides for blind education that are sold to other schools, states, and internationally. TSBVI's educational curriculum materials address topics such as career education, compensatory skills including braille and abacus, assistive technology, independent living, orientation and mobility, and social interaction skills. The Curriculum Department also develops resource guides for teachers and

professionals, including occupational and physical therapists, speech-language pathologists, and diagnosticians.

Since 1999, the Curriculum Department has sold nearly 100,000 products, including print, braille, videos, and CDs, and generated more than $4.1 million in revenue. During school year 2014–15, the department sold more than 3,000 publications, primarily in print and braille, videos, and CDs.

LEGAL SERVICES

TSBVI established a process that reduces administrative costs for legal fees. TSBVI shares the cost of its attorney with the Texas School for the Deaf (TSD) through an Interagency Cooperation Contract (ICC) executed in November 2015. TSBVI pays approximately 50.0 percent of the cost of TSD's general counsel. The ICC outlines the services TSD's attorney will provide to TSBVI, and the basis for calculating reimbursable costs that TSBVI pays to TSD. TSD's general counsel works onsite at each school two days each week, with the option of working at either school one day a week depending on the schools' respective needs. This arrangement reduces costs while ensuring that both schools have access to quality legal services and expertise.

PARENTAL INVOLVEMENT

TSBVI has developed an effective process for involving parents in their children's education. TSBVI faces a unique challenge to parental involvement because the vast majority of TSBVI students live outside the Austin area and travel home on the weekends. The parents of students attending TSBVI span the socioeconomic and demographic spectrum and reside in various rural and urban environments. Unlike typical school districts whose parents reside within a single geographical area, TSBVI must find ways to involve parents of students living across the state.

One of the ways that TSBVI addresses the geographic limitations of parental involvement is through the school's Parent Network as a means of improving communication channels and providing a forum for the parents of blind students to connect and gain greater access to services while their students attend school. The Parent Network provides the following:

- support for parents of TSBVI students to attend an annual Parent Weekend. Parent Weekend is intended to inform parents of upcoming programs and activities for the school year through academic workshops and social and family-oriented activities;

- contact information with other TSBVI parents of student classmates and dormmates;

- information about parents who share the same bus stop when students return to their home communities; and

- knowledge and experience from other parents of students with visual impairments.

FINDINGS AND RECOMMENDATIONS

The LBB's school performance review team identified significant findings and recommendations based on the analysis of data and onsite review of TSBVI'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 to determine the level of priority, appropriate timeline, and method of implementation. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report. The recommendations are organized in three functional areas: educational, financial and operational.

EDUCATIONAL

INSTRUCTIONAL MATERIALS

Establish and implement a process to develop instructional materials that increases the efficiency of teacher-developed instructional materials. TSBVI has not explored processes to increase efficiency and effectiveness in developing individualized instructional materials.

Due to the diverse instructional needs of its students, TSBVI does not have a single schoolwide curriculum that serves

kindergarten to grade 12. Typically, TSBVI teachers construct the curriculum for their students based on whether students are academically close to a grade level, or whether the students need modified instruction. TSBVI teachers use a combination of state-approved textbooks, original TSBVI curricula, instructional software programs, available curricula for academically struggling secondary students, and teacher-made materials.

TSBVI teachers develop instructional materials for specific students during the school year with the assistance of teacher assistants and adapted material specialists. The degree of individualization of the instructional materials prevents teachers from developing materials during the summer, because they do not yet know the academic levels of students they will be instructing. New teachers face a considerable challenge because they need to develop a large volume of instructional materials targeted to students' specific needs.

TSBVI has explored limited systems and methods that could make developing instructional materials less time-consuming and more effective. Coordination among teachers to develop instructional materials collaboratively occurs on a small scale, to the extent practicable, when teachers have students with similar needs according to content area, students' disabilities and abilities, and learning media.

CAREER EDUCATION

Develop a detailed long-term plan and systematic strategies to expand the Career Education Department including data-driven work experience and course additions, a business advisory council, and career-related student organizations. TSBVI lacks long-term goals and detailed strategies to effectively and efficiently expand the Career Education Department.

TSBVI's Career Education Department faces the unique challenge of preparing students to become employees, all of whom have special needs, in all 20 educational regions of Texas. Unlike typical geographically based school districts, TSBVI cannot develop its career education structure in response to the business and industry needs of a single local workforce. TSBVI's Career Education Department uses a community-based vocational education framework to provide productive employment skills for students with disabilities. The department provides middle school and high school students with career development and career and technical education (CTE) course offerings. Additionally, the Career Education Department uses personal relationships and connections to coach and motivate students and to

match them with relevant work experiences in their areas of interest.

During school year 2014–15, TSBVI offered 11 CTE and career development classes. The TSBVI Career Education Department staff consists of three CTE-certified teachers, one career education teacher, and six job coaches.

Although the Career Education Department has established relationships with local businesses, it has not used these relationships to develop a business advisory committee that has input into the program. The Career Education Department performs limited evaluations of its career education courses, quality of instruction, instructional materials, and whether equipment and facilities meet industry standards. Additionally, TSBVI lacks detailed effective strategies for expanding or adding work opportunities based on workforce trends. TSBVI also has not encouraged students that take career education courses to be involved in career-related student organizations.

FINANCIAL

CASHIER OFFICE PRACTICES AND CONTROLS

Review cash-handling practices to eliminate inefficient tasks, and provide tighter security for the cashier's office. TSBVI's cashier's office lacks efficient and effective business processes and security protocols. The cashier's office is located in the school's Administration Building. The school has one main cashier and a backup cashier who are responsible for receipting all funds received through the mail or brought directly to the cashier's office. The cashier processes checks daily from a variety of sources for deposit into the school's bank accounts. During the onsite review, the review team observed several inefficient cashiering and cash-handling processes in the cashier's office including:

- lack of an online payment mechanism for vendors and parents that send money to school for payments and deposits into student trust accounts, resulting in a time-consuming system of processing and depositing checks;

- lack of a process to remotely deposit checks into bank accounts, which results in an inefficient use of staff time to prepare deposits and travel daily to the bank;

- copying cash and filing it with receipts for supporting documentation, which is an inefficient process and unnecessary work for the cashier;

- hand-writing travel reimbursement checks and typing certain Legacy Fund checks using a paper checkbook. These are manual processes that are inefficient and requires additional work for staff in the Business Office;

- the delivery of money to the cashier in envelopes that were set aside to be counted and receipted later in the day, which increases the risk for misappropriation or loss of funds; and

- use of separate receipt books for each type of fund received. This requires extra staff time to maintain numerous receipt books.

The security protocols in the cashier's office are also lacking. For example, several staff who do not require access for their job duties have access to the cashier's office and safe. According to the accounting supervisor, approximately $1,000 is kept in the safe for petty cash, and approximately $750 is kept on hand related to student trust accounts. Providing unauthorized staff access to areas where cash and checks are stored increases the risk of theft. Additionally, check stock for the school's Legacy Fund is stored under a desk instead of being secured in the safe in the cashier's office.

CROSS-TRAINING JOB FUNCTIONS

Accelerate cross-training for essential Business Office functions. TSBVI's Business Office lacks sufficient cross-training. No staff in the Business Office are sufficiently trained as backups to perform the duties of the payroll accountant, accounts payable accountant II, accounting supervisor, budget analyst, or the travel accountant. These positions have 116 years of combined experience at TSBVI. Deficiencies in cross-training increase the risk that critical processing could be delayed or performed inaccurately if staff are absent or unable to perform their duties.

OPERATIONAL

CONTINUING EDUCATION

Modify the Governing Board's continuing education training and orientation system to ensure new and tenured board members understand their responsibilities and the role, structure, and process of the Governing Board. TSBVI's board members are not always trained on their roles and responsibilities, and they do not obtain all the training hours required by board policy. Some of the board members indicated that the initial orientation for newly

appointed board members did not adequately address the roles and responsibilities of the Governing Board.

Additionally, onsite interviews with staff indicated that some board members do not always understand the scope of their roles and responsibilities. Some board members have interfered in the daily operations of the school. When interference has occurred, the Governing Board president had to remind board members of their policy-making role.

CONCURRENT EMPLOYMENT

Eliminate the director of community resource's role as coordinator of the All Blind Children of Texas Foundation (ABCTX). TSBVI has a designated director-level position to serve as the coordinator for the All Blind Children of Texas Foundation, resulting in an inappropriate use of state resources. Since 2004, TSBVI has had an informal agreement with ABCTX that authorizes TSBVI's director of community resources to spend part of her time working as the coordinator of ABCTX. However, TSBVI and ABCTX do not have a written memorandum of understanding or any formal process to define the relationship between the school and the foundation.

The director of community resources estimates that she spends 20.0 percent of her time, or eight hours a week, working for ABCTX. No process is in place for tracking the actual time spent working for ABCTX. The director indicated that some weeks she spends more than 20.0 percent of her time working for ABCTX and some weeks less. ABCTX does not pay any portion of the state-funded salary for this position.

TSBVI also lacks a written description of the activities that the director of community resources performs for ABCTX; however, she indicated that as coordinator and the only staff of ABCTX, she handles all the operations of the foundation and uses various TSBVI resources, including making copies and phone calls, mailing letters, and using school computers for producing reports and performing research. According to the director, ABCTX reimburses TSBVI for resources used. Pursuant to the Texas Government Code, Section 2203.004, state property may be used only for state purposes. A person may not entrust state property to a state officer or employee or to any other person if the property is not to be used for state purposes.

Also, as a state employee, the salary for the director of community resources is paid through appropriations. When the director uses state funds to perform work for ABCTX,

funds are not being used as intended. Additionally, when TSBVI inaccurately reports to the Employees Retirement System of Texas that the director of community resources is working 40 hours a week for the school, the staff is receiving hours allocated to retirement that she has not worked.

STUDENT MEAL REVENUES

Maximize food service revenue by charging students according to their eligibility classifications, charging guests for meals, and including labor and operating costs in catering charges. TSBVI does not charge day students and guests for meals, and undercharges for catering services, which results in a missed opportunity for additional revenue.

As a Residential Child Care Institution, all of TSBVI's residential students are eligible for free breakfasts and lunches, and the school receives federal meal reimbursements based on the number of breakfasts and lunches served to these students. TSBVI also serves meals to six day students who live in the Austin area and whose parents bring them to and from school every day. Although TSBVI obtains the meal applications from day students, makes their eligibility determination, and enters the eligibility status in a point-of-sale system, the school does not charge any day students for meals served and has not evaluated the cost-effectiveness of charging these students.

Although TSBVI staff and visitors are required to pay for breakfast and lunch, a guest of a TSBVI student is not charged for meals. Instead, the school uses the General Revenue Fund to cover the costs of meals served to day students and guests. These uncharged meals result in the Food Service Department losing revenues.

Additionally, TSBVI's Food Service Department undercharges for catering services. The Food Service Department provides catering services for internal meetings and events. Department staff prepare catered food at the same time that they prepare student meals. Food and supplies for the catering event are ordered through the food service catering account and the school's department budgets are charged for the food costs. However, the Food Service Department does not track the labor and operating expenses used to prepare catered meals separately from student meals. As a result, department budgets are charged for the food cost, but not for labor and operating expenses. This omission leads to the Food Service Department not recovering the actual costs to produce catered meals.

STUDENT MEAL PARTICIPATION

Modify the snack program to be eligible for federal Afterschool Care Snack Program reimbursements and implement programs to increase breakfast and lunch participation. TSBVI does not maximize federal reimbursements for snacks and meals served to students. TSBVI residential staff purchase snacks for residential students at local grocery stores. These purchases are made with school credit cards or through funds provided to the students by their parents. However, the school does not track snack purchases, and has no requirements to meet specific nutrition guidelines. The snack purchase, preparation, and serving processes are handled outside of the school's food service operations, and there is no reporting of the number of snacks served. Therefore, these snacks are not eligible for reimbursement through the federal Afterschool Care Snack Program. Additionally, by purchasing food through local grocery stores instead of through its Food Service Department, TSBVI is paying more for snacks.

TSBVI is also not maximizing federal School Breakfast Program (SBP) and National School Lunch Program (NLSP) revenue. For school year 2014–15, SBP participation was 38.7 percent and NLSP participation was 45.5 percent. According to TDA, the statewide participation rate in the SBP is 30.0 percent, and the statewide participation rate in the NSLP is 65.0 percent. Although TSBVI's participation rate exceeded the state average for breakfast, the school's rate is less than the state average for lunch. Both of these participation rates are low considering that almost all of TSBVI's students live on campus, and they do not leave the campus during the cafeteria's breakfast and lunch meal times. During onsite interviews, food service staff stated that the low participation rates were due to many students eating other food they have purchased at the grocery store, rather than eating meals in the cafeteria.

TSBVI has no process to promote participation in the SBP and NSLP. For example, food service staff do not obtain student feedback through formal surveys or student food committees, and menus have not been updated in several years. Without this feedback, TSBVI cannot determine the underlying reasons for why student participation is low for breakfasts and lunches served. Improving meal program participation rates could result in a revenue gain of $27,396 over the next five years.

HELP DESK

Establish a help desk function and implement a system to manage technology support activities. TSBVI's Information Resources (IR) Department does not effectively manage and document technology support activities. Instead, each IR Department staff tracks the support requests they receive. Users make support requests via phone call, email, or personal contact.

During onsite interviews, staff indicated that the IR Department receives a large number of daily technical support requests. The primary responsibility of the system support specialists is to provide technical support to the administrative staff. However, many IR Department staff are assigned to handle requests, regardless of their positions or areas of expertise. This practice takes specialized staff away from performing regular job duties such as infrastructure improvements and completing strategic initiatives that meet TSBVI's ongoing needs.

Help desk systems allow for a structured response to each request regardless of the user. These systems also allow for tracking of calls by user, type of situation, number of calls handled by each technician, or the resolution taken to resolve an issue or concern. Without any of this information, TSBVI is unable to determine if several users routinely need technical assistance or if the software has a glitch. This lack of information inhibits the school from determining if any recurring technology issues need to be addressed through additional training for school staff. Additionally, each IR Department staff conducts research for each call instead of using a databank of known responses. Each of these scenarios contributes to efficiency loss by users and technicians. The cost to implement a work order management system would be $6,900 annually for software licenses for TSBVI's 10 technical staff.

The subsequent chapters in this report contain detailed descriptions of accomplishments, findings, and recommendations and the fiscal impact to implement these recommendations. **Figure 4** shows the total fiscal impact of all 33 recommendations included in the performance review.

FIGURE 4
FIVE-YEAR FISCAL IMPACT SCHOOL YEARS 2017–18 TO 2021–22

	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
Gross Savings	$1,380	$3,784	$5,597	$7,411	$9,224	$27,396	$0
Gross Costs	($8,495)	($8,495)	($8,495)	($8,495)	($8,495)	($42,475)	($3,810)
Total	**($7,115)**	**($4,711)**	**($2,898)**	**($1,084)**	**$729**	**($15,079)**	**($3,810)**

Source: Legislative Budget Board.

CHAPTER 1. GOVERNANCE AND SCHOOL MANAGEMENT

The Texas School for the Blind and Visually Impaired (TSBVI) serves as a dual organization. TSBVI is a state agency established in Texas Constitution and the Texas Education Code (TEC). TSBVI also serves as a special school in the continuum of statewide alternative placements for students who are age 22 or younger, have a visual impairment and may have one or more other disabilities.

The Sixth Texas Legislature established TSBVI on August 16, 1856, as the Blind Institute, with a five-member Governing Board appointed by Governor Elisha Pease. By 1857, three students attended the school; one student was 25 years old at the time of admittance. In 1916, the Thirty-fourth Texas Legislature changed the school's name to the Texas School for the Blind. At that time, the citizens of Austin, Texas donated a 73-acre site between Lamar and Burnet Roads to build a new school for the blind students, and the school moved to its present 45-acre campus located at 1100 West 45th Street in Austin, Texas.

In 1965, the School for Deaf, Blind, and Orphans was integrated into the Texas School for the Blind, and in the early 1970's the school initiated the Deaf-blind Program. The Sixty-fourth Texas Legislature in 1975 added statewide responsibilities to the Texas School for the Blind's enabling statutes and mission, and transferred governance of the school to a subcommittee of the Texas State Board of Education from the Texas Education Agency. In 1989, the Texas Legislature renamed the school to the Texas School for the Blind and Visually Impaired to more accurately reflect the population it serves.

TSBVI's school year 2014–15 Annual Report describes TSBVI's main functions:

- providing a free, appropriate public education that addresses the intense or specialized needs of visually impaired children and youth, including those with additional disabilities, when the local districts and parents agree that such services are not available in a local program;

- conducting supplemental programs, such as summer and other short-term programs;

- providing statewide services to parents of students, school districts, regional education service centers, and other agencies including training, consultation, technical assistance, and developing and disseminating materials such as curriculum, instructional methodology, and educational technology; and

- partnering with Texas Tech University and Stephen F. Austin State University in preparation programs for teachers of the visually impaired.

TSBVI's school year 2014–15 enrollment was 620 students, including both Comprehensive and Short-term Programs. The Comprehensive Program is a regular school year program for students ages 5 to 22 who live on campus during the week. Short-term Programs are short duration courses that last from three days to six weeks during the school year and summer. These programs are also available to students who are not enrolled in TSBVI's comprehensive program.

White students comprise 44.0 percent of student enrollment, while Hispanic students are 44.0 percent, African American students are 14.0 percent, and Asian students are 20.0 percent of enrollment respectively. Additionally, 93.8 percent of TSBVI's students are economically disadvantaged.

BOARD GOVERNANCE

A nine-member Governing Board appointed by the Governor and confirmed by the Senate governs TSBVI. Members of the Governing Board serve six-year terms. The terms of three members expire on January 31 of each odd–numbered year. According to TEC, Section 30.022(a), the composition of the Governing Board must consist of: (1) three members who are blind, or visually impaired, at least one of whom has received educational services related to the blindness, or visual impairment; (2) three members who are working, or have worked, as professionals in the field of delivering services to persons who are blind, or visually impaired; and (3) three members, each of whom is the parent of a child, who at the time of the parent's appointment, is receiving education services related to blindness, or visual impairment.

TEC, Section 30.022(d), directs the Governing Board to organize and conduct itself in the same manner as an independent school district board of trustees to the extent that the Governing Board's organization and conduct does not conflict with its responsibilities related to the status of TSBVI as a state agency.

According to Board Policy BAA, the Governing Board and superintendent must work together to advocate for the high achievement of all TSBVI students; create and support connections with community and state organizations to provide support for the high achievement of all TSBVI students; provide educational leadership for the school, including leadership in developing the school vision statement and long-range educational plan; establish schoolwide policies and annual goals that are tied directly to the school's vision statement and long-range educational plan; support the professional development of principals, teachers, and other staff; and periodically evaluate the Governing Board and superintendent leadership, governance, and teamwork.

TSBVI's Governing Board has its nine appointed positions filled, with three members' terms set to expire on January 31, 2017. **Figure 1–1** shows the members of TSBVI's Governing Board, their terms, and their occupations at the time of the onsite review.

The Governing Board organization and operating structure consists of two officers, a secretary, and three standing committees. Board Policy BDAA establishes the officers of the Governing Board:

- president, who shall be a member of the Governing Board;

- vice president, who shall be a member of the Governing Board;

- secretary, who may or may not be a member of the Governing Board; and

- such other officers and committees as the Governing Board may deem necessary.

Each board officer is elected, or re-elected, by majority vote of a quorum of the Governing Board members at the January meeting of each even-numbered year, and serves for a term of two years unless he or she resigns before the end of the term.

Board Policy BDB, establishes three standing committees of the Governing Board, which are the Audit, Compliance, and Management Review Committee; Finance Committee; and Programs Committee. Three members of the Governing Board serve on each committee, which includes a chairperson and two board members for each committee. Board standing committees typically convene the same day of the regular board meeting, and conduct deliberations according to agendas. The agendas are publically posted on TSBVI's website in accordance with the Texas Government Code. The Programs and Finance Committees meet concurrently before each regularly scheduled board meeting. The Programs Committee reviews and discusses revisions and updates to board policies and then presents changes to the full board at the regular board meeting for adoption. The Programs Committee also discusses reports related to TSBVI's

FIGURE 1–1
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED GOVERNING BOARD
SCHOOL YEAR 2015–16

NAME (1)	TITLE	TERM EXPIRATION	YEARS OF SERVICE	OCCUPATION
Joseph Muniz	President	January 2021	6	Assistant Library Director, City of Harlingen, TX
Mary Alexander	Vice President	January 2021	6	National Program Director, Learning Ally, Inc.
Tobie Wortham	Member	January 2021	6	Educational Diagnostician, Rockwall ISD
Bobby Druesedow, Jr.	Member	January 2019	7	Texas Department of Assistive and Rehabilitative Services Employment Assistant Specialist, Retired
Michael Garrett	Member	January 2019	7	Finance, Retired
Lee Sonnenberg	Member	January 2019	2	Director of Transportation and Parking Services, Texas Tech University
Anne L. Corn, Ed.D	Member	January 2017	4	Professor, Retired
Michael Hanley	Member	January 2017	1	Senior District Executive with the Boy Scouts of America

NOTE: (1) Since the time of the review, Caroline Kupstas Daley has been apppointed as a member of TSBVI's Governing Board.
SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

Comprehensive, Short-term, and Outreach Programs. The Finance Committee reviews and discusses the donations, investment, and budget reports and receives a status report from the chief financial officer (CFO). The Audit, Compliance, and Management Review Committee meets as necessary to receive and discuss audit reports from TSBVI's internal auditor, and monitor management's progress toward implementing open audit recommendations.

TSBVI's Governing Board typically meets six times annually at TSBVI's campus. TSBVI lists the dates and times for the six regular board meetings and committee meetings for the entire school year on its website. The Governing Board also holds special meetings and workshops as necessary.

TSBVI's board meeting agenda is comprehensive and includes public comments, reports from each standing committee, and several action items. These items include dealing with staff contracts, approvals of strategic planning initiatives, and discussions of future board meeting topics.

The executive assistant to the superintendent posts the approved agenda on TSBVI's website 14 days before the regular board meeting. The executive assistant also submits a formal notice of the regular board meeting to the Texas Register eight days before the date of the meeting. The executive assistant posts the regular board meeting and committee meeting agendas in print and braille inside the front door of Building 600 within 72 hours of the meeting time.

The executive assistant to the superintendent and the director of planning and evaluation, with assistance from TSBVI's braillist, produce board materials in large print and braille for board members with accessibility issues at the regular board meeting. During the standing committee meetings and regular board meeting, the director of planning and evaluation records the minutes of the Audit, Compliance and Management Review Committee, while other members of the superintendent's staff record the minutes of the Programs and Finance Committees. The executive assistant to the superintendent records the minutes of the regular board meeting, while the director of planning and evaluation records minutes of executive sessions and submits them to the Governing Board president for approval. Once the Governing Board president approves the minutes from the executive session, the director of planning and evaluation seals the minutes in an envelope and stores the envelope in her office, which is adjacent to the superintendent's office. The full board and committees approve the minutes at the next regularly scheduled board meeting.

BOARD POLICIES AND PROCEDURES

TSBVI's Governing Board policies cover seven separate sections:

- Basic District Foundation;

- Local Governance;

- Business and Support Services;

- Personnel;

- Instruction;

- Students; and

- Community.

The TEC provides the legal framework for board policies, which require continuous periodic updates and/or revisions based on new legislation. TSBVI receives an annual policy alert from the Texas Association of School Boards (TASB), which informs TSBVI of any new policies or changes, updates, and revisions to existing board policies based on changes in state or federal statute or rule.

SCHOOL MANAGEMENT

Mr. William Daugherty has been the TSBVI superintendent since July 2007. The TSBVI board requires the superintendent to reside on campus. The superintendent resides rent-free, including utilities, in the original 1916 superintendent's cottage. The board established this requirement so that the superintendent is immediately available for emergencies with students, staff, or facilities. TSBVI provides groundskeeping and maintenance services for the house.

The board sets the superintendent's annual compensation within limits established in the General Appropriations Act (i.e., the state budget). Any changes to his salary are included in TSBVI's biennial Legislative Appropriations Request, and are based on his annual evaluation and comparisons of his compensation to the superintendent for the Texas School for the Deaf and the executive directors of other state agencies, rather than school districts.

According to the superintendent's job description, the position is primarily responsible for the administration of programs that serve students attending TSBVI. The superintendent is also responsible for the administration of programs that serve visually impaired students, their parents,

and professionals working with visually impaired students statewide through the school's Outreach Program. The superintendent oversees the coordination of the school's business affairs, instructional program, residential programs, and related services and support functions.

TSBVI's Governing Board has two direct reports, the superintendent and the internal auditor. The school attorney is hired by the board and also at times reports directly to the superintendent. The superintendent has 11 direct reports. These include:
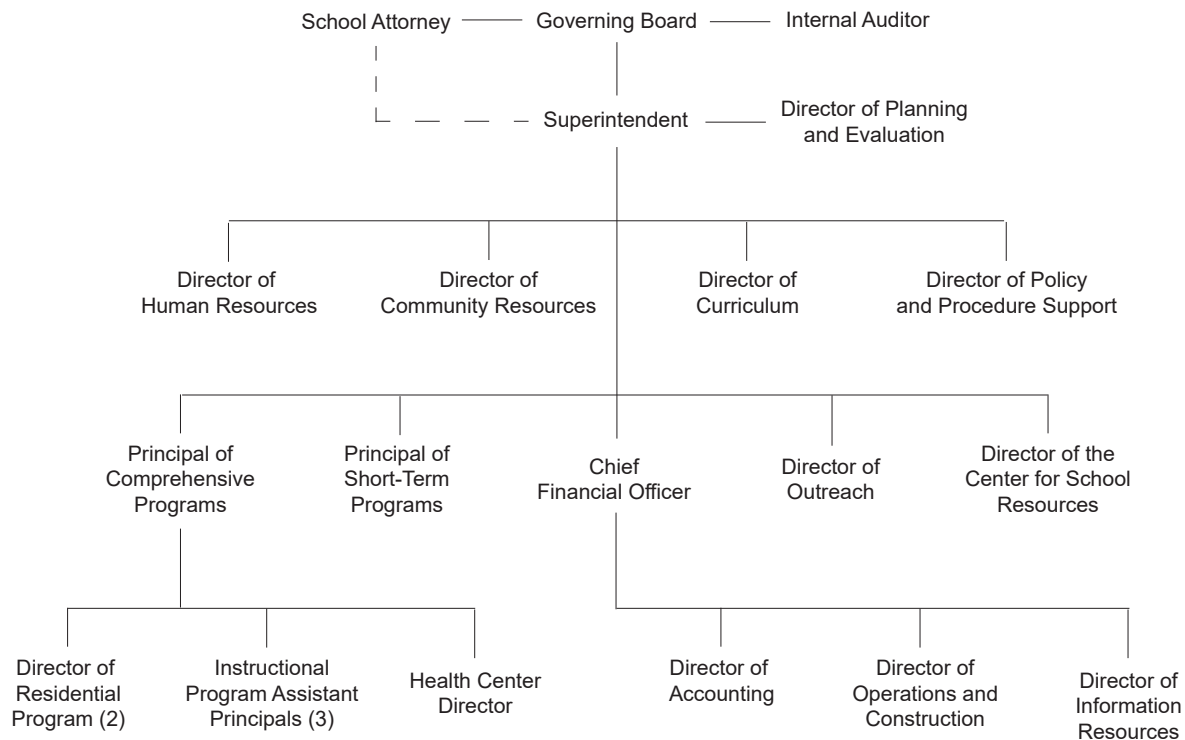
- School Attorney;
- Planning and Evaluation;
- Human Resources;
- Community Resources;
- Curriculum;
- Policy and Procedure Support;
- Comprehensive Programs;

- Short-Term Programs;
- Business, Operations, and Technology;
- Outreach; and
- Center for School Resources.

Figure 1–2 shows TSBVI's organizational structure.

TSBVI's general counsel provides legal advice to the Governing Board and superintendent for issues related to employment, special education, contracts, grievance hearings, complaints, and unemployment claims. The Office of the Attorney General (OAG) provides legal support to the school, and tries all court cases or authorizes TSBVI to secure the services of outside counsel. TSBVI's general counsel has no staff; the superintendent's executive assistant performs needed clerical tasks. The general counsel routinely works with the OAG on major employment cases with the Equal Employment Opportunity Commission. TSBVI does not have Special Education "due process" cases because all students who attend TSBVI are referred by local

FIGURE 1-2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED ORGANIZATION
SCHOOL YEAR 2015-16

SOURCE: Texas School for the Blind and Visually Impaired Superintendent's Office, March 2016.

school districts throughout the state of Texas; the local district is responsible for all Admission, Review, and Dismissal (ARD) meetings that result in the development of Individualized Education Programs (IEP) for students with disabilities. Accordingly, TSBVI did not incur expenditures for outside legal fees for school years 2012–13 to 2014–15.

TSBVI employs an internal auditor who has been with the school for approximately nine years. In 2007, the position was a part–time contract internal auditor, but it became a full–time position in 2014. The internal auditor reports functionally to the board and reports administratively to the superintendent for matters such as vacation and sick leave. The duties of the internal auditor include:

- conducting audits as specified in the audit plan;

- preparing audit reports;

- conducting quality assurance reviews in accordance with professional standards; and

- conducting economy and efficiency audits and program results audits as directed by TSBVI's Governing Board.

STRATEGIC PLANNING

TSBVI's strategic planning process consists of three major components: (1) the Site-based Decision-making Plan (SBDM Plan); (2) the Agency Strategic Plan; and (3) the TSBVI Annual Improvement Plan.

The SBDM Plan merges the two planning processes required of TSBVI as a state agency and as a school district to develop the Agency Strategic Plan and TSBVI's Annual Improvement Plan. The SBDM Plan outlines the roles of the Governing Board, administration, and the Instructional Planning Council, which serves as TSBVI's site-based decision-making team, in the planning process.

TSBVI's superintendent and director of Planning and Evaluation, along with the superintendent's management team, lead the strategic planning process that culminates in the development of TSBVI's biennial Agency Strategic Plan. The Agency Strategic Plan is a five-year plan that must be updated every two years for the biennial legislative session.

The Agency Strategic Plan is a comprehensive plan that includes all of TSBVI's programs, departments, and divisions. TSBVI submits this plan to the Texas Legislature and to the Governor's Office in July of even-numbered years as part of its Legislative Appropriations Request. The Agency Strategic

Plan communicates to the Governor and Legislature how TSBVI intends to carry out its mission relative to its funding. The Agency Strategic Plan allows the superintendent and Governing Board to focus on strategic goals that reflect emerging issues and trends on TSBVI's campus and in its statewide outreach efforts.

The Annual Improvement Plan serves as TSBVI's District Improvement Plan that is required by TEC, Section 11.252. Its primary purpose is to guide staff in the improvement of student performance. The Annual Improvement Plan includes annual goals, objectives, strategies, and actions that TSBVI developed after completing a comprehensive needs assessment.

The TSBVI Annual Improvement Plan includes four sections:

- Comprehensive Programs Improvement Plan (includes the Post-Secondary Program);

- Short-term Programs Improvement Plan (includes Summer Program);

- Outreach Program Improvement Plan; and

- Administrative and Support Services Improvement Plan that focuses on departments that provide support services such as the Business Office; Information Resources Department; Operations and Construction; School Support Services; and the Residential Program.

ACCOMPLISHMENTS

♦ The superintendent prepares a comprehensive Off-month Report that enhances the Governing Board-superintendent relationship with open and transparent communication.

♦ TSBVI has established a process that reduces administrative costs for legal fees.

FINDINGS

♦ TSBVI's board members are not always aware of their roles and responsibilities, and they do not obtain all the training hours required by board policy.

♦ TSBVI's Governing Board has not defined how the board should perform various governance tasks and activities.

♦ TSBVI lacks an adequate process for evaluating the superintendent to ensure accountability.

♦ TSBVI lacks a process to effectively evaluate the performance of members of the management team.

♦ TSBVI lacks a process to ensure clear communication among the superintendent, management, and staff.

♦ TSBVI has designated a director-level position to serve as the coordinator for the All Blind Children of Texas Foundation, resulting in an inappropriate use of state resources.

RECOMMENDATIONS

♦ **Recommendation 1: Modify the Governing Board's continuing education training and orientation system to ensure new and tenured board members understand their responsibilities and the role, structure, and process of the Governing Board.**

♦ **Recommendation 2: Develop board operating procedures to clarify how the Governing Board should operate as a corporate body and guide board members in conducting governance tasks and activities.**

♦ **Recommendation 3: Revise the superintendent's evaluation process to require the Governing Board to set annual expectations and performance goals.**

♦ **Recommendation 4: Refine the process for evaluating management staff to encourage executive leadership development and accountability.**

♦ **Recommendation 5: Develop an internal communications plan that includes specific strategies and tactics to communicate key messages, initiatives, and directives from management team meetings to other TSBVI staff.**

♦ **Recommendation 6: Eliminate the director of community resource's role as coordinator of ABCTX.**

DETAILED ACCOMPLISHMENTS

BOARD AND SUPERINTENDENT COMMUNICATION

The superintendent prepares a comprehensive Off-month Report that enhances the Governing Board-superintendent relationship with open and transparent communication.

During onsite interviews, the superintendent and the Governing Board both indicated that they have a good working relationship. One of the examples cited that

contributes to this relationship is the superintendent's Off-month Report. This report details activities, events, and issues that affect TSBVI operations and administration during months without regularly scheduled board meetings. The superintendent addresses the Off-month Report to the Governing Board and includes a general discussion of events and specific issues that the Governing Board should know. For example, the December 2015 Off-month Report included: notices of newly hired staff; status of compliance with new laws related to guns on campus and cameras in classrooms; and a summary of the contract to develop a deferred maintenance assessment review of TSBVI facilities for the board's review. The report also included details of the upcoming management and performance review conducted by the Legislative Budget Board, and academic and community-related initiatives and projects. Board members, in individual interviews, consistently praised the Off-month Report as an effective communication tool that enhanced the trust between the Governing Board and superintendent. Best practices indicate one of the best ways for the superintendent to establish and maintain a relationship with the Governing Board is through ongoing and frequent communication. This communication ensures that board members are aware of potential issues and activities that may affect their deliberations and decision-making.

LEGAL SERVICES

TSBVI has established a process that reduces administrative costs for legal fees.

TSBVI shares the cost of its attorney with the Texas School for the Deaf (TSD) through an Interagency Cooperation Contract (ICC) executed by both superintendents in November 2015. TSBVI pays approximately 50.0 percent of the cost of TSD's general counsel in accordance with the ICC, which outlines the services TSD's attorney will provide to TSBVI, and the basis for calculating reimbursable costs that TSBVI pays to TSD. TSD's general counsel works onsite at each school two days each week, with the option of working at either school one day a week depending on the schools' respective needs.

TSD's attorney records the hours of services worked on behalf of TSBVI based on a "cost per hour of service" based on the attorney's monthly gross pay and longevity pay, divided by 173.33 hours (2,080 hours divided by 12 months) to determine the hourly rate. TSD submits quarterly billings to TSBVI that include the number of hours expended for the quarter on TSBVI matters multiplied by the cost per hour of

service, plus one-half the monthly charges for West Law services, legal research books and subscriptions, continuing legal education, bar and professional dues, and membership in the Texas School Boards' Counsel of School Attorneys. TSBVI also pays the actual costs for travel, office space, telephone, letterhead, and business cards for TSBVI matters, either directly or through quarterly billings from TSD. The ICC specifies that this cost sharing arrangement "shall not exceed $80,000 per contract year."

This cost sharing arrangement directly reduces costs while ensuring both schools have access to quality legal services and expertise.

DETAILED FINDINGS

CONTINUING EDUCATION (REC. 1)

TSBVI's board members are not always aware of their roles and responsibilities, and they do not obtain all the training hours required by board policy.

The superintendent, along with members of TSBVI's management team, conducts an extensive, one-day introductory orientation for new board members. This orientation includes reviewing the Governing Board Orientation Manual, which covers 15 topical areas. These areas include: board responsibilities in policy; member training requirements; policies related to the superintendent and the superintendent's evaluation process; the school's organization structure; administrative and operational functions; academic programs; and conducting a tour of the school's facilities.

The board also receives some training provided by the Texas Association of School Boards (TASB) on their roles and responsibilities. The most recent training, prior to the onsite review, was on September 24, 2015. Other TASB training sessions related to the roles and responsibilities of the board were held on November 20, 2014 and on September 19, 2013.

However, the new board orientation and TASB trainings have not always been effective. During onsite interviews, four of the nine members indicated the orientation did not adequately address the roles and responsibilities of the Governing Board. Additionally, board members and staff of the superintendent's management team stated that some board members do not always understand the scope of their roles and responsibilities. As a result, some board members have interfered in the day-to-day operations of the school.

For example, members have attended staff meetings, observed lessons delivered by teachers, contacted students directly, and actively participated in grievance processes before they reached the Governing Board level. When these instances of board members overreaching into day-to-day operational decisions of TSBVI management occurred, the Governing Board president had to remind members of their policy-making role.

TSD board members also do not consistently receive all the training hours required by board and State Board of Education (SBOE) policy. The Texas Administrative Code, Section 61.1, requires board members to receive ongoing continuing education in accordance with rules set forth by the SBOE. These rules apply to TSBVI's Governing Board and local school district boards of trustees.

Under the SBOE rules, board members are required to receive three different kinds of continuing education. These three types of continuing education are sometimes referred to as Tiers 1, 2, and 3.

- Tier 1 continuing education consists of orientation and includes orientation for local district practices, curriculum and instruction, business and finance operations, district operations, superintendent evaluation and board member roles and responsibilities, in addition to topics chosen by the local district. This tier also includes an orientation to the TEC within 120 days of joining the Governing Board and updates to the TEC after each legislative session, both provided by representatives from regional education service centers.

- Tier 2 continuing education consists of teamwork training. Each year, the Governing Board and superintendent must participate, as a group, in a teambuilding session intended to enhance the team's effectiveness. The teambuilding session must include a review of the roles, rights, and responsibilities of the local board as outlined in the Framework for Governance Leadership, a list of major board activities, and identify in which of those activities board members would benefit from having additional training.

- Tier 3 continuing education consists of "discretionary" continuing education related to the activities of the Governing Board identified as being areas of need.

SBOE requires board members to obtain 10 hours of continuing education in their first year of service. Following the first year of service, members must obtain at least five hours of continuing education annually.

The director of planning and evaluation is responsible for maintaining a record of the continuing education training hours accumulated annually by each board member. At the November board meeting of each year, the director of planning and evaluation reports to the Governing Board the status of each member's continuing education hours, identifying areas where each member must accumulate additional continuing education hours to meet SBOE requirements.   She also informs the Governing Board of where to go for required training, and training that individual   board members specifically request.   Finally, the director of planning and evaluation reminds board members of upcoming continuing education training during each board meeting.

Figure 1–3 shows the number of continuing education training hours accumulated by sitting board members for the past three years that ended November 5, 2013, November 11, 2014, and November 5, 2015.

Figure 1–3 shows current members of the Governing Board did not consistently attend Tier 3 training in 2 of the 12 month periods despite the Governing Board's continuing education requirements included in its policies. Board Policy BBD requires new members to obtain 10 hours of continuing education training in their first year of service and to obtain at least five hours of continuing education annually after their first year of service. **Figure 1–3** also shows that three members did not meet the five-hour annual continuing education requirement in the period that ended November 5, 2013, and seven members did not meet the five-hour requirement in the period that ended November 4, 2015.

FIGURE 1–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED GOVERNING BOARD CONTINUING EDUCATION HOURS NOVEMBER 2013, NOVEMBER 2014, AND NOVEMBER 2015

12-MONTH PERIOD/TRAINING TOPIC	MEMBER 1	MEMBER 2	MEMBER 3	MEMBER 4	MEMBER 5	MEMBER 6	MEMBER 7	MEMBER 8 (1)	MEMBER 9 (2)
November 5, 2013									
Tier 3 Continuing Education	11.75	0.00	1.75	14.50	12.50	8.50	0.00	N/A	N/A
Tier 2 Team Building: Board Roles and Responsibilities; Standard Operating Procedures	3.00	3.00	0.00	3.00	3.00	3.00	0.00	N/A	N/A
Subtotal 2013	**14.75**	**3.00**	**1.75**	**17.50**	**15.50**	**11.50**	**0.00**	**N/A**	**N/A**
November 11, 2014									
Tier 3 Continuing Education	8.25	5.00	8.50	5.00	12.00	5.00	5.00	5.00	N/A
Tier 2 Team Building and Self-Assessment	3.00	3.00	3.00	3.00	3.00	3.00	3.00	3.00	N/A
Subtotal 2014	**11.25**	**8.00**	**11.50**	**8.00**	**15.00**	**8.00**	**8.00**	**8.00**	**N/A**
November 4, 2015									
Tier 3 Continuing Education	0.00	0.00	4.50	0.00	0.00	0.00	0.00	5.00	6.00
Tier 2 Team Building - Effective Board Practices: An Inventory for School Boards	3.50	3.50	3.50	3.50	3.50	3.50	3.50	3.50	3.50
Tier 1 Continuing Education – Texas Education Code Update (3)	0.00	2.00	0.00	2.00	0.00	2.00	2.00	2.00	0.00
Subtotal 2015	**3.50**	**5.50**	**8.00**	**5.50**	**3.50**	**5.50**	**5.50**	**10.50**	**9.50**
Total Continuing Education Hours	**29.50**	**16.50**	**21.25**	**31.00**	**34.00**	**25.00**	**13.50**	**18.50**	**9.50**

NOTES:
(1)   Board member 8 took the oath of office on October 3, 2014.
(2)   Board member 9 took the oath of office on September 24, 2015.
(3)   There was no Tier 1 continuing education conducted in 2013 and 2014.
SOURCE: Texas School for the Blind and Visually Impaired, Superintendent's Office, June 2016.

Without consistent board member participation in continuing education, members are not exposed to industry best practices. This exposure could improve their understanding of their roles and responsibilities, board governance, and operating structures.

According to Deloitte's publication *The Effective Not-for-Profit Board: A value-driving force*, orientation and education programs are a best practice to help speed the time it takes for new board members to become productive members. The report suggests a governance best practice is the "provision of continuing board education, either during an annual board retreat or throughout the year as a part of, or in conjunction with, board meetings." Additionally, the Center for Public Education, in its publication *Eight Characteristics of Effective School Boards: Full Report*, lists as one of its eight characteristics: "Effective school boards take part in team development and training, sometimes with their superintendents, to build shared knowledge, values, and commitments for their improvement efforts."

Another best practice in continuing education for high-performing boards is a formal and thorough orientation for new members. According to the Center for Public Education's *Eight Characteristics of Effective School Boards: Full Report*, "Orientation workshops for new members are recommended soon after their election, and developing a policy statement on orientation which included a commitment by the Governing Board and administrative staff to help new members learn board functions, policies, and procedures. Chief responsibility for orienting should reside with the superintendent and board chair, and this work should include meetings with top administrative personnel to examine services, policies, and programs."

Finally, the University of Northern Iowa's Institute for Educational Leadership, in its white paper entitled *Strengthening Board of Education/Superintendent Relationships in America's Schools* encourages school boards to develop training and orientation systems to prepare new and continuing members of the Governing Board for the complex issues facing today's school boards. For example, a structured orientation and training system would enable the Governing Board to identify best practices for conducting board self-assessments. Board members would be exposed to research and position papers published by governance experts.

TSBVI should modify the Governing Board's continuing education training and orientation system to ensure new and tenured board members understand their responsibilities

and the role, structure, and process of the Governing Board. The Governing Board president should work with the superintendent to develop a system that includes the following features:

- Develop a board policy and related operating procedures for a new member orientation system that includes the current officers of the Governing Board, the superintendent, and members of the superintendent's management team. The operating procedures should provide guidelines for regulatory issues to be covered in addition to specific governance-related topics.

- Develop a policy statement signed by each board member committing to meet the minimum number of continuing education hours required by TEA through TAC, Section 61.1, and included in Board Policy BBD.

- Develop an annual board training calendar identifying governance-related training topics and specific dates board members will be required to attend training as a group.

- Distribute an annual survey to board members to determine their training preferences and use the results of the survey to build the Governing Board's continuing professional education calendar for the year.

- Develop board operating procedures to enforce board member attendance at a specified number of continuing professional education sessions, and include sanctions in the policy for failure to attend a minimum number of continuing education sessions. Sanctions could include removing board members from committee chair or co-chair positions.

- Develop a board policy to encourage full board member participation in annual teambuilding sessions, including punitive sanctions to hold individual board members accountable for their professional development.

- Develop a reporting system to monitor the status of each board member's progress toward meeting the number of continuing education hours approved by the Governing Board in its newly adopted policy statement.

The president of the Governing Board should develop the training and orientation system and related process, and monitor and enforce the policies and procedures adopted by the board.

This recommendation could be implemented with existing resources, as TSBVI includes the cost of continuing education for board members in its biennial budget.

BOARD PROCESSES (REC. 2)

TSBVI's Governing Board has not defined how the board should perform various governance tasks and activities.

The Governing Board has a comprehensive board orientation manual that includes board policies, but does not provide specific guidance on how the Governing Board should operate within its overall governance framework related to those policies. During the onsite review, the review team noted several issues requiring clarification of board processes or operating procedures.

For example, TSBVI has no documented process for board members to submit items for consideration during current meetings or during the months the Governing Board does not meet. The process for members to add items to upcoming meeting agendas consists of the Governing Board president asking each member if they wish to place an item on the agenda for the next board meeting at the end of the current meeting. If a member has an item to include in the agenda, the president takes note and includes the item in the agenda for the next regular board meeting. In the months the board does not convene between regularly scheduled board meetings, members may contact the president by email or phone to request an item to be included in the upcoming agenda for the regular meeting. The board president uses his discretion to filter requests to place items on the agenda that he deems inappropriate for the board to consider.

This process is not documented and has not been officially approved by the Governing Board. Items included in the agenda are left almost entirely up to the discretion of the Governing Board president. During onsite interviews, board members indicated that the current process was working well. However, the members' positive review of this process may be due to the trust and respect that members have for the current board president. The lack of formal operating procedures documenting the process for members to request items to be placed on the agenda could cause tension in the board if the board elects a new president that does not have the experience or respect the current president affords. This

situation puts TSBVI at risk for developing an environment of distrust between members and the president.

The lack of formal board operating procedures has also led to board policies and procedures not being updated. As of March 2016, 130 of 367 TSBVI board policies and related procedures were out of date. In a February 2016 audit report, TSBVI's internal auditor included a finding stating that board policies needed to be updated. The director of policy and procedure support is working with the internal auditor, board, and superintendent to develop a plan to update the remaining board policies and procedures, with an anticipated completion date in two years. However, during onsite interviews, the internal auditor indicated that there is no documentation of the status of the updates other than the audit recommendation tracking schedule.

The institutional knowledge about the process for documenting board policies resides with the director of policy and procedure support. Should the director leave the position, there is no formal, documented process to ensure all of TSBVI's board policies are updated and reviewed on a timely basis.

The absence of board operating procedures has also resulted in TSBVI's board not receiving well-designed, summary level, executive reports. Executive reports are the tools the Governing Board uses to monitor fiscal and operational performance against expected outcomes throughout the school. However, there are no procedures in place to guide the superintendent and management team as to the minimum types of executive summary level reports board members should receive. For example, the review team examined three financial reports the superintendent provides to the Governing Board to monitor TSBVI's expenditures budget, investments, and donations. For example, the expenditure budget report does not include a budget versus actual comparison by line item or year-over-year percentage increases or decreases in specific budget categories. The investment report does not contain statistics related to year-over-year returns on investments. The report of donations received does not have "period-to-period" comparisons of donations received so the Governing Board can assess the effectiveness of TSBVI's development activities.

Without procedures guiding the executive reporting process, there is a risk the Governing Board may not have information needed to monitor actual performance against expected performance, which could impede student achievement, fiscal health, and operational efficiency.

Effective school boards need specific guidance and clarification on how to successfully fulfill their governance responsibilities. The Texas Association of School Boards (TASB), in its publication *Effective Board Practices: An Inventory for School Boards*, states: "Written board operating procedures are intended to define clearly how to carry out regular board tasks. Many people wrongly assume that the way to perform routine tasks is commonly known and understood by all members of the Governing Board. This is an incorrect assumption and often contributes to inefficiency, inconsistency in trustee actions, and failure to carry out important tasks."

The New York State School Boards Association (NYSSBA), in its presentation Leadership Academy 2014, Building an Effective Governance Team: Why Effective Board Operating Procedures Matter, lists developing board operating procedures as a best practice to enable the Governing Board to focus on its real work of improving student performance. The NYSSBA further states that developing a board operating procedures manual allows the Governing Board to gather all relevant board infrastructure in one place and include specific procedural guidance for board governance-related functions:

- board member roles and responsibilities;

- board meetings and committees;

- communications;

- board procedures in the areas of Finance, Human Resources, Curriculum, and Student Support Services; and

- internal board workings.

Another best practice is Austin ISD's manual entitled Board Member Handbook, Austin ISD Board of Trustees. This handbook contains four sections and related appendices that detail specific procedures and processes to guide board members in conducting board operations in the following areas:

- Section One: Board Governance – Includes the Corporate Nature of the Governing Board of Trustees, Governing Principles, Mechanisms of Governance, and Board Organization and Structure of Work.

- Section Two: Board Oversight – Includes Statutory Duties of the School Board and Superintendent, Mechanisms for Oversight of Management, Board's Relationship with the Superintendent and Staff, Board-Superintendent Covenants, and Monitoring Superintendent Performance.

- Section Three: Board Meetings – Includes Commitment to Open Government, Meeting Schedule and Structure, Board Meetings, Board Meeting and Executive Session Agendas, and Board Meeting Protocols.

- Section Four: Individual Board Member Protocols – Includes Code of Conduct; Conflicts of Interest; Board Member Communications; Involvement in Elections; Requests for Records Information, or Reports; Visiting School Campuses; Access to Technology; Access to Legal Counsel; Continuing Education Requirements; Travel Reimbursement; and Process for Addressing Board Member Violations.

- Appendix – Includes Matrix of Board Committees, Board Representation, and District Advisory Bodies; Austin ISD Planning, Monitoring, and Reporting Schedule; Dashboard Metrics and Monitoring; Baseline Expectations for Superintendent Performance; and Basic Information on Parliamentary Procedure.

TSBVI should develop board operating procedures to clarify how the Governing Board should operate as a corporate body and guide board members in conducting governance tasks and activities. These procedures could be included in the Governing Board Orientation Manual given to every member. The procedures should be specific and modeled after the Austin ISD's Board Member Handbook, and should include guidance to board members in the form of specific procedures and processes governing meeting agendas, updating board policies, and executive summary level reporting. The president of the Governing Board should work collaboratively with the members and superintendent to develop these procedures. This work should include convening a workshop to initiate the process to develop the Governing Board operating procedures. The Governing Board should also develop a process for annually reviewing and updating its operating procedures.

Since the time of the onsite review, TSBVI indicated that they have started drafting a proposed Board Standard Operating Procedure (SOP) that will guide the school and the board members in conducting governance tasks and responsibilities. Additionally, TSBVI stated that since the time of the onsite review, they have developed a schedule to implement policy and procedure reviews and updates.

This recommendation could be implemented with existing resources.

SUPERINTENDENT'S EVALUATION PROCESS (REC. 3)

TSBVI lacks an adequate process for evaluating the superintendent to ensure accountability.

TSBVI Board Policy BJCD-E requires the Governing Board to establish an annual calendar providing for the following activities, in which both the Governing Board and superintendent participate:

- procedures for setting goals that define expectations and set priorities for the superintendent;

- formative conference; and

- summative conference.

Figure 1–4 shows a calendar of the Governing Board's superintendent evaluation process included in TSBVI's Board Activity Calendar of Actions Required in Policy and as Usual Practice.

FIGURE 1–4
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
SUPERINTENDENT'S EVALUATION PROCESS
BASED ON BOARD ACTIVITY CALENDAR

TIMELINE	ACTION
September	Board conducts a Formative Evaluation of the superintendent as a part of the superintendent's appraisal process required in Policy BJCD-E.
November	Board discusses the annual evaluation process for the actual appraisal of the superintendent scheduled to occur in the January board meeting.
January	Board conducts the superintendent's annual, Summative Evaluation.

SOURCE: Texas School for the Blind and Visually Impaired Board Activity Calendar, Actions Required in Policy and as Usual Practice, September 2015, updated 11/20/2015, 01/29/2016, 04/08/2016, and 06/03/2016.

According to a review of board agendas during school year 2015–16, TSBVI's board completed the superintendent's appraisal process in the months outlined in the Governing Board activity calendar. The Governing Board uses the superintendent's annual summative evaluation in January to evaluate the superintendent's performance against goals established the prior year, and to set the superintendent's goals for the upcoming year. Although the Governing Board consistently follows its appraisal and evaluation process for the superintendent in accordance with Board Policies BJCD and BJCD-E, the Governing Board does not establish its own goals for the superintendent nor do they collaborate with the superintendent to develop goals.

Each year, the superintendent develops his own goals for the upcoming year and presents them to the Governing Board for review, comment, and prioritization during the Governing Board's summative evaluation conducted in January. During onsite interviews, board members indicated that they discuss the superintendent's goals as presented, and have occasionally modified or added goals. However, the Governing Board does not take an active leadership role in collaboratively setting expectations for the superintendent and in developing the superintendent's annual performance goals.

TSBVI's board policies do not contain guidelines for conducting the superintendent's evaluation or how the Governing Board should determine its expectations and annual performance goals for the superintendent. In regards to the appraisal process, Board Policy BJCD states "The Governing Board shall appraise the Superintendent annually using the commissioner's recommended appraisal process and criteria."

The absence of well-constructed policies and procedures with clear guidelines for the Governing Board to conduct superintendent evaluations could lead to inadequate accountability of the superintendent, diminish the effectiveness of the superintendent evaluation process, and result in strained board/superintendent relations. As a best practice, the NYSSBA, in its 2015 publication, *Superintendent Evaluation* states that effective boards collectively develop a superintendent evaluation model to define and clarify the superintendent evaluation process and provide specific guidelines for evaluating the superintendent. These guidelines include the steps in the evaluation process, and the roles and responsibilities of the Governing Board and superintendent. These guidelines would be included in expanded board operating procedures and cover performance standards and rating scales, timelines for evaluating new and tenured superintendents, rating templates by evaluation area, and the process for defining the superintendent's annual objectives. More importantly, NYSSBA recommends establishing a SMART model to use when the Governing Board identifies annual performance goals for the superintendent. SMART is an acronym that establishes guidelines for developing annual performance goals which must be specific, measurable, achievable, relevant, and time-bound. While most of the goals set forth by TSBVI's superintendent during his most recent evaluation period do meet the SMART model standards, TSBVI's board does not have a process to ensure this will occur in future evaluation periods. **Figure 1–5** shows the elements of the SMART model.

FIGURE 1–5
THE SMART MODEL FOR INCLUSION IN BOARD OPERATING PROCEDURES

Specific	Define Expectations
	Avoid generalities and use verbs to start sentence
Measurable	Quality, quantity, timeliness and cost
Achievable	Challenging, but attainable goals
Relevant	Link the goal to higher level school goals
Time-bound	Set timelines to complete the goal with benchmarks to indicate progress.

SOURCE: Superintendent Evaluation, New York State School Boards Association, 2015, Page 13.

Additionally, the Illinois Association of School Boards, in its 2014 publication T*he Superintendent Evaluation Process, Strengthening the Governing Board-Superintendent Relationship*, suggests the superintendent and school board discuss and reach agreement on what the school board will expect from the superintendent in terms of results. The Governing Board and superintendent should agree on what measurements will be used to determine whether a particular goal has been met, or whether the administration is in compliance with board policy.

TSBVI should revise the superintendent's evaluation process to require the Governing Board to set annual expectations and performance goals.

TSBVI should begin by developing and implementing procedures that contain detailed guidelines for the annual superintendent appraisal/evaluation process. The Governing Board president should also work with the Governing Board Programs Committee, the superintendent, the director of policy and procedure support, and TSBVI's general counsel to expand Board Policy BJCD to reflect best practices in superintendent evaluation by including more detailed information on the roles and responsibilities of board members and the superintendent in the superintendent evaluation process. This work should also include the Governing Board collectively establishing expectations and performance goals for the superintendent.

This recommendation could be implemented with existing resources.

EVALUATION PROCESS FOR THE SUPERINTENDENT'S MANAGEMENT TEAM (REC. 4)

TSBVI lacks a process to effectively evaluate the performance of members of the management team.

At TSBVI, the superintendent's management team is a group of administrators who work collaboratively with the superintendent to make important governance decisions and lead and coordinate school-improvement initiatives. The management team includes the director of planning and evaluation, director of human resources, the principal of comprehensive programs, the principal of short-term programs, the CFO, the director of outreach, and the director of the center for school resources. The superintendent meets with the management team each Monday morning. These meetings are interactive and typically include sharing of information between departments where members of the management team provide status reports for their respective functional areas; discussions of functional area issues or concerns affecting administration and operation of the school; and preparing for board meetings and the legislative session. Further, the superintendent issues directives to team members regarding instructional, administrative, or operational matters affecting the school when necessary.

All of the team members report directly to the superintendent, and the superintendent evaluates them annually. However, the superintendent does not consistently establish goals and expectations for management team members at the beginning of the academic year, which could reduce accountability.

The superintendent uses an internally developed Administrative/Supervisory Performance Appraisal form to evaluate the annual performance of team members and other staff reporting directly to him. The form has sections to evaluate: Leadership Skills/Quality of Work, Quantity of Work, and Professionalism, with separate sections for Performance Goals and Areas of Special Achievement or Accomplishment. Each section of the form includes standard expectations for performance in that particular area and uses a three-level rating scale to assess the performance of the management team member or direct report to the superintendent. **Figure 1–6** shows the Administrative/Supervisory Performance Appraisal rating scale.

FIGURE 1–6
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SUPERINTENDENT'S ADMINISTRATIVE/SUPERVISORY PERFORMANCE APPRAISAL RATING SCALE

RATING VALUE	PERFORMANCE INDICATOR
1	Performance is below the standard
2	Performance meets the standard
3	Performance exceeds the standard

SOURCE: Texas School for the Blind and Visually Impaired Administrative/Supervisory Performance Appraisal, March 2016.

Figure 1–7 shows samples of standard expectations of performance in each section.

As shown in **Figure 1–7**, the expectations for performance measured in each section of the appraisal tilt toward middle management and supervisory standards rather than executive leadership standards, which makes the appraisal less effective when assessing the performance of members of the superintendent's management team. For example, performance expectations in the Leadership Skills/Quality of Work section are not linked to TSBVI's strategic goals or developing and sustaining high performance teams, which are essential for executive level managers and principals. Moreover, performance expectations in the Professionalism section include "demonstrating loyalty and support to the supervisor,

management team, and the organization," which is an expectation of middle managers and supervisors as members of the management team cannot demonstrate loyalty or support themselves.

During onsite interviews, some team members indicated that the superintendent did not set goals and objectives at the beginning of the school year, and instead evaluated staff based on whether they accomplished items on the action plan developed by each department. The needs assessment lists the department's specific goals and objectives. Other team members described the evaluation process as not containing any development of goals and expectations for the coming year and not enhancing professional development at the management team level.

Onsite interviews also indicated that some team members felt that the superintendent's evaluation process does not allow for staff to draft their own goals or expectations to engage in collaborative goal-setting.

The Pennsylvania School Boards Association recommends developing an effective evaluation process for superintendents and assistant superintendents that includes:

- Focusing on performance standards;
- Focusing the CEO or assistant superintendent's activities on the district's mission and strategic plan;

FIGURE 1–7
SAMPLES OF TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED STANDARD EXPECTATIONS OF PERFORMANCE FROM THE ADMINISTRATIVE/SUPERVISORY PERFORMANCE APPRAISAL RATING SCALE

SECTION OF ADMINISTRATIVE/ SUPERVISORY PERFORMANCE APPRAISAL	STANDARD EXPECTATION OF PERFORMANCE (SAMPLE)
Leadership Skills/Quality of Work	• Demonstrates the basic knowledge and expectations necessary to perform assignments. • Demonstrates effective problem-solving and decision-making skills. • Demonstrates sound organizational skills in the planning, delegating and follow-through of work demands. • Demonstrates skills in accurately assessing program weaknesses and formulating sound action plans. • Demonstrates skills in directing, training, and improving the effectiveness of subordinate staff. • Demonstrates ability to secure motivation and cooperation of subordinate staff through effective communication.
Quantity of Work	• Accomplishes assignments in a timely manner. • Consistently produces the volume of work necessary for accomplishing job responsibilities. • Demonstrates skill in establishing priorities and schedules for completing work.
Professionalism	• Follows established lines of communication with supervisors and colleagues in decision-making and sharing of information. • Informs supervisor of departmental issues and activities on a timely basis. • Demonstrates loyalty and support to the supervisor, management team, and the organization. • Demonstrates emotional maturity and stability (ability to perform under stress; frustration tolerance).

SOURCE: Texas School for the Blind and Visually Impaired Administrative/Supervisory Performance Appraisal, March 2016.

- Providing a mechanism to assess how effectively the superintendent or assistant superintendent has implemented board policies and decisions;

- Providing a basis for future superintendent and assistant superintendent performance expectations;

- Facilitating coordination and teamwork among the organization's leadership;

- Creating a formal system for superintendent and assistant superintendent professional and personal development;

- Establishing parameters for superintendent and assistant superintendent performance that enable the Governing Board to provide constructive feedback regarding the superintendent and assistant superintendent's professional and personal performance; and

- Encouraging school boards to work collaboratively with the superintendent to develop annual goals that may be associated with immediate, longer-term strategic planning and district improvement initiatives.

While this evaluation process is targeted to school boards' evaluation of superintendent and assistant superintendent performance in school districts in Pennsylvania, it is adaptable to a superintendent and members of a management team. Assistant superintendents are usually members of the superintendent's management team, all of whom play pivotal roles in assisting the superintendent with implementing board policies and decisions, and implementing the elements of the district's strategic plan. Moreover, the executive level evaluation instrument recommended by the Pennsylvania School Boards Association includes objective performance standards and key performance indicators for evaluation in the following areas that could be adapted for use by a superintendent in designing and implementing a performance evaluation process tailored to a cabinet level management team:

- Student Growth and Achievement (adaptable to the principals of comprehensive and short-term programs, the director of curriculum, and the director of the center for school resources);

- Organizational Leadership (adaptable to the specific function for which the management team member or direct report is responsible);

- Operational and Financial Management (adaptable to the CFO);

- Communications and Community Relations (adaptable to the director of community resources, director of outreach, and to the principals of comprehensive and short-term programs);

- Human Resource Management (adaptable to the director of human resources); and

- Professionalism (adaptable to all management team members and direct reports to the superintendent).

The superintendent evaluates each of these objective performance standards using key performance indicators that are evaluated according to a rating scale of "Distinguished," "Proficient," "Needs Improvement," or "Failing." The form aggregates the ratings for each key performance indicator and assigns an overall rating to the performance standards, with comments.

As a developmental tool, the performance evaluation instrument includes a summary, formative assessment of strengths and weaknesses, and a section to describe the steps the staff who is rated should take to improve performance in areas identified for improvement, including the resources necessary to support improvement strategies. Finally, the evaluation form includes a section that lists the annual performance goals of the executive evaluated and the status or results related to achieving the goals over the school year.

TSBVI's superintendent should refine the process for evaluating management staff to encourage executive leadership development and accountability.

The superintendent should adapt a best practices model using the Pennsylvania School Boards Association's model to modify the performance evaluation process for members of the management team. The superintendent and director of human resources should refine the evaluation process to focus on jointly developing goals, by functional area of responsibility, that are aligned with TSBVI's strategic plan. Additionally, the superintendent and director of human resources should develop a new performance evaluation instrument specifically for members of the management team that includes performance standards, key performance indicators, and an assessment of strengths and weaknesses along with potential professional development opportunities. The superintendent and director of human resources should ensure the evaluation process requires collaborative goal-setting at the outset of the process, with a review of progress

toward achieving the goals at the time of the formal performance evaluation conference.

This recommendation could be implemented with existing resources.

STAFF COMMUNICATION (REC. 5)

TSBVI lacks a process to ensure clear communication among the superintendent, management, and staff.

The superintendent routinely communicates key initiatives and directives from management team meetings through posts on the campuswide intranet and email, and relies on individual members of the management team to reinforce the communication through team meetings within their respective departments. However, during onsite interviews, some members of the superintendent's management team indicated communication is sometimes ineffective because staff do not consistently check their email or postings to the intranet. TSBVI requires staff to check their email twice daily, but not everyone complies with this requirement. One member of the management team confirmed the general dissatisfaction of staff with communications from the management team.

Some members of the management team indicated they routinely conduct meetings within their departments the day after management team meetings to ensure decisions, directives, and key messages from the superintendent reach staff. However, these team and department meetings are not required of management team members and not all management team members hold meetings to communicate information from the superintendent. TSBVI does not have a formal internal communications plan that provides protocols for communicating decisions, directives, initiatives, and key messages originating within the management team.

As a best practice, the Council of the Great City Schools, in its 2009 publication *Building Public Confidence in Urban Schools: It Begins Inside the District, A Guide for Administrators and Board Members,* says all school district leaders are responsible for communicating with staff. It goes further to say that school district leaders should "build leadership" by recognizing the need for internal communication and consider the following:

- Keeping managers, supervisors, and principals informed so that they can disseminate information to their staff and teachers, respectively;

- Conducting scheduled meetings with staff by the superintendent, senior, and middle management; and

- Having the district's chief communications officer (or director) as a part of the superintendent's cabinet, allowing the senior communications professional to have a sense of the district's "big picture."

The publication also suggests developing strategies and tactics to "build bridges" (i.e., communicate initiatives, decisions, etc.) to all segments of an organization. Examples of strategies and tactics to build bridges of communication included in the Council of Great City School's publication include:

- Developing staff opinion surveys to gauge what communication tools they desire to be informed and buy into the system;

- Refining and improving communication vehicles used to disseminate information to staff;

- Creating a "communications toolkit" for principals and managers that includes key messages to be shared when describing a major initiative, memo templates for use in communicating with staff, and talking points for staff meetings; and

- Convening a standing internal communications advisory group.

TSBVI should develop an internal communications plan that includes specific strategies and tactics to communicate key messages, initiatives, and directives from management team meetings to other TSBVI staff. The director of planning and evaluation should include strategies and tactics recommended by the Council of Great City Schools in the internal communications plan. These strategies and tactics should include:

- Developing a consistent electronic communications vehicle to keep managers, supervisors, and other staff informed, such as a weekly fact sheet detailing initiatives and directives from management team meetings;

- Conducting periodic, scheduled meetings between teachers and staff and the superintendent and members of the management team;

- Developing an opinion survey to determine which communication tools staff desire or prefer to be informed about issues from the management to enable them to buy into the system;

- Refining and improving existing communication vehicles used to disseminate information to staff, including newsletters, e-mails and intranet postings;

- Creating a "communications toolkit" for managers and supervisors that include key messages to be shared when describing a major initiative from the management team, memo templates for use in communicating with teachers and staff, and talking points for staff meetings; and

- Convening a standing internal communications advisory group consisting of middle managers, supervisors, teachers, staff, and the director of planning and evaluation.

This recommendation could be implemented with existing resources.

CONCURRENT EMPLOYMENT (REC. 6)

TSBVI has designated a director-level position to serve as the coordinator for the All Blind Children of Texas Foundation, resulting in an inappropriate use of state resources.

Since 2004, TSBVI has had an informal agreement with the All Blind Children of Texas (ABCTX) Foundation that authorizes TSBVI's director of community resources to spend part of her time working as the coordinator of ABCTX. However, TSBVI and ABCTX do not have a written memorandum of understanding or any formal process to define the relationship between the school and the foundation. TSBVI staff told the review team that the arrangement resulted from informal discussions between the foundation's board members and the school's superintendent. The superintendent delegated the duty to the director of community resources under the "other duties as assigned" section of the TSBVI job description.

ABCTX was established in 2004 by TSBVI's superintendent at the time. ABCTX is a non-profit foundation whose primary purpose is to underwrite a variety of student programs and activities (depending on student need) at the request of educators and other professionals who work with blind and visually impaired children throughout Texas. Most of the foundation's funds support extracurricular activities such as field trips or other events for blind and visually impaired students not paid for by TSBVI, local school districts, or other organizations. Teachers or other professionals, including TSBVI staff, complete a form requesting funds from ABCTX with a summary of the use of

the funds, and submit it to the foundation's Board of Trustees (board). TSBVI's director of community resources, serving in the role as the coordinator of the ABCTX foundation, receives the funding requests and submits them to the ABCTX board for review and approval. The board determines if the funds will be provided. ABCTX's board is separate from TSBVI's Governing Board, however there is one member who is on both boards. Examples of recent student projects funded by ABCTX include a bowling trip and an out of state summer music program.

From January 2015 to December 2015, ABCTX donated $18,908 toward statewide programs for the blind and visually impaired. TSBVI students received $8,715, or 46.1 percent of this amount. At the time of the onsite review, ABCTX had a fund balance of approximately $35,000.

The director of community resources estimates that she spends 20.0 percent of her time, or eight hours a week, working for ABCTX as its coordinator. No process is in place for tracking the actual time spent working for ABCTX. The director indicated that some weeks she spends more than 20.0 percent of her time working for ABCTX and some weeks less. ABCTX does not pay any portion of the state-funded salary for the position

TSBVI lacks a written description of the activities that the director of community resources performs for ABCTX; however, she indicated that as coordinator and the only staff of ABCTX, she handles all the operations of the foundation and uses various TSBVI resources, including making copies and phone calls, mailing letters, and using school computers for producing reports and performing research. According to the director, she keeps a list of all the resources she uses and periodically sends this information to TSBVI's Business Office. The Business Office then records these resources under an assigned code and invoices ABCTX. In school year 2014–15, ABCTX paid TSBVI $10.36 for the use of school resources.

Pursuant to the Texas Government Code, Section 2203.004, state property may be used only for state purposes. A person may not entrust state property to a state officer or employee or to any other person if the property is not to be used for state purposes. Thus, allowing the director of community resources to use state property while working for ABCTX is in violation of the Texas Government Code. Additionally, while the amount of resources being used for ABCTX was not material at the time of the onsite review, TSBVI does not

have a policy or procedure that limits the amount of resources that can be used for ABCTX purposes.

As a state employee, the salary for the director of community resources is paid through state appropriations. When the director uses state funds to perform work for ABCTX, funds are not being used as intended. Additionally, as a state employee, the director is eligible for a retirement benefit through the Employees Retirement System of Texas (ERS) based on the amount of time employed at TSBVI. TSBVI inaccurately reports to ERS that the director of community resources is working 40 hours a week for the school when she spends an estimated eight hours a week not working for TSBVI. The value of 20.0 percent of the director of community resources time that is provided to the private foundation is equal to $14,438 annually, based on 20.0 percent of the director of community resources salary of $53,721 ($10,744) plus 20.0 percent of benefits ($3,694) which is 34.4 percent of the salary.

TSBVI should eliminate the director of community resource's role as coordinator of ABCTX.

The superintendent should notify the board of ABCTX that TSBVI staff can no longer work concurrently for the foundation. The director of community resources should provide the ABCTX board president with all pertinent financial and operational records for the foundation.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

RECOMMENDATION	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 1. GOVERNANCE AND SCHOOL MANAGEMENT							
1. Modify the Governing Board's continuing education training and orientation system to ensure new and tenured board members understand their responsibilities and the role, structure, and process of the Governing Board.	$0	$0	$0	$0	$0	$0	$0
2. Develop board operating procedures to clarify how the Governing Board should operate as a corporate body and guide board members in conducting governance tasks and activities.	$0	$0	$0	$0	$0	$0	$0
3. Revise the superintendent's evaluation process to require the Governing Board to set annual expectations and performance goals.	$0	$0	$0	$0	$0	$0	$0
4. Refine the process for evaluating management staff to encourage executive leadership development and accountability.	$0	$0	$0	$0	$0	$0	$0
5. Develop an internal communications plan that includes specific strategies and tactics to communicate key messages, initiatives, and directives from management team meetings to other TSBVI staff.	$0	$0	$0	$0	$0	$0	$0
6. Eliminate the director of community resource's role as coordinator of ABCTX.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 2. EDUCATIONAL, RESIDENTIAL, AND COMMUNITY SERVICES

As a state agency and a school, the Texas School for the Blind and Visually Impaired (TSBVI) provides a range of direct educational services to students, ages five to 22, who are blind, visually impaired, or deaf-blind, and who may have multiple disabilities. TSBVI also serves as a statewide educational resource center on blindness and visual impairment. The school provides a variety of educational services to families, students, and professionals throughout the state. The school's mission is to "serve as a leading center of expertise and supports, working in partnership with schools, families, and organizations to improve educational outcomes for students who are blind or visually impaired, including those with deaf-blindness or additional disabilities." TSBVI's vision is that "all students in Texas who are blind or visually impaired, including those with deaf-blindness or additional disabilities, will have high-quality educational opportunities to develop their skills, knowledge, and character to lead productive and fulfilling lives."

TSBVI's main functions are to:
- provide a free, appropriate public education that addresses the intensive or specialized needs of visually impaired children and youth, including those with additional disabilities, when the local district and parents agree that such services are not available in a local program;

- conduct supplemental programs, such as short-term and summer programs;

- provide statewide services to parents of students, school districts, Texas' Regional Education Service Centers (ESC), and other agencies, including training, consultation, technical assistance, and developing and disseminating materials such as curriculum, instructional methodology, and educational technology; and

- partner with Texas Tech University and Stephen F. Austin State University in preparation programs for teachers of the visually impaired.

TSBVI has a diversified educational service model with campus-based and outreach services to benefit the education of students with blindness and visual impairments, including:
- Comprehensive Programs – campus-based, school-year programs;

- Short-term Programs – short-duration courses during the school year and summer available to students from across the state; and

- Outreach Program – teams of specialists meeting the statewide needs of individuals with visual impairments from birth to age 22 and the families and professionals who work with them.

TSBVI offers full-time Comprehensive Programs to students from kindergarten to grade 12 who are unable to be served appropriately by their local school districts. Most Comprehensive Program students reside on campus during the week and travel home for weekends and breaks. TSBVI organizes its Comprehensive Programs into five instructional programs based on students' academic skills and functional levels:
- the Academics program serves students who perform at grade level or within two years of their grade levels and uses curriculum aligned with the Texas Essential Knowledge and Skills (TEKS);

- the Modified Academics program serves students who are age 12 or older and who are functioning at more than two years less than their age but have at least kindergarten-equivalent reading, writing, and math skills; TSBVI modifies the Elementary Academics curriculum for students younger than age 12 as needed;

- the Alternative Academics program is a basic skills program serving students who have multiple disabilities in addition to visual impairment and who have difficulty generalizing skills to new situations; these students learn best through consistent routines and functional, meaningful activities based on prerequisite TEKS;

- the Experiences in Transition (EXIT) program serves students ages 18 to 22 who have completed graduation requirements but need further instruction in transition issues that young adults with visual impairments might face. EXIT offers community-based instruction through a combination of coursework, work training, and independent living and community participation activities; and

- the Post-secondary program is administered with the Criss Cole Rehabilitation Center of the Texas Department of Assistive and Rehabilitative Services (DARS), Division of Blind Services; the program serves individuals ages 18 to 22 who graduated from high school or earned a general equivalency degree. It gives them an opportunity to experience adult living in a supportive environment. The program integrates academic remediation and TSBVI support with skills associated with employment, independent living, and community participation. In September 2016, the Legislature transferred blind and visually impaired services and programs from DARS to the Texas Workforce Commission and the Texas Health and Human Services Commission.

TSBVI admits students through a referral process initiated by a student's local school district and parents. Many school districts may not have the resources or staff to provide blind and visually impaired students with the level of resources and individualized education that these students may need. School districts refer these students to TSBVI to acquire the skills necessary to return to their local districts, typically within three years.

The Short-term Programs offer short-duration group and individualized classes year-round for students with visual impairments. The Short-term Programs consist of two sessions, the School Year Short-term Program and the Summer Short-term Program. Students travel to TSBVI's campus and participate in classes and activities with peers from across the state. These classes last from three days to five days. Short-term Programs staff consist of a principal, five teachers, two teacher assistants, an online learning developer, two administrative assistants, and five residential staff.

For school year 2014–15, students enrolled in the Comprehensive Programs came from 110 local school districts and all 20 ESC regions. Students enrolled in the School Year Short-term Program for that school year came from 86 local school districts and 19 ESC regions, and students enrolled in the Summer Short-term Program came from 136 local school districts and 18 ESC regions.

Figure 2–1 shows TSBVI student enrollment by program. During school years 2010–11 to 2014–15, TSBVI student enrollment ranged from 163 to 176 students in Comprehensive Programs, from 120 to 146 students in the School Year Short-term Program, and from 314 to 335 students in Summer Short-term Programs.

Figure 2–2 shows the student demographic information and economic status compared to the average number of students enrolled throughout the state. In comparison to the demographic distribution of students statewide, TSBVI has a larger share of White students, a similar share of African American students, and a smaller share of Hispanic and Asian students. TSBVI also has 35.0 percent more students considered economically disadvantaged than the state average.

FIGURE 2–1
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED STUDENT ENROLLMENT BY PROGRAM
SCHOOL YEARS 2010–11 TO 2014–15

PROGRAM	2010–11	2011–12	2012–13	2013–14	2014–15
Elementary	30	31	32	27	21
Secondary (1)	126	133	137	129	134
Post-secondary	7	7	7	9	9
Subtotal, Comprehensive Programs	**163**	**171**	**176**	**165**	**164**
School Year Short-term	120	146	141	136	138
Summer Short-term	335	320	328	314	318
Subtotal, Short-term Programs	**455**	**466**	**469**	**450**	**456**
Total Students	**618**	**637**	**645**	**615**	**620**

NOTE:
(1)   Secondary program count includes Experiences in Transition (EXIT) program students.
SOURCES: Texas School for the Blind and Visually Impaired, Annual Report for School Year 2014–15; Texas School for the Blind and Visually Impaired, August 2016.

FIGURE 2–2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED STUDENT CHARACTERISTICS COMPARED TO STATE AVERAGE SCHOOL YEAR 2014–15

STUDENTS	TSBVI	STATE
White	44.0%	28.9%
Hispanic	40.0%	52.0%
African American	14.0%	12.6%
Asian or Pacific Islander	2.0%	4.0%
Economically disadvantaged	93.8%	58.8%

SOURCES: Texas School for the Blind and Visually Impaired, Annual Report for School Year 2014–15; Texas Education Agency, Texas Academic Performance Report, school year 2014–15.

OUTREACH PROGRAM

TSBVI's Outreach Program serves families and local districts throughout Texas. The Outreach Program provides information, training, and support to families, professionals in education and rehabilitation, and community representatives involved in the lives of individuals with visual impairments or deaf-blindness. These individuals range in age from birth to age 22. Services provided directly to local communities and programs include:

- providing individualized local consultations to families, schools, and other related agencies or community organizations;

- training families, professionals and paraprofessionals through workshops and conferences around the state, videoconferencing, and web-based technologies;

- providing resources on visual impairments and deaf-blindness such as articles, online videos, a newsletter, materials from the American Printing House for the Blind, and assistive technology on loan; and

- collaborating with local, state, and national agencies and organizations to help develop quality local programs for students with visual impairments and deaf-blindness.

The TSBVI Outreach Program's positions are organized into a Deaf–blind Team, Visual Impairment Team, Statewide Team, and Media Team.

ORGANIZATION AND MANAGEMENT

Educational services are overseen by the principal of comprehensive programs, the principal of short-term programs, the director of the center for school resources, the director of outreach, and the director of curriculum. All of these positions report directly to the superintendent. **Figure 2–3** shows TSBVI's organization for educational service delivery.
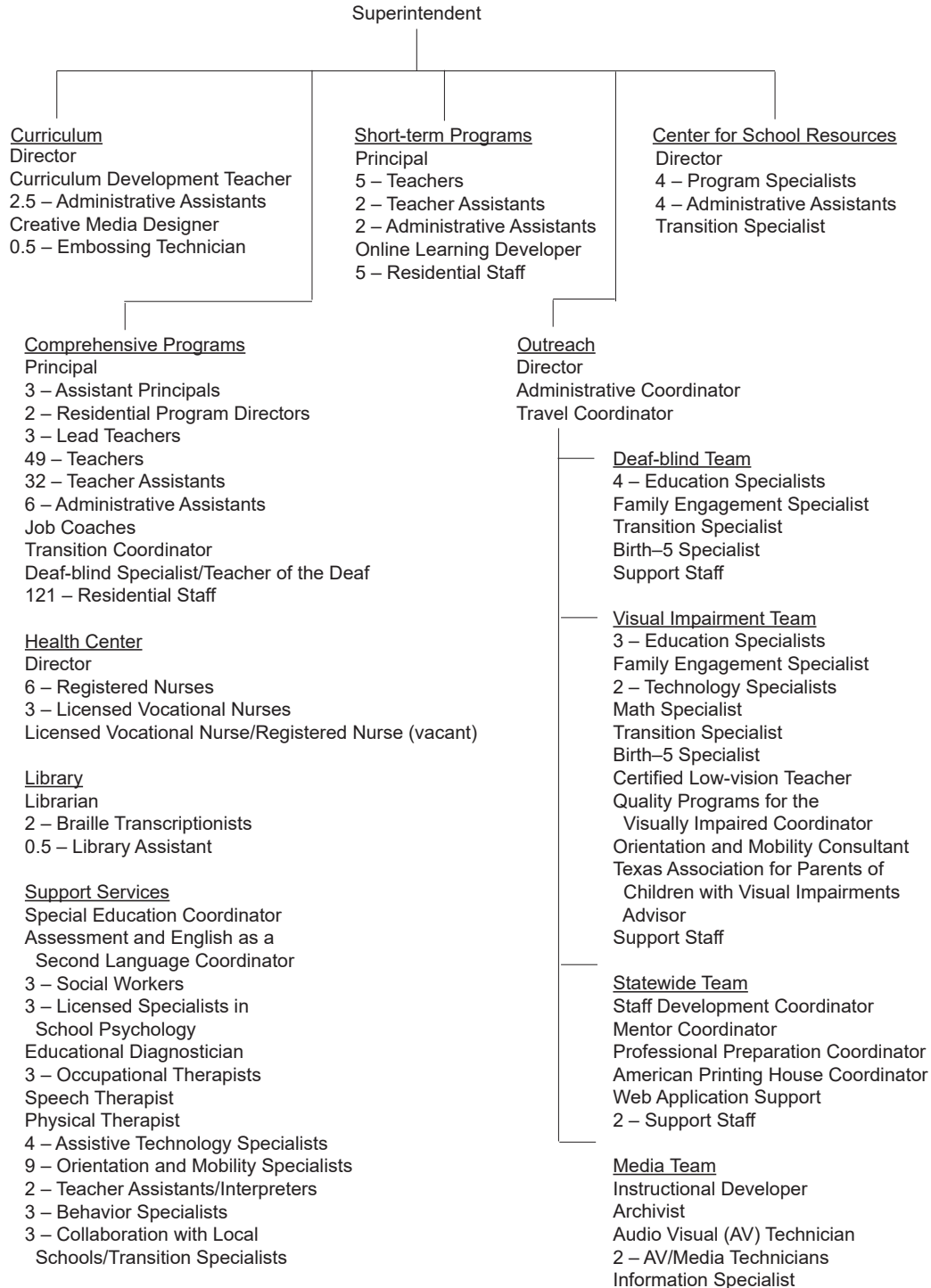
CURRICULUM

All TSBVI students receive special education services as students with visual impairments, with or without additional disabilities. Each student has an admission, review, and dismissal (ARD) committee, which consists of the student's parents, the school staff involved with the student, and the local school district. The ARD committee implements an appropriate individualized education program (IEP) to meet each student's educational needs. IEPs include information about the student's levels of academic and social achievement, yearly goals and objectives, and a schedule of services.

TSBVI provides core curriculum that is adapted for students with visual impairments. Considering the diversity of instructional needs at TSBVI, assistant principals and teachers select from a wide range of curricula. These curricula include state-adopted textbooks; TEKS-aligned, individualized instructional software; and AGS textbooks from Pearson Publishing. The AGS curriculum has high-interest reading materials written at lower reading levels for secondary students who struggle with reading and comprehension of academic concepts. Teachers also develop individualized instructional materials for students. Educational materials can be ordered in large print and braille from the American Printing House for the Blind.

Since school year 2007–08, TSBVI has used some components the TEKS Resource System (TRS), a platform for grades kindergarten to 12 that is used in Texas public schools. TRS includes many tools to help teachers provide instruction in core curriculum areas. Teachers working with students functioning at less than grade level refer to the TRS Vertical Alignment Documents to help them understand the hierarchy of subject area skills from prekindergarten to high school grades. The Curriculum Department utilizes the TRS Year at a Glance documents to guide teachers in the pacing of instruction.

In addition to core curriculum, TSBVI also focuses on an expanded core curriculum (ECC). The ECC addresses concepts and skills that often require specialized instruction with students who are blind or visually impaired. The ECC provides direct instruction in skills that sighted peers learn incidentally by observing others. The ECC also enables

FIGURE 2–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED EDUCATIONAL, RESIDENTIAL, AND COMMUNITY SERVICES ORGANIZATION
SCHOOL YEAR 2015–16

Superintendent

Curriculum
Director
Curriculum Development Teacher
2.5 – Administrative Assistants
Creative Media Designer
0.5 – Embossing Technician

Short-term Programs
Principal
5 – Teachers
2 – Teacher Assistants
2 – Administrative Assistants
Online Learning Developer
5 – Residential Staff

Center for School Resources
Director
4 – Program Specialists
4 – Administrative Assistants
Transition Specialist

Comprehensive Programs
Principal
3 – Assistant Principals
2 – Residential Program Directors
3 – Lead Teachers
49 – Teachers
32 – Teacher Assistants
6 – Administrative Assistants
Job Coaches
Transition Coordinator
Deaf-blind Specialist/Teacher of the Deaf
121 – Residential Staff

Health Center
Director
6 – Registered Nurses
3 – Licensed Vocational Nurses
Licensed Vocational Nurse/Registered Nurse (vacant)

Library
Librarian
2 – Braille Transcriptionists
0.5 – Library Assistant

Support Services
Special Education Coordinator
Assessment and English as a
  Second Language Coordinator
3 – Social Workers
3 – Licensed Specialists in
  School Psychology
Educational Diagnostician
3 – Occupational Therapists
Speech Therapist
Physical Therapist
4 – Assistive Technology Specialists
9 – Orientation and Mobility Specialists
2 – Teacher Assistants/Interpreters
3 – Behavior Specialists
3 – Collaboration with Local
  Schools/Transition Specialists

Outreach
Director
Administrative Coordinator
Travel Coordinator

Deaf-blind Team
4 – Education Specialists
Family Engagement Specialist
Transition Specialist
Birth–5 Specialist
Support Staff

Visual Impairment Team
3 – Education Specialists
Family Engagement Specialist
2 – Technology Specialists
Math Specialist
Transition Specialist
Birth–5 Specialist
Certified Low-vision Teacher
Quality Programs for the
  Visually Impaired Coordinator
Orientation and Mobility Consultant
Texas Association for Parents of
  Children with Visual Impairments
  Advisor
Support Staff

Statewide Team
Staff Development Coordinator
Mentor Coordinator
Professional Preparation Coordinator
American Printing House Coordinator
Web Application Support
2 – Support Staff

Media Team
Instructional Developer
Archivist
Audio Visual (AV) Technician
2 – AV/Media Technicians
Information Specialist

Sources: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Blind and Visually Impaired, March 2016.

nonvisual learners to access content that is typically taught visually, such as mathematical and scientific charts, diagrams, and models. The Texas Education Code, Section 30.002, established nine areas of the ECC that are required for students with visual impairments: assistive technology, career education, compensatory skills, independent living skills, orientation and mobility, recreation and leisure, self-determination, sensory efficiency, and social interaction skills. TSBVI's Curriculum Department develops original ECC curricula for TSBVI teachers and for visual impairment professionals worldwide.

INSTRUCTIONAL PROGRAM EVALUATION

TSBVI evaluates instructional programs based on annual goals and objectives specified in its Annual Improvement Plan. The Annual Improvement Plan is developed after completing a comprehensive needs assessment that includes input from teachers, staff, parents, and students' home districts. This input regards student and school progress on objectives and performance measures associated with student learning, program quality, staff quality, and compliance with federal and state laws.

TSBVI also evaluates its instructional programs through student performance on quality indicators developed as part of a memorandum of understanding (MOU) with the Texas Education Agency (TEA). The MOU requires that TSBVI annually evaluates students' academic progress on: state assessments; norm or criterion-referenced instruments;

completion of courses, credits, and graduation requirements; progress in the attainment of student IEP goals and objectives; and nonacademic indicators such as attendance rates, dropout rates, and other measures of student success. TSBVI developed performance indicators for Academics program students at elementary and secondary levels, Modified Academics program students, Alternative Academics program students at elementary and secondary levels, and EXIT students. Student performance is evaluated based on the increase of knowledge and skills and the generalization and application of skills. The following three-point scale is used to evaluate progress:

- 1 – no progress to minimal progress (0.0 percent to 9.9 percent increase in skills);

- 2 – moderate progress (10.0 percent to 19.9 percent increase in skills); and

- 3 – substantial progress (20.0 percent or greater increase in skills).

Figure 2–4 shows TSBVI's student performance on quality indicators for school years 2012–13 to 2014–15.

STAFF DEVELOPMENT

TSBVI's professional development (PD) coordinator arranges all the schoolwide staff development and training, and assistant principals arrange additional targeted training for the teaching staff. During onsite interviews by the Legislative Budget Board's School Performance Review

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FIGURE 2–4
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED STUDENT PERFORMANCE ON QUALITY INDICATORS BY INSTRUCTIONAL PROGRAM
SCHOOL YEARS 2012–13 TO 2014–15

PROGRAM	PERFORMANCE INDICATOR ASSESSMENTS			MODERATE TO SUBSTANTIAL PROGRESS (1)			PERCENTAGE MAKING MODERATE TO SUBSTANTIAL PROGRESS (1)		
	2012–13	2013–14	2014–15	2012–13	2013–14	2014–15	2012–13	2013–14	2014–15
Elementary Academics	15	19	13	14	18	11	93.3%	94.7%	84.6%
Elementary Alternative Academics	8	6	7	7	6	5	87.5%	100.0%	71.4%
Experiences in Transition (EXIT)	36	39	36	36	35	35	100.0%	89.7%	97.2%
Modified Academics	26	25	24	16	19	10	61.5%	76.0%	41.7%
Secondary Academics	23	28	26	23	23	24	100.0%	82.1%	92.3%
Secondary Alternative Academics	38	27	29	32	25	20	84.2%	92.6%	69.0%
Schoolwide Totals	**146**	**144**	**135**	**128**	**126**	**105**	**87.7%**	**87.5%**	**77.8%**

NOTE: (1) Moderate to substantial progress denotes scoring of 2.0 or higher.
SOURCE: Texas School for the Blind and Visually Impaired, Performance Indicators Report, school years 2012–13 to 2014–15.

Team, staff indicated that TSBVI offers from 225 to 250 trainings a year.

TSBVI offers staff development in a variety of settings and formats. TSBVI has an in-service week for all staff at the start of each school year. TSBVI provides New Employee Orientation, which includes two days of orientation training for new staff who work with students and one day for new staff who do not directly work with students. New Employee Orientation covers topics such as curriculum, behavior support, orientation and mobility, visual impairment and functional implications of vision loss, dual-sensory impairment, family and community relationships, student health, and safety training.

TSBVI also provides training in Foundations in Visual Impairments for staff who do not hold a Teacher of Students with Visual Impairments certificate from the State Board for Educator Certification. This 45-hour training must be completed within a 12-month period after hire and helps designated staff to be knowledgeable and skilled in working with students with visual impairments.

The PD coordinator ensures that teachers have 150 hours of staff development across five years, or 45 hours a year, to maintain their certifications. TSBVI also organizes training for new teacher assistants. New teacher assistants are required to receive 45 hours of training a year, including 7.5 hours of training on orientation and mobility. The PD coordinator informs teachers and professional staff about available trainings off campus that are appropriate for them and disseminates information to assistant principals about trainings available during the summer. To determine what professional development content to offer, the PD coordinator distributes a training needs assessment questionnaire toward the end of each school year. The questionnaire enables staff to indicate their training needs.

SPECIAL PROGRAMS

TSBVI offers an English as a Second Language (ESL) program but no bilingual program. TSBVI has a small number of English Language Learners (ELL). During school year 2013–14, TSBVI had seven ELL students, six ELL students during school year 2014–15, and eight ELL students during school year 2015–16. All content-area teachers and teachers of self-contained classrooms are required to gain ESL certification during the first year of employment at TSBVI unless they are already ESL-certified, pursuant to the Texas Education Code, Section 29.061, and the Texas Administrative Code, Section 89.1245. For school year

2015–16, all 27 content-area and self-contained classroom teachers were ESL-certified or had certifications in sheltered English instruction, which provides access to content and promotes language development.

TSBVI has a Language Proficiency Assessment Committee (LPAC) that includes teachers of students with limited English proficiency (LEP), lead teachers, the ESL coordinator, and assistant principals. TSBVI received a waiver from TEA indicating that a parent member is not required, because it is not always possible to have a parent from out of town in attendance. The LPAC meets monthly to address issues related to the identification of LEP students, statewide assessments, student progress, and exiting students from the ESL program. The LPAC also provides data and recommendations to the student's ARD committee.

TSBVI does not have a gifted and talented program and does not offer pre-advanced placement (AP) or AP classes. However, TSBVI students can enroll in classes at the Austin Independent School District's (ISD) McCallum High School and Lamar Middle School, including foreign language classes, advanced math and science, pre-AP courses, AP courses, and other advanced classes not available at TSBVI.

STUDENT BEHAVIOR MANAGEMENT

TSBVI follows the positive behavioral intervention and supports model, which involves developing the behavioral supports and social culture for students to achieve social, emotional, and academic success. TSBVI applies a system of positive behavior supports across all instructional, living, and community settings to develop and enhance students' abilities to conduct themselves positively and productively in aspects of adult living. TSBVI's behavior support and management model is based on a student code of conduct; campus rules that define behavior expectations; and specific setting supports that define behavior expectations in the classrooms, cafeteria, and dormitories.

TSBVI also uses the Mandt system behavioral management approach. Mandt is a comprehensive, integrated approach to preventing, de-escalating, and intervening to ensure safety. The approach involves developing an organizational culture that promotes the emotional, psychological, and physical safety necessary for teaching new behaviors.

The number of TSBVI students receiving in-school suspension (ISS), out-of-school suspension (OSS) or disciplinary alternative education program (DAEP) placements has been very small. From six to nine TSBVI

students received ISS from school years 2010–11 to 2012–13, and no students received ISS in the following two years. TSBVI rarely assigns OSS, with from zero to six students receiving OSS from school years 2010–11 to 2014–15. During the review team's onsite field work, the principal of comprehensive programs indicated that TSBVI has not had a DAEP placement for longer than one day since school year 2000–01.

STUDENT SERVICES

TSBVI offers a range of student support services, including guidance and counseling; health services; social work services; graduate follow-up for five years; assistive technology; interpreting; occupational, physical, and speech therapies; and orientation and mobility. **Figure 2–5** shows the number and type of staff in each area and the number of students served from school years 2011–12 to 2014–15.

RESIDENTIAL SERVICES

TSBVI's Residential Program provides services for residential students enrolled in Comprehensive and Short-term

Programs. TSBVI students live in residences with living rooms, playrooms, bedrooms, study areas, and kitchens. Residential staff provide 24-hour supervision.

TSBVI's two residential program directors manage the Residential Program. Additionally, full-time resident specialists and chaperones report to the residential program directors.

One residential program director also oversees the Recreation Department. The recreation director oversees the schedule and activities within the department and is supported by four recreational activity coordinators. The Residential Program includes the Weekends Home Program, which provides transportation home for residential students. **Figure 2–6** shows the organizational structure for TSBVI's residential services.

Figure 2–7 shows the job responsibilities of TSBVI staff providing residential services.
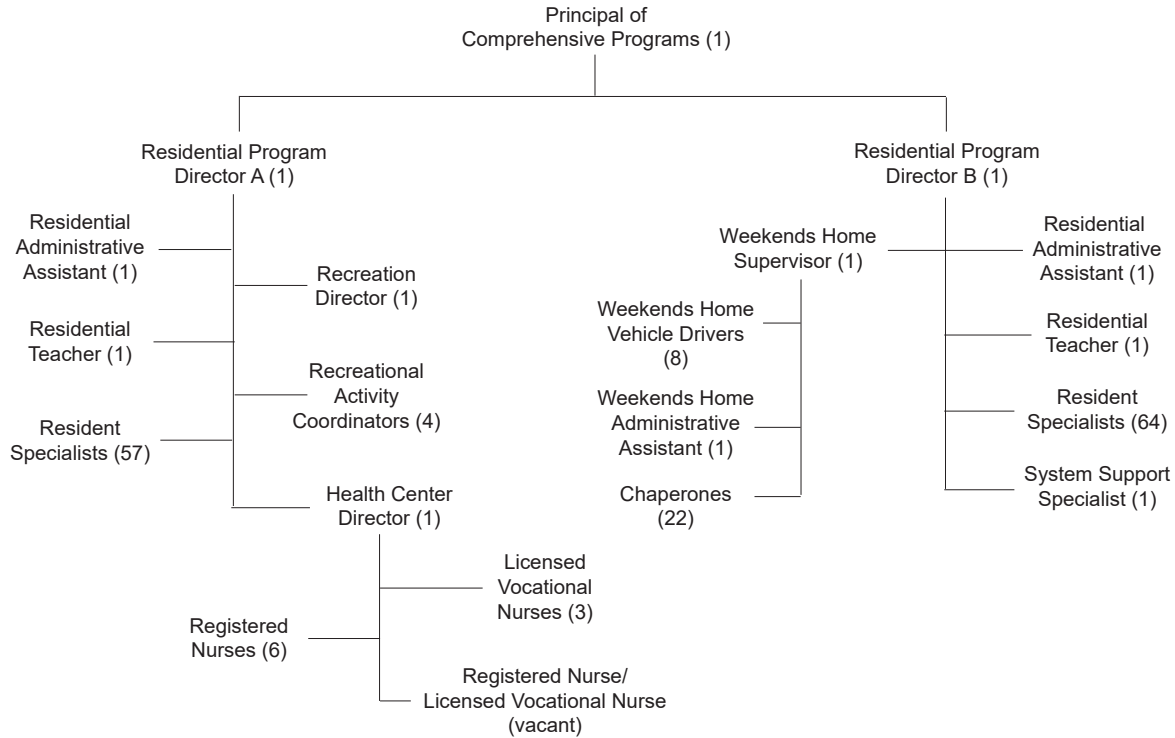
The Residential Program is an instructional program that exceeds providing basic care. Students receive direct instruction related to their IEPs, participate in structured

FIGURE 2–5
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED STUDENT SERVICES, STAFF, AND NUMBER OF STUDENTS SERVED SCHOOL YEARS 2011–12 TO 2014–15

SERVICE	STAFF	SCHOOL YEAR AND STUDENTS SERVED			
		2011–12	2012–13	2013–14	2014–15
Guidance and Counseling	3 Licensed Specialists in School Psychology	41	53	41	33
	3 Social Workers				
Health Services	1 Director/Registered Nurse (RN)	171	176	165	164
	6 RNs				
	3 Licensed Vocational Nurses (LVN)				
	1 RN/LVN (vacant)				
Social Work Services	3 Social Workers	(1)	17	37	40
Graduate Follow-up	1 Director of Planning and Evaluation	88	102	107	114
	1 Temporary Staff				
Assistive Technology	4 Staff	151	159	154	152
Interpreting Services	1 interpreter	(1)	(1)	(1)	(1)
Occupational Therapy	3 Occupational Therapists	76	77	83	77
Orientation and Mobility	9 Orientation and Mobility Specialists	160	164	154	153
Physical Therapy	1 Physical Therapist	35	32	30	23
Speech Therapy	3 Speech Therapists	70	73	85	81
Audiology Services	N/A; service is contracted	(1)	(1)	(1)	(1)

NOTE: (1) Numbers less than five have not been cited pursuant to the U.S. Code, Title 20, Section 1232g, known as the Family Educational Rights and Privacy Act, and in accordance with the Texas Education Agency, operating procedure 10-03.
SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

FIGURE 2–6
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED RESIDENTIAL SERVICES ORGANIZATION
SCHOOL YEAR 2015–16

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Blind and Visually Impaired, March 2016.

activities to practice skills, and apply independent living skills in supervised residential environments.

TSBVI's Residential Program ensures consistency with case management and supports personal goals through the use of communication boards for each student. Communication boards, a system of individualized tactile boards, enable students and staff to track information about individualized goals and progress. The system includes detailed goal sheets explaining students' instructional tasks and areas for growth.

Residential recreation activities enhance TSBVI students' recreation, leisure, and social skills. Every nine weeks, residential staff provide a schedule of recreation activities throughout the day. Activities include sports, movie nights, arts and crafts, student clubs, shopping trips, and swimming.

HEALTH CENTER

TSBVI has an on-campus Health Center that provides services for students 24 hours a day. One residential program director supervises the Health Center director. The Health Center director manages the Health Center and is supported by six registered nurses (RN), three licensed vocational nurses (LVN), and one vacant position that can be filled by an LVN or RN. LVNs have similar responsibilities as RNs, but do not conduct training or provide primary care in trauma-related medical incidents. The Health Center director is an RN and provides support as needed in the Health Center.

COMMUNITY INVOLVEMENT

The TSBVI community is composed of a statewide group of educators, families, and individuals with visual impairments.

FIGURE 2–7
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED RESIDENTIAL JOB POSITIONS AND RESPONSIBILITIES
SCHOOL YEAR 2015–16

POSITION	RESPONSIBILITIES
Residential Program Director A	Manages Student Life Residential Services through the Comprehensive Programs regular school year. Oversees the Recreation Program, Health Center, and Weekends Home Program.
Residential Program Director B	Manages Student Life Residential Services through the Comprehensive Programs regular school year. Oversees the Weekends Home Program.
Resident Specialist	Provides residential services to Comprehensive Programs students, including implementing students' individualized education programs (IEP) during evening and weekend hours. Plans activities to consistently foster students' academic, daily living, leisure, and social skills.
Chaperone	Accompanies students to and from their home communities on weekend trips, ensuring their safety and well-being. Implements the students' IEPs during the weekend trips home and fosters students' academic, daily living, leisure, and social skills.
Residential Teacher	Teaches students social, leisure, daily living, and other skills as prescribed in students' IEP. Works with residential staff to develop appropriate teaching strategies for each IEP objective and promotes students' independence.
Systems Support Specialist	Maintains and monitors hardware and software systems in residential technology labs and residential settings. Resolves hardware, software, interface, and memory issues and other technical issues to assure that all systems are working appropriately.
Recreation Director	Ensures that the Recreation Program offers activities that provide students with opportunities to build on independent living skills.
	Provides activities for students to learn life skills, practice teamwork, and develop understanding regarding their capabilities.
Recreational Activity Coordinator	Provides activities for students to learn life skills, practice teamwork, and develop understanding regarding their capabilities.
	Provides structured leisure classes and activities with an emphasis on building students' leisure skills and increasing students' social skills, as appropriate to assigned areas.
Weekends Home Program Supervisor	Manages Weekends Home Program to provide students safe transportation to and from their home communities each weekend and school break.
	Assigns, monitors, and evaluates staff to ensure implementation of students' IEPs during the Weekends Home Program.
Weekends Home Vehicle Driver	Drives student and staff to designated cities in Texas for Weekends Home Program. Maintains discipline and safety of students during transportation.

Source: Texas School for the Blind and Visually Impaired, March 2016.

The school's community involvement activities are performed by staff from various departments. The director of outreach leads the majority of TSBVI's community involvement and communications functions and is supported by the director of community resources, the principal of comprehensive programs, and the director of planning and evaluation.
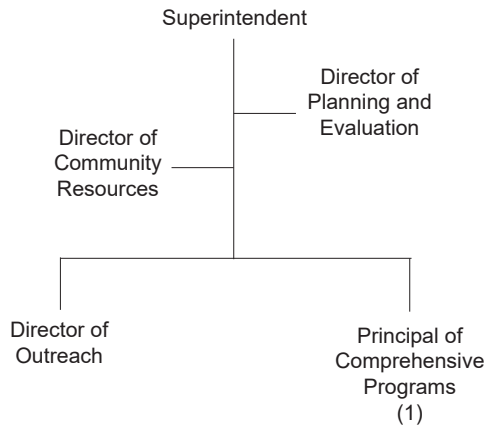
The director of community resources coordinates the school's volunteer program. TSBVI's volunteer program involves groups and individual representative of the community to provide a service to TSBVI students and staff. Students at the University of Texas at Austin and Austin community residents volunteer each year. The director of community resources places volunteers in specific schools or after-school assignments for at least one hour per week. TSBVI's volunteer program included between 70 and 120 volunteers from school years 2010–11 to 2014–15.

Figure 2–8 shows TSBVI's community involvement organization.

Figure 2–9 shows the responsibilities of TSBVI staff that perform community involvement duties.

FIGURE 2–8
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED COMMUNITY INVOLVEMENT ORGANIZATION SCHOOL YEAR 2015–16

Superintendent

Director of Planning and Evaluation

Director of Community Resources

Director of Outreach

Principal of Comprehensive Programs
(1)

NOTE:
(1)   This position provides community involvement-related services for less than 15.0 percent of the time
SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Blind and Visually Impaired, March 2016.

ACCOMPLISHMENTS

♦ TSBVI's Curriculum Department successfully develops curricula and resource guides for blind education that are sold to other schools, states, and internationally.

♦ TSBVI's admission, review, and dismissal infrastructure has increased the efficiency of scheduling, organizing, and conducting the meetings.

♦ TSBVI operates effective short-term classes and summer camps for students who are blind or visually impaired.

♦ TSBVI's Outreach Program effectively assists students, school districts, and families across the state.

♦ TSBVI evaluates each student for instructional and assistive technology when the student enrolls, thereby enhancing student access to communication and learning.

♦ TSBVI has developed an effective process for involving parents in their children's education.

♦ TSBVI developed and implemented an Online Student Incident Reporting system that staff use to input and promptly address student behavior issues.

FIGURE 2–9
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED COMMUNITY INVOLVEMENT STAFF RESPONSIBILITIES SCHOOL YEAR 2015–16

POSITION	RESPONSIBILITIES
Director of Outreach	Collaborates with a network of specialists in visual impairments and deaf-blindness through the Regional Educational Service Centers and local school districts.
	Establishes formal contacts with other agencies involved in delivering services to school-age children who are visually impaired or deaf-blind.
	Provides consultations, direct services, and technical assistance to local districts.
	Implements conferences, workshops, and study seminars regarding issues relevant to visual impairment and deaf-blindness.
Director of Community Resources	Communicates with universities.
	Coordinates volunteer and internship programs.
Principal of Comprehensive Programs	Plans the organization and assignment of campus resources for instructional programs and the Outreach Program.
	Performs some parental involvement planning and community relations functions.
Director of Planning and Evaluation	Surveys school's customers regarding satisfaction with programs.
	Assists superintendent in establishing and maintaining a functional network of contacts with legislative offices, consumer organizations, and federal, state, and private entities.
	Serves as the school's open records coordinator and customer services representative.

SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

♦ TSBVI offers extensive extracurricular activities that help students develop fitness, recreational, and leisure skills.

FINDINGS

♦ TSBVI lacks a timely and systematic process to update its curriculum.

♦ TSBVI has not explored processes to increase efficiency and effectiveness in developing individualized instructional materials.

♦ TSBVI's process for monitoring student progress is time-consuming, and its effectiveness on instruction and parent involvement has not been evaluated.

♦ TSBVI lacks sufficient long-term goals and detailed strategies to effectively and efficiently expand the Career Education Department.

♦ TSBVI lacks an efficient process for acquiring detailed student medical information.

RECOMMENDATIONS

♦ **Recommendation 7: Develop and implement a formal process for updating the curriculum.**

♦ **Recommendation 8: Establish and implement a process to develop instructional materials that increases the efficiency of teacher-developed instructional materials.**

♦ **Recommendation 9: Evaluate the content and usefulness of the report on students' progress that TSBVI provides to parents, and determine the most effective way to monitor progress so that the report improves instruction and parental involvement.**

♦ **Recommendation 10: Develop a detailed long-term plan and systematic strategies to expand the Career Education Department including data-driven work experience and course additions, a business advisory council, and career-related student organizations.**

♦ **Recommendation 11: Establish an updated, consolidated medical enrollment packet completed by students' physicians with accurate medical information.**

DETAILED ACCOMPLISHMENTS

DEVELOPMENT OF CURRICULUM FOR BLIND EDUCATION

TSBVI's Curriculum Department successfully develops curricula and resource guides for blind education that are sold to other schools, states, and internationally.

The TSBVI Curriculum Department develops curriculum and resource guides to meet the unique academic and non-academic needs of students who are blind and visually impaired. TSBVI's educational curriculum materials address topics such as career education, compensatory skills including braille and abacus, assistive technology, independent living, orientation and mobility, and social interaction skills. The Curriculum Department also develops resource guides for teachers and professionals including occupational and physical therapists, speech-language pathologists, and diagnosticians.

Since 1999, the Curriculum Department has sold nearly 100,000 products, including print, braille, videos, and CDs, and generated more than $4.1 million in revenue. For example, during school year 2014–15, the department sold 3,085 publications: 3,009 print and braille, 23 videos, and 53 CDs. TSBVI's top products for the year included:

- TAPS – Teaching Age-Appropriate Purposeful Skills: An Orientation and Mobility Curriculum for Students with Visual Impairments, Third Edition;

- Calendars for Students with Multiple Impairments Including Deaf Blindness;

- Learning Media Assessment of Students with Visual Impairments: A Resource Guide, Second Edition;

- Independent Living Assessment and Ongoing Evaluation;

- EVALS: Evaluating Visually Impaired Students Using Alternate Learning Standards Emphasizing the Expanded Core Curriculum; and

- Low Vision: A Resource Guide with Adaptations for Students with Visual Impairments.

The Curriculum Department staff includes a director of curriculum, curriculum development teacher, creative media designer, administrative assistants, and an embossing technician.

The Curriculum Department operates as a marketing and business unit. Previously, the TSBVI Business Office sold the curricula, resource guides, and materials the Curriculum Department developed. The Curriculum Department

assumed the marketing and sales function in 2014 to better answer questions about the products.

As a result of the Curriculum Department's efforts in developing these materials, TSBVI has developed a state, national, and international reputation as a leading innovator in the education of students with visual impairments.

ADMISSION, REVIEW, AND DISMISSAL

TSBVI's admission, review, and dismissal infrastructure has increased the efficiency of scheduling, organizing, and conducting the meetings.

The ARD infrastructure includes a committee that makes the educational decisions for a student. The parents, or adult students, the school staff who work with the student, and the local school district are members of the ARD committee. The committee meets at least once a year to discuss the student's IEP. The IEP is written by the ARD committee and describes the special education services that the student will receive and the student's annual goals. TSBVI has implemented a variety of strategies to make ARD meetings efficient and effective.

The respective local school district staff form the ARD committee for each TSBVI student. TSBVI staff, who may or may not be part of the ARD committee, provide support for the local school district's ARD committee. TSBVI assistant principals and lead teachers work in three teams with each team responsible for supporting about one-third of the students and their IEPS and ARD meetings. A TSBVI assistant principal or lead teacher facilitates the local school district's ARD meeting through a conference call. Additional support is provided by 2.5 administrative assistants dedicated to the ARD process: a full-time ARD scheduling coordinator supporting all teams, a full-time archive manager supporting one team, and a half-time administrative assistant serving as one team's ARD assistant. An assistant principal's administrative assistant provides ARD support for the final team.

TSBVI has developed a Live Binder, an online resource for organizing digital information, which includes detailed information for TSBVI staff on how to prepare for and participate in ARDs and contains the special education-related reference information. Some assistant principals and lead teachers attended the Regional Educational Service Center XIII (Region 13) ARD facilitator training. Before the ARD meeting, TSBVI team members conduct a planning meeting chaired by the assistant principal or lead teacher. In

this planning meeting, which lasts about 60 to 90 minutes, the TSBVI team formulates its recommendations for the IEP and ensures agreement among the TSBVI team.

TSBVI sends the draft IEP to the student's local school district in advance of the ARD meeting so local school district staff have time to incorporate TSBVI's input into the student's IEP. TSBVI encourages TSBVI staff to communicate with the district and with the parents before the meeting and respond to any questions or concerns. TSBVI assists its staff in preparing summaries of their information for efficient and effective presentations at the ARD meetings. The TSBVI special education coordinator attends weekly ARD organizational meetings with the ARD staff to discuss upcoming ARDs and how to implement them efficiently.

The annual ARD meetings are scheduled near the anniversary dates of the initial ARDs. This method of scheduling results in annual ARD meetings scheduled throughout the year. The length of the meetings may vary; ARD meetings are scheduled for 90 minutes and last, on average, from 60 minutes to 90 minutes. In some circumstances, ARD meetings may last longer, including for students who are age 14 and require a transition plan, for discussion of a Full and Individual Evaluation (FIE), or for in-depth discussion of issues related to a student's complex learning or behavioral needs. ARD meetings convened for revising a student's IEP may last from 30 minutes to 60 minutes.

TSBVI's process for scheduling and conducting ARD meetings effectively and efficiently meets the needs of its student population.

SHORT-TERM PROGRAMS

TSBVI operates effective short-term classes and summer camps for students who are blind or visually impaired.

TSBVI's Short-term Programs offer courses to Texas students with visual impairments throughout the school year and summer sessions. Teachers of visually impaired students refer students from elementary school to high school to the program. As part of the referral and acceptance process, TSBVI assesses the students before they attend the programs. At the completion of the course, TSBVI makes extensive instructional recommendations and develops goals and objectives for that student through a discussion with the student's local district teacher. The program has no cost to attend, transportation is provided, and students live in a residential dormitory.

TSBVI's Short-term Programs offer 24 classes ranging from three to five days each. TSBVI staff developed all the classes. The short-term classes consist of a series of activities based on a certain concept. The classes focus on compensatory skills that students with visual impairments need to access the regular curriculum. Classes include academics, health, social skills, technology, driving education, travel, cooking, and performing arts. Typically, classes include a teacher and teacher assistant with two to three students working on similar objectives.

TSBVI also offers a summer enrichment program during June and July. The Summer Short-term Program serves students at all ability levels. The topics of the classes change each year and last from four days to five weeks. The Summer Short-term Program offers enrichment classes for elementary and secondary students. The program provides students with an opportunity to develop and use academic and technology skills, enhance their social and independent living and self-determination skills on campus and off campus, and practice their orientation and mobility skills. TSBVI offers a life skills camp for students ages six to 21 who are up to three years behind grade level. This camp offers small group art, music, sensory integration, water play, community outings, and simple food preparation activities.

Figure 2–10 shows the student enrollment in TSBVI's Short-term Programs for school years 2010–11 to 2014–15.

TSBVI's Short-term Programs analyze student performance and achievement of objectives specified for each student using preassessments and postassessments. The Short-term Programs also conduct local district and parent surveys and generate feedback from students. During school year 2014–15, 91.0 percent of students who attended short-term classes showed progress as measured by improvements from preassessment to postassessment scores. For the Short-term Programs, 97.0 percent of district staff, parents, and students rated the student experiences as very satisfactory or outstanding. The Short-term Programs use the data as part of the annual needs assessment and in the development of the Annual Improvement Plan.

OUTREACH PROGRAM

TSBVI's Outreach Program effectively assists students, school districts, and families across the state.

The Outreach Program provides information, training, and support to families of children with visual impairment from birth to age 22 and to teachers and professionals working with such students statewide. The Outreach Program conducts local consultations throughout the state. During these consultations, TSBVI teachers go to local districts, meet with district and school staff, and visit families of students.

During school year 2014–15, Outreach staff presented or facilitated 246 conferences and workshops in local districts, ESCs, or at state and national conferences. TSBVI's Outreach Program also sponsored several statewide conferences and offered 50 video conferences that were archived and made available on the school's website. The school also sponsored several statewide conferences, including a low-vision conference, mentor training, three mentor centers, active learning strategies, intensive braille instruction, introduction to the intervener team model, and the deaf-blind symposium and preconference.

TSBVI'S Outreach Program also played a key role in developing web-based modules for training paraprofessionals and having community colleges embed these modules in their curriculum. TSBVI's Outreach Program posted 91 educational videos on the TSBVI On-the-Go Learning website with 2,765 hours of estimated usage.

FIGURE 2–10
ENROLLMENT IN TEXAS SCHOOL FOR THE BLIND AND VISUAL IMPAIRED SHORT-TERM PROGRAMS
SCHOOL YEARS 2010–11 TO 2014–15

	SCHOOL YEAR SHORT-TERM PROGRAM		SUMMER SHORT-TERM PROGRAM	
YEAR	STUDENT ENROLLMENT	CLASS COUNT (1)	STUDENT ENROLLMENT	CLASS COUNT (1)
2010–11	120	194	328	335
2011–12	146	199	316	320
2012–13	139	212	322	328
2013–14	137	218	307	314
2014–15	138	206	313	318

NOTE: (1) The class count refers to each time a student attends a unique class, which requires resources for travel, staff, instruction, food, and housing. Under the class count, a student who attends multiple classes is counted multiple times.
SOURCE: Texas School for the Blind and Visually Impaired, August 2016.

TSBVI's Outreach Program regularly surveys its customers to evaluate the effectiveness of statewide services. **Figure 2–11** shows the TSBVI Outreach Program's customer survey results for fiscal years 2011 to 2015. A high percentage of surveyed customers indicated that TSBVI's Outreach Program improves knowledge and skills, conducts effective consultations and workshops, and contributes positive changes in local communities.

The Outreach Program oversees components of preparation programs at Texas Tech University and Stephen F. Austin State University for teachers of the visually impaired and orientation and mobility professionals. The Legislature appropriated TSBVI with $1.4 million in All Funds for the 2016–17 biennium for professional education in visual impairment. Of the school's appropriations, $900,000, or 64.3 percent, in Federal Funds were awarded through the federal Individuals with Disabilities Education Act; $500,000, or 35.7 percent, were appropriated from General Revenue Funds.

TSBVI manages the teacher mentor program and houses a Texas Tech University faculty member on its campus. TSBVI has an MOU with each university to recruit and train new teachers and professionals working with students with visual impairments. **Figure 2–12** shows the number of students enrolled in the preparation program at each university from school years 2010–11 through 2014–15.

TSBVI's Outreach Program provides effective statewide services to support young people with visual impairments, their families, and the professionals who work with them.

FIGURE 2–12
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
PROFESSIONAL EDUCATION IN VISUAL IMPAIRMENT
SCHOOL YEARS 2010–11 TO 2014–15

YEAR	STEPHEN F. AUSTIN STATE UNIVERSITY	TEXAS TECH UNIVERSITY	TOTAL ENROLLMENT
2010–11	57	66	123
2011–12	56	81	137
2012–13	62	82	144
2013–14	62	86	148
2014–15	61	93	154

SOURCE: Texas School for the Blind and Visually Impaired, Outreach Program, March 2016.

ASSISTIVE TECHNOLOGY

TSBVI evaluates each student for instructional and assistive technology when the student enrolls, thereby enhancing student access to communication and learning.

Assistive technology includes electronic equipment, tools, and instructional services that can enhance communication, access, and learning. The electronic equipment and tools consist of switches, mobile devices, portable note-takers, and computer access tools such as magnification software, screen readers, and keyboards. It also includes low-tech devices such as abacuses, braille typewriters, and optical devices.

TSBVI staff conduct informal assessments of a student's assistive technology and learning media upon admission to the school and annually in preparation for the student's ARD, to ensure the student's ARD committee considers the appropriate assistive technology and learning media. At least every three years, as part of the student's FIE, TSBVI staff

FIGURE 2–11
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED OUTREACH PERFORMANCE AND EFFECTIVENESS SURVEY RESULTS
FISCAL YEARS 2011 TO 2015

	PERCENTAGE RATING VERY SATISFACTORY OR OUTSTANDING				PERCENT AGREEING	
	IMPROVEMENT OF KNOWLEDGE AND SKILLS AS A RESULT OF SERVICES AND PRODUCTS RECEIVED FROM OUTREACH		EFFECTIVENESS OF OUTREACH CONSULTATIONS OR WORKSHOPS		POSITIVE CHANGE FOR THE STUDENT, STAFF, OR FAMILY AS A RESULT OF SCHOOL CONSULTATIONS	
YEAR	RESULTS	TARGET	RESULTS	TARGET	RESULTS	TARGET
2011	84.4%	85.0%	86.7%	85.0%	88.4%	90.0%
2012	87.1%	85.0%	88.3%	85.0%	100.0%	90.0%
2013	88.5%	85.0%	90.7%	85.0%	93.7%	90.0%
2014	87.9%	85.0%	90.7%	85.0%	100.0%	90.0%
2015	92.7%	85.0%	93.1%	85.0%	100.0%	90.0%

SOURCE: Texas School for the Blind and Visually Impaired, Performance Measure Results, fiscal years 2011 to 2015.

complete a Functional Vision Evaluation and Learning Media Assessment. This includes assessment of the student's ability to work with regular and large print, optical aides, braille, tactile graphics; to understand visual, auditory, and tactile information; and assessment of reading rates, written communication, and computer literacy. The assessment results in recommendations regarding access to print materials, production of written communications, computer accessibility, and the need for other hardware and software. A student's ARD committee may also request a formal Assistive Technology Evaluation at any time.

Students coming from small districts may not have the assistive technology they need, or their technology may not be compatible with TSBVI's assistive technology. Technology teachers meet with students once or twice a week to review the effectiveness of the students' assistive technology devices. These teachers may transition certain students from specialized devices to general devices, based on student performance. Technology teachers work with students one-on-one or in groups to ensure their technology matches their needs.

TSBVI students cannot take TSBVI's assistive and instructional technology with them when they return to their local school district. However, TSBVI loans transitional equipment to students as they return to their local school district, as well as to students with visual impairments statewide. TSBVI and the respective regional ESCs provide training to teachers and parents on loan devices. Students can borrow a device for up to a year, and as part of the loan application, the Outreach Program requires the student's local district to develop a purchase plan for the device after the loan year is over.

PARENTAL INVOLVEMENT PROCESS

TSBVI has developed an effective process for involving parents in their children's education.

TSBVI faces a unique challenge to parental involvement because the vast majority of TSBVI students live outside the Austin area and only travel home on the weekends. The parents of students attending TSBVI span the socioeconomic and demographic spectrum and reside in various rural and urban environments. TSBVI's parental involvement process requires targeted solutions to overcome the logistical and financial barriers parents may face to participate in their child's education at TSBVI.

One of the ways that TSBVI's process addresses the geographical limitations of parental involvement is through the school's "Parent Network." The Parent Network improves communication channels and provides a forum for the parents of blind students to connect and gain greater access to services while their children attend school. The Parent Network allows TSBVI parents to:

- meet parents attending TSBVI at an annual Parent Weekend the first week of November;

- exchange contact information with other TSBVI parents of student classmates and dorm-mates;

- correspond with TSBVI parents who share the same bus stop when students return to their home communities; and

- share knowledge and experience with other parents of students with visual impairments.

TSBVI also involves parents through annual on-campus events. A large number of parents visit the Austin campus each fall to attend Parent Weekend. Parent Weekend is intended to inform parents of upcoming programs and activities for the school year through academic workshops and social and family-oriented activities.

Figure 2–13 shows some of the activities parents participate in during Parent Weekend.

TSBVI encourages parent participation and input in three major committees:

- Parent Advisory Group – Provides input to the superintendent related to schoolwide improvement and strategic planning. Members of this group are parents or guardians of TSBVI Comprehensive Programs students. The group meets annually in November in conjunction with the TSBVI Parent Weekend event. Members of the advisory group vary each year;

- Instructional Planning Council – Provides input to the superintendent on schoolwide improvement related to site-based decision making. Parents are invited to an annual meeting to provide feedback on decisions made by the council; and

- School Health Advisory Council – Provides recommendations about the school's health education instruction; includes staff and parents.

FIGURE 2–13
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SAMPLE PARENT WEEKEND ACTIVITIES
SCHOOL YEAR 2015–16

ACADEMIC PROGRAMMING SESSIONS	FAMILY SESSIONS
Parent-Teacher Meetings	Parent Social Coffeehouse
Transition Fair	Family Portraits
Orientation and Mobility Blindfold Experiences	Taste of Talent Art Show
Fitting in Without Sight	Student Council Jump Rope and Hula Hoop Contest
Experiences in Transition (EXIT) Family Faculty Program: "Your Future"	Camping, Motorcycle Rides, Rock Wall, Moonwalk
Experience in Transition Student Workshops	Tandem Bicycle Rides
Health and Wellness Workshops	Pedal Car Rides, Roadway Village
	Face Painting
	Fine Arts Performance
	Pep Rally/Athletic Department Demonstrations

SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

In addition to parent membership in TSBVI planning and advisory committees, TSBVI regularly solicits parent feedback and offers opportunities for parent evaluation. Each year parents complete the Comprehensive Programs Parent Survey. In addition, TSBVI provides ongoing opportunities for parents to evaluate and assess the effectiveness and quality of its programs. Parents complete an evaluation form after each event including Parent Weekend, parent teacher conferences, ARD meetings, and annual Instructional Planning Council meetings.

Another effective component of TSBVI's parental involvement process is the development of multiple systems of communication among TSBVI staff and parents. TSBVI publishes a newsletter for parents and regularly updates parent information on its website. To keep parents informed of their children's educational goals and progress, TSBVI teachers communicate through regularly scheduled phone calls and written progress reports throughout the school year. TSBVI also leverages technology to aid in communication, including use of the parent access site in TSBVI's student information software program.

TSBVI also involves parents effectively in the individualized education of their children. When a local school district refers a student for admission to TSBVI's Comprehensive Programs, TSBVI contacts the parent to include the parent's perspective and input regarding the student's needs when considering the referral. When teachers begin planning for a student's upcoming ARD meeting, teachers seek input from the parent regarding IEP development. TSBVI includes parents when planning a student's return to the local school district after attending TSBVI, so that parents, as well as districts, are informed about how to support the student upon returning to the local school district.

To improve access and increase participation, TSBVI provides travel subsidies and free lodging to parents attending Parent Weekend. Travel support is also budgeted for TSBVI parents involved in school committees. Financial support for travel expenses is an effective component of TSBVI's parental involvement plan that addresses the economic obstacles parents might otherwise face when traveling potentially long distances to participate in on-campus activities.

ONLINE STUDENT INCIDENT REPORTING

TSBVI developed and implemented an Online Student Incident Reporting system that staff use to input and promptly address student behavior issues.

TSBVI developed the Online Student Incident Report (OSIR) system in-house. According to the TSBVI Student Behavior Support Administrative Procedure, the OSIR system is used when a student displays behavior that constitutes an incident. Examples of behaviors entered in the OSIR system include emergencies when a student's behavior presents a danger to self or others, incidents where physical restraint is used with a student, incidents of severe behavior, sexual incidents, physical aggression, and destruction of property.

Any staff can enter data to report a behavior or discipline incident using a Student Incident Report (SIR) form within the OSIR system. The information is electronically distributed to all staff. Staff immediately review the report and take action. The residential director or assistant principal are required to contact the parent for serious offenses and incidents requiring a restraint. They are also required to mail a copy of the report to the student's parents within one school day of the use of the intervention or disciplinary consequence.

The residential director or the assistant principal mails a copy of the SIR to the parent and documents that action in OSIR. The assistant principal ensures that a copy of the SIR is forwarded to the student's assigned behavior specialist and to the principal. The behavior specialist organizes the data provided by OSIR for use by the student's ARD committee. The ARD committee uses the data to consider the effects of the student's behavior on the student's learning. The committee decides whether to develop or revise the student's behavior intervention plan, assess the effectiveness of the intervention, and determine whether it should continue.

OSIR data is also used to identify the most important intervention strategies and judge the appropriateness of student placements. The report includes detailed data on the incident and how it was handled. For example, in case of an incident resulting in a restraint, immediately after notifying the residential director or assistant principal, the staff reporting the restraint records information in the OSIR system including a description of the restraint, behaviors prompting the restraint, and efforts made to de-escalate the situation before attempting the restraint.

TSBVI's OSIR system allows staff to effectively track and communicate student behavioral information.

EXTRACURRICULAR ACTIVITIES

TSBVI offers extensive extracurricular activities that help students develop fitness, recreational, and leisure skills.

Participation in extracurricular activities helps students develop skills, build friendships with other students, increase self-esteem, and receive recognition from adults and peers. TSBVI offers students a wide range of extracurricular opportunities, including residential classes, athletics and sports activities, community events, and school partnerships. Each school year, residential directors organize extracurricular activities into residential classes. Residential staff and teachers oversee and implement the residential classes.

The recreation manager maintains a weekly schedule, and a formal registration and attendance system. TSBVI considers participation in extracurricular activities a privilege and specifies the number of absences students can have, as well as the academic performance level a student has to maintain to be eligible for participation. Students can register for two classes each nine-week period. Residential staff help with registration and monitor attendance. The school publishes a weekly master schedule of after school activities. Activities are offered throughout the day, seven days a week. **Figure 2–14** shows the residential classes TSBVI offered in school year 2015–16.

TSBVI belongs to the South Central Association of Schools for the Blind (SCASB). Twice a year, TSBVI students attend SCASB events and compete against teams from Alabama, Georgia, Louisiana, Mississippi, and Oklahoma. Three residential staff drive students to competitions, including a track and field conference championship and a performing arts festival.

TSBVI students also participate in extracurricular community events and school partnerships such as:

- concerts and plays;

- St. David's Fit Ability Program – This program features a weight room that is specially adapted for wheelchair users to exercise. The program also provides the opportunity to participate in rugby and in basketball;

- Austin Zoo – The zoo assists animals in need through rescue, rehabilitation, and education. It allows the students to learn about animals and spend time outdoors exercising and having fun;

- YMCA – TSBVI has a membership at the YMCA in Austin. Students can participate in swimming, yoga, weightlifting, and other sports to stay fit. By learning what activities are available in the Austin YMCA and how to use the facilities, the students can transfer those skills to their local YMCA at home;

- Lend Your Legs Social tandem ride – Weekly tandem bicycle rides on Mondays in the fall and spring. Volunteer tandem captains and students bike together for approximately 10 miles in the neighborhood surrounding the school;

FIGURE 2–14
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED RESIDENTIAL CLASSES
SCHOOL YEAR 2015–16

Goalball	Yoga	Robotics Club
Cheerleading	Dance	Yearbook Club
Tandem biking	Art	Spanish Club
Pep Squad	Group games	Drama Club
Archery	Music Mania	Walking and Running Club
Rowing	Music recording	Gardening Club
Stand and paddle boarding	Private music lessons	Book Club
Swimming	Jewelry making	Letter-writing workshops
Swimming lessons	Quiz Night	Badger Dog Writing Club
Horseback riding	Poker Night	Leo Club
Hiking	Bowling	Boy and Girl Scouts of America
Wrestling	Venture Crew	Scrapbooking
Basketball	Bicycle maintenance	Canoeing
Weight training	Cooking and baking	Rock wall climbing
Judo	International foods	Prom
Kayaking	Shopping trips	

SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

• Leo Club – Lions Club sponsors TSBVI's Student Leo Club program that gives young people the opportunity to develop leadership skills, serve their communities, and produce positive effects. They have a biweekly meeting on campus, sponsor food drives for the homeless, and participate in other charitable events; and

• Girls' School of Austin – Students from both schools communicate and connect at special events including the Duo Dash, swim meets, Special Olympics, school dances, White Cane Day, and as pen pals. In school year 2015–16, the Duo Dash expanded to include members of the greater blind and visually impaired community along with students from both schools.

DETAILED FINDINGS

UPDATING CURRICULUM (REC. 7)

TSBVI lacks a timely and systematic process to update its curriculum.

TSBVI's Curriculum Department develops original curriculum and resource guides for teachers and professionals to meet the unique academic and non-academic needs of students who are blind and visually impaired. The curricula

developed at TSBVI is used internally for TSBVI students and externally for students with visual impairments in Texas and worldwide.

TSBVI's curriculum development cycle includes the following steps:

• educational or instructional need is identified;

• curriculum writing committee is established;

• goals and objectives are determined;

• curricular materials (activities and lesson plans) are gathered and adapted or developed by the committee;

• curriculum is peer reviewed;

• curriculum is made available to staff;

• curriculum is used and evaluated by staff; and

• revisions are made, as necessary.

TSBVI selects teachers and professionals from across the state to help develop curriculum. This group, the Writing Committee, is composed of teachers and professionals from TSBVI and other districts in Texas and appropriate content area experts. The Writing Committee meets monthly during

the school year for several days each time and works more intensively in the summer. Because of the committee's schedule, the director of curriculum indicated that it takes an average of three years to develop a curriculum. For example, it took two years to develop Empowered: An Activity-Based Self-Determination Curriculum and three years for Braille Fundamentals: A Braille Curriculum for Students with Visual Impairments from Primary to High School Levels.

Although TSBVI's curriculum development cycle includes revisions, the school does not update its curriculum in a timely or consistent manner. Typically, TSBVI updates curricula when it has received requests from teachers or school districts and is able to dedicate resources to the updating process. Without a systematic schedule, this revision process leaves some curriculum outdated. For example, 20 years passed before the popular TAPS Orientation and Mobility Curriculum was updated in 2012. Revisions for very few TSBVI publications have been completed since their original publication dates. Consequently, many materials, including best sellers, have not been revised in 10 years to 20 years. Outdated curriculum could negatively affect student achievement and lead to instruction that is not aligned with updated, research-based best practices.

Best practices in curriculum development stipulate regularly scheduled revision phases during a six-year to eight-year cycle from development to major update. The curriculum development framework typically has a timeline for each phase of the cycle. Throughout the implementation and use of the curriculum, TSBVI continuously collects data on student performance, and gathers feedback from teachers, students, and other instructional staff. The Curriculum Department annually makes minor revisions in the curriculum. The final one or two years of the cycle are allocated to a major curriculum update based on student performance data and state and district requirements.

TSBVI should develop and implement a formal process for updating the curriculum. TSBVI's Curriculum Department should develop a calendar that shows which and how many curricula and resource guides should be updated each year. This information will help the department determine the resources it needs for the updating task each year.

The director of curriculum and the curriculum development teacher should define a curriculum cycle timeline specifying when new curriculum should be reviewed and updated. They should prepare a curriculum update schedule, articulate a

curriculum updating methodology, define major milestones in the updating process, and estimate resources needed. The curriculum updating methodology should address:

- overall criteria for identifying whether a curriculum needs to be updated;

- the type of information and data the department needs to compile on an ongoing basis that will help determine the scope of the updating task;

- analyses performed to determine what needs to be updated and the reasons for the need for an update;

- the sources and type of information and data needed for the update;

- a curriculum updating work plan template;

- a step-by-step updating guide; and

- a general timeline.

After the plan is completed, the director of curriculum should organize a committee to review the plan and refine the updating system.

Since the time of the onsite review, TSBVI staff indicated that the Curriculum Department began updates of three publications and are in the process of obtaining an outside consultant to update a fourth publication.

This recommendation could be implemented with existing resources.

INSTRUCTIONAL MATERIALS (REC. 8)
TSBVI has not explored processes to increase efficiency and effectiveness in developing individualized instructional materials.

Due to the diverse instructional needs of its students, TSBVI does not have a single schoolwide curriculum that serves kindergarten to grade 12. Typically, TSBVI teachers construct the curriculum for their students based on whether these students are academically close to grade level, or whether the students need modified instruction. TSBVI teachers use a combination of state-approved textbooks, original TSBVI curricula, instructional software programs, available curricula for academically struggling secondary students, and teacher-made materials.

During onsite interviews, both elementary and secondary teachers indicated that a considerable portion of the instructional materials they use are teacher-developed. Some

TSBVI teachers rely almost exclusively on materials they develop. Teachers indicated that the tailoring of instructional materials to the needs of their students is necessary because it enhances the individualized instruction provided. These materials are typically developed for a single student or small group, and not adapted for other students.

To meet the diverse, specialized needs of their students, TSBVI teachers develop instructional materials for specific students during the school year. TSBVI paraprofessional staff, including teacher assistants and adapted material specialists, support teachers by adapting instructional materials. This support includes adapting materials to braille, enlarged print, or recordings. TSBVI staff indicate that they maintain an inventory of instructional materials, consult with teachers about materials they may need, and share information and related materials among the teachers. Summer preparation could reduce the amount of time that TSBVI teachers need to develop materials during the school year. However, the degree of individualization of the instructional materials prevents teachers from developing materials during the summer, because they do not yet know the academic levels of students they will be instructing. New teachers face a considerable challenge because they need to develop a large volume of instructional materials targeted to students' specific needs.

TSBVI has explored limited systems and methods that could make developing instructional materials less time-consuming and more effective. Coordination among teachers to develop instructional materials collaboratively occurs on a small scale, to the extent practicable, when teachers have students with similar needs according to content area, students' disabilities and abilities, and learning media.

The American Foundation for the Blind's Leadership Institute emphasizes the need for meeting the academic needs of students with visual impairments through specialized services. Such services may include individualizing instructional materials, but teachers should not be expected to develop an original product for each student or a small group of students. Best practice advocates a team approach to the development of individualized materials. Developing instructional materials in isolation can limit the applicability and adaptability of the materials beyond a specific student. Teacher-developed materials may have elements that can be replicated or adapted for other students.

TSBVI should establish and implement a process to develop instructional materials that increases the efficiency of teacher-developed instructional materials.

The director of curriculum, principal of comprehensive programs, assistant principals, and lead teachers should form a committee to develop and implement a methodology for teacher-developed instructional materials. The committee should:

- Analyze existing teacher-developed instructional materials to identify content adapted to students' learning needs. Student records contain information on the educational implications associated with the disability conditions of each student. The analysis should result in the identification of topics, keywords, subject areas, content, student age, grade level, developmental/skill level, content, and expanded core curriculum area.

- Establish a process for developing instructional materials. The process should clearly and operationally define a standard for individualization of materials. This process could include having teachers begin developing materials in teams rather than having teachers work individually. The process should incorporate economies of scale based on using and adapting existing teacher-developed materials and increasing the ability to efficiently develop materials.

- Develop a searchable database of lessons, materials, and adapted curricula that teachers can use as a springboard when working with a student. The Curriculum Department should establish the database with parameters developed in the analysis of existing materials to allow teachers to search for materials, lessons, and activities. Each entry in the database would also have information on where any physical materials or manipulatives associated with the lesson could be found and which teacher originally developed the lesson.

- Develop a training guide on the process for the preparation of teacher-developed instructional materials and train all teachers. The assistant principals should monitor the use of the teacher-developed materials database and observe teams of teachers as they prepare instructional materials. The assistant principals should evaluate the efficiency of the process and refine it as needed.

This recommendation could be implemented with existing resources.

STUDENT PROGRESS REPORTS (REC. 9)

TSBVI's process for monitoring student progress is time-consuming, and its effectiveness on instruction and parent involvement has not been evaluated.

TSBVI requires teachers to record data on each student's progress on IEP goals or objectives using eSPED, a type of special education information management software, or another teacher-preferred method. TSBVI encourages the use of eSPED to ensure accuracy related to the goal language as written in the IEP, to archive the information, and to allow other team members to review and provide input. At the end of each 9-week grading period, teachers review the collected data to prepare summary progress reports, which TSBVI sends to parents. The school calendar provides a non-student work day at the end of each 9-week grading period for teachers to enter progress report information into eSPED for the 9-week progress reports.

TSBVI expects teachers to record progress data on a weekly basis, but teachers may choose to do so more frequently. Teachers may also choose to keep weekly progress data at either the goal or the objective level. Teachers enter data directly into eSPED or use another system to compile data. Teachers use different methodologies to collect and record data, and their efficiency in doing so varies widely. TSBVI encourages teachers to write succinct and relevant notes for data collection and narrative progress report comments.

The design of the eSPED Progress Reporting screens allows for flexibility for districts using the system. TSBVI requires teachers to provide a progress code for each goal and a narrative comment that relates to the goal's mastery criteria. Progress codes do no specify the extent of progress a student has made in mastering the skill. It is optional for teachers to provide information other than a code at the objective level. Teachers determine the need for further action if a student is not making sufficient progress to meet the goal by end of the IEP year. If this is the case, TSBVI instructs teachers to alert the assistant principal or lead teacher to the issue. The lead teacher of assistant principal determines any further action and what information to convey on the progress report.

Elementary and secondary teachers estimated that it takes about two hours a week to enter the data and their narrative responses into eSPED. According to this estimate, each teacher spends 72 hours entering data into eSPED during the 36-week school year. During onsite interviews, teachers indicated that this activity is time-consuming and adds limited value to their instruction. Moreover, the narrative

format of the information makes analysis of the data difficult. TSBVI administrators and teachers indicated that they are not aware of the extent to which parents review the reports on student progress, or whether they find the information provided to be meaningful. TSBVI does not use quantitative reporting categories or graphs that display student progress that are available through the eSPED system. TSBVI's process for collecting progress data and reporting it to parents is not effectively promoting a data-driven culture that benefits instruction. Student progress reports do not include a two-way communication component, which could result in less effective parental involvement in their children's educational progress.

The Institute of Education Sciences (IES) publishes best practices in education based on available evidence and expertise. IES recommends that schools make data part of an ongoing cycle of instructional improvement and foster a data-driven culture. Furthermore, the National Education Association (NEA) published a policy brief on parental, family, and community involvement. Research suggests that parental involvement is highly correlated with student success. The NEA recommends regular communication about student progress using effective, reliable two-way communication channels among schools and homes.

Several districts in Texas, including Houston ISD, use software systems that enable teachers to enter quantitative data regarding student progress during the grading period, establishing data points that accumulate and automatically generate graphs to show student progress. Being able to measure and longitudinally track student progress on IEP goals and display progress graphically enhances the ability of staff and parents to monitor how a student is progressing over time.

TSBVI should evaluate the content and usefulness of the report on students' progress that TSBVI provides to parents, and determine the most effective way to monitor progress so that the report improves instruction and parental involvement.

The director of the center for school resources, assistant principals, lead teachers, and an eSPED specialist within the Information Resources Department should form a committee to survey teachers and parents regarding the report on student's progress. The survey should address how teachers collect, enter, discuss, and apply data on student progress. The committee should analyze teachers' responses and make recommendations to increase the instructional utility of

progress data collection and reporting to promote a data-driven school culture.

In addition, the survey should explore the most effective ways to use reports on student progress for parental involvement. The survey should inquire about the information parents want to have about their children's progress; how general, technical, and detailed the information should be; and whether the information should be presented graphically, in text by IEP goal, or as an overall statement. The survey should also ask parents what they like or do not find relevant in the current report. The survey should also present several report content and format options such as: (1) Keep the report in its current content and format. (2) Include in the report a brief statement about the overall progress of the student. If the student is not likely to achieve all the IEP goals, identify only the goals the student is not likely to achieve. (3) Give parents who want information by goal the option to contact TSBVI for a more detailed report. To allow for a two-way communication system, TSBVI should solicit parent input related to how they would like to respond to reports on progress.

The committee should analyze survey responses and determine the scope of data for the parent report, decide whether to change the qualitative progress codes to quantitative codes that enable graphic display of progress, develop a data input template for teachers using eSPED, and develop a report format. Teachers should review the data input template and report format, and the committee should refine it based on teachers' comments and suggestions.

The review process should also assess the time it takes teachers to prepare the data and consider whether the data entry can be conducted by teacher assistants or other administrative staff. TSBVI should also review the redesigned report with parents. During the first year of implementation, the committee should track the time involved in teacher preparation of the data and the number of parents requesting more detailed reports.

This recommendation could be implemented with existing resources.

CAREER EDUCATION (REC. 10)
TSBVI lacks sufficient long-term goals and detailed strategies to effectively and efficiently expand the Career Education Department.

TSBVI's Career Education Department faces the unique challenge of preparing students to become employees, all of whom have special needs, in all 20 educational areas of Texas. Unlike geographically based school districts, TSBVI cannot develop its career education structure in response to the business and industry needs of a single local workforce. TSBVI's Career Education Department uses a community-based vocational education framework to provide productive employment skills for students with disabilities. The department provides middle school and high school students with career development and career and technical education (CTE) course offerings. Additionally, the Career Education Department uses personal relationships and connections to coach and motivate students and to match them with relevant work experiences in their areas of interest.

The TSBVI Career Education Department staff consists of three CTE-certified teachers, one career education teacher, and six job coaches. Certified special education teachers from the Experiences in Transition (EXIT) program also teach Career Development classes. Career Education Department teachers and job coaches collaborate and communicate regularly with EXIT staff.

During school year 2014–15, the Career Education Department implemented a systematic, sequential five-step, four- year approach to career education. The five-step sequence consists of the following courses:

- general employability,
- Methodology for Academic and Personal Success (MAPS) I,
- work exploration,
- MAPS II; and
- work training.

The sequential structure provides students with foundational knowledge and skills related to employment and exposes them to a variety of work experiences. The courses also help students narrow their future employment interests.

Figure 2–15 shows the CTE and career development classes offered by TSBVI's Career Education Department.

TSBVI has engaged in limited long–term goal setting and strategic planning related to career education. TSBVI's Goal A from the school year 2015–16 Annual Improvement Plan

is that "students with visual impairments will demonstrate knowledge and skills to lead vocationally, personally, and socially satisfying lives." The related Objective 4 is that "70.0% of students graduated from TSBVI during the past five years will be employed, enrolled in post-secondary education and training, or engaged in productive activities." To accomplish this long-term goal and objective, the school developed strategies to improve the Career Education Department within Action Plan 2, "Refine and Expand Career Education Programming and Instruction." This plan includes four action steps related to the five-step sequence for career education, curriculum development for the Principles of Hospitality Course, creating a Call Center Training program, and increased paid work experiences.

TSBVI has not created more detailed and comprehensive goals and action plans for expanding the Career Education Department.

TSBVI's Career Education Department provides students with hands-on opportunities to gain skills in job settings on and off campus that replicate natural work environments. **Figure 2–16** shows the on-campus and off-campus work training sites in school year 2014–15.

TSBVI offers career education courses in the Human Services career cluster, but few opportunities for other career clusters. Although TSBVI offers several career education courses and work opportunities, it has not implemented the infrastructure needed to expand an effective career education program.

FIGURE 2–15
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED CAREER EDUCATION DEPARTMENT CLASSES
SCHOOL YEAR 2014–15

CAREER AND TECHNICAL EDUCATION	CAREER DEVELOPMENT
Principles of Human Services	Exploring Careers: Grades 7 and 8
Interpersonal Studies	Career Portals: Grades 7 and 8
Lifetime Nutrition and Wellness	Work Exploration: Grades 6, 7, and 8
Child Development	Work Exploration for High School
	Work Training (1)
	General Employability
	Methodology for Academic and Personal Success (MAPS) I and II

NOTE: (1) Approved by the Texas Education Agency for innovative course elective credit.
SOURCE: Texas School for the Blind and Visually Impaired, Annual Report for School Year 2014–15.

FIGURE 2–16
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED WORK TRAINING SITES
SCHOOL YEAR 2014–15

ON CAMPUS	OFF CAMPUS
Animal Care	Top Drawer Thrift Store
Horticulture	Department of Aging and Disability Services Winter's Building (Texercise office)
Assembly, Manufacturing, Embroidery	Texas Coffee Traders
Wildcat Coffee Shop	Austin Humane Society
Wildcat Bistro	Stubb's Bar-B-Q
Wildcat Recycling	Gethsemane Lutheran Child Development Center
Wildcat Cleaning Crew	Parson's House Retirement Community
Wildcat Juice Bar	Pease Elementary School
Wildcat Inn (including laundry service)	
Roar Store (spirit store)	
Mark Smith Work Center	
Elementary Work Center	

SOURCE: Texas School for the Blind and Visually Impaired, Annual Report for School Year 2014–15.

Although the Career Education Department has established relationships with local businesses, it has not used these relationships to develop a business advisory committee that has input into the program. The Career Education Department performs limited evaluation of its career education courses, quality of instruction, instructional materials, and whether equipment and facilities meet industry standards, a task usually performed by a business advisory committee. TSBVI evaluates student performance through performance standards developed by the school and agreed upon by TEA and evaluates the quality of effectiveness of the Career Education Department as part of the annual needs assessment. TSBVI also evaluates quality of instruction through the standard teacher appraisal process, but does not provide any additional specialized or industry-based evaluations.

The relationships of the Career Education Department supervisor, teachers, and job coaches with local businesses are highly individualized. These staff seek internships and work opportunities for specific students to gain work experience. TSBVI selected the Business and Industry endorsement with a focus on Hospitality and Tourism based on reports on workforce trends, and Action Plan 2 incudes an action step to "increase opportunities for 'paid work experiences' for select students by adding a second corporate partner to the Links Program." However, TSBVI lacks detailed, effective strategies for expanding or adding work opportunities based on workforce trends. TSBVI has not encouraged students that take career education courses to be involved in career-related student organizations.

Successful career education programs link to post-graduation opportunities, including postsecondary education, internships, and work experience. These programs also include partnerships with businesses to understand workforce needs and to form business advisory councils to consult and evaluate the career education programs. Strong career education programs also provide students with programs of study in career clusters and the opportunity to join career-related student organizations.

Best practices recommend that career education programs should be developed to reflect economic and workforce needs, should include articulation agreements with post-secondary institutions, and be developed in collaboration and partnership with members of the related workforce.

TSBVI should develop a detailed long-term plan and systematic strategies to expand the Career Education Department including data-driven work experience and course additions, a business advisory council, and career-related student organizations.

TSBVI should form a committee with the principal of comprehensive programs, assistant principal, and career education teachers to develop a more detailed long-term plan and systematic strategies for expanding the Career Education Department. The committee should evaluate the existing strengths and weaknesses of the Career Education Department. This evaluation should include collecting more extensive data about post-graduation career outcomes for former TSBVI students and exploring employment opportunities across the state. As a result of this analysis, the committee should develop goals to expand the department through a clear, data-driven, long-term plan and systematic strategies.

The Career Education Department should formalize strategies for partnering with employers in business and industry. These strategies could include developing a business advisory council representing as many of the regionally available industries as possible. The committee should delineate a process for the business advisory council to regularly evaluate the department. The committee should explore the possibility of sharing information and resources with career education programs in local school districts.

The committee should systematically select and develop work experiences, including expanded internship opportunities. The committee should identify and adopt strategies to overcome barriers that lower rates of access or success for TSBVI's special population of students with visual impairments.

The committee should also develop a plan for programs of study that allow students to progress through a sequence of courses that provide the skills necessary for success in a given job cluster. The Career Education Department should develop programs of study and should implement them in partnership among TSBVI, postsecondary institutions, and business representatives. Through the long-term plan, TSBVI could expand existing courses and work opportunities. Additionally, the committee's long-term plan should address strategies for developing and maintaining career education student organizations such as SkillsUSA; Business Professionals of America; Future Business Leaders of America; Family, Career, and Community Leaders of America; Texas Association of

Future Educators; and the Texas Technology Students Association.

This recommendation could be implemented with existing resources.

HEALTH CENTER – MEDICAL INFORMATION (REC. 11)

TSBVI lacks an efficient process for acquiring detailed student medical information.

As part of the registration of students for the Comprehensive Programs, TSBVI requires the completion of three forms: detailed Student Medical/Dietary History, Student Medication, and Student Physical Examination form. The Student Medication and the Student Physical Examination forms have to be completed and signed by the student's primary physician. The Student Medical/Dietary History is to be completed by the student's parents, although it asks for detailed information on the student's medical conditions. Requiring parents to provide detailed medical information, instead of a physician, can lead to incomplete or inaccurate records. During onsite interviews, Health Center staff indicated they spend a considerable amount of time calling parents and physicians to verify information on the medical forms or obtain missing information.

Figure 2–17 shows a list of the information TSBVI asks parents for when documenting a student's medical and dietary history.

Complete and accurate medical histories are especially important because TSBVI has seen an increase in the number of medically complex students with multiple disabilities in the past five years. As a result, the Health Center increased the number of nurses to meet student needs. In school year 2015–16, the Health Center administered approximately 87,400 regularly scheduled medications and made 3,800 medical assessments of students in need of treatment. Medical emergencies have also increased. In school year 2014–15, emergency medical services were required five times, and in school year 2015–16, emergency medical services were required 16 times.

Figure 2–18 shows some of the intensive medical conditions and emergency medication needs of TSBVI students in school year 2015–16.

Health Center staff consider accurate, detailed information about students' medical conditions imperative to providing appropriate medical treatment for students. When a detailed medical history is provided by a physician, the health needs of the student are clearly specified and an appropriate care plan can be developed and implemented. This information also gives the Health Center the opportunity to educate TSBVI families on the medical conditions of their children and identify resources in their respective community.

The Perkins School for the Blind requires a student medical history form to be completed by parents, but reviewed and signed by the student's primary care physician as part of their

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FIGURE 2–17
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED STUDENT MEDICAL AND DIETARY HISTORIES
SCHOOL YEAR 2015–16

MEDICAL HISTORY	DIET AND EATING	OTHER
Student's eyes, including description of eye condition	Eating and swallowing difficulties	Participation in physical activities
Conditions and diseases, including a description of complications, long-terms effects, and ongoing treatment for each of the following:	Special modifications	Retinal precautions
• gastrointestinal; • bladder, kidney, liver;	Special food and drink preparation	Swimming
• respiratory; • nervous system, neurological;		
• blood, heart, circulation; • nonfood allergies;	Tube-feeding-prohibited food and drink	
• muscles and bones; • ear;		
• orthopedic and adaptive equipment; • behavioral or psychological;	Required food, drink, or supplements	
• endocrinal; • dental; and		
• skin cancer; • menstrual	Food preferences	

SOURCE: Texas School for the Blind and Visually Impaired, Student Medical/Dietary History form, March 2016.

FIGURE 2–18
TSBVI STUDENT MEDICAL CONDITIONS AND EMERGENCY MEDICATIONS
SCHOOL YEAR 2015–16

MEDICAL CONDITION/EMERGENCY MEDICATION	STUDENTS (N=156)	PERCENTAGE OF STUDENTS
Diabetes insipidus	6	3.8%
Epinephrine autoinjectors (emergency medication)	6	3.8%
Swallowing or choking risk	8	5.1%
Inhaler (emergency medication)	8	5.1%
Growth hormone injection	10	6.4%
Hypothyroidism	10	6.4%
Panhypopituitarism	11	7.1%
Asthma	13	8.3%
Traumatic brain injury	13	8.3%
Anti-inflammatory glucocorticoid Injection (emergency medication)	14	9.0%
Ventriculoperitoneal shunt	14	9.0%
Diazepam (emergency medication)	16	10.3%
Seizures	40	25.6%

NOTE: Data includes duplicated counts, because some students have multiple medical conditions.
SOURCE: Texas School for the Blind and Visually Impaired, Health Center, March 2016.

enrollment documentation. The school also requires the completion of an annual health update form to be completed and signed by the student's primary care physician. The California School for the Blind also requires a student's physician to complete a medical packet to meet admissions criteria.

TSBVI should establish an updated, consolidated medical enrollment packet completed by students' physicians with accurate medical information.

TSBVI's health center director should review the Student Medical/Dietary History form and update it by adding items and by refining or modifying existing items based on the medical profile of the student population. TSBVI should update the form to require medical files from the primary care physician for medically complex students and for students with certain medical conditions. To increase efficiency, TSBVI should combine the Student Physical Examination form, Student Medication form, and updated Student Medical History form into one medical packet completed by students' physicians. The health center director and staff should monitor the completeness and accuracy of the medical history information provided during the first year of the new form's use and determine whether the health center director should further modify the form.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

RECOMMENDATION	2016–17	2017–18	2018–19	2019–20	2020–21	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 2. EDUCATIONAL, RESIDENTIAL, AND COMMUNITY SERVICES							
7. Develop and implement a formal process for updating the curriculum.	$0	$0	$0	$0	$0	$0	$0
8. Establish and implement a process to develop instructional materials that increases the efficiency of teacher-developed instructional materials.	$0	$0	$0	$0	$0	$0	$0
9. Evaluate the content and usefulness of the report on students' progress that TSBVI provides to parents, and determine the most effective way to monitor progress so that the report improves instruction and parental involvement.	$0	$0	$0	$0	$0	$0	$0
10. Develop a detailed long-term plan and systematic strategies to expand the Career Education Department including data-driven work experience and course additions, a business advisory council, and career-related student organizations.	$0	$0	$0	$0	$0	$0	$0
11. Establish an updated, consolidated medical enrollment packet completed by students' physicians with accurate medical information.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 3. HUMAN RESOURCES MANAGEMENT

Educating students is a labor-intensive undertaking. Labor costs consume approximately 80.0 percent of the average school's budget. Consequently, appropriately managing staff is a critical function for a school. To be effective and efficient, schools must hire the appropriate number of staff with the qualifications and credentials to fill each position. To ensure that morale and productivity remain high, staff must be adequately compensated; given opportunities for training; and must have access to benefits and services, including grievance and conflict resolution services. As a state agency, the Texas School for the Blind and Visually Impaired (TSBVI) coordinates these areas with the Employees Retirement System of Texas (ERS), the Texas Workforce Commission, and the Comptroller of Public Accounts.

TSBVI is funded through legislative appropriations, federal funding, and grants. Statute mandates that TSBVI follows the salary structures of the Austin Independent School District (ISD) for all teaching positions. Noninstructional staff are classified by the state's employee classification and compensation system. Additionally, TSBVI is subject to a limit on the number of full-time-equivalent (FTE) positions it can employ. TSBVI's fiscal year 2016 FTE position cap is 376.6, and the total payroll costs for fiscal year 2016 constitute 76.6 percent of the funding received. **Figure 3–1** shows TSBVI's payroll costs as a percentage of total revenues for fiscal years 2014 to 2016.

Figure 3–2 shows TSBVI's staff by category for school year 2015–16. During school year 2015–16, 22.9 percent of TSBVI staff were teachers, 23.9 percent were residential specialists, and 20.6 percent were support staff. **Figure 3–2** shows actual full-time and part-time staff rather than full-time-equivalent positions, as shown in **Figure 3–1.**

FIGURE 3–2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED STAFFING COMPOSITION, SCHOOL YEAR 2015–16

POSITION	STAFF	PERCENTAGE OF TOTAL STAFF
Teachers	132	22.9%
Residential	138	23.9%
Support Staff	119	20.6%
Hourly and Substitutes	124	21.4%
Teacher Aides	37	6.4%
Auxiliary	17	2.9%
Central Administration	10	1.7%
Total Staff	**577**	

NOTE: The Texas School for the Blind and Visually Impaired staff hours are based on hours worked, not full-time-equivalent positions.
SOURCES: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired, March 2016.

FIGURE 3–1
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED PAYROLL COSTS AS A PERCENTAGE OF TOTAL REVENUES AND EXPENDITURES, FISCAL YEARS 2014 TO 2016
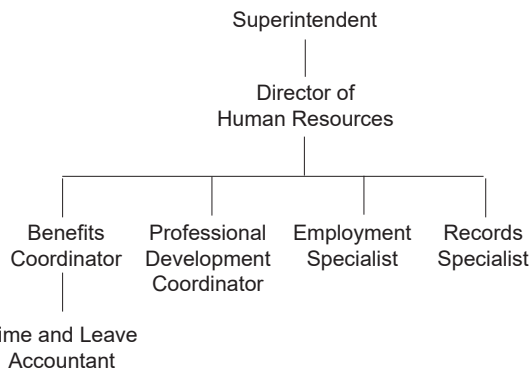
(IN MILLIONS)	2014 ACTUAL		2015 ACTUAL		2016 BUDGETED	
CATEGORY	EXPENDITURE OR REVENUE	PERCENTAGE OF REVENUE	EXPENDITURE OR REVENUE	PERCENTAGE OF REVENUE	EXPENDITURE OR REVENUE	PERCENTAGE OF REVENUE
Total Revenues	**$25.0**	**100%**	**$25.0**	**100%**	**$25.0**	**100%**
Salaries and Wages	$17.0	69.2%	$19.0	75.2%	$19.	75.6%
Other Payroll Costs	$0.5	2.0%	$0.4	1.7%	$0.2	1.0%
Total Salaries, Wages and Other Payroll Costs	**$18.0**	**71.2%**	**$19.0**	**76.8%**	**$19.0**	**76.6%**
Other Expenditures	$7.0	28.7%	$6.0	23.2%	$6.0	23.4%
Total Expenditures	**$25.0**	**100%**	**$25.0**	**100%**	**$25.0**	**100%**
Full-time-equivalent Positions	378.6		376.7		376.6	

SOURCES: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired, Fiscal Year 2016 Operating Budget, March 2016.

ORGANIZATION AND MANAGEMENT

TSBVI's Human Resources (HR) Department has five staff and is led by the director of HR, who reports to the superintendent. The HR Department consists of a benefits coordinator, professional development coordinator, time and leave accountant, employment specialist, and a records specialist. The department is responsible for addressing HR-related staff development topics, verifying staff certifications, guiding staff in completing required certifications, maintaining updated job descriptions, and coordinating ERS benefits. TSBVI's HR staff are cross-trained to know each other's tasks and assist one another during peak periods or extended absences. **Figure 3–3** shows TSBVI's HR Department organization.

FIGURE 3–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
HUMAN RESOURCES DEPARTMENT
SCHOOL YEAR 2015–16

Sources: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired, March 2016.

The director of HR ensures the school's compliance with labor laws and the school's Board of Trustees' personnel policies. The director also updates job descriptions, administers the school's complaint and grievance process, and manages staff relations. Additionally, the director ensures that staff are accurately classified according to their job responsibilities and tasks.

The benefits coordinator, in collaboration with the director of HR, develops human resource procedures; coordinates insurance and other benefits offered through ERS; supervises the time and leave accountant; and assists staff with benefits inquiries.

The time and leave accountant manages staff time records, including auditing leave balance reports, and assists the benefits coordinator with tasks in support of benefits administration.

The professional development coordinator organizes a schoolwide human resource development program. The program includes training, planning, and logistics support for staff development activities conducted by the school's programs and support division. The coordinator also coordinates the school's annual in-service week, monthly training, new employee orientation (NEO), defensive driving, CPR, first aid, behavior support, and instructional and residential training sessions. NEO HR training sessions are provided to new staff twice a month and annually for returning staff. However, each department is responsible for providing professional development opportunities for its staff.

The employment specialist facilitates job description updates and job posting on the school's intranet, the TSBVI website, the Work in Texas state employment website, and other online websites. This position also tracks applicant data, screens applications for minimum qualifications, and refers qualified applicants to hiring managers. Additionally, this position coordinates with braille transcriptionists to translate job postings and other applicant materials into braille as needed, performs background checks, and coordinates fingerprinting for new staff.

The records specialist assists with answering telephone calls and mail distribution; tracks and records applications for employment and Personnel Action Forms (PAF); initiates and maintains all personnel files; and maintains and updates other HR forms. This position also enters new-hire, termination, and PAF information into the Uniform Statewide Payroll/Personnel System (USPS), the Public Employee Retirement Systems (PERS) (an internal HR database), and the ERS system.

POLICIES AND PROCEDURES

TSBVI's Governing Board has established 63 board policies related to personnel management. The topics include employment requirements and expectations, staff performance evaluations, time and leave, staff relations, terminations and resignations, and staff development. TSBVI has three board policies governing staff evaluations. HR Department staff prepare the school's employee handbook, which provides staff with the policies and procedures necessary to ensure effective daily operations. TSBVI posts both the employee handbook and HR forms to the school's

intranet for all staff to access, in addition to providing hard copies upon initial employment and when requested.

Board Policy DGBA governs the staff complaint and grievance process. The staff grievance process begins with a complaint, and then can be carried into one of four grievance levels. Level I grievances are heard by the staff's supervisor; Level II grievances are routed to the principal or division director; Level III grievances are heard by the superintendent; and Level IV grievances are heard by the board.

FINDINGS

♦ TSBVI's HR function supports the school's basic staffing needs; however, enhancing some of its services could improve the overall management of this functional area.

♦ TSBVI does not have a comprehensive plan to recruit and retain qualified staff.

♦ TSBVI lacks a structured approach to executive-level leadership training.

RECOMMENDATIONS

♦ **Recommendation 12: Assess the school's HR support needs by conducting an effectiveness survey and use the results to enhance HR services.**

♦ **Recommendation 13: Develop and implement a comprehensive retention strategy, analyze staff turnover rates, and monitor recruiting effectiveness to update the strategy accordingly.**

♦ **Recommendation 14: Develop and implement a comprehensive staff development program for the superintendent's management team.**

DETAILED FINDINGS

HUMAN RESOURCES MANAGEMENT (REC. 12)

TSBVI's HR function supports the school's basic staffing needs; however, enhancing some of its services could improve the overall management of this functional area.

The director of HR holds a Senior Professional in HR certification through the HR Certification Institute, and a Senior Certified Professional certification from the Society for Human Resource Management (SHRM). However, the other HR Department staff do not hold any HR certifications, nor have they received any specialized HR management training. As a result, HR

Department staff could become overly dependent upon the director for routine decision-making.

During the onsite review, the HR Department staff reported that they have not regularly attended trainings and would like to expand upon their HR knowledge. Additionally, the director of HR stated that staff may pursue trainings on their own. **Figure 3–4** shows a gap analysis of core activities that the HR Department performs compared to industry standards.

Increased training could help HR staff effectively and quickly answer HR-related questions, analyze staff trends, and manage the HR function proactively. According to best practices, HR Department staff should remain updated on employment laws, practices, and trends by networking with other HR professionals at regional and national seminars. Many organizations provide cost-effective HR knowledge sharing and training opportunities. Such opportunities help staff to gain general HR knowledge, Texas-specific school HR knowledge, and best practices. These networking opportunities include the following:

• SHRM is the world's largest HR professional society, and is the leading provider of resources serving the needs of HR professionals and advancing the practice of human resource management; SHRM offers HR seminars, conferences, research papers, certification training materials, and examinations;

• the Texas State Human Resources Association (TSHRA) is a professional, nonprofit organization that was founded to provide information exchange, guidance, and camaraderie to HR professionals in state government; TSHRA meets once each month, and all members are encouraged to attend;

• the Texas Association of School Business Officials (TASBO) is an independent, not-for-profit organization that is dedicated to providing resources to Texas school finance and operations staff; its mission is to enhance the efficiency and effectiveness of Texas public schools through the development of highly qualified school finance and operations professionals. TASBO offers education courses, research tools, workshops, webinars and quarterly publications. TASBO also offers a Certified Texas School Business Specialist designation that can be earned by schools' human resources personnel; and

FIGURE 3–4
TEXAS SCHOOL FOR THE BLIND AND VSUALLY IMPAIRED HUMAN RESOURCES DEPARTMENT ACTIVITIES GAP ANALYSIS
SCHOOL YEAR 2015–16

TASK	INDUSTRY STANDARDS	TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
New-hire Processing	Collect data necessary for employment such as proof of citizenship, Social Security Number, etc.	Activity performed.
Criminal History Check	Perform before hire.	Staff may begin employment, but employment is conditional upon results of the criminal background check.
Teaching Certification Confirmation	Confirm teaching certification before hire. Periodic checks for expired certification. Review certification for status at contract renewal review.	Activity performed.
Hiring Process	Manage new-hire paperwork. Forward hiring recommendation to superintendent. Send letters of job offers.	No standard interview questions provided. No scoring rubric provided. No interview training provided. No scheduling assistance provided.
Benefits Administration	Input benefit selections. Coordinate benefit enrollment with the Employees Retirement System. Provide annual updates at staff meeting.	Activity performed.
Job Description Management	Review and update job descriptions on a regular basis.	Activity performed. Job descriptions were recently updated.
Contract Preparation	Draft contracts for staff receiving recommendation for continued employment. Use standardized forms.	Activity performed.
Staff Evaluations	Evaluate teachers through the professional development and appraisal system.	Activity performed.
Professional Development/Training	Principals request teacher training. Curriculum Department reviews requests. Departments provide administrative training as needed.	Action plan for training is created using TSBVI's strategic plan, state laws, and TSBVI policies.
Hours and Leave Administration	Report leave. Locate substitutes when necessary. Document general policies on use of overtime. Review accumulated compensatory time each pay period.	No analysis and management reports of overtime and compensatory time worked, usage, and balances are performed.
File Maintenance	Initiate and periodically update staff files.	Activity performed.
Employee Handbook	Update employee handbook annually.	Activity performed.
Management Reports	Develop and distribute management reports.	No analysis is conducted, and reports are not generated, including staffing statistics and trends, staff demographics and trends, staff turnover, vacancies and lengths of time to hire, and recruiting trends.

Sources: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired; March 2016.

• the Texas Association of School Personnel Administrators (TASPA) provides professional growth and networking opportunities to public school human resources administrators and support staff; a portion of the annual membership dues funds scholarships for prospective teachers in areas with short supply; TASPA members also may attend statewide conferences or regional workshops focused on relevant human resources topics.

Best practices also suggest that school HR departments periodically review staff needs to identify areas of improvement in HR support services. These schools typically prepare or conduct a staff survey to assess the overall staff satisfaction with its services. These surveys typically assess the HR effectiveness so that departments can develop strategies to improve management practices.

TSBVI should assess the school's HR support needs by conducting an effectiveness survey and use the results to enhance HR services.

The director of HR should meet with HR Department staff to discuss the school's ongoing HR needs and develop a survey to obtain feedback about how to further

complement the overall management of HR. This survey should include open-ended questions to capture specific comments from staff about satisfaction, professional development opportunities, and suggestions for improvement. The director of HR should use this feedback to enhance the HR Department structure and related protocols to better support HR Department staff, which could result in a more efficient and effective functional area.

The fiscal impact assumes an annual cost of $1,115, and a onetime cost of $3,810. The annual cost is $190 for the SHRM membership fee, and the fiscal impact assumes three staff would become members, for a total cost of $570. The onetime cost per staff is $1,270, including $870 for SHRM study materials and $400 for the SHRM exam fee. The fiscal impact assumes that three staff will become SHRM-certified, for a total onetime cost of $3,810. The annual TASPA membership for the school is $80. The annual cost per staff is $225 to attend the TASPA conference, and the fiscal impact assumes that one staff would attend, for a total annual cost of $225. The annual cost per staff is $75 for the TSHRA membership fee, and the fiscal impact assumes two staff would become members, for a total annual cost of $150. The fiscal impact also assumes an annual $90 for the TASBO institutional membership. The annual costs include $570 for SHRM, $80 for TASPA membership, $225 for TASPA training, $150 for TSHRA, and $90 for TASBO, for a total annual cost of $1,115.

RECRUITMENT, HIRING, AND RETENTION (REC. 13)

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

Termination occurs when staff leaves an organization either voluntarily or involuntarily. During school year 2014–15, 59 staff left TSBVI, resulting in a 10.2 percent staff turnover rate. An analysis of staff turnover data for school year 2014–15 showed that positions with the highest turnover rates are hourly and substitute staff, residential specialists, and staff that work in the areas of transportation and food service. Although TSBVI does not have excessive turnover, the school can improve its processes for attracting, recruiting, and retaining qualified staff.

During the Legislative Budget Board's School Performance Review team's onsite review, the director of HR reported that TSBVI does not have a formal recruiting strategy or plan that outlines recruiting methods and resources that will be applied for each position. When TSBVI has vacancies, it attempts to first internally fill the openings. TSBVI then posts the vacancy on the school's website, sends the job vacancy announcements to local universities that have visually impaired education programs, and reaches out to organizations and personal contacts. TSBVI does not attend job fairs or events that may attract qualified noninstructional staff.

TSBVI also lacks a process to collect or analyze recruitment data. The school does not identify a particular recruitment method that is more successful than others at providing quality candidates.

The school has not linked the type of staff it wishes to recruit with successful recruitment strategies. TSBVI has a limited review or prescreening of minimum qualifications before forwarding applications to the department heads. TSBVI does not have standard baseline interview questions to assess if a candidate possesses the minimum professional and personal skills expected by the school. The school also has no scoring rubric for potential candidates and has no interview training for TSBVI staff conducting candidate interviews.

TSBVI does provide limited staff incentives, such as time off for top performers and service pins. Additionally, the state pays longevity pay based on years of service. However, TSBVI has no formal mentor program for its new staff. Research has shown that well-structured mentoring programs lower staff attrition rates. One study from George Mason University in Fairfax, Virginia, found that, among new special education teachers who continued to teach for a second year, 20.0 percent noted that they stayed because of the mentoring support that they had received.

Successful retention requires an ongoing commitment from the employer to provide staff with the tools needed for success. Retention also requires an ongoing commitment from the staff to make best efforts in supporting the employer's mission and strategies. These commitments depend on setting expectations, periodic evaluation, open communication, and adjustments to strategies for continual improvement.

Best practice dictates that staff retention plans begin with the onboarding process when staff are first hired. This process includes topics such as the following:

- salary and benefits – establish competitive staff compensation systems, then communicate to all staff how the systems were developed and how the structure works;

- training – develop training programs and options for staff to expand upon their skills and knowledge, then communicate this training availability to all staff;

- work–life balance – develop and implement strategies to develop a more flexible and positive work environment; and

- staff appreciation and recognition programs – develop programs and activities to show staff that they are valued.

Staff turnover matters for three key reasons: (1) it is costly; (2) it affects an organization's performance; and (3) it may become increasingly difficult to manage. Staff turnover costs an organization time, money, and other resources. A 2008 SHRM study noted that the cost to replace and hire new staff is estimated to be 60.0 percent of a staff's annual salary. A PricewaterhouseCoopers white paper issued in 2006 noted that the total costs of staff replacement, including training and loss of productivity, can range from 90.0 percent to 200.0 percent of a staff's annual salary. Effective turnover analysis examines three questions:

- How many people are leaving (turnover rate)?

- Who is leaving?

- What are the relative costs and benefits of turnover?

Effective recruiting plans include short-term and long-term goals and objectives for each position or job category. Organizations start by deciding what key talent they have the most difficulty recruiting, and then determining where that talent is most likely to be. Organizations then define recruiting mechanisms and sources to be used for each position or category. Effective recruiting strategies are focused to interest applicants in the organization and inform them of the benefits of working for the organization. Some of the most successful recruiting strategies include using a combination of such sources as the following:

- social media – provides an immediate way to attract people to an organization; the organization needs to have the appropriate messaging, a targeted audience, and a commitment to following up with potential candidates regularly;

- referral programs – ask staff to recommend others within their networks; referral programs can be useful additions to a social media strategy and can often provide hard-to-find candidates who also fit into the organization's culture.

- crowdsourcing – similar to staff referral programs, but asks a broader group of people to recommend candidates who meet certain criteria; social media can act as a place for visitors to recommend candidates; organizations also dedicate sections of their career sites to enable visitors to recommend candidates; crowdsourcing can be a rich source of candidates when aimed at a targeted audience;

- career site – a robust, interactive career site is essential to any recruiting strategy; the site should contain all the information for any interested candidates to learn more about an organization and what it has to offer applicants.

- community outreach – community outreach programs link existing outreach activities with recruiting, which provides a mechanism to build a workforce with great loyalty and low turnover, at a low cost; these programs take time to develop, and the benefits are long-term; and

- college recruiting – establishing relationships even in the first or second year of college and building on that relationship can help bring new talent into the organization and provide needed skills; college recruiting can include internships or rotational programs to give students work experience, and to evaluate and assess students for potential recruitment as staff.

An SHRM study in calendar year 2016 noted that the most popular method organizations use to recruit staff is through staff referrals. The second most popular tool is the company's website, and the third is social media.

SHRM's study also analyzed the tools used to recruit job candidates by organization size and industry. The tools used to source candidates varied by organization size and the organization's industry. **Figure 3–5** shows a summary of the top five candidate sourcing trends for organizations similar to TSBVI in relation to staff size of 100.0 to 499.0 FTE positions and in the government sector.

FIGURE 3–5
RECRUITING TOOLS USED BY ORGANIZATIONS SIMILAR TO TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED, APRIL 2016

TOOL	STAFF SIZE OF 100.0 TO 499.0 POSITIONS	GOVERNMENT SECTOR ORGANIZATIONS
Staff Referrals	86.0%	67.0%
Company Website	84.0%	86.0%
Social Media	67.0%	54.0%
Paid Job Boards	71.0%	62.0%
Free Job Boards	67.0%	62.0%
Print Advertisements	(Not in the top five)	54.0%

NOTE: TSBVI=Texas School for the Blind and Visually Impaired.
SOURCE: Society for Human Resource Management, Survey Findings, Talent Acquisition: Recruitment and Selection, April 2016.

DeSoto ISD's HR Department holds an annual job fair to attract qualified teachers. The unique aspect of this job fair is that the district invites only attendees that district recruiting staff have met. HR prescreens these candidates for background checks and credential verification. Using this method enables principals to proceed with job offers upon interview completion. Principals and department heads participate in the job fair and conduct interviews with attendees that meet the respective school's or department's needs. The collaborative effort among HR, school principals, and department managers enables DeSoto ISD to make job offers either at the job fair or shortly thereafter.

TSBVI should develop and implement a comprehensive retention strategy, analyze staff turnover rates, and monitor recruiting effectiveness to update the strategy accordingly.

TSBVI's director of HR should work with department heads and principals to identify potential recruiting methods and sources for their respective functions. The director of HR should then develop a recruiting strategy by position that lists the recruiting tools that will be used to source each position category. The director of HR should develop a process to monitor recruiting effectiveness by position and recruiting source. The process can include information either in the staff database for recruiting method or in a spreadsheet that lists each staff hired, the recruiting source, employment date, and termination date (if any). The director of HR should conduct an annual analysis to determine how many staff have remained with the school, how many have left, employment lengths, and recruiting sources. The recruiting sources that result in staff being hired but not staying with the school should then be placed lower on the priorities for recruiting efforts. Lastly, the director of HR should facilitate annual job fairs that include campus tours so that applicants can experience the campus environment and speak with staff before being hired.

The director of HR and superintendent should develop and implement a comprehensive staff retention plan that supports the strategic direction for the school and also is tied to budget priorities. The director of HR should form a committee including teachers, school administrators, and the superintendent's management team to develop, implement, and monitor the plan. Topics to be addressed in the plan should include the following:

- recruiting;
- mentoring;
- training and professional development;

- compensation;
- career paths and growth opportunities;
- communication;
- inclusion in decision making;
- schedule flexibility; and
- succession planning.

Additionally, the director of HR should develop an exit survey that is specific to TSBVI to provide data from staff leaving the school. Finally, the director of HR should analyze staff turnover rates and determine the cause, so that appropriate action and planning can occur.

This recommendation could be implemented with existing resources.

STAFF DEVELOPMENT (REC. 14)
TSBVI lacks a structured approach to executive-level leadership training.

TSBVI experienced turnover in middle-management and executive-level positions during the last five years. At the time of the review team's onsite review, five of the 10 positions on the superintendent's management team have been in their positions for four years or less. The superintendent's management team includes the director of planning and evaluation, director of HR, principal of comprehensive programs, principal of short-term programs, chief financial officer, director of outreach, director of the center of school resources, director of community resources, director of curriculum, and the director of policy and procedure support.

During onsite interviews, the superintendent's management team indicated that no formal executive leadership training is available for them to perform their respective areas of responsibility more effectively. Additionally, staff on the superintendent's management team indicated that the superintendent did not hold team-oriented leadership meetings for the team to participate in brainstorming sessions and team-building activities essential to overall leadership development. Furthermore, new superintendent management staff do not receive training related to TSBVI's policies and procedures, federal regulations, planning and communication, time management, and proactive management.

When management-level positions turn over substantially, effective organizations provide new staff with leadership

training to assist them in adapting to their new jobs. Professional development is an important component in the retention of qualified staff. Executive-level leadership training is necessary to ensure that staff are properly coached on how to be effective leaders and manage their departments, because effective leaders are crucial to the organization's academic and financial success.

The lack of structured executive leadership training can impede growth and development of long-tenured managers. Such a lack of training also impedes innovative management techniques and processes. Establishing proactive leadership development programs provides a tool for organizational succession management.

TSBVI should develop and implement a comprehensive staff development program for the superintendent's management team.

TSBVI's director of HR should establish a professional development workgroup that consists of the director of HR, director of community resources, director of curriculum, director of center for school resources, principal of comprehensive programs, principal of short-term programs, director of outreach, director of school support services, and the CFO. The workgroup should develop a comprehensive professional development plan, which consists of development goals and training needs for each function. After the training goals and needs have been identified, the director of HR should compile a written professional development plan. The director of HR should then present the professional development plan to the superintendent and board for approval. The director of HR should then implement the professional development plan and ensure that annual review and updates occur.

This recommendation could be implemented with existing resources.

FISCAL IMPACT

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

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							
12. Assess the school's HR support needs by conducting an effectiveness survey and use the results to enhance HR services.	($1,115)	($1,115)	($1,115)	($1,115)	($1,115)	($5,575)	($3,810)
13. Develop and implement a comprehensive retention strategy, analyze staff turnover rates, and monitor recruiting effectiveness to update the strategy accordingly.	$0	$0	$0	$0	$0	$0	$0
14. Develop and implement a comprehensive staff development program for the superintendent's management team.	$0	$0	$0	$0	$0	$0	$0
TOTAL	($1,115)	($1,115)	($1,115)	($1,115)	($1,115)	($5,575)	($3,810)

CHAPTER 4. FACILITIES AND SAFETY MANAGEMENT

As required by statute, facilities management at the Texas School for the Blind and Visually Impaired (TSBVI) is shared with the Texas Facilities Commission (TFC). The agencies coordinate regarding facilities planning, construction of projects, and maintenance of infrastructure (e.g., electrical, plumbing, irrigation, heating and cooling). Facilities planning establishes school 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. 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. Facilities management is a vital school function supporting the delivery of educational services. Efficient facilities operations help schools manage changes in enrollment and changing instructional program needs.

A school'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 an entity's organizational structure. Safety and security includes ensuring the physical security of 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. As a state agency, TSBVI coordinates with the Texas School Safety Center (TxSSC) and the State Office of Risk Management (SORM).

TSBVI operates on a 45-acre campus in Austin. Major reconstruction of the campus began in 2008 and continued through school year 2011–12. Almost every building on the campus was replaced with new construction by the end of 2012. Other campus improvements continued through school year 2014–15, including new perimeter fencing and gates, completion of a covered walkway, construction of an outdoor pavilion, campus signage, improvements to the campuswide public address system, and installation of conference video systems.

In September 2013, TFC became responsible for TSBVI's facilities-related maintenance and operations after these responsibilities were transferred to TFC by the Eighty–third Legislature, Regular Session, 2013. A memorandum of understanding (MOU) between TSBVI and TFC outlines each agency's respective responsibilities with regard to the following:

- facilities maintenance and operations services for the physical equipment and facilities;
- facilities construction;
- wiring, cabling, and conduit;
- facility reconfiguration;
- recycling and garbage disposal;
- pest control;
- deferred maintenance administration;
- key administration;
- environmental hazards administration;
- fire protection systems; and
- security systems services.

In September 2015, TSBVI and TFC added custodial and grounds services to the facilities MOU, and TFC began providing these services. **Figure 4–1** shows a detailed description of facilities operation services that TFC provides for TSBVI.

When the facilities functions were transferred from TSBVI to TFC, the agencies established a protocol for communication and a staff transition plan. TSBVI facilities staff were transferred to TFC and report to the TFC campus manager, who serves as the primary contact to ensure that services are performed. TFC campus staff are physically officed onsite at TSBVI. TSBVI provides training to TFC staff and contractors who regularly provide services at TSBVI. Training sessions are conducted during the orientation process and encompass educating each staff and contractor about the campus, campus life, and how to interact with blind and visually impaired students.

FIGURE 4–1
FACILITIES SERVICES PROVIDED BY THE TEXAS FACILITIES COMMISSION IN ACCORDANCE WITH A MEMORANDUM OF UNDERSTANDING WITH THE TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED, SEPTEMBER 2015

SERVICES	AGENCIES' RESPONSIBILITIES
Work Orders	The Texas Facilities Commission (TFC) provides routine maintenance when work requests are submitted.
	A representative of the Texas School for the Blind and Visually Impaired (TSBVI) provides identification, the name of the facility, the room number, contact including telephone number, and information about the service requested when submitting the routine work order.
Preventive Maintenance	TFC performs preventive maintenance for heating, ventilation, and air conditioning (HVAC) systems, the emergency backup system, and battery backups; fire safety equipment, including fire alarms, sprinkler systems, fire extinguishers, kitchen stove hoods, and fire hydrants; electrical systems; plumbing systems, including grease traps and swimming pools; and elevators.
General Maintenance	TFC maintains, repairs, and replaces facility surfaces, including floors, walls, windows, and doors; ceiling tiles and suspension systems; building and garage windows; exterior materials and finishes; roofs; pavement and sidewalks; showers, tubs, and sinks, and counter tops and other flat surfaces including caulking.
Mechanical, Electrical, and Plumbing Systems	TFC operates and repairs systems related to distribution, HVAC, water, electrical, lighting, and electrical emergency backup.
Fire Protection Systems	TFC provides programming and maintains databases for fire protection systems including computers, communication panels, and remote fire panels; tests and maintains all fire systems; maintains fire system devices; provides 24-hour support to fire systems; and establishes emergency procedures.
Security Controls and Equipment	TFC maintains the security controls and equipment for facilities, including electronic door hardware, card readers, and cameras.
Elevator and Lift Systems	TFC provides preventive and routine maintenance.
Grounds Maintenance	TFC maintains irrigation system services for the campus.
Pest Control	TFC ensures interior pest control for campus facilities.
Trash and Recycling Removal	TFC provides trash removal for the campus and collects recycling material from specified exterior collection sites on campus.
Custodial Services	TFC procures and maintains custodial supplies and cleaning equipment for all facilities; and ensures all custodial services are completed on campus.
Grounds	TFC provides grounds maintenance services for the campus, including the outdoor athletic facilities.
Fuel Storage Tanks	TFC provides maintenance of the diesel and unleaded gasoline storage tanks and dispensing stations and all fuel purchases and deliveries.

Source: Texas School for the Blind and Visually Impaired Memorandum of Understanding with the Texas Facilities Commission, September 2015.

STAFF ROLES AND RESPONSIBILITIES

Figure 4–2 shows the organization of TSBVI's facilities management, including TFC staff. TFC's onsite facilities staff work closely with the director of operations and construction.
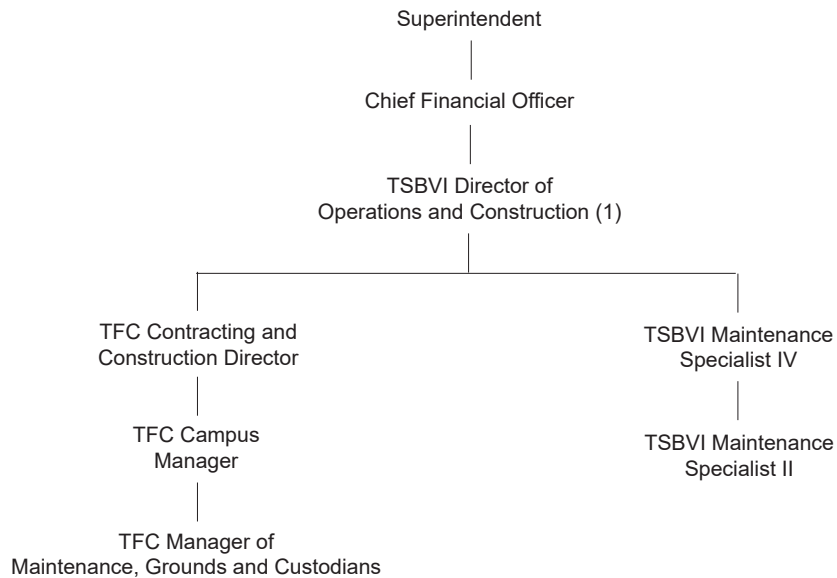
Figure 4–3 shows the major responsibilities for the TSBVI staff assigned to oversee and support facilities for the school.

TFC and TSBVI staff meet at least once each month to review school and state calendars, project schedules, outstanding work orders, and other maintenance or deferred maintenance items. Regular participants at these meetings include TSBVI's chief financial officer, TSBVI's director of operations and construction, the deputy executive of TFC's Planning and Real Estate Management Division, TFC's property management services director, and TFC's senior management for the maintenance, grounds, custodial, landscaping, and environmental services operations.

TFC's campus manager and the manager of maintenance, grounds, and custodians meet with TSBVI's director of operations and construction daily to discuss work assignments and ensure that service levels meet the school's overall

FIGURE 4–2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED FACILITIES ORGANIZATION
SCHOOL YEAR 2015–16

NOTE: (1) Texas School for the Blind and Visually Impaired indicated that since the time of the review, the dirctor of operations and construction job title was changed to the director of school support services.
SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

FIGURE 4–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED FACILITIES STAFF RESPONSIBILITIES
SCHOOL YEAR 2015–16

POSITION	RESPONSIBILITIES
Director of Operations and Construction (1)	Oversees the developing and updating of the facilities long-range master plan.
	Develops and evaluates budget requests for the Operations and Construction Department.
	Develops and implements processes for evaluating facilities functions within the Operations and Construction Department.
	Prepares and presents requested reports on Operations and Construction Department activities to administrative team, superintendent, and the Governing Board.
	Monitors performance of outside contractors.
	Monitors expenses of the operational areas of the Operations and Construction Department to ensure agreement with the established operating and capital budgets.
	Oversees the development and preparation of budget estimates for special projects and capital construction.
	Oversees the development of specifications and bid proposals for capital improvement projects.
	Develops, conducts, and supervises the energy management and conservation program.
	Oversees the preparation of management and productivity reports and studies.
	Plans and coordinates the removal of asbestos from the school.

FIGURE 4–3 (CONTINUED)
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED FACILITIES STAFF RESPONSIBILITIES
SCHOOL YEAR 2015–16

POSITION	RESPONSIBILITIES
Maintenance Specialist IV	Coordinates building construction, repair, renovation, or restoration projects.
	Performs inspections, adjustments, maintenance, and repair on electrical, plumbing, steam, air conditioning, and mechanical equipment.
	Inspects structures and evaluates work to be performed.
	Inspects equipment, machinery, systems, and building accessories and appliances.
	Examines and interprets drawings, diagrams, and blueprints.
	Administers the school's work order program, including reviewing work order requests and entering work orders into the Texas Facilities Commission work order system; reviews work orders to assure completion.
	Requisitions materials and equipment, maintains records of materials used, calculates material and labor costs, and orders parts and supplies to complete work orders.
	Repairs or oversees repairs to electronic equipment.
	Performs workshop operations to fabricate specialized items needed for project work or to refinish furniture, doors, and paneling.
	Assists in the delivery of materials and equipment.
	Supervises the work of others as required.
	Complies with all applicable security and safety rules, regulations, and standards.
Maintenance Specialist II	Performs maintenance and repair of small appliances such as refrigerators, washers and dryers, microwaves, and vacuum cleaners.
	Assists with installation of televisions and other small appliances in student dormitories or other areas on campus.
	Moves materials from various locations on campus.
	Complies with all applicable security and safety rules, regulations, and standards.

NOTE: (1) Texas School for the Blind and Visually Impaired indicated that since the time of the review, the director of operations and construction job title was changed to the director of school support services.
SOURCE: Texas School for the Blind and Visually Impaired, May 2016.

expectations. TSBVI facility maintenance services are performed during regular business hours from 7:00 a.m. to 5:00 p.m. Monday to Friday, excluding holidays. Some services require work in the facility after normal business hours, and TFC is responsible for 24-hour oversight of facility maintenance. TSBVI and TFC have developed a preventive maintenance schedule, and the TSBVI director of operations and construction coordinates with TFC staff to set the times and dates for performing scheduled preventive maintenance on campus. TFC works with TSBVI to ensure that maintenance staff are available on state holidays that are not school holidays.

TSBVI staff submit electronic work orders to TFC for facilities work. To check a work order, TSBVI staff contact TFC's campus manager or the manager of maintenance, grounds, and custodians. Routine work orders are typically completed within four to five days unless parts or equipment are not immediately available. Emergency work orders are typically completed within one to two days. TFC completed 580 work orders for TSBVI from September 2015 to March 2016.

TFC staff also work with TSBVI staff to provide assistance with setup and takedown for sporting events and student activities. TSBVI coordinates with TFC to assist in planning and support and provides a calendar of all regularly scheduled events held during the school year.

TSBVI's director of operations and construction is primarily responsible for facilities contracts, planning, and construction oversight. The director of operations and construction works directly with TFC staff to ensure proper execution and quality of renovation and construction projects.

CAMPUS FACILITIES

Figure 4–4 shows the building inventory on TSBVI's campus with the name, use, age, and gross square footage of each building. TSBVI's campus buildings include dormitories, instructional facilities, offices, and vocational training facilities. The Wildcat Inn, Building No. 607, is a laboratory for TSBVI students enrolled in the hospitality and tourism program. The school does not charge a usage fee for guests at the Wildcat Inn. The primary guests are parents and interns.

FACILITIES ASSESSMENT AND PLANNING

TFC contracted with a facilities planning firm to provide long-range facilities planning services for TSBVI. Facilities planning for a school involves compiling information on programs, policies, and facility data. Facilities planning helps schools effectively and efficiently allocate resources in growing and decreasing enrollment conditions. TSBVI students enroll from across the state; therefore, the long-range facilities planning process is more complicated than in a typical school district. Planners have to project how many students are likely to enroll in TSBVI from multiple communities.

In February 2016, the facilities planning firm completed the TSBVI facilities condition assessment. The assessment consisted of reviewing available construction record drawings, investigating known issues, interviewing TSBVI and TFC staff, and surveying all the buildings. The assessment included a report summarizing specific existing conditions, code and safety deficiencies, and proposed recommendations.

FIGURE 4–4
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SCHOOL BUILDING INVENTORY
SCHOOL YEAR 2015–16

BUILDING	FACILITY	USE	YEAR BUILT OR ACQUIRED	GROSS SQUARE FOOTAGE
507	Old Operations Building	Office	1916	4,058
509	Superintendent's House	Residence	1916	4,955
512	Cottage	Office	1940	1,320
573	Duplex	Dormitory	2004	5,049
574	Duplex	Dormitory	2004	5,049
575	Duplex	Dormitory	2004	5,049
576	Duplex	Dormitory	2004	5,049
577	Dormitory	Dormitory	2008	5,049
600	Administration Building and High School	Office and Classrooms	2010	70,061
601	Cafeteria	Cafeteria	2011	9,309
602	Fine Arts Center	Classrooms	2011	14,230
603	Health Center and Activity Center	Nurses Station, Classroom, and Gymnasium	2010	15,130
604	Natatorium	Natatorium	2011	9,107
605	Outreach Building	Office and Conference	2010	15,411
606	Elementary School	Classroom	2012	31,085
607	Wildcat Inn	Classroom/Hospitality Center	2012	19,900
608	Business Office	Office	2010	7,077
609	Gymnasium	Gymnasium	2013	28,598
610	Maintenance Office and Warehouse	Maintenance Shop	2011	27,071
611	Pet Grooming Classroom	Classroom	2013	939
650	Duplex	Dormitory	2008	5,653
651	Duplex	Dormitory	2009	5,653
652	Duplex	Dormitory	2009	5,653
653	Duplex	Dormitory	2010	5,653

FIGURE 4–4 (CONTINUED)
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SCHOOL BUILDING INVENTORY
SCHOOL YEAR 2015–16

BUILDING	FACILITY	USE	YEAR BUILT OR ACQUIRED	GROSS SQUARE FOOTAGE
654	Duplex	Dormitory	2010	5,653
655	Duplex	Dormitory	2010	5,653
656	Duplex	Dormitory	2010	5,653
657	Duplex	Dormitory	2009	5,653
660	Elementary Residence Office	Dormitory	2008	633
661	Elementary Student Dormitory	Dormitory	2008	3,825
662	Elementary Student Dormitory	Dormitory	2008	3,825
663	Elementary Student Dormitory	Dormitory	2008	3,825
664	Elementary Student Dormitory	Dormitory	2008	3,825
4801	Dormitory	Dormitory	2003	2,970
			Total Square Footage	**347,623**

SOURCE: Parkhill, Smith, and Cooper, Inc., Facilities Condition Report, commissioned by the Texas Facilities Commission, February 2016.
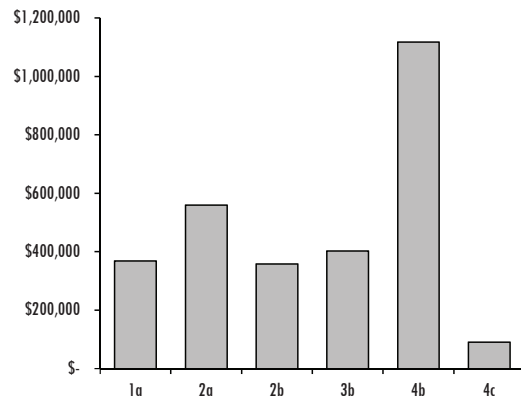
The condition assessment report identified issues, made recommendations for improvements, and prioritized the recommendations using the following classifications:

- priority category:

  1. critical – repair or replacement is urgent;

  2. trending critical – repair or replacement needed within 12 months;

  3. necessary – repair or replacement needed within two years to five years; or

  4. recommended – repair or replacement needed within three years to 10 years; and

- priority hierarchy:

  a. safety – health or safety are at risk;

  b. necessity – vital tasks cannot be accomplished; or

  c. efficiency – operating efficiency or cost effectiveness has been depleted.

Figure 4–5 shows recommended building improvement in the facilities condition assessment report by prioritized category.

As shown in **Figure 4–5**, the largest cost category of improvements, estimated at $1.1 million, have a priority category of 4 and a hierarchy category of B. These ratings indicate that these repairs and replacements are necessary but not immediate, and need to be resolved within three years to 10 years.

FIGURE 4–5
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED BUILDING IMPROVEMENT BY PRIORITIZED CATEGORY SCHOOL YEAR 2015–16

NOTES: Priority categories:
(1) critical – repair or replacement is urgent;
(2) trending critical – repair or replacement needed within 12 months;
(3) necessary – repair or replacement needed within two years to five years; and
(4) recommended – repair or replacement needed within three years to 10 years.
Priority hierarchy:
(a) safety – health or safety are at risk;
(b) necessity – vital tasks cannot be accomplished; and
(c) efficiency – operating efficiency or cost effectiveness has been depleted.
SOURCE: Parkhill, Smith, and Cooper, Inc., Facilities Condition Report commissioned by the Texas Facilities Commission, February 2016.

SAFETY AND SECURITY

TFC provides fire protection services and maintenance for security controls and equipment; TSBVI manages all other safety and security functions. **Figure 4–6** shows the organization of TSBVI's safety and security function.

Each of these staff have responsibilities related to maintaining the safety and security of the TSBVI campus. **Figure 4–7** shows the major job duties of TSBVI's safety and security staff.

TSBVI maintains several safety manuals for use throughout the school. The Parent and Student Handbook includes school rules, requirements, and procedures for TSBVI students and their parents. The Employee Handbook provides safety and security expectations and procedures for staff. The Emergency Response Team Procedures Manual details staff responsibilities and the procedures and actions that staff should take in an emergency. The Emergency Procedure Quick Reference Guide provides essential information for staff to respond quickly to

emergencies. The Health, Safety and Risk Management Manual contains procedures and policies related to safety and security and other areas of risk management.
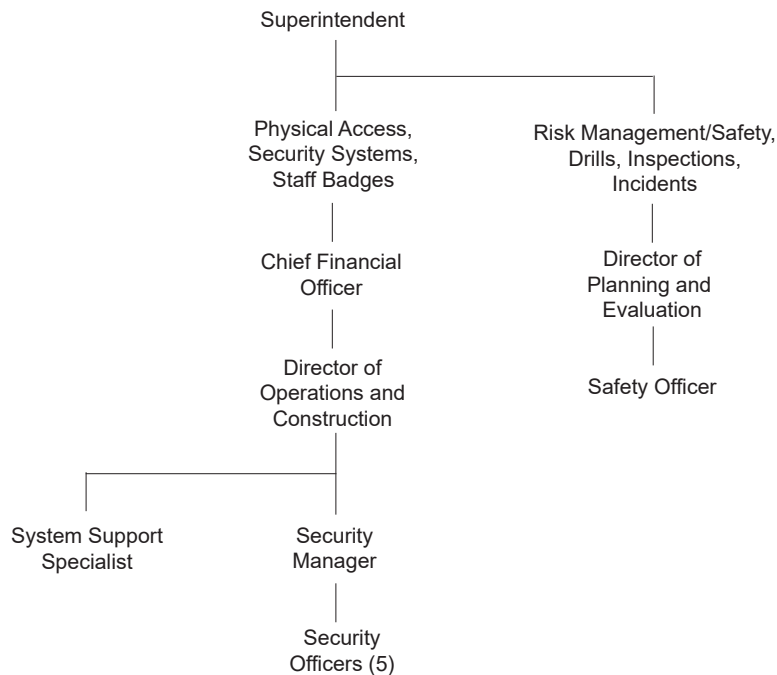
FINDINGS

♦ TSBVI lacks processes for ensuring that fire drills are regularly conducted.

♦ TSBVI's Security Department lacks professional development and training plans.

RECOMMENDATIONS

♦ **Recommendation 15: Develop and implement formal procedures for emergency drills.**

♦ **Recommendation 16: Compare the Security Department staff's skill sets against the school's needs and develop professional development plans and training schedules.**

FIGURE 4–6
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SAFETY AND SECURITY ORGANIZATION
SCHOOL YEAR 2015–16

Source: Texas School for the Blind and Visually Impaired, March 2016.

FIGURE 4–7
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SAFETY AND SECURITY STAFF RESPONSIBILITIES
SCHOOL YEAR 2015–16

POSITION	SAFETY AND SECURITY DUTIES
Superintendent	Ensures physical facilities are safe, accessible, and appropriate for the students and staff to achieve program objectives.
Chief Financial Officer	Oversees the director of operations and construction in carrying out the operations activities of the Security Department.
Director of Operations and Construction	Establishes goals and develops guidelines, procedures, rules, and regulations. Prepares and presents requested reports on operational activities to the administrative team, superintendent, and the Governing Board.
System Support Specialist	Reports to the director of operations and construction. Adds and edits building and gate card access for all users and troubleshoots card and access issues. Develops reports for access monitoring, alarms, and lockdowns as requested and performs weekly network backups.
Security Manager	Reports to the director of operations and construction. Oversees and patrols grounds, receives visitors, directs traffic, and supervises the security officers.
Security Officer	Patrols assigned routes within buildings and directs visitors to the appropriate area. Checks for unlocked doors or open windows, assists with fire drills and disaster evacuation, contacts emergency services when needed. Assists emergency personnel as needed, and assists supervisor with investigation of thefts and other campus incidents.
Director of Planning and Evaluation	Oversees the safety officer. Develops the Emergency Operations Plan (EOP), the Emergency Response Team Procedures Manual, and the Emergency Procedures Quick Reference Guide with assistance from the safety officer. Serves as the agency risk manager.
Safety Officer	Monitors the safety of school facilities, schedules and conducts emergency drills, develops and implements health and safety educational programs for staff, and investigates student and staff injuries.

SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

DETAILED FINDINGS

MANAGEMENT OF THE SAFETY AND SECURITY FUNCTION (REC. 15)

TSBVI lacks processes for ensuring that fire drills are regularly conducted.

An emergency operations plan (EOP) identifies the roles and actions of a school's staff, students, and students' families in response to hazards, threats, and vulnerabilities that affect a safe and secure learning environment. TSBVI's EOP was last reviewed and updated in March 2006. In August 2012, TSBVI's internal auditor reported that the EOP had not been updated regularly. The auditor also found that the emergency operations planning team (EOPT) had not met periodically for emergency training to complete tasks such as updating the EOP. The EOPT consists of executive management, campus administration, department heads, and safety and security staff.

The Texas Education Code, Section 37.109, requires schools to review their EOPs and related documents at least annually. TSBVI must also conduct a safety and security audit at least every three years, and must submit the audit to TxSSC. TSBVI submitted its audit to TxSSC as required, but the

school has not updated its EOP since 2006. The lack of an updated EOP exposes the school to the risk of not being properly prepared for an emergency.

Figure 4–8 shows components of TSBVI's 2006 EOP, TSBVI's 2016 EOP, and best practices recommended by TxSSC. TSBVI provided the Legislative Budget Board's School Performance Review team with a January 2016 draft EOP; however, the plan had not been completed at the time of the review team's March 2016 onsite review.

TSBVI is also not meeting the recommended frequency for emergency drills. The Texas Department of Insurance requires a minimum of nine fire drills, or one per month for each month having 10 school days or more, to achieve full credit for fire drills. TSBVI also requires that fire drills be held in buildings in which classes are held as well as in student residences at least once per month while students are present. However, compliance with TSBVI's annual fire and lockdown drill and inspections schedule is inconsistently performed. **Figure 4–9** shows the record of fire drills performed at TSBVI.

Additionally, TxSSC recommends conducting drills when the majority of staff and students are onsite. However, TSBVI

FIGURE 4–8
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED'S EMERGENCY OPERATIONS PLAN COMPONENTS
MARCH 2016

RECOMMENDED PRACTICE	2006 EOP	2016 DRAFT EOP
The district emergency operations plan (EOP) and related documents are reviewed at least annually by the district's safety and security committee.	The EOP is dated March 1, 2006, and has not been reviewed and updated.	New draft in progress.
Include a promulgation statement signed by leadership that gives the authority and the responsibility for staff to perform their tasks and formalizes the plan as in effect.	No promulgation statement and no page signed by the superintendent or other authorities are included.	Promulgation statement included in draft EOP.
Include overview and purpose section in EOP.	Introduction section includes overview and purpose.	Section included in draft EOP.
Include situation and assumptions section in EOP.	Section not included in EOP.	Included in overview and purpose section of draft EOP.
Include concept of operations section in EOP.	Section included in EOP.	Section included in draft EOP.
Include organization and assignment of responsibilities section in EOP.	Functions and responsibilities included in EOP; however, EOP does not list the responsibilities of the Security Department.	Section included in draft EOP.
Include direction and control section in EOP.	Section included in EOP.	Section included in draft EOP.
Include administration and support section in EOP.	Section included in EOP.	Section included in draft EOP.
Include maintenance and changes section in EOP.	Section not included in EOP.	Section included in draft EOP.
Include appendices and attachments section in EOP.	Section not included in EOP.	Section included in draft EOP.

SOURCES: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired; Texas School Safety Center; March 2016.

conducted a tornado drill in May 2015 in the evening when many students and staff were off campus for programming and activities, and only 88 students attended.

TSBVI should develop and implement formal procedures for emergency drills.

TSBVI should finalize its EOP and develop a process for annual review. The safety officer and director of planning and evaluation should develop a plan for conducting emergency drills that meets all school requirements. TSBVI's superintendent, director of operations and construction, and safety officer should meet with the local fire marshal to confirm and prepare a list of the minimum frequency and type of drills for each building. The safety officer should include this list in the draft EOP.

This recommendation could be implemented with existing resources.

PROFESSIONAL DEVELOPMENT AND TRAINING (REC. 16)

TSBVI's Security Department lacks professional development and training plans.

TSBVI conducted safety training during school years 2014–15 and 2015–16, including new employee orientation (NEO). The orientation has a safety session addressing ergonomics, slips, trips, falls, and electrical and fire hazards. NEO also covers students' orientation and mobility, which includes a staff safety component when working with blind and visually impaired students and staff. NEO training also includes a one-hour safety training session conducted by the safety officer that includes an overview of the Emergency Procedures Manual and a school safety video. Three safety and security staff attended the NEO during school years 2014–15 or 2015–16.

TSBVI offers trainings regarding the following: abuse, neglect, and exploitation; a combined training on blood-borne pathogens and identifying signs of child abuse; crisis response

FIGURE 4–9
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SUMMARY OF FIRE DRILLS PERFORMED
SCHOOL YEAR 2014–15

BUILDING	FACILITY	2014					2015						
		AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUNE	JULY
507	Old Operations Office	No records provided.											
509	Superintendent's House	No records provided.											
512	Cottage/Office	No records provided.											
573	Dormitory/Duplex	No records provided.											
574	Dormitory/Duplex	No records provided.											
575	Dormitory/Duplex		X	X		X		X	X	X			
576	Dormitory/Duplex	No records provided.											
577	Dormitory	No records provided.											
600	Administration Building and High School								X	X	X	X	
601	Cafeteria								X	X	X	X	
602	Fine Arts Center-Classroom								X	X	X	X	
603	Health Center								X	X	X	X	
604	Natatorium								X	X	X	X	
605	Outreach Building/ Office and Conference Rooms	No records provided.											
606	Elementary School	No records provided.											
607	Wildcat Inn – Classroom/ Hospitality		X										
608	Business Office	No records provided.											
609	Gymnasium	No records provided.											
610	Maintenance Office/ Warehouse	No records provided.											
611	Pet Grooming Classroom	No records provided.											
640	Independent Living Apartments	No records provided.											
650	Dormitory/Duplex	No records provided.											
651	Dormitory/Duplex		X	X		X	X	X	X	X			
652	Dormitory/Duplex		X				X	X			X		
653	Dormitory/Duplex	No records provided.											
654	Dormitory/Duplex	No records provided.											
655	Dormitory/Duplex								X		X		
656	Dormitory/Duplex								X	X			
657	Dormitory/Duplex			X		X		X	X	X			
660	Elementary/Residence Office/Dormitory	No records provided.											

FIGURE 4–9 (CONTINUED)
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SUMMARY OF FIRE DRILLS PERFORMED
SCHOOL YEAR 2014–15

BUILDING	FACILITY	2014					2015						
		AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUNE	JULY
661	Dormitory	No records provided.											
662	Dormitory	No records provided.											
663	Dormitory	No records provided.											
664	Dormitory	No records provided.											
4801	Dormitory	No records provided.											

SOURCE: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired; April 2016.

and recovery; emergency operations planning; Mandt, a behavioral management program to mitigate and reduce the risk of injuries from student aggression; and first aid, cardiopulmonary resuscitation (CPR), and use of automated external defibrillators (AED). **Figure 4–10** shows training for TSBVI safety and security staff recorded by the Human Resources Department.

TSBVI lacks a formal training schedule for safety and security staff. Staff determine which trainings they want to attend and when. As shown in **Figure 4–10**, this results in security staff training that is limited and inconsistently attended. During this two-year period, crisis response and recovery training was attended by one staff, the safety officer. Each of the

five security officers has a different set of training, with one attending NEO and another one receiving first aid, CPR, and AED training.

An effective, formal professional development and training plan ensures security staff will remain up-to-date regarding security issues and methods. A professional development and training plan typically consists of clear guidelines for areas of improvement including goals, rationales, activities, milestones, resources, and a statement of consequences if there is no evidence of growth.

The Texas School Safety Center recommends training for security staff such as the 2016 Texas School-Based Law Enforcement

FIGURE 4–10
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED SAFETY AND SECURITY STAFF TRAINING
SCHOOL YEARS 2014–15 AND 2015–16

POSITION	NEO	ABUSE/ NEGLECT/ EXPLOITATION	BLOOD-BORNE PATHOGEN/ CHILD ABUSE IDENTIFICATION	CRISIS RESPONSE AND RECOVERY	EMERGENCY OPERATIONS PLANNING	MANDT	FIRST AID/ CPR/AED
Chief Financial Officer	X						
Director of Operations and Construction		X	X				
Security Manager		X				X	
Safety Officer		X	X	X	X		
Director of Planning and Evaluation		X	X				
Security Officer 1		X				X	X
Security Officer 2	X					X	
Security Officer 3							X
Security Officer 4	X						
Security Officer 5		X	X				X

NOTES: NEO=new employee orientation; EOP=Emergency Operations Planning; CPR=cardiopulmonary resuscitation; AED=automated external defibrillators.
SOURCES: Legislative Budget Board School Performance Review Team, Texas School for the Blind and Visually Impaired; June 2016.

Conference, which serves as a venue for school-based law enforcement officers, school personnel, and other educational stakeholders to expand their knowledge and skills.

TSBVI should compare the Security Department staff's skill sets against the school's needs and develop professional development plans and training schedules.

The director of operations and construction should meet with the superintendent and security manager to establish a

professional development and training plan. Additionally, the director should regularly evaluate the progress against the plan to determine needed adjustments to meet the school's changing security needs.

This recommendation could be implemented with existing resources, as the Security Department already has a professional development budget.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

RECOMMENDATION	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 4. FACILITIES AND SAFETY MANAGEMENT							
15. Develop and implement formal procedures for emergency drills.	$0	$0	$0	$0	$0	$0	$0
16. Compare the Security Department staff's skill sets against the school's needs and develop professional development plans and training schedules.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 5. BUSINESS SERVICES

Financial management involves planning, managing, and safeguarding financial resources. For the Texas School for the Blind and Visually Impaired (TSBVI), such functions include organization, management, and staffing; financial performance; planning and budgeting; administrative technology; accounting and payroll; cash management; internal audit; fixed asset management; risk management, and evaluation of contracting processes. Unlike other schools, TSBVI is a state agency and receives appropriations from the Legislature. The school uses state systems for accounting, payroll, and property management.

Effective financial management is dependent on organizational structure. Larger organizations typically have staff dedicated to financial functions, and smaller organizations, such as TSBVI, have staff with multiple responsibilities. Financial performance must be evaluated on an ongoing basis to ensure that TSBVI is meeting its financial goals and has the resources to meet its objectives.

Budget preparation and administration are critical to overall school operations. Budget activities include budget development, adoption, monitoring, amendment, and reporting. Administrative technology involves accounting systems and applications that enable the school to capture, authenticate, summarize, categorize, and report financial transactions and information.

Accounting and payroll processes ensure that the school pays its staff and vendors accurately and timely. Cash management provides the means to track, manage, and protect liquid assets, which consist of cash and cash equivalents such as certificates of deposit and money market securities. Effective cash management programs use efficient banking structures to manage cash and liquidity; employs a variety of cash management techniques; and maximizes investment earnings.

Fixed asset management functions identify and record fixed assets and establish policies and procedures to ensure that property is accounted for regularly and protected from loss and theft.

Risk management involves protecting physical assets and staff against losses arising from unforeseen events. Effective risk management employs strategies to mitigate the effects of

such losses. Such strategies could involve the retention of risks where the effects of losses can be absorbed, or they could involve transferring the risk where the potential for financial loss is too great to bear.
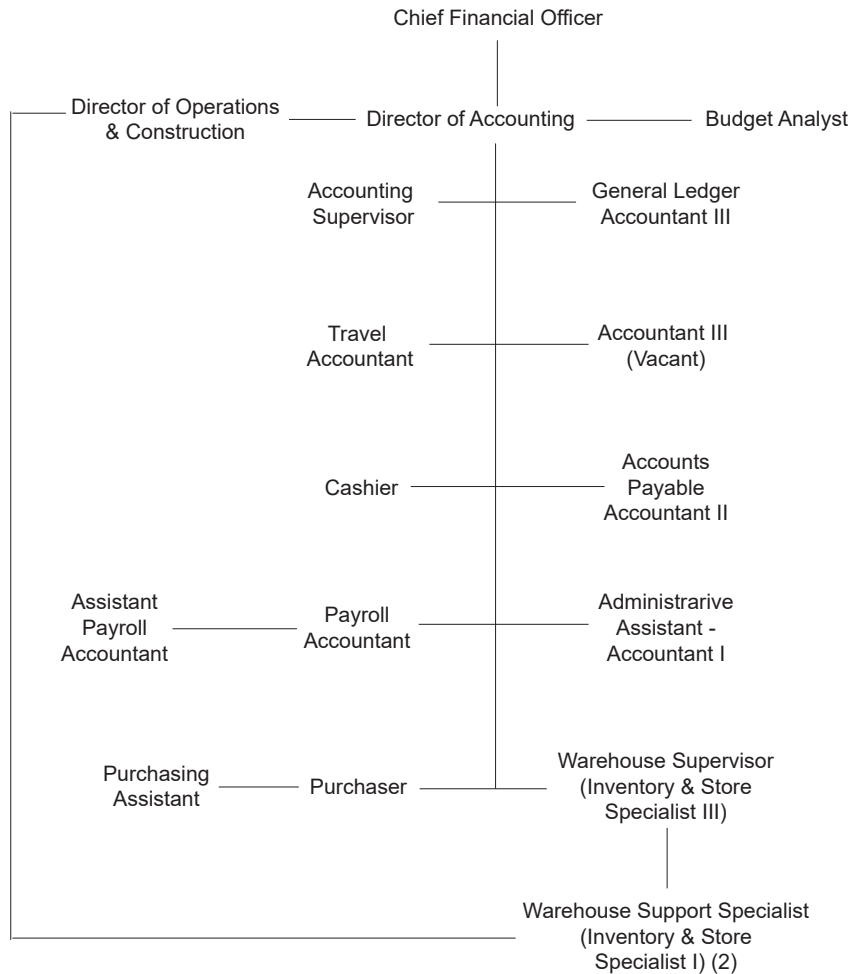
Organized management structures; competent, trained staff; strong internal controls; efficient technological systems; and timely information ensure that all of these functions are executed successfully.

TSBVI's chief financial officer (CFO) leads the Business Office, which executes most financial functions. Risk management, fixed asset management, and internal audit functions report to the director of school support services. The CFO reports directly to the superintendent and has been with TSBVI since March 2016. TSBVI's CFO is responsible for all accounting, budgeting, payroll, and purchasing functions. The director of accounting and the budget analyst report directly to the CFO. Including the CFO, the Business Office has 14 positions, one of which is vacant. **Figure 5–1** shows the Business Office organization.

TSBVI's purchasing function resides in the Business Office and includes a director of accounting, purchaser, and purchasing assistant. The purchaser performs the following duties:

- directs and coordinates all purchasing functions in accordance with the school's policies and procedures and requirements of the Texas Comptroller of Public Accounts, Statewide Procurement and Statewide Support Services divisions, and other relevant state agencies;

- advises and assists departmental staff regarding the proper procedure for obtaining merchandise or services through the spot purchase method;

- places timely departmental requisitions for merchandise or services;

- works to achieve established goals related to the school's use of historically underutilized businesses;

- establishes and maintains an effective order tracking system that aids in quickly identifying the status of all purchase orders;

FIGURE 5–1
BUSINESS OFFICE ORGANIZATION
SCHOOL YEAR 2015–16

SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

- documents receipt of merchandise or service and forwards receiving reports to the accounts payable accountant for payment processing; and

- manages TSBVI's procurement card program, including verifying monthly statements from the procurement card provider by reconciling to the cardholder's purchase logs and supporting receipts.

The purchasing assistant's responsibilities include the following:

- places orders for merchandise on contract with the state or on an open market status;

- implements established operational procedures for the purchasing function;

- answers inquiries from staff and vendors associated with outstanding or completed orders;

- provides assistance and information to other staff regarding purchasing procedures and guidelines; and

- updates purchase orders and requisitions to reflect information from receiving reports and submits these reports to the accounts payable accountant.

Additionally, three warehouse staff—a warehouse supervisor and two warehouse support specialists—have some purchasing duties. Warehouse staff reorder a limited number of supplies as needed. The warehouse supervisor reports to the director of operations and construction.

TSBVI receives appropriations from the Legislature and uses state systems for accounting, payroll, and property management. As a state agency, TSD is subject to the state's budget process, which occurs on a two-year cycle. After the Legislature makes biennial appropriations, each state agency prepares and files itemized operating budgets with the Office of the Governor, Budget Division, and the Legislative Budget Board by December 1 of each fiscal year.
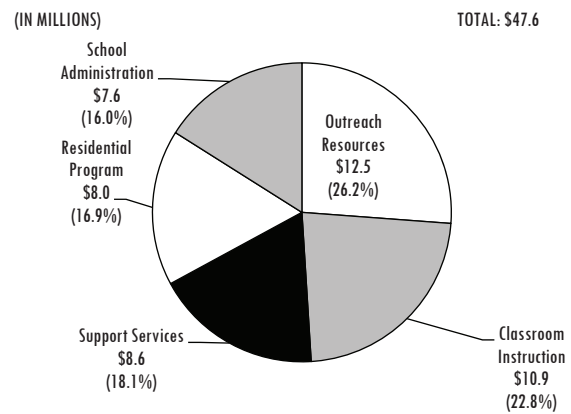
For the 2016–17 biennium, TSBVI was appropriated $47.6 million in All Funds, with 80.0 percent of its funding from state appropriations. **Figure 5–2** shows TSBVI's biennial appropriations for 2014–15 and 2016–17 by method of finance.

Figure 5–3 shows the total appropriations for TSBVI by program. Outreach resources and classroom instruction make up 49.0 percent of appropriations, and support services, residential programs, and school administration make up the remaining 51.0 percent.

Figure 5–4 shows TSBVI's actual revenues and expenditures for fiscal years 2013 to 2015. From fiscal year 2013 to 2015, TSBVI's revenues increased 14.2 percent from $25.3 million to $28.9 million. During the same period, expenditures increased 4.3 percent from $30.1 million to $31.4 million.

The Texas Education Code, Section 30.003, requires local school districts that place students at TSBVI to share the cost of educating those students. The local district's share per student equals the dollar amount of maintenance and debt service taxes imposed by the district for the year divided by the average daily attendance in the district for the preceding year. The Commissioner of Education deducts the amount owed from funding from the Foundation School Fund payable to the district. Districts that do not receive these payments for students placed at TSBVI remit payment to the Commissioner of Education, who forwards it to TSBVI. These funds are appropriated to the school as Appropriated Receipts; these funds totaled $825,988 for school year 2014–15.

FIGURE 5–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED APPROPRIATIONS BY PROGRAM, 2016–17 BIENNIUM

(IN MILLIONS)   TOTAL: $47.6

School Administration $7.6 (16.0%)
Residential Program $8.0 (16.9%)
Outreach Resources $12.5 (26.2%)
Support Services $8.6 (18.1%)
Classroom Instruction $10.9 (22.8%)

SOURCE: Legislative Budget Board, Fiscal Size-Up, 2016–17 Biennium, May 2016.

TSBVI is also eligible to apply for federal funding pursuant to the U.S. Elementary and Secondary Education Act, Title I. Title I funds provide funding to local school districts to improve the academic achievement of disadvantaged students. Students are classified as disadvantaged if they are from low-income families, are in foster homes, are neglected, are delinquent, or if their families receive temporary assistance from state governments. Title I funds are appropriated to the school as Federal Funds; these funds totaled $22,226 for school year 2014–15.

TSBVI maintains seven bank accounts consisting of five checking accounts, a money market account, and an investment pool account. In addition, TSBVI has three certificates of deposit. As of December 2015, a total of $969,673 was on deposit in these accounts. **Figure 5–5** shows TSBVI's deposit accounts.

FIGURE 5–2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED APPROPRIATIONS BY METHOD OF FINANCE 2014–15 AND 2016–17 BIENNIA

(IN MILLIONS)

METHOD OF FINANCE	EXPENDED/BUDGETED 2014–15	APPROPRIATED 2016–17	BIENNIAL CHANGE	PERCENTAGE CHANGE
General Revenue Funds	$29.2	$29.0	($0.2)	(0.5%)
General Revenue–Dedicated Funds	$0.0	$0.0	$0.0	N/A
Federal Funds	$9.5	$9.6	$0.0	0.5%
Other Funds	$11.7	$9.0	($2.7)	(22.9%)
Total, All Methods of Finance	**$50.4**	**$47.6**	**($2.8)**	**(5.5%)**

SOURCE: Texas School for the Blind and Visually Impaired, fiscal year 2016 Operating Budget, March 2016.

FIGURE 5–4
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED REVENUES AND EXPENDITURES
FISCAL YEARS 2013 TO 2015

		(IN MILLIONS)		
CATEGORY	2013	2014	2015	PERCENTAGE CHANGE 2013 TO 2015
Total Revenue	$25.3	$30.3	$28.9	14.2%
Total Expenditures	$30.1	$30.3	$31.4	4.3%
Excess (Deficiency) Revenues over Expenditures	($4.8)	($0.0) (1)	($2.5)	47.9%
Other Sources (Uses)	($3.1)	$1.4	$1.3	141.9%
Net Change in Fund Balance	($1.7)	$1.4	$1.2	170.6%
Beginning Fund Balance	$3.9	$3.5	$4.9	25.6%
Ending Fund Balance	$3.5	$4.9	$3.1	(11.4%)

NOTE:
(1)   The actual deficiency amount for fiscal year 2014 was $7,174.
SOURCE: Texas School for the Blind and Visually Impaired, Annual Financial Reports, 2013 to 2015.

FIGURE 5–5
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED CASH AND INVESTMENT ACCOUNT BALANCES
DECEMBER 2015

ACCOUNT	TYPE	PURPOSE	BANK	AMOUNT AS OF DECEMBER 31, 2015
Legacy Fund	Checking	Main fund for Legacy receipts and disbursements	ABC Bank	$10,731
Legacy Money Market	Money Market	Holds excess Legacy Funds in short-term investments.	ABC Bank	$322,255
Legacy Petty Cash	Checking	Revolving fund for Legacy petty cash.	ABC Bank	$563
Student Activity	Checking	Holds funds collected through fund raising, grants, and donations to support student activities and organizations.	ABC Bank	$31,673
Student Trust	Checking	Funds held in trust on behalf of residential students to provide for extracurricular activities.	ABC Bank	$8,378
Travel Advance	Checking	To provide travel cash advances to staff travelling on behalf of the Texas School for the Blind and Visually Impaired.	ABC Bank	$7,365
Legacy Investments – CD	Three Certificates of Deposit	Holds excess Legacy Funds in short-term investments.	First National Bank of Bellville	$580,000
Legacy Investments – Pool	Investment Pool	Holds excess Legacy Funds in short-term investments.	Texas Class	$8,708
Total Cash and Investments				**$969,673**

SOURCE: Texas School for the Blind and Visually Impaired, December 2015.

TSBVI prepares a separate budget for its Legacy Funds. The revenues for the Legacy Fund come from bequests, farm income, mineral royalties, donations, and investment income. A regular source of legacy revenue comes from the Bert Broday, Jr., Trust, which was established for the benefit of TSBVI and provides quarterly payments of approximately $194,000 to the Legacy Fund. As of June 30, 2015, the Broday trust had a value of approximately $20.6 million.

These funds are expended on behalf of programs and activities for TSBVI students that are not supported through state or federal appropriations. For example, TSBVI funds its

transportation program through the Legacy Fund. The fiscal year 2016 Legacy Fund budget totaled approximately $1.3 million, and the fiscal year 2015 budget totaled approximately $1.7 million. **Figure 5–6** shows the Legacy Fund's five largest expenditures for fiscal year 2015.

FIGURE 5–6
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
LEGACY FUNDS FIVE LARGEST EXPENDITURES
FISCAL YEAR 2015

EXPENDITURE	AMOUNT
Contingency for Construction Projects	$325,382
Weekend Home Travel	$247,102
School Bus and Vehicle Purchases	$158,812
Athletics and Ski Trip	$66,542
Parent Involvement/Home Visits	$45,968

SOURCE: Texas School for the Blind and Visually Impaired, Legacy Fund Budget Report, fiscal year 2015.

TSBVI uses several software applications to support Business Office operations. As required by the state, TSBVI uses the Uniform Statewide Accounting System (USAS) is as its general ledger and accounts payable system. TSBVI processes payroll using the Uniform Statewide Payroll/Personnel System (USPS). Fixed assets are accounted for using the Statewide Property Accounting (SPA) system.

In addition to these statewide systems, TSBVI uses Micro Information Products (MIP), a third-party accounting system as its internal general ledger. Transactions are entered into MIP, then uploaded to USAS. MIP provides reports and functionality not available in USAS. TSBVI also uses accounting software to record student trust fund transactions and to track curriculum sales. TSBVI uses word-processing software and spreadsheet software to support various accounting and reporting activities.

The Texas Comptroller of Public Accounts is implementing a new enterprise resource planning system statewide. The Centralized Accounting and Payroll/Personnel System (CAPPS) will integrate activities across a common platform that will enable users to enter information once and access it through other accounting functions. CAPPS is expected to streamline business operations; make transaction accounting more flexible, accurate, and automated; and improve reporting. TSBVI is scheduled to transition to CAPPS during fiscal year 2018.

FINDINGS

♦ TSBVI'S cashier's office lacks efficient and effective business processes and security protocols.

♦ TSBVI has not maximized the capabilities of its internal accounting system.

♦ TSBVI lacks effective internal controls for vendor master files.

♦ TSBVI does not adequately segregate the responsibilities of staff overseeing the school's Legacy Fund.

♦ TSBVI lacks sufficient payroll audit procedures.

♦ TSBVI does not use available technology to improve payroll processing efficiency.

♦ TSBVI's Business Office lacks sufficient cross-training.

♦ TSBVI's Business Office lacks documented, desk-level procedures that describe how critical tasks are to be performed.

♦ TSBVI's annual fixed assets inventory process is inefficient and lacks sufficient accountability.

RECOMMENDATIONS

♦ **Recommendation 17: Review cash-handling practices to eliminate inefficient tasks, and provide tighter security for the cashier's office.**

♦ **Recommendation 18: Maximize the capabilities of the school's internal accounting software by using the system to print checks, record transactions, and reconcile bank accounts.**

♦ **Recommendation 19: Limit staff access to add vendors to the USAS and MIP vendor databases.**

♦ **Recommendation 20: Segregate incompatible duties regarding Legacy Funds to further strengthen internal controls and reduce the risk of misappropriation of funds.**

♦ **Recommendation 21: Formalize the payroll audit process to increase its value and enhance its usefulness.**

♦ **Recommendation 22: Explore opportunities to enhance payroll efficiency by eliminating paper timesheets for substitutes and authorizing substitutes to use the electronic timesheet system.**

♦ **Recommendation 23: Accelerate cross-training for essential Business Office functions.**

♦ **Recommendation 24: Develop uniform, comprehensive desk-level procedures structured for the Business Office's unique environment and detailed enough to use for staff training purposes.**

♦ **Recommendation 25: Identify a fixed asset custodian for each department, and automate the physical inventory process.**

DETAILED FINDINGS

CASHIER'S OFFICE (REC. 17)

TSBVI's cashier's office lacks efficient and effective business processes and security protocols.

The cashier's office is located in the school's Administration Building. The school has one main cashier and a backup cashier who has other Business Office duties. The cashier's office is responsible for receipting all funds received through the mail or brought directly to the cashier's office. The cashier processes checks daily from a variety of sources for deposit into the school's bank accounts. Deposits are from a variety of sources such as fundraisers, trust fund deposits, petty cash reimbursements, travel advance deposits, deposits from student activities, and other sources.

Other key tasks of the cashier include the following:

• serving as receptionist for the Business Office and Information Resources Department (due to the proximity of the cashier's office to these departments);

• processing deposits and withdrawals of student trust funds and student worker checks;

• reconciling and replenishing petty cash drawer;

• processing credit card charges for curriculum sales;

• distributing payroll checks; and

• collecting and counting cafeteria deposits for treasury deposit.

During an onsite review, the Legislative Budget Board's School Performance Review team observed several inefficient cashiering and cash-handling processes in the cashier's office. **Figure 5–7** shows a summary of the observed processes along with their related outcome.

The cashier's office also does not use remote deposit capture technology to streamline bank deposits. The cashier uses traditional bank deposit slips to make deposits to TSBVI's bank accounts. These deposit slips have to be physically carried to the bank. Effective organizations scan and process checks electronically. Scanned images have the same legality as paper checks. By not using remote deposit capture technology, TSBVI is missing an opportunity to expedite cash handling, improve cash flow, reduce the risk of loss, and eliminate deposit-based fraud.

The security protocols in the cashier's office are also lacking. For example, several staff who do not require access for their job duties have access to the cashier's office and safe. According to the accounting supervisor, approximately $1,000 is kept in the safe for petty cash, and approximately $750 is kept on hand related to student trust accounts. Providing unauthorized

FIGURE 5–7
OBSERVED CASH HANDLING PRACTICES AT TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
MARCH 2016

PROCESS	OUTCOME
Cashier's office lacks an online payment mechanism for vendors and parents to send money to school for payments and deposits into student trust accounts	Time-consuming system of processing and depositing checks
Cashier's office lacks a process to remotely deposit checks into bank accounts	Inefficient use of staff time to prepare deposits and travel to the bank daily to make deposits into accounts
Copying cash and filing it with receipts for supporting documentation	Inefficient process and unnecessary work for the cashier
Hand-writing travel reimbursement checks and typing certain Legacy Fund checks using a paper checkbook	Manual process is inefficient and requires additional work for staff in the Business Office
Delivery of money to the cashier that is set aside to be counted and receipted later in the day	Increases the risk for misappropriation or loss of funds
Use of separate receipt books for each type of fund received	Requires extra staff time to maintain numerous receipt books

Sources: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired, March 2016.

staff access to areas where cash and checks are stored increases the risk of theft. Additionally, check stock for the school's Legacy Fund is stored under a desk instead of being secured in the safe in the cashier's office.

TSBVI should review cash-handling practices to eliminate inefficient tasks, and provide tighter security for the cashier's office. The CFO should instruct the director of accounting to review each of the areas outlined in **Figure 5–7** and develop a more efficient approach. For example, TSBVI should investigate implementing an online payment mechanism that enables vendors and parents to pay bills and make deposits to student trust funds, thereby eliminating the need for processing many of the checks in the cashier's office. TSBVI should also investigate implementing remote deposit capture technology, which will decrease the number of necessary daily trips to make deposits at various back accounts. The director of accounting also should direct the cashier to cease making copies of cash and receipts. The director of accounting should review the process of handwriting and typing checks to determine if it is more efficient to process these transactions through an automated system. Regarding cash handling, the director of accounting should establish effective cash handling procedures which require that the cash deposited with the cashier is verified and witnessed immediately, after which a receipt is provided to the depositor and a copy maintained by the cashier.

Instead of using separate receipt books for each type of fund received, the director of accounting directs the cashier to use one generic receipt book with a field to describe the type of funds (e.g., Legacy, student activity, travel). The CFO should direct the director of accounting to review who has access to the cashier's office to ensure that only necessary staff have access to the office and its contents. The director of accounting should ensure that all Business Office staff understand and adhere to strict access protocols.

Since the time of the onsite review, TSBVI has hired a new director of accounting and cashier. TSBVI has reorganized the cashier's office and changes have been made to the cash handling process.

The fiscal impact for this recommendation is $480. This recommendation assumes that TSBVI will spend $40 a month for an online check deposit service ($40 x 12 months =$480). This amount is based on a local bank that charges $40 per month for the check scanner and training for the cashier and the backup. Additionally, depending on the management assessment of the feasibility of implementing an

online payment mechanism, an additional fiscal impact may occur that cannot be determined at this time. No additional fiscal impact is assumed related to the savings from increased job efficiency and fuel savings from fewer trips to the bank cannot be estimated.

MAXIMIZING ACCOUNTING SOFTWARE CAPABILITIES (REC. 18)

TSBVI has not maximized the capabilities of its internal accounting system.

Micro Information Products (MIP) is a fund accounting software system that functions as TSBVI's internal general ledger to maintain budgets, generate purchase requisitions, process accounts payable vouchers, and generate transaction and financial reports. However, MIP has many functions that TSBVI is not using, leading to inefficient business practices.

For example, the school uses commercial accounting software and spreadsheet software to capture, organize, and report financial data that would be more effectively managed using its MIP accounting system. TSBVI uses MIP to record Legacy Fund, student activity fund, and travel disbursements. However, the checks for these disbursements are prepared outside of the MIP system using three-to-a-page checks, which are either hand written or typed on a typewriter. In addition, the cashier uses QuickBooks to account for student trust fund checks, which are also written by hand using three-to-a-page checks. MIP can print checks and track expenditures from all local accounts, but the Business Office staff are not using these functions. MIP also has a bank reconciliation module that TSBVI is not using. Instead, the administrative assistant accountant I uses a spreadsheet to reconcile the bank accounts.

TSBVI develops educational curricula for blind and visually impaired students and sells them through the Curriculum Department. The Curriculum Department processes incoming orders. When the Business Office receives the funds, the assistant payroll accountant processes the receipts and forwards them to the cashier who prepares the deposit and records the sale in QuickBooks. This process could be completed in MIP using the program's ability to account for cash receipts from curriculum sales and other types of revenue, such as receipts from students' home school districts.

Another example of underutilization of MIP for budget purposes involves grant expenditure budget reports. The payroll accountant prepares grant budget reports using

voucher source documents instead of MIP expenditure reports, which can be readily produced from the system. Then the payroll accountant reconciles the spreadsheet to a report generated by the central accounting system for the State of Texas, known as the Uniform Statewide Accounting System (USAS). The budget analyst uses MIP expenditure reports to generate reports not related to grant budgets. The payroll accountant could use similar MIP reports to generate grant budget reports. Preparing such reports from source documents and then reconciling them to USAS reports is inefficient and does not use the full reporting capabilities of the MIP system.

TSBVI should maximize the capabilities of the school's internal accounting software by using the system to print checks, record transactions, and reconcile bank accounts. The CFO should conduct a review of MIP capabilities that are not being used or are underutilized. TSBVI should discontinue printing checks outside of the system and begin using the MIP system instead of a spreadsheet to reconcile bank accounts. The CFO also should direct the payroll accountant to use MIP budget reports to prepare grant budgets rather than preparing grant budgets in spreadsheets from source documents. TSBVI should also research and consider strategies to maximize the use of technology to automate tasks that are being manually performed.

Since the time of the onsite review, the school indicates that they are using MIP for bank reconciliations and are working with the vendor to implement all available modules in the MIP system.

This recommendation could be implemented with existing resources.

INTERNAL CONTROLS (REC. 19)

TSBVI lacks effective internal controls for vendor master files.

The accounts payable accountant II, administrative assistant accountant I, and the travel accountant positions are involved in processing various types of payments. Each of these staff is able to set up a vendor on at least one system, USAS or MIP. The accounts payable accountant II position has the capability to enter vendors into USAS and MIP. The accounts payable accountant II processes the bulk of TSBVI's vendor invoices using a three-way match system wherein the vendor's invoice is matched to an authorized purchase order and evidence of receipt. The accounts payable accountant II

processed 1,423, 2,137, and 2,350 accounts payable vouchers in fiscal years 2013, 2014, and 2015, respectively.

In addition, the accounts payable accountant II processes interagency vouchers for transactions with other state agencies, such as payments to the Texas Department of Public Safety for background checks performed on behalf of TSBVI. Finally, the accounts payable accountant II processes requisitions against the school's Legacy Fund, which consists of donations and endowed funds administered by the board for the benefit of students. For example, using Legacy Funds, an MIP voucher would be used to pay for chartered bus services on behalf of the Weekends Home program.

The administrative assistant accountant I also performs data entry into the USAS and MIP systems and processes student activity fund vouchers, Legacy Fund requisitions to reimburse parent mileage, and travel reimbursements. The administrative assistant accountant I can set up a vendor on the MIP system, but not on USAS.

The travel accountant processes payment vouchers related to staff and student travel. The travel accountant also processes vouchers to pay the travel expenses and fees of mentors and speakers contracted by the Outreach Department.

Effective organizations restrict the ability to establish vendors for payment to their purchasing department. This restriction is necessary for proper segregation of duties. Best practices do not authorize the staff or department who pays a vendor to also enter the vendor into the system. Although mitigating controls, such as the requirement that a second staff must release the voucher for payment, may be included in the process, proper segregation of duties should always be maintained.

Accounts Payable Now and Tomorrow is an organization that promotes best practices in the accounts payable field. The organization published 101 Best Practices for Accounts Payable on its website. One best practice cited is to limit access to the vendor master file. The practice states that staff with access to the vendor master file should not perform any other tasks in the procure-to-pay functions to hinder the possibility of defrauding the organization. They cite as a worst practice allowing accounts payable processors to add vendors to the master file whenever it seems necessary.

TSBVI should limit staff access to add vendors to the USAS and MIP vendor databases. The purchasing function should establish new vendors in cooperation and consultation with the accounts payable function. The CFO should review the

access controls of each staff who has the ability to set up a new vendor in the system. The CFO should meet with appropriate staff from the Information Resources Department to determine how to restrict the ability of those with payment responsibilities from adding new vendors to the systems. The CFO, in consultation with Information Resources Department, should develop a means of detecting and reporting when a new vendor has been established on the USAS and MIP systems.

This recommendation could be implemented with existing resources.

LEGACY FUND CONTROLS (REC. 20)

TSBVI does not adequately segregate the responsibilities of staff overseeing the school's Legacy Fund.

TSBVI maintains a Legacy Fund, which is used to pay for programs and activities that benefit students not supported through federal or state appropriations. Legacy Fund revenues come from bequests, farm income, mineral royalties, donations, and investment income. TSBVI has established a separate budget and bank account to administer Legacy Funds.

TSBVI staff authorized to expend Legacy Funds submit requisitions to the Business Office. Depending on the nature of the requisition, either the administrative assistant accountant I, travel accountant, or accounts payable accountant II will process the requisition. These positions process the following Legacy Funds:

- administrative assistant accountant I – parent mileage reimbursements; contract positions who provide after-school music instruction; and procurement card legacy charges;

- travel accountant – student travel; and

- accounts payable accountant II – all other expenses.

TSBVI's compensating controls include supervisory review, expenditure approval, and bank reconciliations. However, duties regarding the Legacy Fund are not segregated because of the duties assigned to the administrative assistant accountant I. This staff establishes vendors in the MIP system, writes Legacy Fund checks, and reconciles the Legacy Fund bank account.

TSBVI's internal auditor conducted an audit of legacy funds and issued a June 2015 report. Although the audit concluded that overall controls provide reasonable assurance that Legacy Fund revenues and expenditures are accounted for and

reported accurately, some issues were noted. For example, the report stated that "separation of duties is expected to improve as open positions in the Business Office are filled and new staff can be trained." At the time of the onsite review, this issue had not been corrected.

Segregation of duties is a well-established principle in the accounting and auditing field. It states that no one staff should have access to all phases of a business process or transaction. When segregation of duties is absent, the risk exists that staff could execute, conceal, and continue perpetrating fraud on an organization. The result could be not only loss of financial resources, but also impairment of an organization's reputation. This result is particularly significant for an entity such as TSBVI, which is considered by the public as a safeguard of the state's resources for the benefit of blind and visually impaired students.

TSBVI should segregate incompatible duties regarding Legacy Funds to further strengthen internal controls and reduce the risk of misappropriation of funds. The CFO should review and reassign the duties of the administrative assistant accountant I. The CFO should assign another staff to reconcile the Legacy Fund bank account if the administrative assistant accountant I prints and records Legacy Fund checks. Additionally, the CFO should review the previous issues noted by the internal auditor and implement solutions to address outstanding items.

This recommendation could be implemented with existing resources.

PAYROLL AUDIT (REC. 21)

TSBVI lacks sufficient payroll audit procedures.

In 2014, a former payroll accountant fraudulently increased her pay by understating her leave without pay (LWOP) hours. TSBVI responded by establishing an audit procedure designed to verify hours against source documents such as the Payroll Exception Notice (PEN) and Personnel Action Forms (PAF). TSBVI uses an exception payroll, which means that salaried staff are paid the same amount except in certain cases. Timekeepers use PEN and PAF forms to document payroll exceptions that either increase or decrease staff's pay. Examples include LWOP, changes in shift pattern, changes in staff status, and extra work hours.

TSBVI uses a web-based time and attendance reporting system known. Each day, staff must enter their information into the system. Nonexempt staff enter hours worked and leave taken, and exempt staff enter only leave taken.

Supervisors are responsible for approving staff timesheets in the system. Timekeepers assigned to each department are responsible for ensuring that staff submit and supervisors approve timesheets each week.

Staff who wish to be on LWOP must request time off no less than 14 days before the absence, except in justifiably extenuating circumstances. Timekeepers working with staff are responsible for predicting LWOP by the tenth day of the month in which the LWOP will be taken. After the tenth day of the month, the timekeeper enters changes to the predicted LWOP into the attendance reporting system and notifies the Human Resources Department and payroll function of the changes in LWOP hours.

From August 2009 to February 2014, a former payroll accountant reported LWOP for all except three months. However, instead of reducing her monthly salary by the amount of LWOP incurred during the month, the payroll accountant carried it forward to reduce a future month's salary. This practice had occurred from 2009 to 2014. During this time, the Business Office was not adequately monitoring or tracking LWOP.

In 2014, TSBVI's internal auditor conducted a payroll processing audit of August 2014 and December 2013 payroll records. The January 2015 internal audit report concluded that "The payroll fraud at TSBVI was indicative of an apparent failure of management to properly supervise and provide oversight of the payroll accountant and her work activities."

In response, TSBVI implemented the following changes to payroll processing:

- assigned the general ledger accountant III to audit the payroll by comparing the final payroll report to PEN and PAF forms and substitute timesheets; this verification ensures, for example, that the LWOP reflected on the PEN form has been deducted from the employee's pay;

- assigned the director of accounting to review and verify changes to the payroll of Business Office, Information Resources, and Security Department staff; and

- required the current payroll accountant to verify amounts charged to the various payroll accounts before the final payroll is released into USAS each month.

These manual controls were necessary because automated system controls are not available in the USPS payroll system. However, the additional manual controls implemented to strengthen controls for payroll require improvement. First, when performing the payroll audit, the general ledger accountant III does not use a standard audit program or checklist indicating what is being checked or verified. Such a form would standardize the verification process, document the steps, and make the payroll audit consistent from month to month.

Next, the general ledger accountant III records findings by hand in a notebook, and the writing is difficult to decipher. TSBVI has no tracking or classification system for findings; therefore, management cannot identify which types of errors are reoccurring or how often.

After each payroll audit, the general ledger accountant III shares the findings with the payroll accountant for disposition. The payroll accountant gives verbal instructions on how the discrepancies are to be resolved, but does not provide any written documentation that would allow the payroll auditor to independently determine if the instructions are the correct course of action and to establish an audit trail.

The payroll auditor's findings are not formally shared with management to ensure proper supervision, monitoring, and oversight of the payroll verification process. **Figure 5–8** shows an example of payroll audit findings and shows how disorganized and difficult these logs are to decipher.

Best practices for auditing transactions involve having a planned and structured audit approach and neatly documented working papers to support findings and conclusions. Professional auditors typically use audit programs to achieve this objective and to clearly define the nature and purpose of the verification process. Moreover, best practice dictates that when an audit process is performed within a department, there is always another level of review and approval performed by a knowledgeable staff independent of the process. The reviewer should be able to identify errors and omissions. The reviewer should document approval to verify that a review has been conducted.

TSBVI should formalize the payroll audit process to increase its value and enhance its usefulness. The CFO should develop a more structured and targeted audit program along with a findings classification system so that errors can be tracked and categorized. The CFO should require the general ledger accountant III to develop and adopt work paper standards to promote completeness, order, and legibility to support results. The general ledger accountant should share findings with the payroll accountant and should document responses so that department management can be apprised of action

FIGURE 5–8
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED PAYROLL AUDIT LOG
FEBRUARY 3, 2016

Source: Texas School for the Blind and Visually Impaired, February 2016.

taken on each finding. The CFO should direct the director of accounting to work with the payroll accountant and the general ledger accountant III to develop a more formal, structured payroll audit process that incorporates these elements. As an additional control, the CFO should formalize a process for the timekeepers for each department to review and approve timesheets, including time off and LWOP, before their submission to the Payroll Department. The director of accounting should present a draft of the plan to the CFO for review, feedback, and approval. The CFO should adopt the final plan, and approve implementation of the new payroll audit process.

Since the time of the onsite review, the school indicates they implemented new steps related to the payroll review and approval process. Another accountant verifies the data entry

of payroll prior to submission to the director of accounting for final approval.

This recommendation could be implemented with existing resources.

SUBSTITUTE TIMESHEETS (REC. 22)
TSBVI does not use available technology to improve payroll processing efficiency.

Although TSBVI cannot alter USPS, the statewide payroll system, internal processes around the USPS system can be improved to make payroll processing more efficient.

The amount of an exempt staff's pay is the same each month unless their pay is adjusted for LWOP. This condition occurs when staff has taken off during the pay period and does not have sufficient vacation or sick leave to cover the absence. All

salaried staff must account for eight hours each day as either working, on leave, or on LWOP. Salaried staff enter their time manually using the time and attendance reporting system. The information from this system is then uploaded into USPS to process the payroll.

USAS and the attendance reporting system keep track of staff leave balances. If a staff has exhausted their leave, the department timekeeper sends a PEN form to the Business Office to notify the payroll accountant to reduce the staff's pay. The PEN form shows regular hours worked, leave used, extra hours worked, LWOP hours, and overtime and compensatory time earned. Substitutes, who are hourly staff, do not use the web-based timekeeping system; they use a paper timesheet that department timekeepers must manually enter into USPS.

Using paper timesheets increases the chance of human error and adds increased time and effort into the accounts payable process.

TSBVI should explore opportunities to enhance payroll efficiency by eliminating paper timesheets for substitutes and authorizing substitutes to use the electronic timesheet system. Even after paper timesheets are eliminated, review, approval, and timesheet corrections would still need to occur. The CFO should instruct the director of accounting to explore options and challenges for allowing substitutes to use the Clockwise System. The director of accounting should determine the feasibility of substitutes using the automated timekeeping system and should develop written procedures to document any necessary new tasks and processes. If substitutes begin using the automated system, the director of accounting should assess staff training needs and implement a training program for existing staff, including the department timekeepers, Human Resources and payroll staff, and substitutes.

This recommendation could be implemented with existing resources.

CROSS-TRAINING JOB FUNCTIONS (REC. 23)

TSBVI's Business Office lacks sufficient cross-training.

No staff in the Business Office are sufficiently trained as backups to perform the duties of the payroll accountant, accounts payable accountant II, accounting supervisor, budget analyst, or the travel accountant. These positions have 116 years of combined experience at TSBVI.

The payroll accountant has been with the school for approximately 11 years and is responsible for processing payroll through USPS. The accounts payable accountant II has been with the school for 34 years and works extensively with USAS to process most of the school's payment vouchers. The accounting supervisor has also been with the school for 34 years and is the primary custodian of the USAS and USPS systems. The budget analyst has been with the school for 22 years, and has responsibility for compiling and administering general and grant fund budgets, preparing reports for budget managers, reconciling MIP and USAS activity, and managing receivables from students' home school districts. The travel accountant has been with TSBVI for 15 years and is primarily responsible for processing TSBVI staff travel vouchers.

The CFO and the director of accounting recognize the lack of cross-training in the Business Office and are attempting to resolve the problem. In October 2015, the payroll accountant began training a staff as a payroll assistant. However, at the time of the onsite review, the staff was not fully trained to perform the entire payroll function. The accounts payable accountant II has been training another Business office staff member since summer 2015. No process is in place to cross-train any staff to perform the duties of the accounting supervisor, budget analyst, or travel accountant positions.

Business Office staff typically handle discrete tasks related to their positions. Deficiencies in cross-training increase the risk that critical processing could be delayed or performed inaccurately if staff are absent or unable to perform their duties. The lack of sufficient cross-training could result in a disruption of service in the Business Office due to the long tenure of staff in critical positions. Effective cross-training ensures that critical functions would continue when staff who regularly perform the tasks are unavailable or leave the organization.

The Houston Chronicle published an article stating the benefits of cross-training, which enables staff to become more valuable members of the team and increases productivity. The article includes the following cross-training steps:
- ask staff to list their essential job functions;

- ascertain from the management team whether cross-training should be departmental or interdepartmental;

- work with each staff to help them learn a coworker's job, and encourage them to take detailed notes, which should be transcribed, documented, and maintained on a shared drive; and

- pair new staff with veteran staff, and have newcomers cycle through several different departments or units within the same department.

TSBVI should accelerate cross-training for essential Business Office functions. The assistant payroll accountant and the Purchasing Department staff who assists the accounts payable accountant II should complete their cross-training so that they can fully perform the duties of their respective peers. TSBVI should also ensure that the critical job functions of the accounting supervisor, budget analyst, and travel accountant are covered through cross-training. The CFO and the director of accounting should identify all of the critical functions in the department that require cross-training. The CFO and director of accounting should develop a cross-training matrix identifying critical functions and the staff to be cross-trained on those functions. The CFO and director of accounting should implement the cross-training steps outlined above to develop and implement a cross-training program. The CFO and director of accounting should ensure that the cross-training program is updated as necessary to accommodate new staff or changes in operating procedures.

Since the time of the onsite review, the school indicates they have implemented cross training initiatives across positions in the TSBVI Business Office.

This recommendation could be implemented with existing resources.

DESK-LEVEL PROCEDURES (REC. 24)

TSBVI's Business Office lacks documented, desk-level procedures that describe how critical tasks are to be performed.

TSBVI has a variety of general procedures but lacks narrowly defined, tactical, desk-level procedures that can be used to train new staff or cross-train existing staff. Existing procedures are not uniform and, in some instances, are too general to be considered desk-level procedures or detailed enough to be instructive. For example, the Fiscal Management Division of the State Comptroller of Public Accounts maintains various resources on its Fiscal Management System (FMS) website as a reference guide for agencies. The information on the FMS provides TSBVI with the information necessary to comply with the Comptroller's guidelines and for processing payroll using the statewide payroll system, USPS. However, the procedures are not a substitute for detailed desk-level payroll processing procedures tailored to TSBVI's unique environment. TSBVI maintains the following Business Office procedures:

- USPS Payroll System Monthly Procedures;

- Budget Procedures Manual;

- annual property inventory procedures;

- purchasing policies and guidelines;

- encumbrance processing/encumbrance system procedures;

- procurement card procedures; and

- Cashier's Office Employee Handbook for Advances and Reimbursements Check Writing/Other Duties, which is detailed and substantially meets the standard for desk-level procedures.

Although these procedures contain broad steps for the indicated processes, they are insufficient for desk-level procedures because they communicate what should be done, but do not describe how the task is to be completed. **Figure 5–9** shows an excerpt from the USPS Payroll System Monthly Procedures.

Without sufficient, detailed desk-level procedures, TSBVI risks not being in compliance with laws or reporting standards whenever new requirements are introduced at the state or federal level. For example, legislation enacted by the Eighty-fourth Legislature, 2015, requires all agencies to post all contracts with outside vendors on their websites. TSBVI does not have a process to ensure that all TSBVI contracts are disclosed on the school's website. At the time of the onsite review, TSBVI's website did not list any contracts with outside vendors.

Without detailed desk-level procedures, TSBVI lacks an effective tool to train and cross-train staff. Moreover, if knowledgeable, long-tenured staff leave the school or are unable to perform their duties, institutional knowledge and step-by-step procedures of how to perform critical tasks could be lost.

Effective desk-level procedures provide detailed steps, screen shots, and specific instructions on how critical tasks are done. Not every discrete task in a function can be discussed to the prescribed level of detail. However, it is essential that the critical processing steps for the most important areas be enumerated and explained in detail.

MindTools is a website that provides resources to help professionals enhance their skills. The site offers the following best practices for developing effective desk-level procedures:

FIGURE 5–9
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED, UNIFORM STATEWIDE PAYROLL/PERSONNEL SYSTEM PAYROLL PROCEDURES EXAMPLE, 2016

Monthly Processing

The Texas School for the Blind and Visually Impaired (TSBVI) payroll office receives and processes all documents necessary to correctly administer employee compensation throughout their employment at TSBVI. All personnel actions are received from Human Resources unless noted otherwise. Each personnel action is reviewed and verified for accuracy. The following is an overview of the routine monthly payroll process:

- All new-hire and transfer in personnel actions.
- All promotion, demotion, merit, and salary change personnel actions.
- All personnel actions reflecting position changes of any type.
- All leave without pay personnel actions.
- All extra hours and overtime personnel actions.
- All terminations and transfer out personnel actions
- All substitute hours worked. **
- All substitute overtime personnel actions.
- All external payroll deductions, (child support, tax levies, student loans, etc.)
- All special payments, (benefit replacement pay, longevity, per diem, etc.)

     ** Substitute hours are compiled and received from departmental timekeepers.

All substitute hours worked by substitute employees are entered monthly into an Excel worksheet. The data is then reviewed and verified.

The Payroll Accountant tracks substitute work activity. All substitute employees who have not worked in 12 consecutive months are terminated per TSBVI policy. Substitute termination personnel actions are initiated by the Payroll Accountant and forwarded to Human Resources for processing.

All personnel actions are sent to the Administrator for Business, Operations, and Technology for approval prior to entry into USPS.

Source: Texas School for the Blind and Visually Impaired, March 2016.

- develop a procedure when a process:

- is lengthy (e.g., year-end inventory);

- is complex (e.g., benefits administration);

- is routine, but it's essential that everyone strictly follows rules (e.g., payroll);

- demands consistency (e.g., handling a refund request);

- involves documentation (e.g., disciplining a staff member);

- involves significant change (e.g., installing a new computer system);

- has serious consequences if completed incorrectly (e.g., safety guidelines);

- raises repeated questions;

- confuses people; or

- is subject to varied interpretation.

- questions to consider regarding the level of detail:

- Do users have enough information to complete the action?

- Is enough information available to guide users in using good professional judgment?

- Is the level of detail appropriate for the subject?

- Is the level of detail appropriate for readers? and

- How comfortable are readers with the subject? and

- steps in writing procedures:

- gather information;

- start writing; and

- use visual elements such as flowcharts, process maps, screenshots, forms, play scripts, question-and-answer formats, and matrices.

TSBVI should develop uniform, comprehensive, desk-level procedures structured for the Business Office's unique environment and detailed enough to use for staff training purposes. The CFO should instruct the director of accounting

to identify and prioritize Business Office functions that require more detailed, desk-level procedures. The director of accounting should identify functions requiring more detailed procedures and meet with the process owners to outline an approach and develop a schedule and work plan to develop detailed desk-level procedures. The director of accounting should then meet with the CFO for approval of the plan for desk-level procedures.

This recommendation could be implemented with existing resources.

FIXED ASSETS INVENTORY (REC. 25)

TSBVI's annual fixed assets inventory process is inefficient and lacks sufficient accountability.

The school has not assigned property custodians within each department to ensure accountability for fixed assets and does not use barcode technology to expedite the physical inventory process. During the onsite review, it was noted that the warehouse already uses a barcode scanner and related software to track warehouse supplies for the Outreach Program. The State Property Accounting System (SPA) manual outlines property management requirements for all state agencies. It requires each agency to designate a property manager who is responsible for the custody and care of the agency's property. TSBVI's designated property manager is the director of accounting. Two warehouse staff and the director of accounting have primary responsibility for fixed assets. Warehouse staff inventory responsibilities include the following:

- processing additions, transfers, and disposal of all state property assets;

- updating the SPA system;

- tagging fixed assets upon receipt in the warehouse;

- conducting the annual physical inventory and maintaining all inventory records;

- completing a certification of physical inventory form, which is signed by the director of accounting and submitted to the Comptroller of Public Accounts annually; and

- disposing of surplus items.

Warehouse staff use the receiving report, which lists the items ordered and received, to identify an item as a fixed asset. After the item is identified, staff affix two tags onto the item to identify the school and the asset. All electronics are tagged

and tracked. The fixed asset threshold for capitalized items is $5,000.

Warehouse staff are assigned an asset and enter it into the SPA system. However, no staff within each department is designated as property custodian for the entire department. Property custodians ensure that everyone in the department complies with fixed asset policies and procedures involving asset acquisition, safeguarding, transfer, disposal, and inventory. Property custodians establish accountability and expedite transfers, disposals, and the annual inventory.

In addition to their regular duties, warehouse staff use a clipboard and tablet to conduct the annual inventory. As they locate fixed assets throughout the campus, they write down the tag number and compare it to a printout from the SPA system. The warehouse staff stated that they typically find everything on the list. When they are unable to locate an item, they enlist the help of department supervisors to track the item. If the item is not found, then an exception is noted and the item is removed from the list. The inventory requires five months or more to complete using this process. **Figure 5–10** shows an example of the inventory count sheet recorded on paper.

An effective management program for fixed assets captures asset information at the procurement stage and throughout the asset's life. The program should track the cost, useful life, location, movement, custodian, and disposition of the item. The Texas Comptroller of Public Accounts established best practices for fixed assets to assist local governments with setting up effective and efficient management systems. These best practices provide a comprehensive solution to deficient management systems and suggest steps to develop and maintain effective systems. **Figure 5–11** shows these best practices.

TSBVI should identify a fixed asset custodian for each department, and automate the physical inventory process. Instead of taking the annual inventory themselves, the warehouse staff could send property listings to the departmental custodians who would locate the assets in their respective departments and identify discrepancies. The departmental custodians would be responsible for holding the assignees accountable for the assets in their possession as indicated on the SPA inventory listings.

In addition, TSBVI should automate the physical inventory process by implementing a scanning solution using bar coded asset tags. The technology for implementing this system is already being used by warehouse staff for the Outreach

FIGURE 5–10
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED INVENTORY COUNT SHEET
MARCH 2016

Source: Texas School for the Blind and Visually Impaired, March 2016.

FIGURE 5–11
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS BEST PRACTICES FOR FIXED ASSETS
MAY 1999

PRACTICE	PROCESS
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, employee 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.
Setting Up the Fixed Asset Management System	Adopt a proposal setting up the fixed asset system, including adoption of formal policies and procedures.
	Establish positions and job descriptions for those with fixed asset responsibilities.
	Determine the structure of the fixed asset inventory database and develop standard forms to match the format of computerized records.
	Provide training as necessary.
	Identify specific assets below the capitalization threshold that should be tracked for information purposes and safeguarding.
	Budget the amount necessary to operate the fixed assets management system adequately.

FIGURE 5–11 (CONTINUED)
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS BEST PRACTICES FOR FIXED ASSETS
MAY 1999

PRACTICE	PROCESS
Implementing the 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 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 they are received.
	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 and upgrades.

SOURCE: Texas Comptroller of Public Accounts, Getting a Fix on Fixed Assets, City and County Financial Management, May 1999, Volume 15, Issue 2.

Program and is more efficient than the manual process. This technology could also be used for fixed assets.

The CFO should instruct the director of accounting to identify and contact staff within each department to serve as property custodians for the department. The director of accounting should meet with the departmental property custodians to review fixed asset procedures and discuss their responsibilities. The director of accounting should contact the vendor that provided the Outreach Program with their system. The director of accounting should determine what would be necessary to use the system to take the annual inventory. The CFO and director of accounting would determine whether it would be more feasible to adapt the system to annual inventory needs or to seek another vendor.

The fiscal impact of this recommendation cannot be determined until a final determination is made about whether to adapt the existing barcode system or to purchase a new system.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

RECOMMENDATION	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 5. BUSINESS SERVICES							
17. Review cash-handling practices to eliminate inefficient tasks, and provide tighter security for the cashier's office.	($480)	($480)	($480)	($480)	($480)	($2,400)	$0
18. Maximize the capabilities of the school's internal accounting software by using the system to print checks, record transactions, and reconcile bank accounts.	$0	$0	$0	$0	$0	$0	$0
19. Limit staff access to add vendors to the USAS and MIP vendor databases.	$0	$0	$0	$0	$0	$0	$0
20. Segregate incompatible duties regarding Legacy Funds to further strengthen internal controls and reduce the risk of misappropriation of funds.	$0	$0	$0	$0	$0	$0	$0
21. Formalize the payroll audit process to increase its value and enhance its usefulness.	$0	$0	$0	$0	$0	$0	$0
22. Explore opportunities to enhance payroll efficiency by eliminating paper timesheets for substitutes and authorizing substitutes to use the electronic timesheet system.	$0	$0	$0	$0	$0	$0	$0
23. Accelerate cross-training for essential Business Office functions.	$0	$0	$0	$0	$0	$0	$0
24. Develop uniform, comprehensive, desk-level procedures structured for the Business Office's unique environment and detailed enough to use for staff training purposes.	$0	$0	$0	$0	$0	$0	$0
25. Identify a fixed asset custodian for each department, and automate the physical inventory process.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**($480)**	**($480)**	**($480)**	**($480)**	**($480)**	**($2,400)**	**$0**

CHAPTER 6. FOOD SERVICES

The Texas School for the Blind and Visually Impaired (TSBVI) food service operation provides meals to students and staff each day during the school year and during special events. TSBVI participates in the federally funded School Breakfast Program (SBP) and National School Lunch Program (NSLP). The SBP and NSLP are federal entitlement programs administered at the state level by the Texas Department of Agriculture (TDA). Under the SBP and NSLP, the school receives cash assistance for breakfasts and lunches served that comply with program requirements. TSBVI receives different amounts of reimbursement based on the number of breakfasts and lunches served in each of the benefit categories: free, reduced-price, and paid. Both breakfasts and lunches must comply with federal nutrition guidelines and are reimbursable to the school based on the number of meals served within the benefit categories.

TSBVI meets the USDA's requirements to be designated as a Residential Child Care Institution (RCCI). As an RCCI, the school's residential student population is considered institutionalized for purposes of free meal eligibility income determination. An institutionalized child is considered a one–person household since the student is not living with their natural family as an economic unit. Therefore, TSBVI is not required to obtain a meal application or signature from an adult household member. Since an institutionalized child is defined as a family of one, program eligibility is based on income received by the child; the family's income is not included. As a result, all of the school's residential students under the age of 21 are eligible for free meals. The school's day students do not automatically qualify for free meals. TSBVI is required to obtain completed meal applications for day students to determine meal eligibility based on the day students' family size and household income.

Traditionally, schools participating in the NSLP program are expected to fully cover operational costs through federal and state reimbursements. However, traditional school districts only serve breakfast, lunch, and snacks, which are all reimbursed through federal and state funds. TSBVI is a residential facility and is required to serve three meals a day to all residential students even though the school is not eligible to receive federal reimbursement for dinners served. TSBVI is also not eligible to receive state matching funds for lunches served because the state does not consider TSBVI a school

district or private school. Therefore, the program creates an overall cost to the school that must be covered through legislative appropriations used to support all of the school's activities.

The three primary models of organizing food service operations are self-management, contracted management, and contracted consulting. Using the self-management model, a school operates its food service department without assistance from an outside entity. Using a contracted management model, a school contracts with a food service management company to manage either all or a portion of its operations. In this arrangement, a school may rely on the company to provide all or some staff or may use the school's staff for its operations. Using a consulting model, a school contracts with a food service consulting company to provide guidance on food service operations (e.g., menus, sales and marketing plans, and ordering processes based on industry standards, etc.). In this arrangement, school staff would operate the food service department.
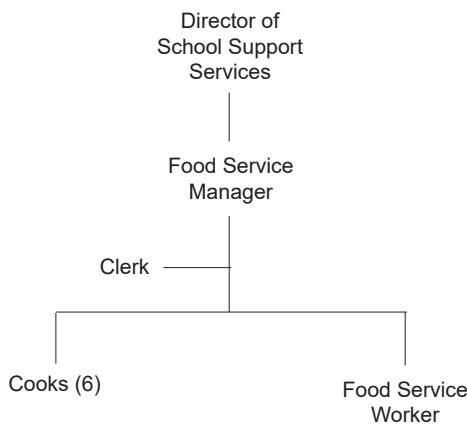
TSBVI employs the self-management model and manages all aspects of the food service program. The school's Food Service Department manages the operational aspects of the food service program such as menu planning and ordering foods, preparing and serving meals, staffing and staff training; managing inventory, and submitting meal reimbursement claims through the TDA Texas Unified Nutrition Programs System. The Business Office manages food service's financial functions such as bid preparation and analysis; preparing and monitoring budgets; accounting for food service revenues and expenditures; and qualifying day students for free or reduced-price meals.

TSBVI operates one kitchen to serve all students. Food service staff prepare breakfast, lunch and dinner Monday through Thursdays and breakfast and lunch on Fridays. During the week, students come to the cafeteria at designated times, select their meal, and the cashier enters their student identification number into the point-of-sale (POS) system. In school year 2014–15, TSBVI enrolled 620 students, and had a 38.7 percent breakfast participation. For lunch, 45.5 percent of the students participated. TSBVI did not have an estimate for the number of dinner meals served. Dormitory managers also purchase snacks from local supermarkets using the school's credit card and store them in the dormitories. Dormitory staff

serve the snacks to students at designated times each day. Additionally, dormitory staff frequently take students for dinner to local restaurants during the week to enhance their life skills. Most students travel home each weekend, but some remain on campus. TSBVI staff provide food for these students by taking them out to eat or ordering in from local restaurants. Food service does not prepare, serve, or provide food for students that stay on weekends except for special events.

Within TSBVI's organizational structure, the Food Service Department is included in School Support Services. The food service manager reports to the director of school support services. The Food Service Department has nine full-time staff, including the manager. TSBVI Food service staff work one of two shifts: 5:45 AM to 1:45 PM or 9:30 AM to 6:00 PM. All Food Service Department staff are full-time employees of TSBVI staff. **Figure 6–1** shows TSBVI's Food Service Department organization.

FIGURE 6–1
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED FOOD SERVICE DEPARTMENT ORGANIZATION
SCHOOL YEAR 2015–16

Director of
School Support
Services

Food Service
Manager

Clerk

Cooks (6)

Food Service
Worker

SOURCE: Texas School for the Blind and Visually Impaired Food Service Department, March 2016.

The food service manager oversees food service operations, makes food and supply orders, and directs food service staff in their daily duties. The clerk handles all of the food service operations daily documentation. Cooks ensure that the meals are being prepared properly and supervise the daily sanitation. They are also responsible for serving food and daily cleanup, as well as ensuring that all products are labeled properly when stored away after use. The food service staff ensures that the food products are placed on the food service line and that the temperatures are taken for the products on the food service line.

FINDINGS

♦ TSBVI lacks a process to evaluate the Food Service Department's financial status and make efficient management and operations decisions.

♦ TSBVI does not charge day students and guests for meals and undercharges for catering services, which results in a missed opportunity for additional revenue.

♦ TSBVI does not maximize federal reimbursements for snacks and meals served to students.

RECOMMENDATIONS

♦ **Recommendation 26: Develop and implement processes to improve financial management and operations in the Food Service Department.**

♦ **Recommendation 27:   Maximize food service revenue by charging students according to their eligibility classifications, charging guests for meals, and including labor and operating costs in catering charges.**

♦ **Recommendation 28: Modify the snack program to be eligible for the federal After School Care Snack Program reimbursements and implement programs to increase breakfast and lunch participation.**

DETAILED FINDINGS

MANAGEMENT AND OPERATIONS (REC. 26)

TSBVI lacks a process to evaluate the Food Service Department's financial status and make efficient management and operations decisions.

TSBVI's Food Service Department is not self–sustaining as all the costs of breakfast, lunch, and snacks are not fully covered through federal and state reimbursements. Operational costs not covered by federal and state reimbursements are supplemented by TSBVI's General Revenue Fund.

The operational and financial activities of the food service program are divided between the Food Service Department and the Business Office. The Food Service Department is responsible for managing food service staff and food preparation activities. The Business Office performs financial activities for the food service program. These activities include budgeting, consolidating food service financial reporting into the school's Legislative Appropriation Request and Annual Financial Report, submitting meal reimbursement claims to

TDA, depositing funds received for meal sales, and recording revenue.

Although TSBVI's Business Office prepares an annual budget for the Food Service Department, it does not provide detailed operational budgets or financial reports to the food service manager. For example, TSBVI's Business Office does not prepare income statements, balance sheets, budget-to-actual comparisons, profit and loss summaries, or cash flow statements to monitor food service operations. Without these reports it is difficult to ensure costs are kept to reasonable levels and that appropriate adjustments are made when necessary.

As a result, the Food Service Department plans menus, assigns staff hours, and purchases food and supplies without budgeting guidance from the Business Office, and lacks the information necessary to conduct its own analysis to control costs. For example, the department does not control meal costs by pre-costing or post-costing the components of each meal served. Pre-costing involves determining the cost of each meal component and then planning menus to ensure that each meal served does not cost more than budgeted. Post-costing entails determining the actual cost to prepare meals served and comparing it to estimated costs to determine variances and make necessary adjustments to ensure the department does not exceed its established budget. Failure to pre- and post-cost menu items could raise food supply costs and lower revenue.

The lack of adequate budgeting, operational analysis, and accountability is reflected in the Food Service Department's high cost-to-revenue ratios and significant budget deficits.

Figure 6–2 shows food service revenues and expenditures by category for school years 2013–14 and 2014–15.

According to the School Nutrition Association's (SNA) April 2008 School Lunch and Breakfast Cost Study II, schools on average expended 37.0 percent of food service revenues on food

FIGURE 6–2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
FOOD SERVICE REVENUES AND EXPENDITURES
FISCAL YEARS 2013–14 AND 2014–15

REVENUES	2013–14 ACTUAL	2014–15 ACTUAL
Local	$36,693	$30,677
Federal	$63,169	$58,997
Total Revenue	**$99,862**	**$89,674**

EXPENDITURES	2013–14 ACTUAL	2014–15 ACTUAL
Food	$156,767	$159,184
Salaries	$237,646	$251,508
Employee Benefits	$59,387	$92,868
Purchased Services	$6,574	$617
Equipment Purchases	$16,467	$4,594
Supplies\Miscellaneous	$19,735	$20,818
Indirect Cost	$62	$6
Utilities and Other	$325	$451
Total Expenditures	**$496,963**	**$530,046**
Revenues (Under) Expenditures	**($397,101)**	**($440,373)**

SOURCE: Texas School for the Blind and Visually Impaired NSLP Financial Report, school years 2013-14 and 2014-15.

and 48.0 percent on labor and benefits. TSBVI does not receive revenues for dinners served, therefore their expenditure percentages are higher than average. However, TSBVI's meal and labor costs far exceed recommended thresholds with food costs composing 177.5 percent of revenues and labor costs composing 384.0 percent of revenues in school year 2014–15.

Figure 6–3 shows TSBVI's food service expenditures as a percentage of revenues by category for school years 2013–14 and 2014–15.

FIGURE 6–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED FOOD SERVICE LABOR COSTS AS PERCENTAGE OF REVENUES
SCHOOL YEARS 2013–14 AND 2014–15

CATEGORY	SCHOOL YEAR 2013–14 EXPENDITURES	SCHOOL YEAR 2013–14 PERCENTAGE OF REVENUES	SCHOOL YEAR 2014–15 EXPENDITURES	SCHOOL YEAR 2014–15 PERCENTAGE OF REVENUES
Labor	$297,033	297.4%	$344,377	384.0%
Food	$156,767	157.0%	$159,184	177.5%
Supplies	$19,735	19.8%	$20,818	23.2%
Other Operating Expenses	$23,428	23.5%	$5,669	6.3%
Total	**$496,963**	**497.6%**	**$530,048**	**591.1%**

SOURCE: Texas School for the Blind and Visually Impaired NSLP Financial Report, school years 2013-14 and 2014-15.

An alternate analysis excluding revenue is comparing the labor and food expenditures as a percentage of the total expenditures and comparing those expenditures between years. In school year 2013–14, labor was 59.8 percent and food was 31.5 percent of the total expenditures. In school year 2014–15, labor increased to 65.0 percent, while food dropped slightly to 30.0 percent of the total expenditures.

According to the Cost Control Manual for School Food Service Directors produced by the Kentucky Department of Education, the prime requirement for cost control management is an accounting system and procedures that provide accurate and timely financial information and reports. Profit and loss statements can be compared each month, and to the same month one year prior, to identify sudden changes or possible errors.

Figure 6–4 shows seven financial reporting tools given by the Cost Control Manual for School Food Service Directors, their optimal frequency for distribution, and whether TSBVI uses these tools.

TSBVI should develop and implement processes to improve financial management and operations in the Food Service Department.

TSBVI should bring operational costs in-line with industry standards and averages and improve department accountability. To do this, the school should develop reports detailing the following:

- Budget and income statements to monitor Food Service operations on a monthly basis. The CFO should provide the director of school support services

FIGURE 6–4
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED FINANCIAL AND MANAGEMENT REPORTING EVALUATION SCHOOL YEAR 2015–16

REPORT	USES	OPTIMAL USE FREQUENCY	USED BY TSBVI
Budget: Illustrates a plan for financial management according to each account.	Allows informed decisions and financial forecasts for the next year through the use of historical, economic, and demographic data; projected enrollment; menu changes; and changes in operational procedures. Allows comparisons between actual and forecasted performance.	Annual with monthly monitoring.	Annual budget is developed at strategy level instead of department and it is not used for monthly monitoring.
Costing food and service.	Allows for informed decision-making about purchases and the continuation of products and services.	Daily	No
Revenue received from meals served.	Allows identification of sources of revenue such as free, reduced-price, paid, a la carte, or other.	Daily	Yes
Balance Sheet: Illustrates the financial position of the account at a point in time.	Allows a comparison of current balances with balances at the end of the month of the prior year.	Monthly	No – TSBVI operates Food Service as part of Support Services and does not prepare separate balance sheets.
Profit and Loss Statement: Illustrates what is left after all expenditures are paid.	Allows identification and analysis of increases or decreases in participation or expenses. Allows administrators to determine where key issues and problems exist.	Weekly or Monthly	No
Statement of Changes: Shows changes in working capital from year to year.	Allows for the monitoring of net increases in working capital requirements.	Annually	No
Key Operating Percentages: Trends, Expenditures and Revenues over time.	Allows management and staff to monitor expenditures over time, including: food cost percentage, labor cost percentage, other cost percentage, and participation rates.	Monthly	No

Sources: Legislative Budget Board, School Review Team, March 2016; Cost Control Manual for School Food Service Directors, Kentucky Department of Education, Division of School and Community Nutrition, 1992.

and food service manager with copies and meet monthly to discuss deviations from the budget to make appropriate adjustments.

- Projections for the cost of serving dinner and snacks that identify General Revenue Fund appropriations as a Food Service revenue source on internal financial statements to enhance financial monitoring.

- A cost per meal budget, and menus based on the budget. Cost per meal budgets should be created for breakfast, lunch and dinner.

TSBVI's Business Office, School Support Services, and Food Service staff should use these reports to monitor and track key operating and financial measures (for example, net profit or loss, student participation, meals per labor hour, food costs, and wages). The director of school support services and the food service manager can also use the reports to identify and discuss favorable and/or unfavorable trends or variances each month and adjust operations as appropriate.

To bring expenditures under control, TSBVI should develop operating target metrics, monitor outcomes on a monthly basis, and take appropriate action as necessary. The metrics should include:

- food cost percentage;

- labor cost percentage;

- other costs percentage; and

- meal participation rates.

The director of school support services should work with the food service manager to develop the cost of each menu item served for each meal and ensure that these costs are in agreement with the budget. The food service manager should prepare a post-cost analysis of menu items served when invoices are received and provide this to the director of school support services for review and appropriate action.

The CFO should earmark an amount of TSBVI's General Revenue Funds to subsidize food service operations not covered by federal reimbursements. The Business Office should prepare monthly budget-to-actual reports and income statements and provide them to the director of school support services and food service manager for review and appropriate action. The CFO should provide justification and corrective action strategies for each category that is over budget.

This recommendation could be implemented with existing resources. The Food Service Department may realize savings by reducing costs, but this amount cannot be estimated from the available data.

STUDENT MEAL REVENUES (REC. 27)

TSBVI does not charge day students and guests for meals and undercharges for catering services, which results in a missed opportunity for additional revenue.

As a RCCI, all of TSBVI's residential students are eligible for free breakfasts and lunches. The school also serves six day students and uses completed meal applications to determine meal eligibility based on family size and parental income. These students may be eligible for free, reduced-price, or full price breakfast and lunch. The school receives federal reimbursements based on the number of breakfasts and lunches served to students by eligibility category. The Food Service Department has each student's meal eligibility classification and when students receive meals, the staff record the students' meals into the POS system. The POS system generates reports that summarize meals served by meal period and student classification. TSBVI electronically submits these student meals served by classification and meal period to TDA for reimbursement.

Although TSBVI obtains the meal applications, makes the eligibility determination, and enters the eligibility status in the POS system, the school does not charge day students for meals served. In addition, although TSBVI staff and visitors are required to pay for breakfast and lunch, guests of TSBVI students are not charged for meals. The school uses the General Revenue Fund to cover the costs of meals served to day students who are not eligible for free breakfasts and lunches and to cover the costs of meals served to guests of students. As a result of this practice, the Food Service Department is losing revenue. The TDA meal reimbursement report shows 287 lunches were provided to day students who were not eligible for free or reduced-priced meals in school year 2014–15. TSBVI does not charge day students but instead only receives the federal reimbursement rate of $0.36 per full price meal. Applying a $3 rate for lunch for day students, TSBVI lost an estimated $861 (287 lunches x $3) in school year 2014–15. The number of guests is unknown as TSBVI does not keep records of these meals.

In addition to providing free meals to day students and guests of students, TSBVI's Food Service Department undercharges for catering services. The Food Service Department provides catering services for internal meetings and events. Department

staff prepare catered food at the same time that they prepare student meals. Food and supplies for the catering event are ordered through the food service catering account. The school's department managers submit a completed catering form and their department's budget is charged for the food costs.

However, the Food Service Department does not track the labor and operating expenses used to prepare catered meals separately from student meals. As a result, department budgets are charged for the food cost, but not for labor and operating expenses. Because catering charges do not include labor and operating expenses, the Food Services Department is not recovering the actual costs to produce catered meals.

TSBVI should maximize food service revenue by charging students according to their eligibility classifications, charging guests for meals, and including labor and operating costs in catering charges. The school should charge guests full price for all meals. The director of school support services should also establish processes to collect money from day students. Processes could include either paying on-line through meal accounts or paying at a cash register. Food service staff should be trained on cash-handling procedures for students and guests that pay at the register.

The CFO should modify the current pricing policy to reflect that day students will be charged according to their meal eligibility classifications and guests will be charged according to established meal prices. The superintendent should present the revised pricing policy to the Governing Board for approval. Once the revised pricing policy is approved, the superintendent should notify all parents of day students.

The food service manager should develop a catering menu based on commonly requested items. The cost to prepare the items should be used as the basis for menu item pricing. This should include labor and operating costs, which should be tracked separately from student meals. Once the menu is developed, the food service manager should present it to the director of school support services, the CFO and the superintendent for approval.

This recommendation could be implemented with existing resources. The Food Service Department would generate new revenue by correctly charging for catering and cafeteria meals based on accurate food, labor, and operating expenditures, however, this amount cannot be determined from the available data.

STUDENT MEAL PARTICIPATION (REC. 28)

TSBVI does not maximize federal reimbursements for snacks and meals served to students.

TSBVI residential staff purchase snacks for residential students at local grocery stores. These purchases are made with school credit cards or through funds provided to the students by their parents. The school credit cards are paid with funds from TSBVI's General Revenue Fund. Staff keep these items in dormitory kitchen areas and serve them to students at designated times each day. However, the school does not track snack purchases, and has no requirements to meet specific nutrition guidelines. The snack purchase, preparation, and serving processes are handled outside of the school's food service operations, and there is no reporting of the number of snacks served. Therefore, these snacks are not eligible for reimbursement through the federal After School Care Snack Program (ASCSP). ASCSP is federal entitlement program, similar to the SBP and NSLP, administered by TDA. This program provides reimbursement to help schools serve nutritious snacks to students after their school day ends. ASCSP requires that snacks meet federal nutrition guidelines and be tracked and reported to TDA. By not meeting ASCSP requirements, TSBVI spends state funds on snacks, but does not receive any federal revenue to support the food service program. Additionally, by purchasing food through local grocery stores instead of through its Food Service Department, the school is paying more for snacks, as the Food Service Department buys foods in bulk at reduced costs.

TSBVI is also not maximizing federal SBP and NSLP revenue. For school year 2014–15, breakfast participation was only 38.7 percent and lunch participation was 45.5 percent. Meal participation rates are an important metric for management because they reflect how well food service operations are attracting students to eat healthy nutritious meals at school. Meal participation rates are derived from comparing the number of student meals served to the average daily attendance.

According to TDA's report to the Eightieth Legislature, 2007, the statewide participation rate in the SBP is 30.0 percent, and the statewide participation rate in the NSLP is 65.0 percent. Although TSBVI's participation rate exceeded the state average for breakfast, the school's rate is less than the state average for lunch. Both of these participation rates are low considering that all but six of TSBVI's students live on campus and they do not leave campus during the cafeteria's breakfast and lunch meal times. During onsite interviews, Food Service Department staff stated that the low participation rates were due to many students eating other food that they have purchased at the grocery store rather than eat meals in the cafeteria.

TSBVI has no process to promote participation in the SBP and NSLP. For example, the Food Service Department

prepares standard menus that comply with regulatory requirements. However, Food Service Department staff do not obtain student feedback through formal surveys or student food committees, and the menus have not been updated in several years. A student food committee would be composed of students and provide input on food service operations such as menu items, food quality and service. Without this feedback, TSBVI cannot determine the underlying reasons for why student participation is low for breakfasts and lunches served.

All meals except snacks are served in the school's cafeteria or dormitory rooms, and TSBVI does not offer special meal programs such as breakfast in the classroom, late breakfast, and grab-and-go meals. Additionally, the Food Service Department does not generate and use meal participation reports as a management tool to improve student meal participation rates. Failure to maximize meal participation causes the school to forgo potential revenues from SBP and NLSP reimbursement claims for eligible students who do not participate.

Figure 6–5 shows USDA reimbursement rates for the free meal eligibility classification level for breakfast, lunch and snacks. TSBVI would be reimbursed an additional $2.04 for each additional breakfast, $3.39 for each additional lunch, and $0.86 for each claimed snack.

FIGURE 6–5
U. S. DEPARTMENT OF AGRICULTURE MEAL AND SNACK REIMBURSEMENTS
JULY 2016-JUNE 2017

UNIT	REIMBURSEMENT
Breakfast	$2.04
Lunch	$3.39
Snacks	$0.86

SOURCE: U.S. Department of Agriculture, 2016.

Best practices dictate that the school remove barriers to student participation in the SBP and NSLP so that students receive the nutritional benefits of the food service program. To increase meal participation, effective food service departments prepare nutritious food that is appetizing and well-liked by students. Elgin ISD developed menus that not only meet the nutritional needs of students but are served as a marketing tool for the department to attract customers. Elgin ISD daily provides students and teachers with a variety of menu selections that include fresh fruits and healthy choices. The food is well-prepared and served in a comfortable atmosphere.

TSBVI should modify the snack program to be eligible for the federal ASCSP reimbursements and implement programs to increase breakfast and lunch participation. TSBVI should cease the practice of buying snacks from the local grocery store with school credit cards and the Food Service Department should order and prepare snacks for students. The food service manager should order snacks that meet ASCSP nutritional requirements and apply for reimbursements. The director of school support services and food service manager should also work to identify methods to increase meal participation. Some strategies that might increase SBP participation include:

- Provide breakfast in the classroom: Students could eat breakfast at their desks during the first few minutes of class, usually while the teacher attends to morning administration duties. Breakfast meals could be delivered to each classroom by food service staff or picked up by students on the way to class. It is important to note that while breakfast in the classroom increases participation, it could restrict food variety and increase food waste and labor required to prepare breakfast and deliver to the classroom;

- Provide grab-and-go breakfasts: Breakfasts could be individually packaged and distributed from the cafeteria line, carts, or kiosks at other locations on the campus. Students could eat outside the cafeteria, in class, or in common areas before or between classes;

- Implement second-chance breakfast: Students could be allowed time after their first-period class for breakfast. Breakfast could be served from the cafeteria or carts in the hallway after first period, allowing students who are not hungry first thing in the morning to receive a healthy breakfast; and

- Revise menus: Based on feedback from parents and staff, the Food Service Department staff should modify menus to incorporate favorite foods that the students enjoy to increase the number of students who participate. The staff could involve the students in menu planning activities.

Strategies that might increase NSLP participation include the following:

- Monitor plate waste and make appropriate menu adjustments as required: When students have the opportunity to suggest changes in the lunch program, the school could appropriately adjust food quality to focus on taste and freshness, offer an increased variety of foods, and inquire about student and staff food preferences;

- Market the NSLP: Students are a potential source of innovative ideas. TSBVI could establish a student food committee that would provide opportunities to interact with the students as customers, share information, learn from them, and promote their ownership in the program. Surveys, focus groups, and advisory councils could be also effective methods of soliciting feedback from students and others.

The director of school support services should develop new policies and procedures for the Food Service Department for the preparation of snacks and for any new breakfast or lunch strategy that is adopted. The director of school support services should present the policies and procedures to the superintendent and Governing Board for approval.

If the school successfully reduces food and labor costs to industry standards of 85.0 percent of revenue, each additional free breakfast served would provide the school with $0.40 of incremental revenue; each free lunch served would provide $0.79 of incremental revenue; and each snack served would provide

$0.16 of incremental revenue. **Figure 6-6** shows the incremental revenue per meal served calculations.

Since the time of the review, TSBVI indicated that it has ceased the practice of purchasing food for the dormitories.

Because snacks are purchased and served outside of the food service program there is no data that shows the number of snacks served and what the food costs are. Because of these factors, the fiscal impact does not include increased revenue from snacks. The fiscal impact assumes that adapting the recommended strategies will result in TSBVI receiving additional revenue of $27,396 during the next five years at the free participation eligibility category level if participation in breakfast and lunch is increased to 44.0 percent and 56.0 percent respectably and the school increases breakfast and lunch participation by an additional 5.0 percent each subsequent year. **Figure 6–7** shows the projected revenue increase if there is an increase in breakfast and lunch meals participation.

FIGURE 6-6
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED ESTIMATED INCREMENTAL REVENUE PER MEAL SERVED

MEAL	PER MEAL REIMBURSEMENT	TARGET FOOD AND LABOR AT 85.0% OF REVENUES (1)	INCREMENTAL REVENUE
Breakfast	$2.04	$1.64	$0.40
Lunch	$3.39	$2.60	$0.79
Snacks	$0.86	$0.70	$0.16

NOTES:
(1)   The amounts reflect what the food and labor cost per meal would be if TSBVI reduced food and labor costs to 85.0 percent of revenues.
SOURCES: Legislative Budget Board, School Review Team, March 2016; USDA 2016-17 reimbursement rates.

FIGURE 6–7
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED PROJECTED REVENUE FOR BREAKFAST AND LUNCH

MEAL	2014–15 TOTAL MEALS SERVED	2014–2015 MEAL PARTICIPATION PERCENTAGE	ADDITIONAL MEALS SERVED IF PARTICIPATION IS INCREASED TO 44.0%	REVENUE PER MEAL	INCREASED REVENUE
Breakfast	11,770	38.7%	1,612	$0.40	$645
Lunch	13,882	45.5%	1,678	$0.79	$1326
Total Annual Increase in Revenue from Breakfast and Lunch					**$1,971**
Annual Increase Year 1 (1)					$1,380
Annual Increase Year 2 (2) – Breakfast participation increases to 49.0%; Lunch Participation increases to 56.0%					$3,784
Annual Increase Year 3 (2) - Breakfast participation increases to 54.0%; Lunch Participation increases to 61.0%					$5,597
Annual Increase Year 4 (2) - Breakfast participation increases to 59.0%; Lunch Participation increases to 66.0%					$7,411
Annual Increase Year 5 (2) - Breakfast participation increases to 64.0%; Lunch Participation increases to 71.0%					$9,224
Total 5-Year Increase in Revenue					**$27,396**

NOTES:
(1)   The first year is calculated at 70.0 percent of potential because it is the first year of program implementation.
(2)   Each annual increase is based on a 5.0 percent increase from the previous year's 5.0 participation percentage.
SOURCES: Legislative Budget Board, School Review Team, March 2016; Texas School for the Blind and Visually Impaired, March 2016.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

RECOMMENDATION	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 6. FOOD SERVICES							
26. Develop and implement processes to improve financial management and operations in the Food Service Department.	$0	$0	$0	$0	$0	$0	$0
27. Maximize food service revenue by charging students according to their eligibility classifications, charging guests for meals, and including labor and operating costs in catering charges.	$0	$0	$0	$0	$0	$0	$0
28. Modify the snack program to be eligible for the federal After School Care Snack Program reimbursements and implement programs to increase breakfast and lunch participation.	$1,380	$3,784	$5,597	$7,411	$9,224	$27,396	$0
TOTAL	**$1,380**	**$3,784**	**$5,597**	**$7,411**	**$9,224**	**$27,396**	**$0**

CHAPTER 7. TRANSPORTATION

A school's primary transportation responsibility is to transport students to and from campus, on field trips, to and from extracurricular events, and, if applicable, to and from resident students' homes in a safe, timely, and cost-effective manner. To accomplish this responsibility, schools must self-maintain or contract for a fleet of vehicles; provide insurance coverage for vehicles, drivers, and riders; hire, train, and provide administrative support for drivers and mechanics; chart bus routes; determine eligible riders; and develop plans for assisting students in case of breakdowns or accidents.

TSBVI's transportation services include procurement and maintenance of vehicles, scheduling the availability of vehicles, and maintaining driver records. However, TSBVI does not provide daily transportation to and from home for students. TSBVI's Transportation Department operates a Weekends Home Program to return residential students to their homes and manages day-trip services for students.

WEEKENDS HOME PROGRAM

For school year 2014–15, 164 students were enrolled in TSBVI's school-year program that provided grades kindergarten to 12 educational services for students from August to June. Of these 164 students, 158 were residential students who reside at the TSBVI campus in dormitories Monday to Friday. These students are from school districts across the state. TSBVI's Weekends Home Program transports residential students from campus to their homes and back again during the school year. Students who live close to the school are transported to TSBVI daily by their local school districts or parents.

The Weekends Home Program routes leave TSBVI on Fridays and end at Dallas, San Antonio, Houston, Abilene, Fort Worth, and Huntsville. Routes include other stops along the way; for example, the Fort Worth route also includes stops in Belton and Waco.

The Weekends Home Program's travel does not drop students off at their homes; instead, parents must transport their children to and from dropoff points. Buses are used for travel to larger metropolitan areas with higher concentrations of students. Dropoff points are typically located near fast-food restaurants and malls.

If a student lives more than 50 miles from one of the dropoff points, the parent has the option to have the child transported home either weekly or biweekly. For students returning home on a biweekly schedule, TSBVI uses an alternating weekend schedule, in which one group of students is assigned to traveling home while the other group of students remains on campus. During the following weekend, the second group travels home, and the first group stays on campus. Any weekend when the school is closed, such as for holidays, all students travel home.

All Weekends Home Program trips include chaperones to assist students with any needs while traveling. The Weekends Home Program supervisor works with Residential Program staff, school staff, and parents to ensure that student information, such as emergency contacts, food allergies, and medications, is available to Weekends Home Program staff who travel with students.

The Weekends Home Program uses a mapping website to chart routes and schedule times for ground transportation. Revisions are made to stops and times based on changes in the number of students using each dropoff point in a given school year. While en route, drivers use a smartphone application that provides traffic updates along the traveled routes. The application enables the drivers to choose another route to stay on schedule when necessary.

A student who lives two hours or more from a central bus stop, but within two hours of an airport, is eligible for air transportation. Drivers and chaperones transport students to and from the airport. A parent or other authorized person receives the student at the airport upon arrival. If the student is traveling with a Weekends Home Program chaperone, the chaperone then calls the parents or guardians. If parents cannot be reached, then emergency numbers are called. If these attempts are unsuccessful, the student is returned to TSBVI while staff continue the process of identifying and contacting a parent or guardian. If the student is traveling alone, the airport personnel call a TSBVI security officer, who then contacts the Weekends Home Program supervisor to arrange for the student to be returned to TSBVI.

Figure 7–1 shows the average weekly number of TSBVI students receiving transportation through the Weekends Home Program by all modes of travel for school years 2011–12 to 2015–16.

FIGURE 7–1
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED AVERAGE NUMBER OF STUDENTS TRANSPORTED BY THE WEEKENDS HOME PROGRAM
SCHOOL YEARS 2011–12 TO 2015–16

SCHOOL YEAR	AVERAGE TRANSPORTED PER WEEK
2011–12	101
2012–13	99
2013–14	99
2014–15	99
2015–16	98

SOURCE: Texas School for the Blind and Visually Impaired, May 2016.

DAY USE

Students also travel on day trips around the Austin area for field trips or other instructional outings. Teachers and teacher assistants plan and supervise day trips and typically serve as the drivers. Students also travel to local high school cooperative classes not available at TSBVI and to Austin Community College. For these courses, the Transportation Department driver transports the students, because the larger buses require a commercial driver license to drive. Day trips take place during the students' instructional day from 8:00 A.M. to 3:00 P.M., Monday to Friday. However, days and times may vary depending on students' schedules.
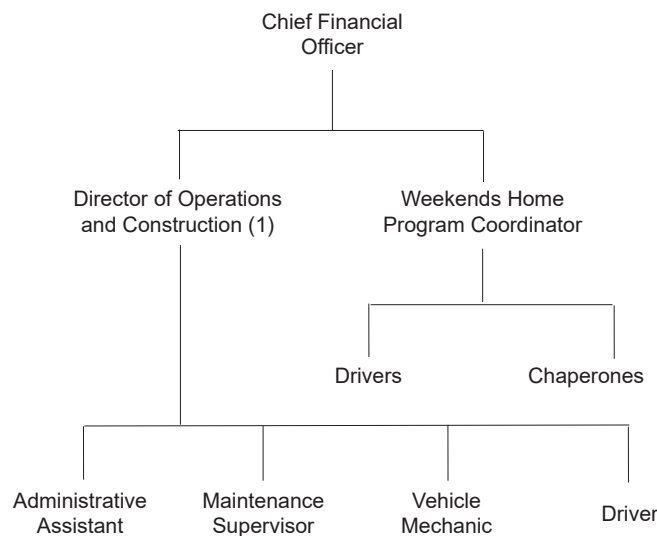
ORGANIZATION AND STAFFING

The organization of a transportation department affects the effectiveness and efficiency of transportation operations and the ability to meet goals for safety and timeliness. **Figure 7–2** shows TSBVI's Transportation Department organizational structure.

The chief financial officer oversees the budget of the Transportation Department and approves purchases. The director of operations and construction's primary transportation duties were to oversee the work of the administrative assistant, maintenance supervisor, vehicle mechanic, and driver; make vehicle procurement decisions; and ensure adequate facilities for storing, fueling, and maintaining TSBVI's vehicles. However, TSBVI indicated that since the time of the review, the director of operations and construction job title was changed to the director of school support services.

An administrative assistant provides support for transportation operations. These responsibilities include scheduling fleet needs for school staff during the school day, providing accident and incident reports, making and reporting fuel purchases, and purchasing supplies and parts for the office and maintenance garage.

The maintenance supervisor and vehicle mechanic positions both serve as TSBVI's vehicle mechanics. Both positions have Automotive Service Excellence certification, and the maintenance supervisor has a degree in automotive technology. The

FIGURE 7–2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED TRANSPORTATION DEPARTMENT, SCHOOL YEAR 2015–16

NOTE: (1) Texas School for the Blind and Visually Impaired indicated that since the time of the review, the director of operations and construction job title was changed to the director of school support services.
SOURCES: Legislative Budget Board School Performance Review Team; Texas School for the Blind and Visually Impaired, March 2016.

maintenance supervisor's assigned shift is 6:00 A.M. to 3:00 P.M. and the vehicle mechanic's shift is 8:00 A.M. to 5:00 P.M., which accounts for most of the hours when vehicles are in use. Some heavy equipment repairs require both mechanics. Mechanics share responsibility for on-call repairs outside of regular work hours. TSBVI handles maintenance onsite, and outsources vehicle maintenance performed by the manufacturer under warranty.

TSBVI's maintenance facility contains the offices for the Transportation Department and the Operations and Construction Department, and the garage area for vehicle repairs. The garage is equipped with portable hydraulic lifts appropriate for all vehicles in the fleet.

The administrative assistant receives daily trip inspection sheets from drivers when vehicles are returned after trips. If any defective issue or concern is noted, the administrative assistant notifies the mechanics. The mechanics make any necessary repairs, then work with the administrative assistant to enter repair data into the Texas Comptroller of Public Accounts (CPA) Office of Vehicle Fleet Management's state vehicle reporting.

TSBVI fuels its diesel-powered vehicles from an above-ground, 2,000-gallon tank. The tank is linked with a fuel reconciliation software program. The software enables users to generate reports by vehicle and vehicle user.

The Transportation Department has one driver, and this position is certified to operate all vehicle types on campus. The driver provides transportation for students and staff for School Support Services and the Operations and Construction Department.

The Weekends Home Program also has staff that are involved in transportation services. The program supervisor oversees the weekly transportation of TSBVI's residential students to and from their homes, develops routes, and schedules multiple modes of transportation to accommodate residential students. The Weekends Home Program also employs drivers and chaperones who accompany students on Weekends Home Program travel.

FLEET

TSBVI has a fleet of buses and vans to transport students for the Weekends Home Program and various activities during the week. These vehicles include activity buses, passenger vans, and Weekends Home buses. **Figure 7–3** shows the TSBVI fleet as of March 2016.

TSBVI's activity buses are painted white instead of yellow and do not have warning systems that require other vehicles to stop when loading and unloading the bus. Because they lack these features, activity buses may not be used to pick up and drop off students at traditional bus stops. However, the school does not provide traditional pickup and dropoff service.

TSBVI also uses passenger vans to transport students to off-campus locations for programs that include orientation and mobility training, attendance at Austin Community College classes, attendance at local public schools for classes not offered at TSBVI, and activities at community-based work sites. The vehicles used for these trips vary depending on the number of students to be transported and whether a vehicle equipped with a wheelchair lift is required. TSBVI has 11 vehicles equipped with wheelchair lifts to provide access for students.

TSBVI contracts with a private transportation company in San Antonio for chartered bus service for Weekends Home Program students who live in the San Antonio area. The contract was bid through CPA. TSBVI charters this route, rather than having staff drive a TSBVI-owned bus, to keep a backup Weekends Home Program bus on campus in case another bus breaks down. TSBVI also had difficulty retaining

FIGURE 7–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED TRANSPORTATION FLEET, AS OF MARCH 2016

TYPE	VEHICLES	WHEELCHAIR-ACCESSIBLE VEHICLES	USE
Activity Bus	4	4	Day trips for students; each vehicle seats up to 15 passengers
Passenger Van	18	3	Day trips for students; each vehicle seats up to 14 passengers
Weekends Home Program Bus	6	4	Weekends Home Program service; each vehicle seats up to 29 passengers
Light Truck	1	0	On-campus work use

SOURCE: Texas School for the Blind and Visually Impaired, March 2016.

drivers for this route because the short distance equates to fewer work hours. Subsequently, this route is the cheapest route for TSBVI to charter. TSBVI paid $50,054 for school year 2014–15 for these services.

EXPENDITURES AND FUNDING

As a state agency, TSBVI's main source of revenue comes from appropriations provided in the state's General Appropriations Act. Transportation includes expenditures for salaries, wages, and benefits for mechanics, administrative support, and a driver. It also includes vehicle maintenance costs and fuel purchases for the fleet of 29 vehicles.

TSBVI prepares an annual fiscal year operating budget. All budgets are based on the previous year's expenditures and may be adjusted depending on factors such as onetime expenses, merits, and promotions, changes in programs, and new or deleted deliverables. **Figure 7–4** shows the TSBVI Transportation Department budgets for school years 2013–14 and 2014–15.

TSBVI purchases vehicles through a CPA contract. The Texas Education Code, Section 34.001(a), states that "a school district may purchase school motor vehicles through the comptroller or through competitive bidding under Subchapter B, Chapter 44." TSBVI has purchased three activity buses since school year 2012–13, a total cost of $274,177.

For most Weekends Home Program trips, TSBVI incurs the cost. However, pursuant to the Texas Administrative Code, Title 19, Section 89.1090, the student's home district reimburses for transportation when TSBVI closes during breaks and major holidays. TSBVI bills the transportation costs to the districts annually, no later than the tenth day after classes are dismissed. The cost to the district for this transportation is the number of miles in the round trip from TSBVI to the published dropoff points multiplied by the maximum mileage rate for personal vehicle reimbursement, as established by CPA.

FIGURE 7–4
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED TRANSPORTATION DEPARTMENT BUDGET
SCHOOL YEARS 2013–14 AND 2014–15

CATEGORY	2013–14	2014–15	PERCENTAGE CHANGE
Vehicle Maintenance			
Salaries and Wages – Budgeted Positions (1)	$72,756	$76,368	5.0%
Longevity Pay	$3,120	$3,120	0.0%
0.5% of Salaries for Retirement	$364	$382	4.9%
1.0% of Salaries for Health Insurance	$728	$764	4.9%
Other Fees and Services	$1,000	$1,000	0.0%
Professional Fees – Medical Services	$50	$50	0.0%
Maintenance and Repair	$300	$300	0.0%
Printing and Copy Charges	$50	$50	0.0%
Freight and Delivery Services	$200	$200	0.0%
Consumables	$2,500	$2,500	0.0%
Maintenance Fuel Purchases	$1,500	$1,500	0.0%
Parts and Supplies	$28,000	$32,000	14.3%
Books and Reference Materials	$200	$200	0.0%
Total Vehicle Maintenance	**$110,768**	**$118,434**	**6.9%**
Fuel Purchases			
General Fuel Purchases	$120,000	$90,000	(25.0%)
Services and Purchases for Students	$0	$2,400	
Total Fuel Purchases	**$120,000**	**$92,400**	**(23.0%)**

Note:
(1)   Budgeted positions in the Transportation Department include the maintenance supervisor and the vehicle mechanic.
Source: Texas School for the Blind and Visually Impaired, March 2016.

TSBVI reimburses parents for mileage for travel to and from dropoff points and airports at a rate of $0.29 per mile. Parents are reimbursed in December, April, and June. For reimbursement, they must report mileage and provide receipts for additional costs, such as tolls and parking fees for airport pickups.

TSBVI funds its Weekends Home Program through a fund held outside the Treasury known as the Legacy Fund. TSBVI has received several bequests that are held in trust for the benefit and care of the students. The revenues generated by these bequests are accounted for and expended from the Legacy Fund. TSBVI's Legacy Fund Program for Weekends Home Program travel has been established as a budget line item in the General Appropriations.

Legacy Fund support of the Weekends Home Program includes the following expenditures:

- chartered buses;

- airline tickets;

- parent travel reimbursements;

- bus tickets;

- cab service;

- food for students; and

- miscellaneous student travel costs.

For fiscal year 2015, $405,915 was spent from the Legacy Fund for TSBVI's transportation expenditures.

FINDINGS

- ♦ TSBVI lacks an effective mechanism for parents to track the location of vehicles during Weekends Home Program trips.

- ♦ TSBVI lacks an efficient vehicle management process to counterbalance mileage accumulation among short-route and long-route vehicles.

RECOMMENDATIONS

- ♦ **Recommendation 29: Explore all available technology that enables parents to track the location and estimated time of arrival of Weekends Home Program vehicles.**

- ♦ **Recommendation 30: Establish a fleet replacement schedule and process to rotate vehicles among long routes and short routes to balance vehicle mileage accumulation and the need for vehicle maintenance and replacement.**

DETAILED FINDINGS

VEHICLE TRACKING (REC. 29)

TSBVI lacks an effective mechanism for parents to track the location of vehicles during Weekends Home Program trips.

The Weekends Home Program provides transportation home and back during the school year for residential students. Weekends Home travel does not provide for home stops; instead, parents must take their child to and from dropoff points.

During the Legislative Budget Board's School Performance Review team's onsite interviews, Weekends Home Program staff indicated that parents occasionally arrive late to pick up students at dropoff locations. When parents do not meet vehicles on time, the bus either waits while staff attempt to contact the parent or the vehicle continues on its route. Either option disrupts the planned schedule of stops and can cause further service problems for students and staff. Not communicating schedule changes or vehicle location information may negatively affect relationships with parents who may become concerned or angry when students do not arrive on time.

As a best practice, many schools use free smartphone applications that allow users to share a location in real-time and control who sees the user and for how long. These applications allow parents to track bus locations on smartphones, tablets, and computers with no software or setup required.

TSBVI should explore all available technology that enables parents to track the location and estimated time of arrival of Weekends Home Program vehicles. The Weekends Home Program supervisor should review the various smartphone applications and software programs on the market and determine which would work best for the school and for parents. TSBVI should then take the necessary steps to acquire and implement use of the application and/or program.

After an application has been selected, the Weekends Home Program supervisor should develop procedures and directions

for the application and train all relevant TSBVI staff on their proper use. The Weekends Home Program supervisor should then update the Weekends Home Program manual with procedures outlining how to access real-time vehicle information and communicate these procedures to parents.

Based on other schools' use of free applications for this purpose, the fiscal impact assumes that this recommendation could be implemented with existing resources.

FLEET REPLACEMENT SCHEDULING (REC. 30)

TSBVI lacks an efficient vehicle management process to counterbalance mileage accumulation among short-route and long-route vehicles.

As a result, vehicles may need to be replaced before reaching the age defined in the school's replacement policy. The school also could be missing an opportunity to reduce or delay some maintenance costs.

During onsite interviews, Transportation Department staff indicated that TSBVI replaces vans every 10 years or 100,000 miles and replace buses every seven years with no mileage specified. **Figure 7–5** shows age and mileage for TSBVI's four activity buses and a sample of four passenger vans.

Figure 7–5 shows that one passenger van (No. 4) will reach its mileage limit before the age limit. Two other passenger vans (Nos. 1 and 3) will reach the age limit before the mileage limit. This accumulation occurs because TSBVI does not rotate vehicles among long routes and short routes to balance vehicle mileage accumulation. Vehicle routes vary in length. When vehicles are not rotated among these routes, an imbalance in mileage per vehicle occurs. This imbalanced

practice causes two similarly aged vehicles to have different mileage during the same period. Fleet mileage imbalances may cause higher maintenance costs for similarly aged vehicles.

For example, one passenger van (No. 3) accumulates the most annual miles, despite already having the highest mileage in the fleet. Without rotation, this van would accumulate 146,765 miles by school year 2020–21, several years before the 10-year replacement threshold. The other vans have significantly lower projected miles, and would reach age replacement before hitting the mileage threshold.

Figure 7–5 also shows that activity buses are not being rotated. One activity bus (No. 49) is scheduled to accrue the most annual miles among these buses, despite another bus having lower mileage. If this trend continues, a significant mileage imbalance would result among activity buses.

Best practices indicate that vehicle rotation extends the useful life of buses and vans. The Brandywine School District in Delaware determined in 1998 that it could extend the useful life of buses by rotating them among longer and shorter routes to ensure even usage. This practice reduces uneven mileage accumulation on vehicles and helps reduce maintenance costs and extend bus life.

TSBVI should establish a fleet replacement schedule and process to rotate vehicles among long routes and short routes to balance vehicle mileage accumulation and the need for vehicle maintenance and replacement.

Transportation Department staff have ready access to mileage statistics. The director of operations and construction should instruct the Transportation Department's administrative

FIGURE 7–5
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED FLEET VEHICLES
MARCH 2016

(IN MILES)

MODEL YEAR	VEHICLE	MILEAGE	MONTHLY USE	FIVE-YEAR MILEAGE INCREASE	PROJECTED MILEAGE IN FIVE YEARS
2011	Activity Bus 49	83,938	1,927	86,715	170,653
2009	Activity Bus 77	118,025	208	9,360	127,385
2009	Activity Bus 78	133,984	213	9,585	143,569
2014	Activity Bus 84	22,637	1,495	67,275	89,912
2013	Passenger Van 1	12,833	686	30,870	43,703
2014	Passenger Van 2	4502	411	18,495	22,997
2013	Passenger Van 3	16,580	2,893	130,185	146,765
2013	Passenger Van 4	11,280	244	10,980	22,260

SOURCE: Texas School for the Blind and Visually Impaired, Fleet Report, March 2016.

assistant to develop a fleet replacement schedule and rotate vehicles between longer and shorter routes to balance vehicle mileage accumulation. The administrative assistant could build a schedule based on mileage and review bus mileage annually to determine the most effective routes to balance mileage for buses.

This recommendation could be implemented with existing resources. The recommendation could result in longer useful life and fewer maintenance and replacement costs that could result in savings; however, this amount cannot be estimated.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

RECOMMENDATION	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 7. TRANSPORTATION							
29. Explore all available technology that enables parents to track the location and estimated time of arrival of Weekends Home Program vehicles.	$0	$0	$0	$0	$0	$0	$0
30. Establish a fleet replacement schedule and process to rotate vehicles among long routes and short routes to balance vehicle mileage accumulation and the need for vehicle maintenance and replacement.	$0	$0	$0	$0	$0	$0	$0
TOTAL	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 8. TECHNOLOGY MANAGEMENT

The Texas School for the Blind and Visually Impaired (TSBVI) technology management function supports the operational, instructional, and financial functions of the school. Technology management requires planning and budgeting, inventory control, technical infrastructure maintenance, application support, and purchasing. The school has staff dedicated to administrative and instructional technology.

Administrative technology includes systems that support a school'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 school'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.

ORGANIZATION AND STAFFING

TSBVI develops an Annual Improvement Plan to improve student performance. The Annual Improvement Plan includes annual goals, objectives, strategies, and actions that TSBVI works toward for each school year. The school has three technology goals listed in their school year 2015–16 Annual Improvement Plan including:
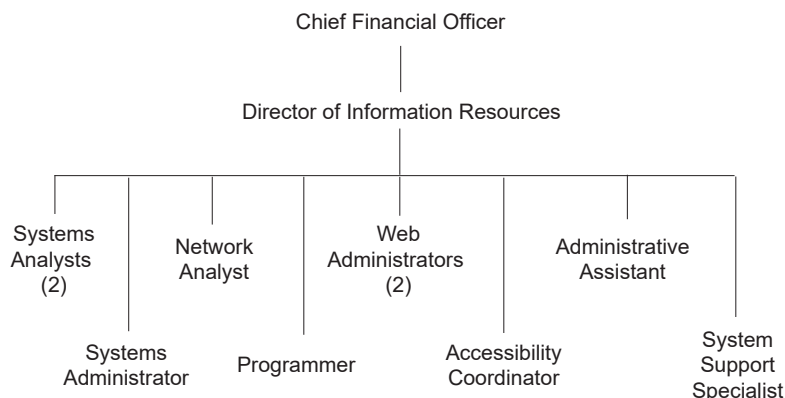
- Improve instructional video production, collaboration and information sharing.

- Develop expanded use of the web application and database to manage school year and summer short-term programs and train staff across campus in its use.

- Provide high-quality staff development for all TSBVI staff according to state/federal regulations, policy, and needs assessments.

TSBVI's Information Resources (IR) Department provides planning, purchasing, and support for instructional and administrative technology, infrastructure technology, and distance education technologies. In addition, the IR Department maintains the school's website and administrative databases that support UNIX-based applications like Maria and Postgres, and Microsoft SQL server.

TSBVI's IR Department has a staff of 9.5 full-time-equivalent positions and is led by the director of information resources (director), who reports to the school's chief financial officer (CFO). The IR department consists of two systems analysts, a systems administrator, network analyst, programmer, two web administrators, an accessibility coordinator, a systems support specialist, and a part-time administrative assistant. **Figure 8–1** shows the IR Department organization.

FIGURE 8–1
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED IR DEPARTMENT ORGANIZATION
SCHOOL YEAR 2015–16

NOTE: Since the time of the review, the IR department no longer has an administrative assistant position.
SOURCE: Texas School for the Blind and Visually Impaired Information Resources Department, March 2016.

The director provides leadership and support for the school's computing needs, telecommunications, and network. The director also oversees TSBVI's technology strategic planning and the overall management of the technology budget. The director serves as the liaison with other departments in the school in seeking ways to meet their information technology needs.

The systems analysts define and support database structures for in-house developed and commercially provided applications. The systems analysts also collaborate with users to gather requirements and provide specifications to the programmer for in-house developed applications. The systems analysts serve as leads for the following initiatives:

- Storage Area Network backups and recovery that support disaster recovery operations;

- Google distance learning classroom initiative;

- Google Apps email administration and cloud storage; and

- VMware virtual server implementation and support.

The systems administrator provides support for Microsoft Active Directory Services and user account management. This support includes authenticating and authorizing all users and computers in the school's network, assigning and enforcing security policies for all computers, installing or updating software, maintaining client imaging templates, and administrating the deployment of anti-virus applications.

The network analyst is responsible for all network infrastructure including wired, wireless, and fiber that support all the school's data and telecommunications needs. This responsibility includes configuring, installing, and maintaining all network hardware and software for switches, routers, firewalls, security access controls, and analog telephone lines.

The programmer designs, writes, and tests program code to implement requirements for in-house developed projects. The programmer also prepares documentation and assists with developing required training materials.

The web administrators design, develop and maintain TSBVI's website along with related web applications including several collaborative websites TSBVI shares with other organizations and institutions. In addition, the web administrators manage the school's Intranet, providing guidance and training on its processes and protocols.

The accessibility coordinator evaluates commercial software for accessibility capabilities or feasible workarounds to address accessibility barriers. In addition, the accessibility coordinator provides training to the educational staff in the use of accessibility tools. Examples of accessibility tools are specially designed keyboards, audible workstations, special switches, pointing devices, screen readers and communication programs, and various braille devices.

The systems support specialist serves as the first line of support for users requiring information or assistance with hardware, software, or information systems in the networked environment. The position also troubleshoots computer hardware, software, authentication, connectivity, and minor network issues for the administrative staff.

The administrative assistant serves part time in the IR Department and part time in the Business Office. In the IR Department, the position maintains departmental files, provides clerical support to IR staff, and purchases goods and services for the department, such as computer hardware and software, office supplies, and other miscellaneous items. In addition, the administrative assistant serves as the E-rate program administrator ensuring compliance with all aspects of the program to maximize benefits for the school. E-rate is a federally funded program governed by the Universal Services Administration Company School and Library Division to enhance a school's network and telecommunications infrastructure. The E-rate program provides discounts of up to 90.0 percent to financially assist eligible schools with telecommunications and Internet access. The E-rate program is funded in cycles beginning each July and continues through the following June.

STAFF DEVELOPMENT

According to the Texas Education Code (TEC), Section 21.451, staff development provided by schools must be conducted in accordance with minimum standards developed by the Commissioner of Education and specifically include training in technology. TSBVI's school year 2015–16 Annual Improvement Plan provides the basis for the IR Department's training goal to improve the quality and methods of electronic information sharing both on and off campus.

TSBVI uses technology teachers assigned throughout the school to reinforce training and assist teachers with using adaptive/assistive technology software and tools. Adaptive/ assistive technology is any item, piece of equipment, software program, or product system used to increase, maintain, or improve the functional capabilities of persons with

disabilities. Examples of adaptive/assistive technologies are special switches, keyboards, pointing devices, screen readers and communication programs.

The IR Department identifies staff training requirements through the annual employee performance appraisal process. Department management revises technology goals annually and identifies training required to support departmental needs. Training resources include vendors, webinars, online services, tradeshows, and regional education service centers.

TECHNOLOGY PLANNING

TSBVI does not have a formal technology plan since the Texas Education Agency (TEA) no longer requires it for E-rate fund submission. TSBVI's last formal technology plan was developed in 2013 for school years 2013–15. Instead of a formal plan, TSBVI's technology planning is driven directly by the needs of the students, instructional staff, and administration as outlined in their school year 2015–16 Annual Improvement Plan. Additionally, technology planning is driven by the Texas Department of Information Resource's 2016–2020 State Strategic Plan for Information Resources Management. The State Strategic Plan provides direction to state agencies and institutions of higher education for the use of information technology. TSBVI also has a technology planning committee that meets as needed to identify, review, and establish technology project requirements. The technology planning committee includes principals, the director of planning and evaluation, the director of information resources, and the director of residential programs, who oversees the technology teachers.

The IR Department has a disaster recovery plan that documents the strategies, personnel, procedures and resources required to respond to any short-or long-term

interruption to its essential business functions. The definition of a disaster is any significant interruption of service in computer and telecommunication functions for a period of more than 72 hours. The two primary core objectives of the department's disaster recovery plan are to restore systems and services to pre-disaster status and to provide systems and services from a remote location, if required.

In case of a power outage, TSBVI has two generators that automatically engage to maintain power for the major computing equipment and the campus access control system. The generators are tested weekly to ensure operational readiness. The department has a backup/recovery hot site at the Texas Department of Information Resource's Network Security Operations Center (NSOC) to maintain operations in case a disaster renders the computing environment inoperable. The school has a one-gigabit link to the NSOC that provides the capability to use that facility to continue business operations.

TECHNOLOGY POLICIES AND PROCEDURES

Schools need clear policies and procedures for the purchase of technology, its acceptable use, the application of copyright laws, and the control of software and hardware inventories.

TSBVI's Governing Board has adopted an Acceptable Use Policy (AUP) to establish procedures that ensure the school's network, electronic communication system, computer hardware and software, and personal communications devices will be used primarily for instructional and administrative purposes consistent with the school's mission and goals. The AUP applies to all TSBVI faculty, staff, students, board members, and individuals who are provided network access. **Figure 8–2** shows the key components of the AUP policy.

FIGURE 8–2
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED ACCEPTABLE USE POLICY KEY COMPONENTS
SCHOOL YEAR 2013–14

KEY COMPONENT	SUB-COMPONENTS (1)
Filtering	Internet Filtering Filtering Categories Request to Disable Filter
Access Rules	Student Access Staff Access Board Member Access All Users: Staff, Students, Board Members, Other Users
Staff Professionalism: Contact with a Student through Social Media	Permitted Electronic Communications Prohibited Electronic Communications Parent Choice

FIGURE 8–2 (CONTINUED)
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED ACCEPTABLE USE POLICY KEY COMPONENTS
SCHOOL YEAR 2013–14

KEY COMPONENT	SUB-COMPONENTS (1)
Student Participation in Social Media	
Director of Information Resources Responsibilities	
Individual User Responsibilities	On-Line Conduct Vandalism Etiquette No Expectation of Privacy Reporting Violations
Sanctions – Termination/Revocation of Use	
Disclaimer	
Issuing Equipment to Students	
Student Use of Personal Computing Devices, Mobile Telephones, or Other Personal Electronic Devices	Rules for Student Use of Personal Computing Devices Rules for Student Use of Personal Mobile Telephones Rules for Student Use of Other Personal Electronic Devices Sanctions – Termination/Revocation of Use
Staff Use of Personal Communications Devices	
Training	Staff Training Student Training Board Member Training

NOTE:
(1) There are no subcomponents where the column is blank.
SOURCE: Texas School for the Blind and Visually Impaired Information Resources Department, March 2016.

INVENTORY AND CONTROL

Technology hardware and software inventories can be extensive in a school, and ensuring that these tools are available to the right staff and at the right location is challenging. Protecting the assets of the school by accurately accounting for both the hardware and software of the school is a primary responsibility of TSBVI's IR Department.

TSBVI follows the Texas Department of Information Resources recommendation of a four-year replacement cycle for technology equipment including desktops, laptops, tablets, printers, and servers. **Figure 8–3** shows the number of administrative, instructional, and residential computers and iPads (tablets) in use at TSBVI.

SYSTEMS INFRASTRUCTURE AND INTEGRATION

Technology infrastructure is the underlying system of cabling, phone lines, hubs, switches, routers and other devices that connect the various parts of an organization through a wide area network (WAN) and through a series of local area networks (LANs). Maintaining a strong infrastructure and integrating these systems is critical to increased staff productivity, fewer costly data errors, and better customer service to the students, parents, and community served by the school.

TSBVI's systems infrastructure is built on a WAN framework that operates on a fiber-optic structure providing one-gigabit

FIGURE 8–3
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED NUMBER OF COMPUTERS AND IPADS IN USE
SCHOOL YEAR 2015–16

AREA	PC DESKTOPS	LAPTOPS	MAC COMPUTERS	IPADS (TABLETS)	TOTAL
Administrative	101	96	29	0	226
Instructional	454	447	1	542	1,444
Residential	97	0	11	0	108
TOTAL	**652**	**543**	**41**	**542**	**1,778**

SOURCE: Texas School for the Blind and Visually Impaired Information Resources Department, March 2016.

wireless connectivity throughout the campus. All school locations have a LAN to provide connectivity for local hardware devices such as printers/faxes and other digital devices. The school virtualized its server infrastructure, reducing the number of physical servers needed to support the school's computing requirements from 40 to 12. Virtualized server technology provides the capability to mask server resources by dividing one physical server into multiple isolated virtual environments, thus reducing the number of servers required. This reduction benefits the school by reducing hardware and licensing costs, space requirements, and energy consumption. It also improves operational efficiency and makes the server environment easier to support and maintain.

DATA SUBMISSIONS AND BUDGETING

TSBVI submits required student incident and behavioral information data through the Public Education Information Management System (PEIMS) to TEA. Data required for PEIMS is collected in a student information system and extracted to a table that is used as data entry for PEIMS submission; a PEIMS coordinator manages and supports that process at the time of submission. The PEIMS coordinator is not a part of the IR department. **Figure 8–4** shows the IR Department's school year 2014–15 operational budget.

TECHNOLOGY ACQUISITION PRACTICES

TEA developed the Financial Accountability System Resource Guide (FASRG) which outlines purchasing and reporting requirements for Texas schools. These standards apply to technology acquisitions as well; however, the need for both technical and purchasing expertise means that more coordination is often necessary when acquiring technology to not only ensure compliance with purchasing laws, but also to ensure that the school's technology needs are met.

Before TSBVI's technology procurement process begins, the school conducts meetings and surveys with staff to develop a master list of needs that are further prioritized by the superintendent and the superintendent's management team. TSBVI uses the following steps for the technology procurement process:

- prepare paper requisition;
- manually enter data into the school's accounting application;

FIGURE 8–4
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED
IR DEPARTMENT OPERATIONAL BUDGET
SCHOOL YEAR 2014–15

CATEGORY	AMOUNT
Salaries and Benefits	$518,868
Consumable Supplies	$8,500
Postage/Freight	$1,200
Rental Equipment and Other Rentals	$4,800
Travel	$1,500
Maintenance & Repair	$64,000
Other Fees & Services	$24,000
Temporary Services	$1,000
Books and Reference Materials	$1,000
Computer Software	$12,000
Computer Equipment – Controlled /Expensed	$10,000
Computer Equipment – Capitalized	$330,000
Professional Fees	$9,500
Parts & Supplies	$2,500
Membership Dues & Conference Fees	$1,800
Total Budget	**$990,668**
Total Students Served 2014-15	688
Average Per Student	$1,440

SOURCE: Texas School for the Blind and Visually Impaired Fiscal Year 2016 Proposed Operating Budget.

- enter requisition into the school's workflow approval tracking system;
- purchaser review and approval
- director of information resources review and approval
- superintendent review and approval
- create purchase order and send to selected vendor;
- prepare paper receiver document;
- receipt or performance of goods/services;
- send invoice for payment to accounts payable; and
- perform a manual match of purchase order, receiver, and invoice for payment.

Since the time of the review, TSBVI has updated its technology acquisition process to be electronic.

FINDINGS

♦ TSBVI's IR Department does not effectively manage and document technology support activities.

♦ TSBVI's IR staff are not adequately trained to support the school's instructional and administrative technology needs.

♦ TSBVI lacks a process for ensuring that computers purchased by the IR Department are all compatible and meet the needs of the school.

RECOMMENDATIONS

♦ **Recommendation 31: Establish a help desk function and implement a system to manage technology support activities.**

♦ **Recommendation 32: Assess IR Department staff skill sets against the school's technical support needs and develop professional development and training plans to address deficiencies.**

♦ **Recommendation 33: Develop and implement standards for computer platforms that will be purchased and used in the school.**

DETAILED FINDINGS

HELP DESK (REC. 31)

TSBVI's IR Department does not effectively manage and document technology support activities.

TSBVI does not have a process to record or track technology-related support requests from staff. The school has no central help desk system or work order management software. Instead, each IR Department staff manages and tracks the support requests they receive. Users make support requests via phone call, email or personal contact. **Figure 8–5** shows a flowchart of the typical technology issue troubleshooting process.

During onsite interviews, staff indicated that the IR Department receives a large number of daily technical support requests. The primary responsibility of one of the systems support specialists is to provide technical support to the administrative staff. However, many department staff are assigned to handle requests regardless of their positions or area of expertise. For example, systems analysts supplement routine technical support, including handling support calls

for username and password resets, adding new users, and use of desktop products. This practice takes specialized staff away from performing their regular job duties such as infrastructure improvements and completing strategic initiatives that meet the school's ongoing needs.

Help desk systems allow for a structured response to each request regardless of the user. These systems also allow for tracking of calls by user, type of situation, number of calls handled by each technician, or the resolution taken to resolve an issue or concern. Without any of this information, TSBVI is unable to determine if several users routinely need technical assistance or if the software has a glitch. This lack of information inhibits the school from determining if any recurring technology issues need to be addressed through additional training for school staff.

Additionally, each IR Department staff conducts research for each call instead of using a databank of known responses. Each of these scenarios contributes to efficiency loss by users and technicians. By having to call or email IR Department staff, there may be a delay based on the availability of staff, which can lead to additional down time for a teacher or administrator. TSBVI also has no way to determine if IR Department staff are responding to technical support requests in a timely or effective manner.
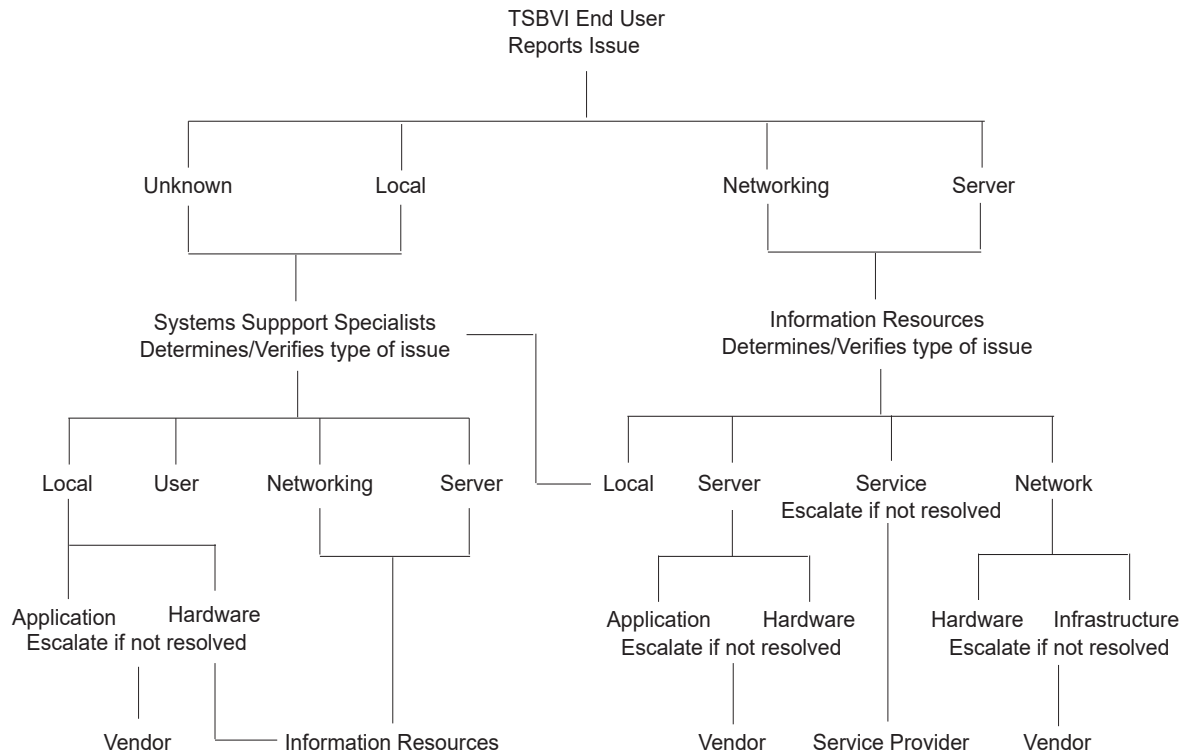
TSBVI should establish a help desk function and implement a system to manage technology support activities.

The director of information resources should research available work order management system software and present product options to the technology planning committee. The director and the committee should determine which options best fits the needs of TSBVI. The work order management system software should have the capability to capture pertinent data to track and monitor status, build a knowledge repository, and measure support effectiveness.

Once a work order management system software is selected, the director of information resources should facilitate training of the IR Department and other TSBVI staff on its use. Initially, the administrative assistant and systems support specialist could staff the help desk. The director of information resources should also facilitate training of the help desk staff on the selected work order management system software and level-one support tasks, such as login ID and password resets.

The director of information resources should use the data collected by the work order management system software to determine if IR Department staff are handling technical

FIGURE 8–5
TEXAS SCHOOL FOR THE BLIND AND VISUALLY IMPAIRED TYPICAL TECHNOLOGY ISSUE TROUBLESHOOTING PROCESS
FLOWCHART
SCHOOL YEAR 2015–16

SOURCE: Texas School for the Blind and Visually Impaired Information Resources Department, March 2016.

issues effectively and to assess if there are common issues occurring throughout the school that may need to be addressed with additional training for TSBVI staff.

The fiscal impact assumes an estimated annual cost of $6,900 for the purchase of a work order management software system. This estimate is based on a review of work order management software systems which charge on average $690 per technical user per year. As TSBVI has 10 technical staff, the estimated annual cost would be $6,900 (10 x $690).

Since the time of the review, TSBVI's IR department has filled the help desk position.

PROFESSIONAL DEVELOPMENT AND TRAINING (REC. 32)
TSBVI's IR staff are not adequately trained to support the school's instructional and administrative technology needs.

TSBVI staff are required to use various instructional and administrative software applications/systems. These include instructional software programs that are designed to enhance the general curriculum and improve students' skills through extra practice, simulations, and problem solving opportunities. These also include administrative software programs such as word processors, spreadsheets, databases, presentations, and charts and graphs, as well as school management software that helps staff manage various school tasks such as the development and maintenance of student records, school finances, and student information systems.

These applications can be complex to operate and master. During onsite interviews, TSBVI's teachers indicated that their understanding and training in key instructional and administrative programs was not adequate. This has consistently made it frustrating and time-consuming for staff

to use these programs. Staff is often not proficient enough in the applications/systems to use them to their fullest capabilities.

TSBVI's IR Department provides technical support and training to staff on instructional and administrative programs; however, department staff indicated that they lacked the training and knowledge in these programs to adequately support the user community. As a result, staff search for solutions to problems by trial and error, using such avenues as free online videos or by calling the manufacturer for assistance.

During onsite interviews, IR Department staff stated that these extra steps in the process delay their ability to resolve technical problems in an efficient manner.

The IR Department's annual employee evaluation process identifies the IR staff's professional development and training needs. The department uses internal classes, seminars, webinars, and on-line resources to provide training to its staff. However, the director does not prepare a formal professional development plan or training schedule. The department has no process to ensure that staff are being trained on the programs and applications that best fit the needs of the school. Additionally, the IR Department has no clear training guidelines for areas of improvement, including goals, rationales, activities, milestones, resources, and a statement of consequences if there is no evidence of growth.

Without a professional development plan and training schedule, the IR Department lacks a methodology for determining the level of funding needed each year for professional development. Thus, the funds the department allocates for professional development and training can change significantly each year. For example, the IR Department's operating budget in school year 2014–15 lists $9,500 for professional fees, which includes education training. The budgeted amount for professional fees decreased to $5,000 in school year 2015–16. However, there was no indication that this decrease in funding corresponded to any change in the training needs of department staff.

TSBVI should assess IR Department staff skill sets against the school's technical support needs and develop professional development and training plans to address deficiencies.

The director of information resources should develop a professional development and training plan that includes specific standards, training requirements, policies, proficiency standards, goals, and timelines to ensure all IR Department

staff attains the capacity to meet the technical support needs of TSBVI staff. The plan should also include training schedules and formats for all IR Department staff.

The director of information resources should work with the CFO to ensure its departmental professional development and training budget is appropriate to meet its needs. In addition, the IR Department staff should regularly evaluate the progress against the plan to meet the school's changing technology needs.

No fiscal impact is assumed for this recommendation, as professional fees, which includes education training, is included in the budget.

PERSONAL COMPUTING STANDARDS (REC. 33)
TSBVI lacks a process for ensuring that computers purchased by the IR Department are all compatible and meet the needs of the school.

During onsite interviews, TSBVI staff indicated they may requisition a PC- or a Mac-based on their own personal preferences. This practice leads to several problems including:

- IR Department staff is not adequately trained to support the MacOS platform, which results in longer than acceptable timeframes to resolve problems.

- State agency software programs are designed to operate on the Microsoft Windows platform, which makes them difficult to operate or inaccessible on a Mac. Often, it requires technical time and expertise to make the applications accessible.

- Although TSBVI is eligible for the Apple school discount, Macs are costlier than a comparable or more feature-rich PC. For example, an Apple Mac Pro costs about $2,500 while a similarly configured Dell Latitude PC costs about $1,000.

A computer platform is defined as a hardware device and an operating system that an application, program or process runs upon.

As a best practice, personal computing standards are established to ensure supportability and maintainability of the technology, compatibility, and integration between computing technologies. In addition, standards ensure security of the network, the systems, and the information they contain. Computing standards facilitate the selection of cost effective hardware, software, and other technologies that are appropriate for use in the classroom to complement the curriculum and on

the school's instructional and administrative needs. The department will adhere to these standards to maintain a reliable and efficient personal computing environment for all users on the school's network. The primary considerations in developing hardware and software standards are:

- optimizing the levels of support IR can provide;

- managing the cost of acquisition, refresh, and support of technology;

- improving service via group policy management (automatic deployment); and

- ensuring network compatibility for upgrades and security.

TSBVI should develop and implement standards for computer platforms that will be purchased and used in the school. The director of information resources should review the approved computer platform standards with the executive management team to receive their approval of the selected platform. The web administrators should post the standards on the school's Intranet site so they are available to all school staff. The administrative assistant should ensure that all personal computing purchases adhere to the standards before placing an order. It should be recognized that there might be situations where personal computing hardware and/or software will need to be purchased to meet a specific requirement such as specialized instructional and multimedia purposes. The director of information resources and the respective department head should approve any deviation from the established standards.

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. Some of the recommendations could enable the agency to reallocate funds or staff time to implement other recommendations in this report.

	RECOMMENDATION	2017–18	2018–19	2019–20	2020–21	2021–22	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 8. TECHNOLOGY MANAGEMENT								
31.	Establish a help desk function and implement a system to manage technology support activities.	($6,900)	($6,900)	($6,900)	($6,900)	($6,900)	($34,500)	$0
32.	Assess IR Department staff skill sets against the school's technical support needs and develop professional development and training plans to address deficiencies.	$0	$0	$0	$0	$0	$0	$0
33.	Develop and implement standards for computer platforms that will be purchased and used in the school.	$0	$0	$0	$0	$0	$0	$0
TOTAL		($6,900)	($6,900)	($6,900)	($6,900)	($6,900)	($34,500)	$0