

LEGISLATIVE BUDGET BOARD

Texas School for the Deaf

Management and Performance Review

LEGISLATIVE BUDGET BOARD STAFF
McCONNELL JONES LANIER & MURPHY LLP

JUNE 2017



TEXAS SCHOOL FOR THE DEAF

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LEGISLATIVE BUDGET BOARD

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June 30, 2017

Claire Bugen
Superintendent
Texas School for the Deaf

Dear Ms. Bugen:

The attached report reviews the management and performance of the Texas School for the Deaf's (TSD) educational, financial, and operational functions.

The report's recommendations will help TSD 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 TSD.

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,

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

Ursula Parks
Director
Legislative Budget Board

/lc

June 30, 2017
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cc: Eric Hogue, President
Angie Wolf, Secretary
Ryan Hutchison, Member
Susan Ridley, Member

Shawn Saladin, Vice-President
Sha Cowan, Member
Tyran Lee, Member
David Saunders, 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, 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 Deaf (TSD) is a state agency as established in the Texas Constitution and the Texas Education Code. TSD also is a school that provides a continuum of direct educational services to students, birth to age 22, who are deaf or hard of hearing and who may have multiple disabilities. TSD's governance structure, leadership, school management, and planning process provide the foundation for effective and efficient education of its students. TSD is located in Austin and is the oldest continuously operating public school in the state. The campus covers approximately 67 acres and has 48 buildings.

Since TSD was established by the Sixth Legislature, Regular Session, 1856, the organization's name and governing structure has changed multiple times. In 1949, the Legislature placed TSD in the supervision of the Texas State Board of Hospitals and Special Schools and officially changed the name to the Texas School for the Deaf. In 1951, the

Legislature directed the State Board of Education to govern the school, thereby formally identifying TSD as an educational institution. In 1979, the Legislature transferred the responsibility for governing TSD from the State Board of Education to the existing Governing Board structure.

TSD admits students through a referral by a school district, or referral by a parent or adult student. TSD encourages families to investigate the special education services offered by their local school districts first. However, parents and adult students may choose TSD rather than the program offered locally in accordance with the eligibility criteria established in the Texas Education Code (TEC) and the school's Governing Board policy on admissions. TSD has school year students and students who attend summer programs. The school year student population includes Austin-area day students and residential students from across the state who reside at the school on weekdays and return home for the weekends.

During school year 2014–15, TSD's total student enrollment was 584 with 322, or 55.1 percent, day students and 262, or 44.8 percent, residential students. TSD's summer and other programs enrollment was 444 students. The student demographics include: 45.5 percent White, 32.6 percent Hispanic, 13.6 percent African American, 4.3 percent Asian, and 1.7 percent two or more races. Approximately 74.3 percent of TSD's students were identified as economically disadvantaged.

TSD also acts as a statewide educational resource center on deafness providing a variety of educational services to families, students, programs, and professionals statewide through the Educational Resource Center on Deafness (ERCOD). ERCOD programs include the Toddler Learning Center (TLC), which serves children birth to age three through home visits, parent education, and classroom instruction. ERCOD also provides deaf education to the more than 7,000 deaf and hard-of-hearing students statewide and the families and teachers who support them. In addition to a curriculum for prekindergarten to grade 12, TSD offers the Adult Curriculum for Community, Employment, and Social Skills (ACCESS) Program to students ages 18 to 22.

EDUCATIONAL OVERVIEW

In 1998, TSD and TEA entered into a memorandum of understanding (MOU) agreement that outlines a set of quality indicators to evaluate student performance. The MOU requires that TSD 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 students' individualized education program (IEP) goals and objectives; and nonacademic indicators such as attendance rates, dropout rates, and other measures of student success. The MOU specifies the quality indicators for each of three school levels. In accordance with the MOU agreement, TSD administers the Stanford Achievement Test, Tenth Edition (SAT-10), and uses the results to assess student progress. TSD measures the student performance on the SAT-10 against the deaf and hard-of-hearing norms established by the Gallaudet Research Institute. TSD students with the most severe cognitive disabilities are evaluated on mastery of IEP objectives, not SAT-10 scores. **Figure 1** shows that TSD has consistently met or exceeded the MOU academic and nonacademic indicators from school years 2011–12 to 2014–15.

FINANCIAL OVERVIEW

TSD receives appropriations from the Legislature and uses state systems for accounting, payroll, and property management. As a state agency, TSD 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, TSD was appropriated \$55.2 million in All Funds, with 92.8 percent of its funding from state appropriations. **Figure 2** shows TSD's biennial appropriations for fiscal years 2014–15 and 2016–17 by method of finance.

Figure 3 shows TSD's appropriations by program. Classroom instruction and school administration make up 42.8 percent of the appropriations; support services, residential programs, and outreach services make up the remaining 57.2 percent.

ACCOMPLISHMENTS

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

STATEWIDE COMMUNITY ENGAGEMENT AND OUTREACH

TSD has established a comprehensive outreach program with statewide services to deaf and hard-of-hearing students and their families. TSD's Educational Resource Center on Deafness (ERCOD) provides support for all communication options, including American Sign Language (ASL), Listening and Spoken Language, English signs, and Spanish bilingual interpreters. ERCOD provides outreach support, resources, and programs for approximately 7,000 deaf and hard-of-hearing students statewide, including the 584 TSD students in Austin, in addition to their families and the professionals who serve them.

ERCOD offers services in five areas, including birth (birth to age three), family, student, professional, and communication and development. ERCOD places significant emphasis on early intervention for deaf education and services. TSD's Parent Infant Program, for children ages birth to three years,

**FIGURE 1
TEXAS SCHOOL FOR THE DEAF STUDENT PERFORMANCE COMPARED TO ACADEMIC AND NONACADEMIC INDICATORS
SCHOOL YEARS 2011–12 TO 2014–15**

DIVISION	2011–12		2012–13		2013–14		2014–15	
	TARGETED	ACHIEVED	TARGETED	ACHIEVED	TARGETED	ACHIEVED	TARGETED	ACHIEVED
Academic Indicators								
Elementary	75.0%	91.0%	80.0%	91.0%	80.0%	89.0%	80.0%	87.0%
Middle School	80.0%	97.0%	80.0%	97.0%	82.0%	97.0%	82.0%	96.0%
High School	85.0%	93.0%	85.0%	92.0%	85.0%	89.0%	80.0%	87.0%
Non-Academic Indicators								
Elementary	90.0%	96.0%	90.0%	95.0%	90.0%	96.0%	90.0%	91.0%
Middle School	90.0%	94.0%	90.0%	95.0%	90.0%	96.0%	90.0%	92.0%
High School	90.0%	97.0%	90.0%	95.0%	90.0%	95.0%	90.0%	91.0%

SOURCE: Texas School for the Deaf, Memorandum of Understanding Report to the Texas Education Agency, school years 2011–12 to 2014–15.

**FIGURE 2
TEXAS SCHOOL FOR THE DEAF BUDGET BY METHOD OF FINANCE
2014–15 AND 2016–17 BIENNIA**

(IN MILLIONS)

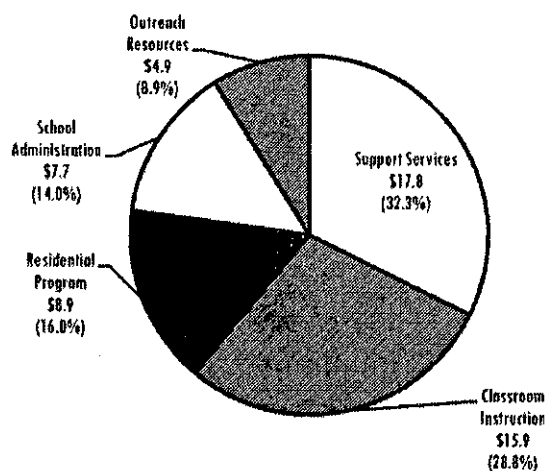
METHOD OF FINANCE	EXPENDED/BUDGETED 2014–15	APPROPRIATED 2016–17	BIENNIAL CHANGE	PERCENTAGE CHANGE
General Revenue Funds	\$36.0	\$35.0	(\$1.0)	(2.6%)
General Revenue–Dedicated Funds	\$0.0	\$0.0	\$0.0	N/A
Federal Funds	\$4.1	\$3.9	(\$0.2)	(5.4%)
Other Funds	\$15.8	\$16.2	\$0.4	2.7%
Total, All Methods of Finance	\$55.9	\$55.2	(\$0.8)	(1.3%)

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

**FIGURE 3
TEXAS SCHOOL FOR THE DEAF APPROPRIATIONS BY PROGRAM
2016–17 BIENNIUM**

(IN MILLIONS)

TOTAL: \$55.2



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

includes home visits with families and morning classes in the TLC. ERCOD parent liaisons provide direct resources and support families statewide, answering questions on the telephone, through email, and through walk-in requests. ERCOD instructs parents in sign language and how to read to their deaf and hard-of-hearing children in person or remotely, using videoconference programs. Student-focused services include an introduction to ASL storytelling; student retreats; summer programs; a science, technology, engineering, and mathematics (STEM) camp; and STEM-related activities. Remote services to students include online resources and interactive ASL storytelling with approximately 200 participants statewide in about 20 locations. Through 3 one-week sign language courses, ERCOD delivers professional development annually to approximately 500

interpreters, teachers of the deaf, and teachers of ASL. TSD disseminates information about TSD and its ERCOD programs statewide through print, social media, websites, and news outlets. ERCOD's efforts help to promote TSD's mission statewide to ensure that its students learn, grow, and belong.

DISTANCE LEARNING

TSD has maximized its distance learning resources to provide educational services to the deaf and hard-of-hearing individuals throughout Texas. These resources include two key components: a videoconferencing capability and a distance learning website. Videoconferencing extends access to educational resources, programs, and services to locations statewide. The distance learning website is a collaboration between Regional Education Service Center XI's Deaf and Hard of Hearing Services, and TSD's ERCOD. Through TSD's efforts and collaboration with other entities, the distance learning program expands the resources available to deaf and hard-of-hearing students, their family, and the professionals who serve them.

ADULT LEARNING PROGRAM

TSD has established an effective transitional living program to serve deaf and hard-of-hearing students ages 18 to 22 who have graduated from high school, but need more transition-related training to prepare them for independent living and employment. The Adult Curriculum for Community, Employment, and Social Skills (ACCESS) Program targets three areas: transition planning, employment skills, and independent living skills. It is an instructional program within the Academic Affairs Division with 31 staff, including teachers, full-time and part-time job coaches, employment and workforce specialists, nurses, and an intervener. The ACCESS Program also includes staff from other departments,

including counselors, social workers, and behavior specialists. In school year 2014–15, the program served 66 students who reside in a variety of living arrangements that support their levels of independence.

HOME GOING

TSD has developed an efficient process to transport residential students home each weekend to regularly connect students with their families. TSD's Homegoing Transportation program provides for transportation by motor coach, airplanes, or shuttle vans for students who live within a two-hour radius of TSD. The program's transportation coordinator works with residential and school staff and parents to ensure that all pertinent student information is available to staff who travel with students. Students younger than age 15 and students with special needs are accompanied by chaperones and school behavior specialists for the trips home. The transportation coordinator maintains a list of all students that travel and adjusts schedules depending on whether a student is not going home or is not returning to school the following week. During school year 2014–15, TSD transported 217 residential students every weekend via the following methods of transportation:

- 192 students via motor coaches, averaging 32 students per motor coach;
- 14 students via airline; and
- 11 students via vans.

TSD's efforts to effectively manage the Homegoing transportation process ensures that its students remain connected to their families and home communities.

LEGAL SERVICES

TSD and the Texas School for the Blind and Visually Impaired (TSBVI) established an Interagency Cooperation Contract (ICC) agreement to efficiently share legal services that reduces administrative costs for legal fees. TSD shares the cost of its attorney with TSBVI in accordance with the ICC agreement executed in November 2015. The ICC agreement outlines the services that the attorney provides to TSBVI, and the basis for calculating reimbursable costs paid to TSD by TSBVI. 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 Westlaw services, legal research books and subscriptions, continuing legal education, bar and professional dues, and membership in the Texas School Boards' Council of School Attorneys. TSBVI also

pays the actual costs for travel, office space, telephone, and business materials for TSBVI matters, either directly or through TSD's quarterly billings. The ICC limits the cost-sharing arrangement to \$80,000 per contract year. TSD's general counsel is on the school's payroll, but the attorney serves 50.0 percent of working hours as general counsel to TSBVI. This arrangement reduces costs and ensures that both schools have access to quality legal services and expertise.

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 TSD'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

METHOD OF INSTRUCTION

Analyze supplementing the use of ASL with other modes of communication. TSD supports only an American Sign Language (ASL) and English bilingual program, although the Texas Education Code (TEC) encourages the use of a variety of language modes to accommodate students' needs.

Pursuant to the TEC, Section 29.302 (b), "students who are deaf or hard of hearing should have the opportunity to develop proficiency in English, including oral or manual-visual methods of communication, and American Sign Language."

ASL is a visual-spatial-tactile language with its own grammar and syntax. The shape, placement, and movement of the hands, as well as facial expressions and body movements convey meaning. ASL uses signs representing ideas, manual signals, and an alphabet (finger spelling). ASL is not a manual version of English, and its grammar and syntax are not the same as English. Manual-visual languages, differ from ASL because they combine speaking and signing simultaneously.

Manual-visual languages were developed to help the deaf students with written literacy. Proponents believe that they help with learning written and spoken English, because English words are manually reproduced in the same order.

TSD has a bilingual program, and its goal is to ensure that students access English and ASL. Students at TSD may access English only in its printed form and some may access English through its printed form as well as its spoken form. TSD's instructional goal is for students to have ASL as their natural visual language in grades kindergarten to grade 12. TSD does not offer instruction in English-based, manual-visual languages.

ADMISSION, REVIEW, AND DISMISSAL

Implement an admission, review, and dismissal (ARD) support infrastructure, scheduling system, and meeting management strategies that more equitably distribute chairing responsibilities and optimize the time required for principals and other professional staff to prepare for and attend ARD meetings. TSD does not efficiently conduct ARD committee meetings to minimize the professional staff time required to participate in these meetings. All TSD students require an annual ARD meeting. TSD implements all annual ARD meetings in the spring of each school year instead of on the ARDs' respective anniversary dates throughout the year. According to TSD, the ARD season starts in January and schedules can cause delays because of the limited availability of required committee members. Convening all annual ARD meetings in the spring occupies principals and other professional staff, limiting their time to attend to other responsibilities.

Preparing for, chairing, and attending ARD committee meetings is the most time-consuming activity in which TSD staff engage. However, the organization, preparation, and staffing that TSD has for handling ARDs is not clearly defined or used and has not been adapted to facilitate the increase in the number of TSD students and the increased complexity of their needs. Using TSD data, the review team estimated that preparing for annual ARD committee meetings, chairing them, and updating students' IEPs subsequent to the meeting required 1,855 staff hours for school year 2014–15, or 46 staff weeks, based on a 40-hour work week. Overall, principals chaired 43.6 percent of the annual ARD committee meetings; other staff, such as assistant principals, curriculum specialists and the ARD facilitator, chaired 56.4 percent of the ARDs.

Each school schedules its own ARD committee meetings, and forwards details of the ARD to the registrar, who assembles a master schedule. This disparate scheduling may hinder professional staff who work across school levels to attend meetings which require their expertise. Although TSD invites local education agencies (LEA) to participate in annual ARD committee meetings for their respective students, LEAs have not historically attended these meetings because most TSD students enroll through parent referral, not LEA referral. TSD has one ARD facilitator position. The ARD facilitator and the special education/records office specialist process, review, and prepare all ARD documentation for accuracy and compliance with the special education laws for all students, across all school departments and grade levels, including the ACCESS program.

Compiling information in preparation for the ARD meetings and after the meeting is challenging and time-consuming. Additionally, TSD does not have a process to monitor and ensure that post-ARD information is complete and accurately entered into the school's IEP database.

RECRUITMENT, HIRING, AND RETENTION

Implement a process to analyze staff termination rates and associated data to develop a comprehensive recruiting strategy and staff retention plan. TSD lacks an effective process for hiring and retaining qualified staff. Termination occurs when staff leaves an organization either voluntarily or involuntarily. TSD experienced 126 terminations (26.7 percent of total full-time-equivalent (FTE) positions) during school year 2014–15, with the largest turnover in residential specialist positions, in percentage of total terminations for the year (28.6 percent) and the percentage of TSD's total FTE positions (7.6 percent). From school years 2011–12 to 2013–14, the categories for principal, teacher, or supervisor experienced about a 3.0 percent increase in terminations each year, from 6.5 percent to 9.4 percent to 12.2 percent respectively. Among teacher aides, termination rates decreased from 20.1 percent to 15.8 percent from school years 2011–12 to 2012–13, but significantly increased during school year 2013–14 to 25.8 percent.

TSD faces challenges in hiring staff with the required certifications and experience. TSD teachers are required to hold either a special education or deaf education certification and the appropriate content certification. Additionally, all teachers must pass the Texas Assessment of Sign Communications or Texas Assessment of Sign Communications- American Sign Language examinations

and must have a sign skill of at least advanced. These requirements make it a challenge to hire qualified teaching staff through traditional recruiting methods. Additionally, many other TSD positions also require either a certification or experience in ASL. As a result, most of TSD recruits most of the teachers and staff through staff networking activities, such as conferences, seminars, and professional relationships.

TSD does not have a staff retention plan. TSD's high staff termination rates have led to heavy workloads for staff across the school. Additionally, TSD's lack of a formal recruiting strategy and plan, combined with a lack of conducting termination analysis by position, has led to ineffective use of human resources.

FINANCIAL

BUSINESS SERVICES OPERATIONS

Review Business Services Division practices to improve efficiencies in operations. Some of TSD's business practices are inefficient. TSD is scheduled to convert to the Comptroller of Public Accounts' Centralized Accounting and Payroll/Personnel System (CAPPS) during fiscal year 2018. Although CAPPS could address some of the inefficiencies, TSD could improve other practices, including:

- explore implementing an online payments website to give parents the option of making deposits to their students' accounts online;
- establish a procedure encouraging vendors to send invoices electronically rather than through the postal mail services;
- assign some of the revenue and travel accountant's travel advance duties to another position in the Business Services Division;
- streamline the check processing and deposits process by adopting the remote check capture practice.

INTERNAL AUDIT

Adopt a board policy that requires the procurement of an external firm to conduct internal audit services at least every five years, and to implement procedures to ensure that TSD timely requests delegation of authority from the State Auditor's Office (SAO) to continue to contract for internal audit services. TSD does not properly manage the outsourced internal audit function. TSD's internal audit function has been outsourced to the same audit firm since at least 1999. Internal audit fees have increased each year for

the past three years. For fiscal years 2013, 2014, and 2015, the fees were \$24,615, \$29,175, and \$33,806, respectively. TSD has neither reprocurd since 1999 nor consistently requested delegation of authority from SAO. Since TSD has been contracting for internal audit services, SAO has documented the receipt of only two TSD delegation requests, in November 2012 and in April 2016. TSD did not have a process to request its delegation of authority from SAO before November 2012 or from the authorization's expiration at the end of fiscal year 2013 to April 2016.

WAREHOUSE

Review warehouse operations and implement a just-in-time (JIT) inventory strategy. TSD lacks an efficient process to manage the use of inventory stored in the warehouse. The primary use of the warehouse is to house consumables and maintenance, repair, and operations goods. TSD's warehouse staff also receives and stores fuel and dispenses it daily to buses, cars, trucks, carts, and lawnmowers. TSD staff review the inventory list to determine available warehouse inventory; but the school does not have a procedure that requires staff to check the list before purchasing items from vendors. The warehouse contains inventory, valued at \$45,000 as of March 2016. TSD staff does not use some of the inventory. TSD does not have a plan to dispose of surplus or obsolete property properly and remove the inventory from school records.

Since the maintenance function transferred to the Texas Facilities Commission (TFC) in September 2013 and the custodial and grounds function transferred to TFC in September 2015, fewer bulk products require maintenance in the warehouse inventory. TFC houses some of its maintenance items in a designated section of TSD's warehouse.

OPERATIONAL

BOARD TRAINING

Establish a continuing Board training and orientation system to ensure that new and tenured board members understand their responsibilities and the role, structure, and process of the board. TSD lacks an effective training plan and process for newly appointed and existing board members. According to the board training records, some board members have not completed the minimum number of continuing education hours required by board policy. Additionally, no board members attended governance-specific training in school year 2013-14 and 2015-16, as outlined in board policies. Furthermore, TSD's board lacks a

formal orientation program for newly appointed board members and an ongoing training program for tenured board members.

SUCCESSION PLANNING

Develop a comprehensive, coordinated succession plan that contains strategies and implementation initiatives to prepare TSD for eventual changes in leadership throughout the organization. TSD lacks a formal succession planning strategy to ensure continuity of leadership at the superintendent level and throughout the organization. The superintendent has been in this position for about 18 years. Members of the superintendent's executive leadership team (ELT) have been with TSD for an average of about 10.5 years, but they have been in their existing positions for an average of about four years.

At the time of the onsite review, the board had begun discussions about succession, but it had not developed a succession plan. However, the superintendent has focused on developing a succession planning strategy for the ELT. As a result, the superintendent is investing in the ELT through training and professional leadership development through the Conference of Educational Administrators of Schools and Programs for the Deaf.

Considering the superintendent's tenure and the average time ELT members have been in their positions, the absence of succession planning throughout the school could result in discontinuity of leadership, upheaval, and discord if key staff leave the school.

REALIGNMENT OF FUNCTIONS

Realign specific functions within divisions of TSD's organizational structure that contain incompatible functions to divisions more appropriate for the functions to balance workloads among division directors and maximize staff expertise. TSD's organizational structure does not align compatible functions within each division, resulting in unbalanced workloads among division directors that report to the superintendent. The workload among division directors who constitute the ELT, is not spread evenly at the division level, requiring some directors to manage incompatible functions with their areas of responsibility. For example, the director of support operations manages functions such as Athletics, Risk Management, and Student Health Services; these functions are not compatible with typical support operations such as Food Services, Homegoing Transportation, Security and Interpreting

Services. Additionally, the director of student life manages functions such as Residential Services, Student Development, Student Alternative Programs, and After School Programs, but does not oversee Athletics, which is a key component of student life.

The director of academic affairs manages Student Support Services, which include Speech and Audiology Services, Vision and Orientation and Mobility Services, and Physical and Occupational Therapy, but does not manage Student Health Services. The CFO manages the Business Services Division, but does not manage the Risk Management function. Requiring division directors to manage functions incompatible within their respective divisions contributes to the risk of not maximizing staff expertise, workload imbalance, low morale, and potential burnout within the ELT that could affect student performance and the delivery of student services.

FACILITY RENTAL

Conduct a facilities rental fee rate analysis in coordination with the Texas Facilities Commission to ensure that fees charged adequately cover all elements of operating, administrative, and capital costs. TSD lacks a process to evaluate the full costs of renting its facilities to ensure the rental fee schedule is adequate to recoup all applicable usage costs. TSD regularly rents campus facilities for a fee to outside organizations. Facilities used for rentals include dormitory rooms for weekend and summer workshops, the auditorium for plays and productions, and the swimming pool for law enforcement exercises and training. TSD also rents its campus grounds to production companies for commercial and movie shoots.

Although renting facilities to outside organizations fosters community engagement and support for the school, this practice requires additional resources. TSD has not evaluated whether rental fees adequately cover all elements of building usage, such as the decrease in physical condition, and has not assessed whether the rental fees provide full recovery of maintenance, custodial, grounds-keeping, and security costs. TSD averaged approximately \$207,000 annually in facility rental revenue from school years 2012-13 to 2014-15. Analyzing the facilities rental fee rate could increase TSD's revenue and decrease its cost associated with facilities rental.

CHILD NUTRITION MANAGEMENT AND OPERATIONS

Evaluate financial information to improve the efficiency of food service operations. TSD lacks a process to monitor

and analyze Food Services Department financial data to make efficient management and operations decisions. TSD operates food services as a nonprofit cost center rather than a self-sustaining activity, whereby all the costs of breakfast, lunch, and snacks are fully covered through federal and state reimbursements. The Food Services Department shares responsibilities for the operational and financial activities of the food services program with the Business Services Division. The Food Services Department manages food services staff and food preparation activities, and the Business Services Division performs financial activities for the program. However, the Business Services Division does not provide the Food Services Department with traditional management-level financial reports, such as budget-to-actual comparisons, profit and loss statements, and cash flow statements. The Food Services Department also does not maintain a formal inventory system and does not regularly conduct physical inventories.

The inefficiencies caused by the lack of management controls of food services operations has resulted in high operational costs. TSD's meal and labor costs exceed recommended thresholds. Increasing the oversight of food services operations, including budgeting, operational monitoring, and accountability, could improve the Food Services Department's financial management.

FOOD HANDLING AND SAFETY PROCEDURES

Develop written food services operational procedures and enhance food handling. TSD's food services operation lacks sufficient oversight and written procedures to ensure proper food safety and handling operations. Although the director of support operations is responsible for food services, most food services operational activities are completed and monitored by the food services supervisor. The director of support operations holds informal and periodic meetings with the food services supervisor to discuss operations. No evidence shows that the director of support operations monitors operations through management reports. In addition to a lack of oversight, the Food Services Department does not have written departmental procedures. Food services staff perform their daily tasks based on verbal instructions and historic practices and procedures.

Insufficient oversight and the absence of written procedures could cause food services staff to be inconsistent in following appropriate food handling and safety procedures.

STUDENT MEAL REVENUES

Develop and implement a process to charge day students for meals according to their eligibility classifications.

TSD's practice to provide free meals to all students, regardless of their eligibility classifications, results in a missed opportunity for additional revenue. As a result of being a Residential Child Care Institution, all of TSD's residential students are eligible for free breakfasts and lunches. Based on family size and household income, day students are eligible for either free, reduced price, or full price meals. TSD receives federal reimbursements and U.S. Department of Agriculture commodities based on the number of lunches served to students. Although TSD obtains meal applications, makes the eligibility determination, and enters the eligibility determination in the point-of-sale system, the school does not charge any students for meals served. Instead, the school uses General Revenue Funds to cover the costs of meals served to students who are not eligible for free or reduced-price meals. As a result, TSD is losing revenues. During school year 2014–15, TSD lost an estimated \$33,201 by providing 31,809 free meals to day students who were not eligible for free-of-charge meals. Implementing a process to charge day students for meals could result in a potential annual revenue gain of \$33,201 considering the same number of day students and the same number of meals are served each year as school year 2014–15.

TRANSPORTATION OPERATIONS

Develop a method to evaluate transportation data to ensure efficient transportation operations. TSD lacks a method to evaluate the efficiency of its transportation services. TSD submits required transportation data to TEA. However, TSD does not use this data or other transportation data to evaluate the school's transportation services. TSD provides three transportation service types, including regular weekly route services, daily shuttles for career and technical and dual credit students, and weekend Homegoing service. TSD transportation operation and route reports do not identify costs by service type among the school attendance route service, extracurricular and cocurricular service, and extended school year service. Separating this information would provide TSD with more useful data to calculate performance indicators, such as cost per bus, cost per student, and overall operation cost.

DATA WAREHOUSE

Assess TSD’s systems and develop a plan to facilitate common data access and easy report generation. Management’s access to data and reports is delayed due to needed data stored in six disparate information technology systems and databases. These systems and databases do not interface or communicate with other systems. In many cases, to access data for required reporting purposes, TSD staff must develop a database to capture the data from multiple systems to generate the report. TSD has 120 plus databases that provide access to data or produce reports. TSD maintains

and updates these systems independently from each other; therefore, the risk of inconsistent and erroneous reports increases. Implementing a centralized data warehouse could help TSD keep all data required for analytical and reporting purposes within one system.

The subsequent chapters in this report contain detailed descriptions of accomplishments, findings, and recommendations and the fiscal impacts to implement recommendations. **Figure 4** shows the total fiscal impact of all 43 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	\$39,189	\$41,755	\$41,755	\$41,755	\$41,755	\$206,209	\$0
Gross Costs	(\$2,010)	(\$2,010)	(\$2,010)	(\$2,010)	(\$2,010)	(\$10,050)	(\$5,080)
Total	\$37,179	\$39,745	\$39,745	\$39,745	\$39,745	\$196,159	(\$5,080)

SOURCE: Legislative Budget Board.

CHAPTER 1. GOVERNANCE AND SCHOOL MANAGEMENT

The Texas School for the Deaf (TSD) is established as a state agency in the Texas Constitution and the Texas Education Code. TSD also is a school that provides a continuum of direct educational services to students, ages 0 to 22, who are deaf or hard of hearing and who may have multiple disabilities. TSD's governance structure, leadership, school management, and planning process provide the foundation for effective and efficient education of its students. TSD is located in Austin.

Since TSD was established by the Sixth Legislature, Regular Session, 1855, the organization's name and governing structure has changed multiple times. In 1949, the Legislature placed TSD in the supervision of the Texas State Board of Hospitals and Special Schools and officially changed the name to the Texas School for the Deaf. In 1951, the Legislature directed the State Board of Education to govern the school, thereby formally identifying TSD as an educational institution. In 1979, the Legislature transferred the responsibility for governing TSD from the State Board of Education to the existing Governing Board structure.

BOARD GOVERNANCE

TSD is governed by a nine-member board appointed by the Governor and confirmed by the Senate. Board members, five of whom must be deaf, are either parents of children who are deaf, professionals working with persons who are deaf, or persons who are deaf. The board organizes and conducts itself like the board of a local school district. In addition to overseeing the provision of all TSD services, the board has specific responsibilities related to budget preparation, policy adoption, and the appointment of TSD's superintendent. The board focuses on decision making, planning, and providing resources for achieving goals. The Legislature appropriates funds for the agency's operations, programs, and services. The board sets goals, objectives, and policies and approves plans based on the appropriations. The Governing Board and the superintendent collaborate as a leadership team to meet stakeholder needs.

Figure 1-1 shows that at the time of the onsite review, TSD's Governing Board had eight positions filled and one vacancy. Four of the eight members serving in positions had

**FIGURE 1-1
TEXAS SCHOOL FOR THE DEAF GOVERNING BOARD
SCHOOL YEAR 2015-16**

NAME	TITLE	TERM EXPIRATION	YEARS OF SERVICE	OCCUPATION
Eric Hogue	President	January 2015 (1)	6	Mayor, City of Wylie
Shawn Saladin	Vice President	January 2017	1	Associate Dean, University of Texas Rio Grande Valley
Angie Wolf	Secretary	January 2015 (1)	10	Human resources, Public Utility Commission of Texas
Shalia (Sha) Cowan	Member	January 2017	10	Deaf education, Austin Sign Language School
Ryan Hutchison	Member	January 2021	Less than 1 year	Nonprofit management, Communication Service for the Deaf
Tyran Lee	Member	January 2013 (1)	5	Deaf education, Lone Star College – Cy-Fair, Cypress
Susan Ridley	Member	January 2013 (1)	6	Forensic accountant, Federal Bureau of Investigation
David Saunders	Member	January 2019	Less than 1 year	Safety and compliance services, WorkforceQA

NOTE: (1) As of May 2016, the existing member had not been reappointed and a new member had not been appointed to the Governing Board for these positions.

SOURCE: Texas School for the Deaf, March 2016.

expired terms. The board president's and secretary's terms expired in January 2015; two other members' terms expired in January 2013. However, Board Policy BBC (LEGAL), which is based on the Texas Association of School Boards' (TASB) reference policies, addresses this lapse in term. According to the policy, a board member whose term has expired, but whose successor has not been appointed, is eligible to continue serving on the board until a successor has been appointed by the Governor.

In addition to the members shown in **Figure 1-1**, the board liaison, who is not a board member and works out of the superintendent's office, serves as the board's recording secretary. Board Policy BDB (LOCAL) provides for two standing committees of the board, which are the Policy Committee and the Budget and Audit Committee. Four members of the board serve on each committee, which includes a chairperson and three board members.

Board standing committees conduct deliberations according to public agenda. The Policy Committee reviews revisions and updates to board policies, which the committee presents to the board for adoption. The Budget and Audit Committee reviews and considers the approval of TSD's Annual Operating Budget, Internal Audit Plan, and Annual Nonfinancial Report. Beginning with the December 11, 2014, board meeting, standing committees meet the day before the board meeting.

TSD's board has a three-level process to address public complaints and grievances. The board encourages the administration to discuss concerns and complaints through informal conferences with the appropriate administrator. In addition, Board Policy GF (LOCAL) outlines a formal grievance process for use when needed. This process requires complainants to formally submit complaints in writing within 15 days of the date of the decision or action that led to the complaint or grievance.

BOARD MEETINGS

TSD's Governing Board meets five times annually in the TSD Ford Career and Technical Education Building. In the regular board meeting held in August of each fiscal year, the board approves its board meeting calendar. The board meeting calendar includes proposed dates for the five regular board meetings, special events and activities scheduled during the meetings, and standard agenda items the board must cover in a particular month because of academic and statutory requirements. The board also holds special meetings and workshops as necessary.

According to the TSD Governing Board Standard Operating Procedures (SOP), Section III, D, 1, a-c, the board president may, without approval from the superintendent or other board members, place any item on the agenda that, in his or her opinion is appropriate. The superintendent may request that the board president place an item on the agenda, and the board president determines whether or not to place the item on the agenda. A board member also may request that the president place an item on the agenda. However, if the board president receives a request for an agenda item from only one member, the president determines whether or not to place the item on the agenda. Any time the board president receives a request from two board members regarding the same item, the board president places the item on the agenda. To have adequate time to prepare the board agenda, the board president requests that the superintendent or board members make all agenda item requests 14 days in advance of the board meeting. The board president has exclusive discretion whether to place items on the agenda received later than that date.

The executive assistant to the superintendent serves as the board liaison. Two to three weeks before each scheduled board meeting, the board liaison develops an agenda outline. The superintendent uses this outline in conferencing with the board president to develop a draft agenda for the upcoming meeting. The superintendent presents the draft agenda to the executive leadership team (ELT) for further input and to review specific agenda items with the ELT members that are responsible for presenting them at the meeting. The superintendent also reviews and discusses the specific agenda items that division directors would present at the upcoming board meeting. After the superintendent receives input from members of the ELT, she develops a final draft agenda and reviews the agenda with the board president to obtain final input and approval.

Upon receiving the approved agenda for the board meeting, the board liaison or superintendent's office staff develops cover sheets for each agenda item. The board liaison sends these cover sheets to the appropriate division director to complete, and the division directors provide any related material for an agenda item within that functional area.

The board liaison posts the approved agenda on the Secretary of State's website by 4:00 pm on Thursday the week before the upcoming Friday board meeting, in compliance with the Texas Open Meetings Act, Texas Government Code, Chapter 551. The board liaison also posts notice of the meeting and the approved agenda at a visible location in all TSD

departments and on the TSD website. The board liaison sends the agenda to the appropriate state agencies, to the Legislative Budget Board, and to the Governor's Office of Budget and Planning.

The board liaison ensures a complete board agenda packet is uploaded to TASB's board policy application the Friday before the meeting, which is seven days before the board meeting. Each board member has electronic access to the agenda. The board liaison also copies all board materials into binders for guests to use at the meeting.

TSD's board agenda is comprehensive and includes a consent agenda for routine actions requiring board approval. The agenda includes items for staff and student recognitions, public participation, updates and reports from the superintendent, adoption of board policies, and special action items for board approval. The board convenes in executive session only when necessary; accordingly, the board agenda does not include executive sessions as a standard agenda item. Board Policy BEC (LEGAL) requires the board to keep a certified agenda or make a tape recording of the proceedings of each closed meeting except for private consultations with TSD's attorney. The board complies with the guidelines of this policy by properly notifying the public of the subject matter of the session and that final actions will be presented at the open meeting. The recording secretary ensures all actions by the board regarding closed sessions are properly documented and signed by the board president.

As observed by the review team, the board president facilitates an efficient board meeting. Each board member may engage in constructive dialogue and ask questions of members of the ELT during deliberations on each agenda item. Based on the review team's observation of the May 6, 2016 board meeting, the president moves through the agenda and relies on the superintendent and members of the ELT to interact with board members. Each agenda item and related background information presented by members of the ELT is displayed on a projector using data from TASB's board policy application. Additionally, for deaf and hard of hearing persons attending the board meeting, American Sign Language interpreters are provided to interpret the proceedings, as well as Communication Access Realtime Translation services where a recorder converts all signing and spoken words into text via closed captioning, which is displayed on screens throughout the meeting.

The recording secretary compiles the official minutes for each board meeting. After approval from the superintendent,

board president and secretary, the board secretary and recording secretary sign and date the minutes and submit them to the board at the next board meeting for approval. Once approved, the recording secretary posts the minutes and related agenda to the school's website.

BOARD POLICIES AND PROCEDURES

TSD's Governing Board Policies cover several sections relevant to local school districts including:

Section A – Basic District Foundation;

Section B – Local Governance;

Section C – Business and Support;

Section D – Personnel;

Section E – Instruction;

Section F – Students; and

Section G – Community and Government Relations.

The Texas Education Code (TEC) provides the legal framework for board policies, which require continuous periodic updates and revisions based on new legislation. TSD uses the TASB policy maintenance services, which alerts TSD of any new policies or revisions to existing board policies. Division directors also may identify the need for new policies or revisions to existing policies that require board adoption. When this identification occurs, TSD follows its procedures for proposing changes to the board for review and approval.

After the superintendent and general counsel review and approve proposed policies, the board liaison uploads the policies to the TASB board policy application to prepare for the Policy Committee meeting. The superintendent, general counsel, and the division director proposing the policy attend the Policy Committee meeting as resources to the committee chair and to respond to questions. The Policy Committee reviews the recommended policies and may recommend additional changes, adopt, or delete the recommended policy. If the Policy Committee accepts proposed policies, the chair recommends that the full board review and adopt the proposed policies in the regular board meeting. After the board approves the policy revisions, the board liaison uploads the policies to TSD's website.

TSD's Governing Board also has a Standard Operating Procedure (SOP) Manual, which it last amended in August 2014. The SOP provides specific guidance to the board in

implementing board policies, defines the board structure, and dictates how the board should operate, including how board members should comport themselves with respect to their roles and responsibilities.

SCHOOL MANAGEMENT

Ms. Claire Bugen has been superintendent for TSD since 1998, having begun her career in a position as an elementary school teacher. She began her tenure with TSD in 1976 as a middle school supervising teacher and has served in several administrative positions with TSD, including upper school principal, principal for instructional services, and assistant superintendent. The TSD board does not require the superintendent to reside on campus. The board initially offered housing as an option, but the superintendent declined. The board converted the building that originally was the superintendent's residence into a school office building.

The board sets the superintendent's annual compensation within limits established in the General Appropriations Act. Any changes to her salary are included in TSD's biennial Legislative Appropriation Request (LAR), and are based on an annual evaluation and recommendations of the State Auditor's Office Studies of Executive Compensation of State Agency Heads.

The superintendent serves as the chief administrative officer of the school and is authorized to take any necessary and appropriate action to carry out the functions and purposes of the school, according to the board's general policies. The superintendent's duties include implementing policy, managing operations, recommending staffing levels, and allocating the resources to implement the school's priorities. These duties include staff recruitment and assignment, staff development, and admission and dismissal of students. Additionally, the primary responsibility of the TSD superintendent is the administration of programs that serve deaf and hard of hearing students, their parents, and professionals working with them at the school and throughout the state.

TSD's organizational structure consists of five divisions, including Central Administration, Business Services, Academic Affairs, Student Life, and Support Operations. Although the superintendent administers the Central Administration Division, all division directors report directly to the superintendent.

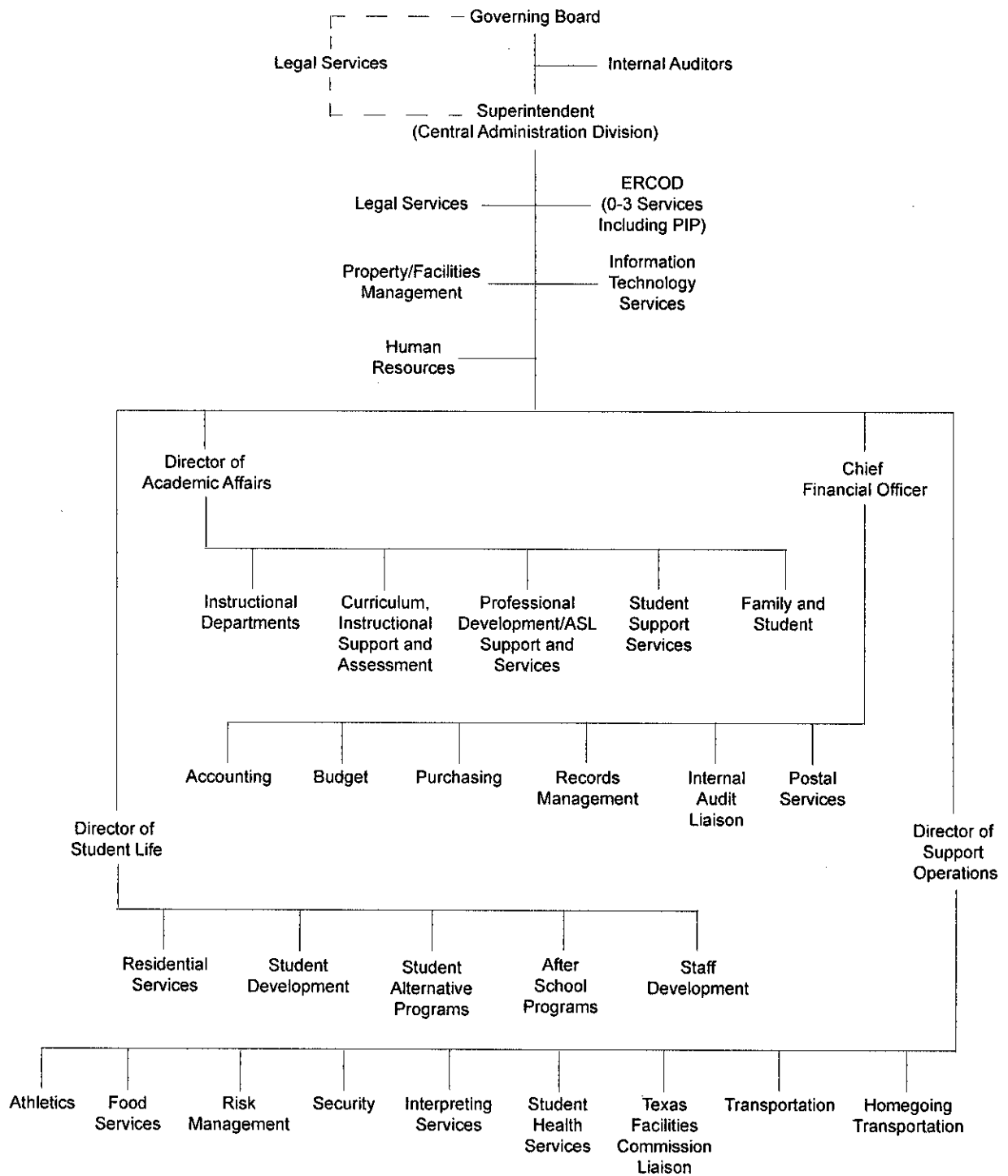
The superintendent's cabinet serves as TSD's ELT; it includes the director of academic affairs, director of student life, director of support operations, Chief Financial Officer, director of the Educational Resource Center on Deafness (ERCOD), director of human resources (HR), director of information technology services, and the general counsel. The superintendent meets with the ELT twice a month before the regularly scheduled board meeting and once each month in the remaining months. According to ELT members, the cabinet meetings are interactive and typically include extensive discussions of pertinent issues affecting the administration and operation of the school. During these meetings, the superintendent issues directives, members of the ELT provide status reports for their respective functional areas, and the team plans collectively for the school's five board meetings. **Figure 1–2** shows TSD's organization for school year 2015–16.

TSD has a School Leadership Council (SLC) of 41 members, which includes managers, supervisors, and staff in leadership roles at the school. The SLC meets once each month from September to May. Members of the SLC administer and manage functions within each of TSD's five divisions; the group serves as an extension of the ELT. TSD also has a District Advisory Committee (DAC) made up of parents, teachers, administrators, school staff, and community representatives who are considered the school's stakeholders. The DAC contributes the following to school administration:

- providing input into decisions relating to planning, budgeting, curriculum, educational and residential programming, staff development, and school organization;
- providing assistance in the development, evaluation, monitoring, and annual revision of the District Improvement Plan; and
- providing input and comment regarding TSD student performance.

According to the proposed bylaws of the DAC, dated January 2015, this committee conducts a minimum of six regular meetings per year. The DAC met five times during school year 2014–15 and, at the time of the onsite review, the group had met twice in school year 2015–16.

**FIGURE 1-2
TEXAS SCHOOL FOR THE DEAF ORGANIZATION
SCHOOL YEAR 2015-16**



NOTES: ERCOD = Educational Resource Center on Deafness; PIP = Parent Infant Program; and ASL = American Sign Language.
SOURCE: Texas School for the Deaf, March 2016.

ACCOMPLISHMENTS

- ◆ TSD has implemented a comprehensive, stakeholder-driven process, with an accountability structure and status reporting, to develop its Five Year Strategic Plan 2016–2021.
- ◆ TSD and TSBVI established an Interagency Cooperation Contract agreement to efficiently share legal services that reduces administrative costs for legal fees.

FINDINGS

- ◆ TSD lacks an effective training plan and process for newly appointed and existing board members.
- ◆ TSD lacks a formal succession planning strategy to ensure continuity of leadership at the superintendent level and throughout the organization.
- ◆ TSD's board process to establish the superintendent's annual goals lacks effective collaboration and accountability.
- ◆ TSD has not maximized the opportunity to enhance the performance evaluation process for members of the executive leadership team.
- ◆ TSD's organizational structure does not align compatible functions within each division, resulting in unbalanced workloads among division directors that report to the superintendent.

RECOMMENDATIONS

- ◆ **Recommendation 1: Establish a continuing board training and orientation system to ensure that new and tenured board members understand their responsibilities and the role, structure, and process of the board.**
- ◆ **Recommendation 2: Develop a comprehensive, coordinated succession plan that contains strategies and implementation initiatives to prepare TSD for eventual changes in leadership throughout the organization.**
- ◆ **Recommendation 3: Review and assess the superintendent evaluation process, make the appropriate changes to enhance collaboration and accountability, and revise the board policy and the Governing Board SOPs to include detailed guidelines for accomplishing the annual superintendent evaluation process.**

- ◆ **Recommendation 4: Refine the process for evaluating members of the ELT to include establishing goals and expectations for each member at the beginning of the school year to encourage executive leadership development and attendant accountability.**
- ◆ **Recommendation 5: Realign specific functions within divisions of TSD's organizational structure that contain incompatible functions to divisions more appropriate for the functions to balance workloads among division directors and maximize staff expertise.**

DETAILED ACCOMPLISHMENTS

STRATEGIC PLANNING

TSD has implemented a comprehensive, stakeholder-driven process with an accountability structure and status reporting, to develop its Five Year Strategic Plan 2016–2021. TSD's strategic planning process effectively includes its stakeholder community and aligns with best practice.

The superintendent, with a core strategic planning team that included the director of academic affairs, director of support operations, and TSD's outreach specialist, formed a TSD School Community Planning Team. The group was formed to work on the strategic plan, and the school hired a facilitator to conduct a two-day planning session in January 2016. Thirty-six participants attended this planning session, including the superintendent, three board members and representatives from the executive leadership team, teachers, staff, parents, alumni, and representatives of the community.

TSD's strategic planning process began with a review of the political, social, economic, and technical environment in which the organization operates. Next, the team looked within the organization and considered various driving forces from educational mandates, changing demographics, and student achievement results that possibly affect the strategic direction of the school. Inherent in this process was an assessment of TSD's strengths, weaknesses, opportunities, and threats. The goals of the planning session included: conducting a preliminary facilities master-planning discussion to inform the overall master planning process; reviewing the TSD Mission, Vision, and Belief Statements; and establishing a prioritized list of critical issues aligned with the results of pre-session surveys and trend analysis. The facilitator formed six small groups for processing information and brainstorming ideas and one large group for gathering data and responding to the small groups' ideas. The large

group voted and achieved majority consensus on prioritized issues. The next stage included setting prioritized goals for the strategic plan in five broad goal areas: communication; academic and personal achievement; staff support; data-driven decision-making; and outreach for maximum statewide effects.

To establish accountability in the strategic planning process and obtain continuous feedback from TSD’s stakeholder community, the core strategic planning team assigned each of the five strategic goal areas to Strategic Goal Teams (SGT). The SGTs continuously work to develop strategies, ideas, and action plans to accomplish TSD’s five strategic goals.

Figure 1–3 shows TSD’s five strategic goals included in the Strategic Plan 2016–2021.

A member of the superintendent’s ELT with functional responsibility for each specific strategic goal serves as chairperson and co-chairperson of each SGT. Each SGT is organized as a committee and includes parents, teachers, and staff. An SGT facilitates the cohesive and coordinated action planning necessary to implement strategic initiatives that are essential for TSD to achieve its five strategic goals. Figure 1–4 shows the chair (the superintendent) and co-chairs of each SGT committee, along with their related functional areas of responsibility.

Each co-chair reports updates to the board related to the progress toward completing the five-year strategic plan for 2016 to 2021, at each regular board meeting. These updates summarize the results of stakeholder feedback, outlining the specific objectives that must be accomplished to achieve the

**FIGURE 1–3
TEXAS SCHOOL FOR THE DEAF FIVE-YEAR STRATEGIC PLAN
SCHOOL YEARS 2016 TO 2021**

GOAL AREA	STRATEGIC GOAL
Goal 1 – Communication	Implement an integrated approach to communication that represents progressive technologies, a knowledge and appreciation for our audiences, and a respectful and transparent culture.
Goal 2 – Academic and Personal Achievement	By developing and realigning resources and existing systems at the Texas School for the Deaf (TSD), TSD will develop and implement a multitiered system of support to address the whole child through: social-emotional learning, American Sign Language and English bilingual learning, academics, and career and college readiness.
Goal 3 – Staff Support	Establish an environment that will attract, build, and retain a highly skilled staff by establishing gold standards and explicit procedures that foster professional development and personal growth.
Goal 4 – Data-driven Decision-Making	Establish a culture of data-driven decision-making through access to reliable data while maintaining fidelity, integrity, and compliance at all levels of school operations.
Goal 5 – Outreach for Maximum Statewide Impact	Maximize high-quality resources and expertise to provide efficient and effective service delivery for robust positive effects for deaf and hard-of-hearing students, their families, communities, and professionals throughout the state.

SOURCE: Texas School for the Deaf, Strategic Goal Team Report, April 20, 2016.

**FIGURE 1–4
TEXAS SCHOOL FOR THE DEAF STRATEGIC GOAL TEAMS
SCHOOL DISTRICT STRATEGIC PLAN 2016–2021**

TEAM	CO-CHAIR AND FUNCTIONAL AREA	CO-CHAIR AND FUNCTIONAL AREA
Goal 1 – Communication	Superintendent	Director of Information Technology
Goal 2 – Academic and Personal Achievement	Director of Academic Affairs	Supervisor of Professional Development and American Sign Language Services
Goal 3 – Staff Support	Director of Human Resources	Chief Financial Officer
Goal 4 – Data-driven Decision-Making	High School Principal Instructional Data Analyst	Supervisor of Curriculum
Goal 5 – Outreach for Maximum Statewide Impact	Director of the Educational Resource Center on Deafness	Program Specialist, Educational Resource Center on Deafness

SOURCE: Texas School for the Deaf, Strategic Goal Team Reports, April 1, 20, 21, and 27, 2016.

strategic goal, and communicating ideas to achieve TSD's five strategic goals. Board members ask questions and engage the co-chairs in detailed discussions about strategic initiatives and offer their insights throughout the presentations. The Agency Strategic Plan is the springboard for developing TSD's biennial LAR. The strategic plan includes TSD's goals, objectives, and strategies; summarizes expenditures and encumbrances for past years; shows budgeted amounts for the current fiscal year; and shows requested appropriations for the upcoming biennium. The Agency Strategic Plan is a five-year plan that must be updated every two years for the biennial legislative session.

LEGAL SERVICES

TSD and TSBVI established an Interagency Cooperation Contract (ICC) agreement to efficiently share legal services that reduces administrative costs for legal fees. This arrangement reduces costs and ensures that both schools have access to quality legal services and expertise.

TSD shares the cost of its attorney with TSBVI in accordance with the ICC agreement executed in November 2015. TSD's general counsel is on the school's payroll, but the attorney services 50.0 percent of working hours as general counsel to TSBVI. The ICC agreement outlines the services that the attorney provides to TSBVI, and the basis for calculating reimbursable costs paid to TSD by TSBVI. The attorney records the hours of services worked on behalf of TSBVI based on a cost per hour of service that is calculated by 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. The billing also includes one-half the monthly charges for Westlaw 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, and business services for TSBVI matters, either directly or through TSD's quarterly billings. The ICC limits the cost-sharing arrangement to \$80,000 per contract year. TSD's general counsel works at each school two days of each week, with the option of working at either location on the fifth day, depending on the two schools' respective needs.

TSD's general counsel provides legal advice to the board and superintendent for issues related to employment, special

education, contracts, grievance hearings, complaints, and unemployment claims. The Office of the Attorney General (OAG) serves as TSD's attorney, provides legal support to the school, and tries all court cases or authorizes TSD to secure the services of outside counsel. TSD's general counsel practices preventive law in the best interest of the school. The general counsel has no staff, but has access to a paralegal staff in one of TSD's departments, and to the superintendent's administrative assistant, who handles clerical tasks. The general counsel routinely works with the OAG on major employment cases and special education cases. In the six years the general counsel has been employed at TSD, outside counsel has been used once related to special education cases. For school year 2014–15, the OAG authorized and TSD spent \$101,306 with a private law firm to handle special education cases. TSD incurred no outside legal fees from school years 2011–12 to 2013–14.

DETAILED FINDINGS

BOARD TRAINING (REC. 1)

TSD lacks an effective training plan and process for newly appointed and existing board members.

According to Board Policy BBD (LOCAL), newly appointed board members should participate in a local orientation session within 60 days of appointment. The superintendent and members of TSD's ELT typically conduct this orientation to familiarize new board members with local board policies and procedures. The orientation provides an overview of school operations and includes a tour of TSD's facilities. Additionally, Board Policy BBD (LOCAL) requires all newly appointed board members to receive an orientation to the TEC within their first 12 months of service. Region 13 delivers this training in a three-hour session. All sitting board members must receive a basic orientation to the TEC with special emphasis on statutory provisions related to Texas school governance. Pursuant to the Texas Administrative Code (TAC), Section 61.1 (b)(2), the entire board must participate in an annual team-building session with the superintendent to enhance the effectiveness of the board-superintendent team and to assess the continuing education needs of the team.

After each legislative session, Region 13 conducts an update to the basic orientation to the TEC to familiarize board members with major changes and other relevant legal developments related to school governance. The full board attended Region 13's December 2015 update.

Board Policy BBD (LOCAL) further requires board members to obtain at least 10 hours of continuing education in their first 12 months of service. Board members could obtain up to five hours of continuing education through online instruction. Online training must be developed and offered by a registered provider, incorporate interactive activities that assess learning and provide feedback to the learner, and offer an opportunity for interaction with the instructor. Following the first year of service, board members must obtain at least five hours of continuing education annually, which could be online instruction if it meets the criteria.

However, TSD’s eight board members have not consistently attended required training, including two newly appointed members who have served less than one year in their positions, which limits the effectiveness of the board. **Figure 1–5** shows the number of continuing education training hours accumulated by sitting board members during school years 2013–14 and 2015–16. Training records for school year 2014–15 were not available at the time of the onsite review.

Figure 1–5 shows that the existing board members did not attend governance-specific training during school years 2013–14 and 2015–16. Based on the training records provided by the superintendent’s office, newly appointed and tenured board members have not completed the minimum number of continuing education hours required by Board Policy BBD.

TSD’s board lacks a formal orientation program for newly appointed board members and an ongoing training program for tenured board members. Board Policy BBD-E establishes the Framework for School Board Development. The

framework cites the board as the educational policy-making body for TSD and considers the importance of the board and the superintendent functioning together as a leadership team. The framework outlines five areas that the leadership team must thoroughly understand to develop as a school board and to ensure the “equity and excellence in performance of all students.” These areas include the following:

- vision – the board ensures establishment of a shared vision that promotes enhanced student achievement;
- structure – the board provides guidance and direction for accomplishing the vision;
- accountability – the board measures and communicates how well the vision is being accomplished;
- advocacy – the board promotes the vision; and
- unity – the board works with the superintendent to lead the school toward the vision.

During onsite interviews, board members said that orientation for new board members is informal and not effective. Additionally, training for tenured board members does not include formal training about their roles and responsibilities, guidelines and restrictions to discharge their governance responsibilities, the board’s governing structure, and the process and protocols for board meetings. One board member described the orientation process as “learning on the fly.”

Members of the board need to understand their roles and responsibilities, bylaws, rules and regulations, the legislative process, and other issues that would enhance their governance skills. Some board members said they feel they need more

**FIGURE 1–5
TEXAS SCHOOL FOR THE DEAF GOVERNING BOARD CONTINUING EDUCATION HOURS
SCHOOL YEAR 2013–14 TO DECEMBER 2015**

TRAINING	BOARD MEMBERS (TRAINING IN HOURS)							
	A	B	C	D	E	F	G	H
2013–2014 Texas Education Code Update from Region 13, February 21, 2014	2	2	0	2	2	0	0	2
2014–2015 Records Unavailable	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
2015–2016 Texas Education Code Orientation Update from Region 13, December 10, 2015	3	3	3	3	3	3	3	3
Total Continuing Education Hours	5	5	3	5	5	3	3	5

NOTES: (1) The board’s continuing education training records were not available at the time of the Legislative Budget Board School Performance Review Team’s onsite review.
SOURCE: Texas School for the Deaf, May 2016.

leadership training and team-building training to be more effective.

The absence of a formal, structured, continuing education strategy for board members limits the board’s ability to build a cohesive team to govern TSD and to ensure high student achievement. Without consistent continuing education and team development, board members may not be aware of best practices in governance and operating structures. They might not have the resources and tools needed to continuously update policies and operating procedures, improve communication with the superintendent, and build the shared knowledge, values, and trust essential for highly effective governing boards. **Figure 1–6** shows specific governance issues noted during board member interviews and the potential effect on governance.

To develop an effective board, best practices suggest that boards develop orientation and education programs for new and existing board members. Best practices also suggest that team development and training with the superintendent

helps the board build on shared knowledge, values, and commitments toward improvement. **Figure 1–7** shows best practice references that could help boards develop the appropriate training programs to improve overall governance.

TSD’s board should establish a continuing board training and orientation system to ensure that new and tenured board members understand their responsibilities and the role, structure, and process of the board. The board president should work with the superintendent to develop a system that includes the following actions:

- amending board policy and related operating procedures regarding new member orientation that includes the sitting officers of the board, the superintendent, and members of the superintendent’s ELT; SOPs should provide guidelines for regulatory issues to be covered in addition to specific governance-related topics, and extensive interaction with the superintendent and members of the executive leadership team responsible for instructional, operational, and administrative functions;

FIGURE 1–6
TEXAS SCHOOL FOR THE DEAF EXAMPLES OF GOVERNANCE-RELATED ISSUES FOR THE GOVERNING BOARD
MARCH 2016

AREA	ISSUE	RESULT
Trust	Based on interviews, most board members felt board members trusted each other. A minority of board members feel there is an absence of trust because of newly appointed members who have replaced culturally deaf (1) board members. These members are perceived as being tough on the superintendent. This group appears to be a minority of the members. However, some members question whether an attempt is being made to replace the superintendent. Other members believe that change is necessary because of the previous board’s tendency to approve any initiatives the superintendent presented to the board. Also, one board member noted that a perception of “embedded relationships” exists among tenured board members and the superintendent; as a result, some members may share information with the superintendent that board members discussed in closed session.	<p>The absence of team-building training contributes to an atmosphere of mistrust. Attending continuing education training as a group helps to build relationships and trust among board members outside of regular board meetings.</p> <p>The absence of training in how to effectively use communication protocols outlined in the Texas School for the Deaf’s (TSD) Governing Board Standard Operating Procedures (SOP) could result in misunderstandings about the type of information board members communicate to the superintendent, thereby contributing to an atmosphere of distrust among board members.</p>
Board Policies and Operating Procedures	The board has not finished updating its policies, operating procedures, and bylaws. The board’s Policy Committee is responsible for completing the initial review of proposed board policies and revisions. The Policy Committee is a standing committee of the board, but board policy or SOP do not outline or describe the process for introducing new policies or reviewing and updating existing policies. The board recognizes that its policies, procedures, and bylaws require updating. At the time of the onsite review, the board president had requested TSD’s general counsel to review the process and recommend a course of action to update the board policies and SOP.	<p>The absence of continuing education training related to board policy development and implementation prevent the board from establishing a process to review and update board policies, operating procedures, and bylaws regularly, thereby potentially impairing the overall effectiveness of the board.</p> <p>The lack of training in this area limits board members’ understanding of how sound policies and operating procedures clarify how the board operates and of how important developing a process to regularly review and update board policies, procedures, and bylaws is to board effectiveness.</p>

FIGURE 1–6 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF EXAMPLES OF GOVERNANCE-RELATED ISSUES FOR THE GOVERNING BOARD
MARCH 2016

AREA	ISSUE	RESULT
Self-evaluation	The board does not have a process to assess its effectiveness as a governing body. During board member interviews, the review team learned that TSD’s board has not developed an evaluation process wherein the board and superintendent collaboratively establish performance goals to enhance the superintendent’s accountability. These are examples of areas where the board would annually assess its performance to improve its effectiveness. The board member interviews also revealed that most members were not aware of the benefits of conducting a self-evaluation. However, the board president is leading the board in this direction.	<p>The absence of group training in conducting board self-evaluations inhibits the board’s ability to objectively evaluate its performance in the interest of continuous improvement.</p> <p>The absence of training in the type of questions board members must ask themselves and the superintendent in the board self-evaluation process contributes to ineffective governance, because the board does not identify its strengths and weaknesses in a structured process.</p> <p>The board’s lack of understanding of the benefits of conducting a self-evaluation could hinder student achievement because board members may not embrace critical self-evaluation that is essential to improving the board’s performance in the oversight of strategic, program, and operations-related initiatives.</p>

NOTE: (1) “Culturally deaf” refers to someone who identifies and participates with the deaf community rather than the mainstream community. SOURCES: Legislative Budget Board School Review Team, onsite interviews with Texas School for the Deaf Governance Board members, March 2016.

FIGURE 1–7
BEST PRACTICES FOR BOARD DEVELOPMENT AND TRAINING RESOURCES, MAY 2016

SOURCE	BEST PRACTICE
<i>The Effective Not-for-Profit Board</i> , The Deloitte Center for Corporate Governance, 2013	Establish 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.
<i>Eight Characteristics of Effective School Boards: Full Report</i> , Center for Public Education, 2011	<p>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.</p> <p>Conduct orientation workshops for new members soon after their election, and develop a policy statement on orientation that includes a commitment by the board and administrative staff to help new members learn board functions, policies, and procedures.</p>
<i>“The Lighthouse Inquiry: Examining the Role of School Board Leadership in the Improvement of Student Achievement,”</i> Mary L. Delagardelle, <i>The Future of School Board Governance: Relevancy and Revelation</i> , Thomas L. Alsbury, editor, 2008	Learning together about board roles has been identified as one of the key best practices of boards in districts that effectively advance student achievement.
<i>Effective Board Practices: An Inventory for School Boards</i> , Texas Association of School Boards, 2011	Complete a self-assessment as part of the annual team-building requirement and use it as an opportunity for the board and superintendent team to determine what needs to be improved to function more effectively.

SOURCE: Legislative Budget Board School Performance Review Team, May 2016.

- | | |
|--|---|
| <ul style="list-style-type: none"> • amending board policy 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 sessions; sanctions could include removing board members from committee chair or co-chair positions. | <p>Each board member should sign a policy statement committing to meet the minimum number of continuing education hours required by the TAC and included in Board Policy BBD (LOCAL), and to renewing the board’s commitment to convening annual teambuilding sessions;</p> |
|--|---|

- developing an annual board training calendar identifying governance-related training topics and specific dates that board members will be required to attend training as a group;
- distributing an annual survey to board members to determine their training preferences and using the results of the survey to schedule the board’s continuing professional education calendar for the year; and
- developing a reporting system to monitor the status of each board member’s progress toward meeting the number of board-approved continuing education hours in its newly adopted policy statement.

The board president should be responsible for developing the training and orientation system, and for monitoring and enforcing the policies and procedures adopted by the board.

Since the time of the onsite review, TSD indicates that the school has modified its board training and orientation system. At the February board meeting, all board members are provided a list of upcoming training options for the rest of the calendar year. The board then decides together which trainings they would like to participate in as well as having options of online trainings, which they can complete individually. The board liaison keeps track of all completed trainings, and provides each member with an update of their progress in completing hours, as well as required hours remaining before the final board meeting of the calendar year. This recommendation could be implemented with existing resources, because TSD sets aside funds for continuing education for board members in its biennial budget.

SUCCESSION PLANNING (REC. 2)

TSD lacks a formal succession planning strategy to ensure continuity of leadership at the superintendent level and throughout the organization. The superintendent has been in this position for about 18 years. Members of the superintendent’s executive leadership team (ELT) have been with TSD for an average of about 10.5 years, but they have been in their positions an average of about four years. **Figure 1–8** shows the distribution of experience for members of the ELT as of June 30, 2016.

As **Figure 1–8** shows, two of the eight members of the superintendent’s executive leadership team have been in their positions six years or more. The remaining six members of the ELT have been in their leadership positions from eight months (as of June 30, 2016) to four years. At the time of the

**FIGURE 1–8
TEXAS SCHOOL FOR THE DEAF EXECUTIVE LEADERSHIP
TEAM MEMBERS’ EXPERIENCE
AS OF JUNE 30, 2016**

TITLE	YEARS IN POSITION	TSD EXPERIENCE
Superintendent	18.00	40.00
Director of Academic Affairs	4.00	12.00
Director of Student Life	0.50	9.00
Director of Support Operations (1)	2.50	14.00
Chief Financial Officer	0.67	0.67
Director of ERCOD	2.00	2.00
Director of Human Resources	0.83	3.00
Director of Information Technology Services	15.00	38.00
General Counsel	6.00	6.00
Average including Superintendent	5.50	13.85
Average not including Superintendent	3.93	10.58

NOTE: TSD=Texas School for the Deaf; ERCOD=Educational Resource Center on Deafness.
 (1) This individual was previously the Director of Student Life from May 2008 through August 2015, making their time in executive leadership 8 years, 10 months.
 SOURCE: Legislative Budget Board School Review Team, onsite interviews with Texas School for the Deaf staff, March 2016.

onsite review, the board had begun discussions about succession, but it had not developed a succession plan. However, the superintendent has focused on developing a succession planning strategy for the ELT. As a result, the superintendent is investing in the ELT through training and professional leadership development through the Conference of Educational Administrators of Schools and Programs.

Considering the superintendent’s tenure and the average time ELT members have been in their positions, the absence of succession planning throughout the school could result in discontinuity of leadership, upheaval, and discord if key staff leave the school. Furthermore, according to Hanover Research, succession planning enables organizations to “build a supply of leaders by anticipating future needs and preparing for vacancies ahead of time; and use foresight to develop objectives and evaluative criteria to measure the success of [a] school’s programs and to continue to place qualified candidates in appropriate roles.”

According to the article “Succession Planning Done Right,” which appeared in the June 2012 edition of the American School Board Journal:

... succession planning should not be a system of preparing one person in an organization to become the next leader. Instead, it should be more about preparing the entire organization for an eventual change in leadership, similar to the way succession is carried out in the private sector. It is not about one person in one job. It should be a systematic process that creates opportunities for upward mobility for all members of the organization and that guarantees internal candidates for the school board to choose from if it so desires. The process involves as much preparation for the organization as it does for an individual to assume an administrative position.

Best practices in succession planning for a school or school district focus on preparing talent for the future, rather than replacement planning, which focuses on filling vacancies in an organizational chart. For example, according to Best Practices on Succession Planning by Hanover Research, October 2014, the School Board of Highlands County (SBHC) in Sebring, Florida, developed a Leadership Effectiveness, Assessment, and Development (L.E.A.D.) Management Program in 2007 to “support the goals of the district focusing on the skills necessary to promote student growth and achievement and effectively facilitate the administrative screening, selection, development, and appraisal process.” The superintendent and SBHC made a statement of commitment to ensuring the allocation of funding for all program initiatives. The program’s objectives included the following:

- use an online administrative advertisement, application, and screening system for considering potential district-level and school-level administrators;
- develop ongoing capacity for leadership and a succession management plan;
- provide appropriate professional development and training to principals, assistant principals, and potential administrators;
- provide appropriate professional development and training to district-based administrative staff to enhance their leadership, managerial skills, and competencies;
- provide opportunities for leadership growth and development through on-the-job training, reflective practices, and assigned field experiences to apply program knowledge and demonstrate leadership competencies;

- include annual administrative performance appraisals based on established criteria for assessment; link rewards to student achievement levels, individual performance and goal accomplishment, and successful outcomes of programs, processes, and procedures; and
- promote a continuous improvement model for program assessment and revision; use midyear and end-of-year reviews and surveys to determine satisfaction with the program and school leadership’s level of preparedness.

SBHC’s comprehensive plan defines how candidates for vacancies will be screened, selected, and trained. The plan also presents the board’s succession management strategy. The L.E.A.D. Management Program addresses all administrative levels and defines SBHC’s plans to evaluate employees and establish a succession model. For example, SBHC uses a Leadership Experiences Assessment Tool to assess administrative applicants. The tool helps to identify qualified candidates and establish measuring criteria. The L.E.A.D. program’s Succession Management Strategy supplements the assessment tool to maximize the availability of a substantial pool of candidates.

SBHC’s Succession Management Strategy provides a methodical approach to succession planning. In the L.E.A.D. report, SBHC defines clear goals and establishes organizational procedures to reach those goals. The strategy helps to forecast needs and considers staff retirement statuses and other vacancies. With these employment areas considered, SBHC can identify and train teachers and administrators that have expressed interest in leadership regarding the established measuring criteria. Succession training programs include hands-on learning and mentoring opportunities, gradual transitions, and ongoing support for new administrators. At the end of each academic year, all staff are evaluated. These evaluations help to sustain SBHC’s hiring strategy.

The board and superintendent should develop a comprehensive, coordinated succession plan that contains strategies and implementation initiatives to prepare TSD for eventual changes in leadership throughout the organization.

The succession plan should include an assessment of TSD’s upcoming leadership and management needs, goals, related instructional and outreach programs, leadership and management capacity within the school, skills of potential candidates, and the related gaps in leadership and

management if vacancies occur. The superintendent and board should consider developing a leadership model similar to the best practices that emphasizes professional development and training at all leadership and management levels. The model should encourage on-the-job training, reflective practices, and assigned field experiences. The superintendent and board should use a methodical process to develop the comprehensive succession plan and include the amount of financial resources required to successfully implement the plan. **Figure 1–9** shows the District Management Council’s suggested succession planning model, including process-related steps and a description of each step to facilitate a succession plan for TSD.

Since the time of the onsite review, TSD indicates that the school has advanced their succession planning including completing the “Set the Stage” “Plan for the Future” and “Assess Current Landscape Requirements” steps as listed in **Figure 1–9**. The school also indicated that they should submit a finalized succession plan to their board for approval in 2017.

No fiscal impact is assumed for this recommendation until TSD decides the depth and breadth of succession planning strategies and initiatives to which the board is willing to commit.

SUPERINTENDENT’S EVALUATION (REC. 3)

TSD’s board process to establish the superintendent’s annual goals lacks effective collaboration and accountability.

TSD Governing Board SOP requires the board to annually evaluate the performance of the superintendent using the Commissioner of Education’s recommended appraisal process and criteria. The annual evaluation is scheduled to be completed by consensus of the board, at the first regularly scheduled meeting of the school year. At this same meeting, the board is to establish the superintendent’s performance goals for the next school year and an evaluation calendar. The board must ensure that the evaluation procedure is conducted based on the responsibilities in the superintendent’s job description and must include job performance goals.

**FIGURE 1–9
THE DISTRICT MANAGEMENT COUNCIL’S 8-STEP SUCCESSION PLANNING PROCESS
OCTOBER 2009**

STEP	DESCRIPTION
Set the Stage	In beginning a succession planning process, it is worth “overinvesting” in setting the stage internally to avoid later roadblocks. Contemplate the purpose, goals, and expectations of the succession planning process. Recognize the expansive reach of succession planning—the avoidance of leadership crises, the potential cost savings in hiring new leaders, and the cultivation of a leadership culture.
Plan for the Future	Districts should use succession planning as a process for reflecting on the district’s future. In this step, districts should take into account both endogenous factors (organizational changes, board priorities, curricular approaches, decentralization, etc.) and exogenous factors (demographics, economy, state and federal legislation, etc.) to identify future needs for an evolving organization.
Assess Current Landscape Requirements	Having a chartered vision for the district’s future, examine the role of leadership in realizing the vision. Assess the characteristics necessary for leadership in the district. Build a “leadership code” that explains leadership characteristics and behaviors that drive success in the district.
Conduct Effective Evaluations	Perhaps the single most significant factor underlying effective leadership development is open and honest feedback about an emerging leader’s performance. Without honest disclosure about an individual’s strengths and weaknesses, proactive development opportunities cannot be deliberately pursued. A district should evaluate its current and emerging leaders against its leadership code through development and use of a formal evaluation rubric.
Assess Leaders’ Mobility	Once the pool of leadership talent has been identified against the leadership code rubrics, further analysis is needed to evaluate the district’s “bench strength” and leadership mobility within the organization. Districts should force themselves to complete a deep bench strength analysis, which yields measures concerning the depth of leadership talent within the organization.
Develop Leaders to Fill the Gaps	Those potential successors ranked in an organization’s bench strength must be further cultivated through on-the-job learning and formal training. Districts may be forced to answer, “How can we get someone ready more quickly?” or even, “Do we have anyone that’s ready now?” Each participant in leadership training programs should be the subject of an individual development plan. The plan should ask such questions as: For what key position should this person be prepared? What kind of competencies should be developed? What are the individual’s career objectives?

**FIGURE 1–9 (CONTINUED)
THE DISTRICT MANAGEMENT COUNCIL'S 8-STEP SUCCESSION PLANNING PROCESS
OCTOBER 2009**

STEP	DESCRIPTION
Create Individual Transition Plans	As districts devote greater resources to identifying and preparing leaders, assuring the transfer of leadership responsibilities in succession is increasingly crucial. When transitions suffer, initiatives get put on hold and progress slows, often never to regain the momentum. Ideally, the replacement of leaders should involve substantive overlap allowing for on-the-job training and a smooth handoff of responsibility. However, this may often not be feasible due to sudden departures, budgetary constraints, or other mitigating circumstances.
(Re)Assess Your Program	Succession planning is a fluid and continual process, and requires regular assessment and adjustment. Evaluation should include an assessment of bench strength by measuring the number of well-qualified internal candidates for each key position, the record of promotions, and the retention of high performers. At the same time, evaluation should also capture more substantive human capital metrics, including the perceptions of fairness, transparency, morale, confidence, and competence.

SOURCE: District Management Council, Using Succession Planning to Drive District Human Capital Growth, 2009.

Figure 1–10 shows a summary of the board’s superintendent evaluation process. The process begins with the superintendent completing a self-evaluation, and then each board member prepares an individual evaluation.

The SOP defines a process for the board to evaluate the superintendent. However, during interviews with board members, the review team noted inconsistent perceptions of the effectiveness of the board’s evaluation process. Some board members indicated that the board collaboratively sets expectations and develops goals for the superintendent for the following year during the annual evaluation in August. However, other board members strongly questioned the board’s role in this process. According to interviews, some board members perceive that this process is not collaborative and that the superintendent develops her goals and the board

accepts the goals. This process could lead to dissatisfaction among board members. The review team learned during interviews that the board had discussed setting goals and expectations for the superintendent at the beginning of the next annual superintendent evaluation process.

The contrasting views of board members regarding the superintendent evaluation process can be attributed to the lack of specific guidelines in the board policies and SOP for conducting the superintendent’s evaluation. Board Policy BJCD (LEGAL), Superintendent Evaluation, provides a one-paragraph reference to the appraisal process, stating, “The board shall appraise the Superintendent annually using the Commissioner’s recommended appraisal process and criteria.” Board Policy BJCD (LEGAL), Procedures for Appraisal of Superintendent, contains broad procedures for

**FIGURE 1–10
TEXAS SCHOOL FOR THE DEAF SUPERINTENDENT'S EVALUATION PROCESS
MARCH 2016**

MONTH	ACTION
July	Superintendent completes self-evaluation and submits to board members. Board members prepare individual evaluations after receiving superintendent’s evaluation.
August (First regularly scheduled board meeting of the school year)	Board collectively reviews superintendent's self-evaluations and discusses individual evaluations in closed session. Board president prepares superintendent’s summative evaluation from individual board member evaluations and discussions. Board meets with superintendent in closed session to review annual summative performance evaluation and establish performance goals for the superintendent in the upcoming school year.
February	Board meets with superintendent to conduct an interim formative evaluation after six months to assess the superintendent’s progress toward completing the performance goals. Board and superintendent discuss the progress made toward the superintendent's performance goals.

SOURCES: Legislative Budget Board School Review Team, onsite interviews with Texas School for the Deaf Governing Board members, March 2016.

appraising the superintendent and suggested criteria the board should use to evaluate the superintendent. The policy also specifies the training that board members should receive before conducting the superintendent’s appraisal. SOP, Section IX, does not provide specific guidance to board members related to collaboratively setting expectations and annual performance goals with the superintendent.

The review team examined the Superintendent Evaluation Compilation and Summary Appraisal Reports for school years 2013–14 and 2014–15. The evaluation tool is divided into two sections. One section contains specific performance goals that could vary for each evaluation period depending on the focus. The other section is based on general job performance responsibilities in Educational Leadership, District Management, and Board and Community Relations. The board rated the superintendent’s progress toward achieving five specific performance goals for school year 2013–14, and four goals for school year 2014–15. The documents contain individual board member ratings and summary ratings for each area. Although the evaluation includes specific performance goals, the board does not include key performance indicators to meet the goals. For example, the four performance goals for school year 2014–15 evaluation were:

1. enhancing academic excellence and innovation to reduce the achievement gap;
2. continue to work with the Texas Facilities Commission on successful implementation of the memorandum of understanding;
3. secure additional financial resources through the legislative process and work with the TSD Foundation; and
4. implement findings from the survey on staff engagement.

The board and superintendent did not specify the expected performance in establishing the superintendent’s goals and to measure achievement. For example, no target percentage to reduce the achievement gap is set; no target percentage financial increase for the LAR process is set; and no indication is given whether the board and superintendent agreed to implement 100.0 percent of the survey findings. Without measurable performance goals, stated in quantitative terms to the extent practicable, it is difficult for the board to hold the superintendent accountable for performance.

As a best practice, the New York State School Boards Association (NYSSBA), in its publication, Superintendent Evaluation, 2015, recommends that the board define and clarify the superintendent evaluation process. The board should provide specific guidelines for evaluating the superintendent. These guidelines should include the steps in the evaluation process, and the roles and responsibilities of the board and superintendent. These guidelines would be incorporated into a board’s 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.

The NYSSBA also recommends using a SMART model to use when the board identifies annual performance goals for the superintendent to achieve. SMART is an acronym that establishes guidelines for developing annual performance goals that must be specific, measurable, achievable, relevant, and time-bound. **Figure 1–11** shows the SMART model that boards would include in their operating procedures for superintendent evaluation.

FIGURE 1–11
THE SMART MODEL TO IDENTIFY GOALS FOR INCLUSION
IN BOARD OPERATING PROCEDURES
2015

CRITERION	HOW TO UTILIZE
Specific	Define expectations; Avoid generalities and use verbs to start sentences
Measurable	Quality, quantity, timeliness, and cost
Achievable	Challenging, but attainable goals
Relevant	Link the goal to higher-level district goals
Time-bound	Set timelines to complete the goal with benchmarks to indicate progress

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

According to the Illinois Association of School Boards, in its publication *The Superintendent Evaluation Process, Strengthening the Board–Superintendent Relationship, 2014*, the superintendent and school board must discuss and reach agreement on what results the board expects from the superintendent. The board and superintendent need to agree on what measurements will be used to determine whether a goal has been met, or whether the administration is in compliance with board policy.

The board president, the Policy Committee, and the superintendent should review and assess the superintendent evaluation process, make the appropriate changes to enhance collaboration and accountability, and revise the board policy and the Governing Board SOPs to include detailed guidelines for accomplishing the annual superintendent evaluation process. The board president should work with the Policy Committee, the superintendent, and TSD's general counsel to expand Board Policy BJCD (LOCAL). This policy should include best practices and more detailed information about the roles and responsibilities of board members and the superintendent in the superintendent evaluation process. The board president should establish a target date to complete the policy revisions and updates to the governing board SOPs to ensure that these changes are implemented for the next superintendent evaluation.

This recommendation could be implemented with existing resources.

LEADERSHIP EVALUATION (REC. 4)

TSD has not maximized the opportunity to enhance the performance evaluation process for members of the executive leadership team.

During onsite interviews, members of the superintendent's executive leadership team (ELT) indicated that there were opportunities to improve the school's performance evaluation process. For example, during the staff evaluation process, ELT members develop their own goals in preparation for an annual meeting with the superintendent. During this meeting, ELT members and the superintendent review these goals and then meet informally throughout the year to discuss progress toward achieving their goals. Several members of the ELT indicated that the informality and inconsistent scheduling of the meetings results in staff not always knowing what is expected of them.

TSD's annual performance evaluation instrument is also not specifically structured for cabinet and executive-level positions. Members of the ELT complete an employee performance review form in advance of attending their ELT performance review meeting with the superintendent. TSD's performance review process involves staff answering a series of questions that are intended to inspire a reflective and generative conversation about performance between the ELT member and the superintendent. This differs from the traditional performance review in which the superintendent numerically ranks the staff's performance on a ratings scale. The cover sheet of the form includes employee goals and

objectives and professional development activities for the next year. A detailed questionnaire supports this summary with the following 10 questions related to the performance review conference:

1. What has gone well?
2. What has not gone well?
3. What have you learned that will help you in the next school year?
4. What goals are you hoping to achieve?
5. What do you have in place or plan to put in place that will help you achieve your goals?
6. What are you least looking forward to about next year?
7. What challenges do you anticipate will arise?
8. How will you overcome these?
9. What support do you need from me?
10. What feedback do you have for me that will help me help you?

Although the evaluation form used in the annual review process stimulates discussion and feedback, not all ELT members completely understand its application. During onsite interviews, some ELT members indicated that they were unclear as to exactly how their evaluations are measured. Many ELT members are still accustomed to the traditional managerial review process of ratings and rankings and they are still adjusting to the school's more conversational approach. Consequently, some members of the ELT feel that the performance evaluation process lacks the structure needed to ensure a collaborative effort of goal development.

TSD's evaluation process of ELT members also does not emphasize that employee goals be linked to TSD's overall strategic goals. This often occurs naturally as the superintendent and staff review and develop goals, but this is not a focus of the process. For example, the school's overall strategic goals are set at the beginning of the school year however, the goal setting part of the evaluation process often occurs much later in the same year. This makes it more difficult to effectively align both individual and school goals.

The superintendent and director of human resources should refine the process for evaluating members of the ELT to include establishing goals and expectations for each member at the beginning of the school year to encourage executive

leadership development and attendant accountability. The process should focus on the superintendent and the ELT member jointly developing goals, by functional area of responsibility, that are aligned with TSD's strategic plan. To ensure that all ELT members understand the performance evaluation process, the superintendent and director of human resources should meet with the ELT team to explain the process and methodology.

This recommendation could be implemented with existing resources.

REALIGNMENT OF FUNCTIONS (REC. 5)

TSD's organizational structure does not align compatible functions within each division, resulting in unbalanced workloads among division directors that report to the superintendent.

The workload among division directors, who constitute the ELT, is not spread evenly at the division level requiring some directors to manage incompatible functions with their areas of responsibility. For example, the director of support operations manages functions such as Athletics, Risk Management and Student Health Services; these functions are not compatible with typical support operations such as Food Services, Homegoing Transportation, Security, and Interpreting Services. The director of student life manages functions such as Residential Services, Student Development, Student Alternative Programs, and After School Programs, but does not oversee Athletics, which is a key component of student life. TSD staff indicated that the decision not to place Athletics in the Student Life Division was intentional. At the time of the onsite review, it was the student life director's first year in this position and it was deemed more appropriate to leave Athletics with the director of support operations since he previously supervised this program for 10 years until he changed positions.

The director of academic affairs manages Student Support Services, which include speech and audiology services, vision and orientation and mobility services, and physical and occupational therapy. However, this director position does not manage student health services. The CFO manages the Business Services Division, but the position does not manage the Risk Management function.

The practice of division directors managing functions that are incompatible within their respective divisions contributes to the risk of not maximizing staff expertise, workload

imbalance, low morale, and potential burnout within the ELT. These risks could affect student performance and the delivery of student services. In TSD's organization structure, shown in **Figure 1–2**, the director of academic affairs and director of student life manage five functional areas within their respective divisions. The director of support operations manages nine functional areas within his division, and the CFO manages six functional areas within his division.

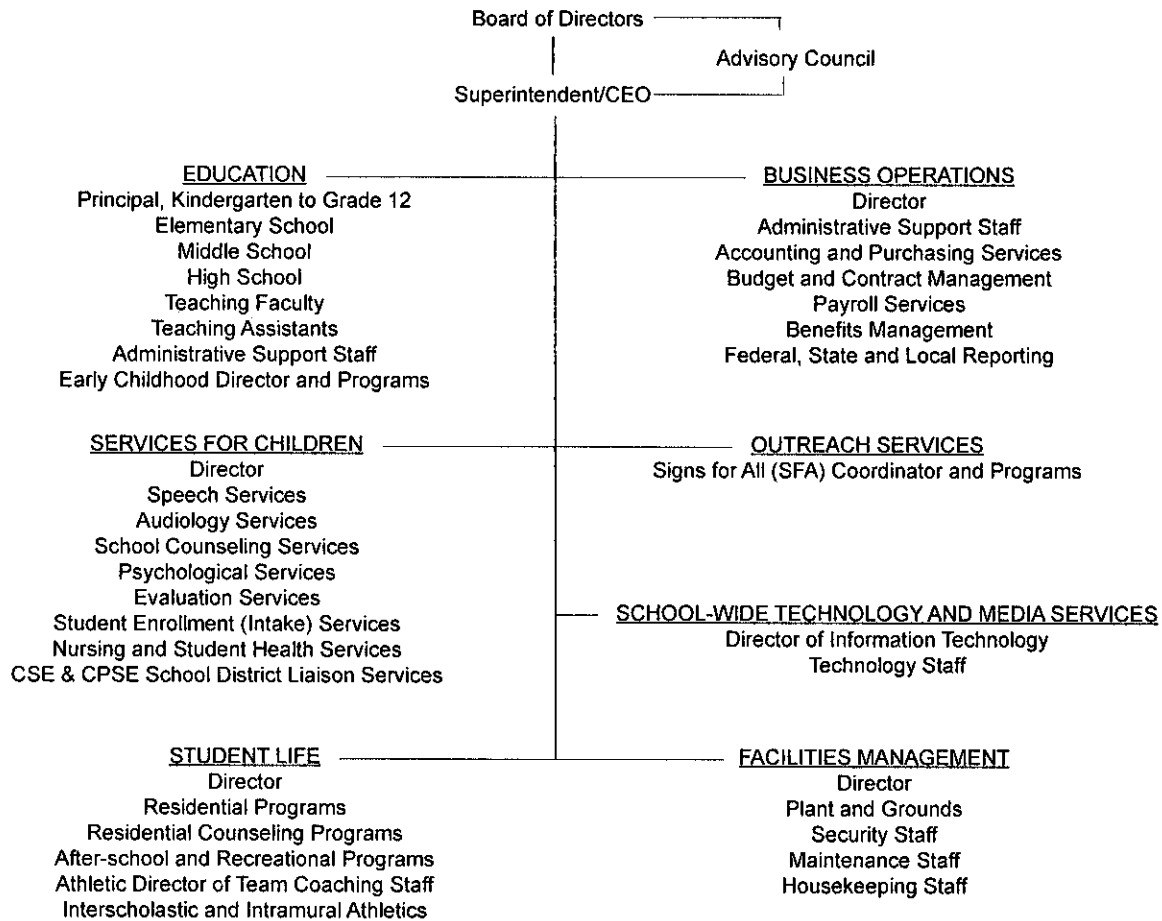
Best practice suggests that organizations should ensure balance and functional alignment for its leadership team. **Figure 1–12** shows the organizational structure for the Rochester School for the Deaf (RSD) in Rochester, New York. This structure is a model for aligning functions within divisions to achieve functional alignment and balanced workloads.

Figure 1–12 shows that RSD aligns the athletic director and interscholastic and intramural athletics within its Student Life Division and aligns nursing and student health services within its Services for Children Division. This structure is compatible with TSD's Academic Affairs Division, which coordinates Student Support Services. The RSD also combines operations and financial management functions and aligns them within its Business Services Division. RSD's organizational structure shows a more balanced workload among directors.

The superintendent should realign specific functions within divisions of TSD's organizational structure that contain incompatible functions to divisions more appropriate for the functions to balance workloads among division directors and maximize staff expertise. The proposed realignment should reflect the following changes to TSD's organization structure:

- Realign the Athletics function to the Student Life Division from the Support Operations Division;
- Realign the Risk Management function to the Business Services Division from the Support Operations Division; and
- Explore moving the Student Health Services function to the Academic Affairs Division from the Support Operations Division. While the workload of the director of academic affairs is already extensive, it is important that Student Health Services be aligned with the services provided by the Academic Affairs Division.

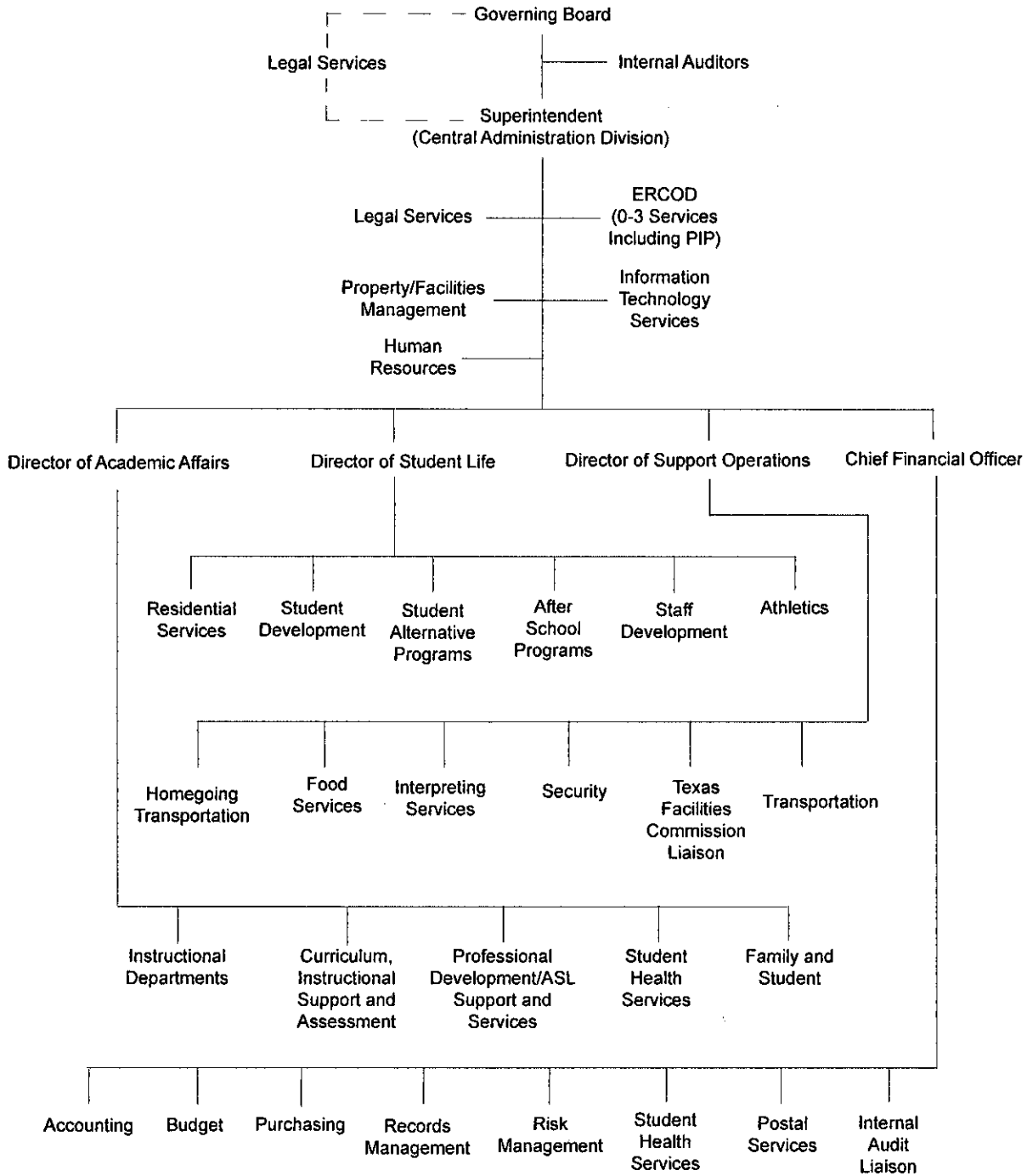
**FIGURE 1-12
ROCHESTER SCHOOL FOR THE DEAF ORGANIZATIONAL STRUCTURE
SCHOOL YEAR 2015-16**



NOTES: CEO = Chief Executive Officer; CSE = Committee on Special Education; and CPSE = Committee on Preschool Special Education.
SOURCE: Rochester School for the Deaf, June 2016.

The effect of the proposed realignment of incompatible functions within the Support Operations Division maximizes staff expertise, establishes a more balanced workload, and aligns compatible functions to enhance student services and support. After realigning these functions, the directors of academic affairs, student life, and support operations each would manage six functional areas within their respective divisions; the CFO would manage seven functional areas within his division. **Figure 1-13** shows the proposed realignment of functions.

**FIGURE 1-13
TEXAS SCHOOL FOR THE DEAF ORGANIZATION PROPOSED REALIGNMENT
MAY 2016**



NOTE: ERCOD = Educational Resource Center on Deafness; PIP = Parent Infant Program; and ASL = American Sign Language.
SOURCE: Legislative Budget Board School Review Team, May 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 1. GOVERNANCE AND SCHOOL MANAGEMENT							
1. Establish a continuing board training and orientation system to ensure that new and tenured board members understand their responsibilities and the role, structure, and process of the board.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2. Develop a comprehensive, coordinated succession plan that contains strategies and implementation initiatives to prepare TSD for eventual changes in leadership throughout the organization.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3. Review and assess the superintendent evaluation process, make the appropriate changes to enhance collaboration and accountability, and revise the board policy and the Governing Board SOPs to include detailed guidelines for accomplishing the annual superintendent evaluation process.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4. Refine the process for evaluating members of the ELT to include establishing goals and expectations for each member at the beginning of the school year to encourage executive leadership development and attendant accountability.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
5. Realign specific functions within divisions of TSD's organizational structure that contain incompatible functions to divisions more appropriate for the functions to balance workloads among division directors and maximize staff expertise.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 2. EDUCATIONAL AND STUDENT LIFE SERVICES

The Texas School for the Deaf (TSD) provides a broad range of direct educational services to students ages 0 to 22 who are deaf or hard of hearing and who may have multiple disabilities. TSD also acts as a statewide educational resource center on deafness and provides educational services to families, students, programs, and professionals statewide through the Educational Resource Center on Deafness (ERCOD). ERCOD programs include the Toddler Learning Center (TLC) which serves children ages zero to three through home visits, parent education, and classroom instruction. ERCOD also provides deaf education to more than 7,000 deaf and hard-of-hearing students statewide and the families and teachers who support them. TSD's stated mission is "... to ensure that students excel in an environment where they learn, grow, and belong ... to support deaf students, families, and professionals in Texas by providing resources through outreach services." TSD's vision is to be "the innovative leader providing exemplary and comprehensive American Sign Language (ASL)/English bilingual education empowering students to be engaged, lifelong learners."

TSD admits students through a referral by a local school district, or referral by a parent or adult self-referral. TSD encourages families to investigate the special education services offered by their local school districts first. However, parents and adult students may choose TSD rather than locally offered programs pursuant to the eligibility criteria established in the Texas Education Code, Sections 30.057(a) (1) and (a)(2), and TSD's Governing Board policy on admissions. TSD has students who attend during the academic school year and students who attend its summer programs. The academic school year student population includes Austin-area day students and residential students from across the state who live at the school from Monday through Friday, and return home for the weekend. **Figure 2-1** shows TSD student enrollment from school years 2012-13 to 2014-15 for regular school year, summer, and other programs. During school year 2014-15, 322, 55.1 percent, of the total were day students, and 262, 44.9 percent, were residential students. In summer 2015, 449 students attended summer and other programs.

Figure 2-2 shows the percentage of students by racial and ethnic groups and other demographics. Compared to the

ethnic and racial distribution of students statewide, TSD has a larger share of White and American Indian students, a smaller share of Hispanic students, and a similar distribution of African American and Asian students. TSD also has a larger share of economically disadvantaged students than the state average.

The Academic Affairs Division coordinates TSD's educational services. The director of academic affairs oversees the instructional departments, including: the Curriculum, Instructional Support, and Assessment Department; the Student Support Services Department; the Family and Student Advocacy Services Department; and the Professional Development/American Sign Language (ASL) Support and Services Department. **Figure 2-3** shows the Academic Affairs Division organization.

The TSD Early Childhood Education program serves preschool and prekindergarten students age three to five. Preschool and prekindergarten classes use the Creative Curriculum for Preschool, by Teaching Strategies, LLC, as the main curriculum resource. This curriculum is a comprehensive, research-based program structured to help educators at all levels of experience plan and implement a developmentally appropriate, content-rich program for children with diverse backgrounds and skill levels. The curriculum is developed for hearing students; therefore, teachers must modify and individualize for ASL instruction. TSD uses the standardized Visual Communication and Sign Language (VCSL) Checklist and Creative Curriculum GOLD to assess student progress. Teachers use Creative Curriculum GOLD to gather information and document student growth and development in a variety of evidence-based areas. VCSL is a standardized and comprehensive checklist used to document developmental milestones in language growth for signing deaf and hard of hearing children.

The TSD elementary school, middle school, and high school programs use the Texas Essential Knowledge and Skills (TEKS) Resource System as the main source for curriculum guides for core courses including English language arts and reading, science, social studies, and math in grades 6-12. For math in grades Kindergarten-5, TSD uses the Origo Education Stepping Stones curriculum. Teachers receive instructional coaching and support from curriculum

**FIGURE 2-1
TEXAS SCHOOL FOR THE DEAF ENROLLMENT BY SCHOOL
SCHOOL YEARS 2012-13 TO 2014-15**

SCHOOL OR PROGRAM	2012-13	2013-14	2014-15
School Year			
ECE and Elementary School (1)	154	159	178
Special Needs	59	64	61
Middle School	104	98	82
High School	178	208	197
Post-High School	55	52	66
Total, School Year Enrollment	550	581	584
Residential Enrollment	242	274	262
Day Enrollment	308	307	322
Summer and Other Programs			
Extended-year Services Programs	40	30	(2)
Summer School	203	66	162
Summer Enrollment Non-TSD	110	101	109
ECE	23	17	14
PIP	(3)	12	13
Other Short-term Programs	179	233	151
Total, Summer and Other Programs Enrollment	558	459	449
Total Enrollment	1,108	1,040	1,033

NOTES:

- (1) Early Childhood Education (ECE)/ and Elementary School includes the Parent Infant Program (PIP), prekindergarten, preschool, and elementary grades kindergarten to five.
- (2) This number was not reported in the Annual Report.
- (3) Numbers less than five have not been cited pursuant to the Family Educational Rights and Privacy Act, U.S. Code of Federal Regulations, Title 34, Part 99.1, and the Texas Education Agency procedure OP 10-03.

SOURCE: Texas School for the Deaf, 2014-15 Annual Report, March 2016.

**FIGURE 2-2
TEXAS SCHOOL FOR THE DEAF STUDENT DEMOGRAPHICS
SCHOOL YEAR 2014-15**

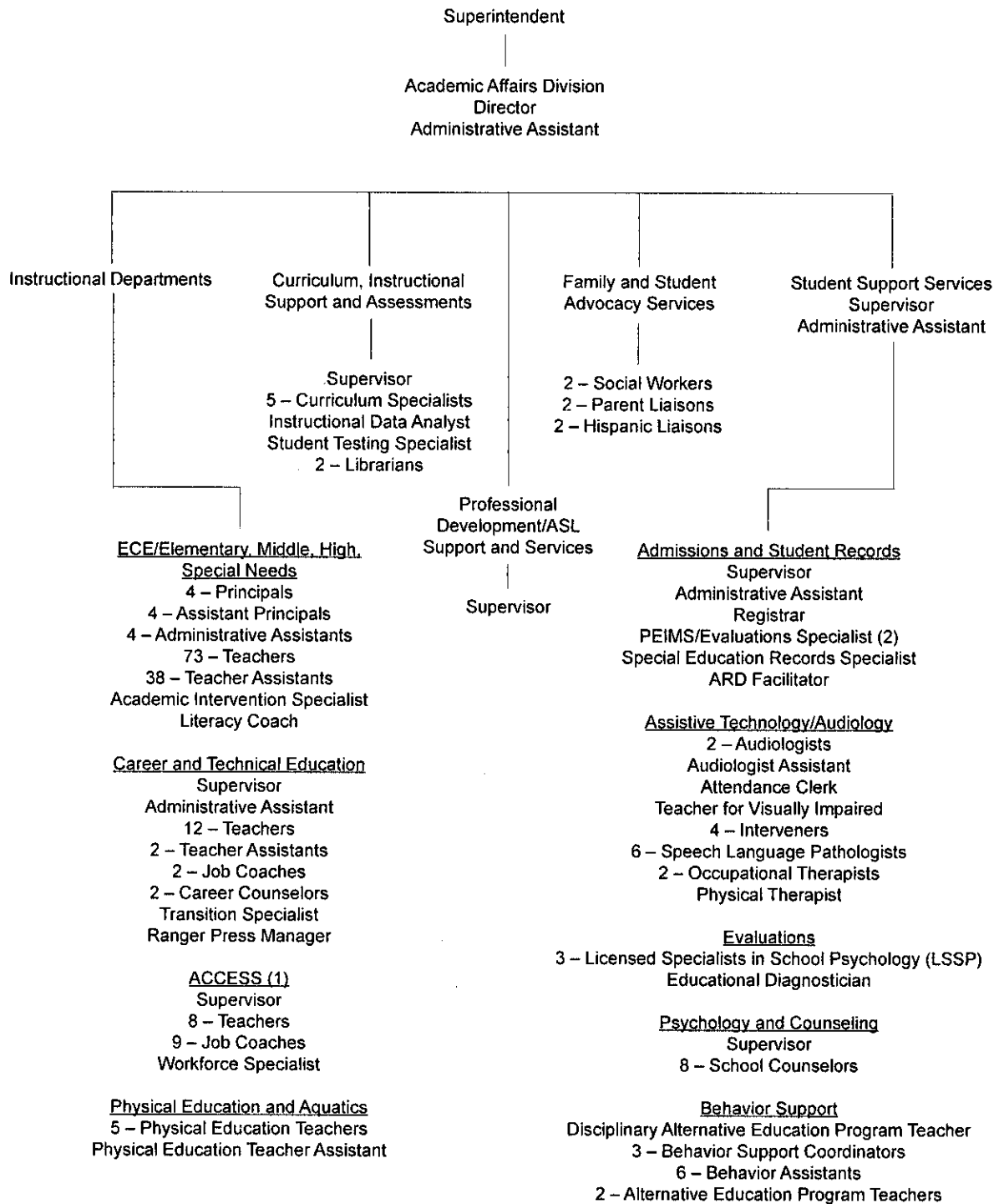
GROUP	TEXAS SCHOOL FOR THE DEAF	STATE
African American	13.6%	12.6%
American Indian	2.3%	0.4%
Asian	4.3%	3.9%
Hispanic	32.6%	52.0%
White	45.5%	28.9%
Two or more races	1.7%	2.0%
Economically disadvantaged	74.3%	58.8%

SOURCE: Texas Education Agency, Texas Academic Performance Report, March 2016.

specialists in the general curriculum, modified curriculum, and students' individualized education programs (IEP). The federal Individuals with Disabilities Education Act (IDEA)

was signed into law on December 3, 2004, and became effective July 1, 2005. IDEA requires schools to establish an admission, review, and dismissal (ARD) committee for each student receiving special education services to develop an IEP for that student. All students at TSD receive special education services and have IEPs; therefore, all students are required to have at least one annual ARD meeting. Teachers also have access to Regional Education Service Center XIII (Region 13) resources, materials, and training. High school students take classes compatible with the foundation graduation program requirements set by the State Board of Education. The five curriculum specialists in the Curriculum, Instructional Support, and Assessment Department are each assigned to a content area and to specific grade levels. TSD provides remedial instruction to students who test at less than their grade level and uses four tiers of modified instruction in some content areas, such as algebra.

**FIGURE 2-3
TEXAS SCHOOL FOR THE DEAF ACADEMIC AFFAIRS DIVISION
SCHOOL YEAR 2014-15**



NOTES:

(1) ACCESS = Adult Curriculum for Community, Employment, and Social Skills

(2) PEIMS = Public Education Information Management System

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

TSD places deaf students with either intellectual disabilities or autism in all schools or in the Special Needs Department program, depending on a variety of evaluation data that addresses their cognitive abilities, adaptive behavior, and academic achievement. Students placed in the Special Needs Department attend smaller classes in more structured settings with more intensive instructional support, more teachers and staff per classroom, slower pacing, and more individualized instruction. The Special Needs Department uses teacher/district developed curriculum guides and resources and specialized materials and curriculum at all grade levels. The program supplements the curriculum with life skills instruction for all grades. The TEKS Resource System is an optional curriculum for the Special Needs Department's program.

In addition to the prekindergarten to grade 12 curriculum, TSD offers the Adult Curriculum for Community, Employment, and Social Skills (ACCESS) Program to students ages 18 to 22. The ACCESS Program provides instruction and community-based learning opportunities to help post-high school deaf students develop practical skills in the areas of employment and independent living. ACCESS students learn the skills needed to find and maintain employment, including how to identify jobs based upon career interests; complete job applications; prepare for job interviews; and recognize and demonstrate the traits of valuable employees. TSD offers students the opportunity to gain hands-on work experience for a minimum of 10 hours per week. ACCESS provides on-the-job training and job coach support as needed.

The ACCESS Program also provides students the opportunity to develop functional daily living skills such as budgeting and money management, using a mass transit system, personal and community safety, time management and organizational skills, personal decision making, and accessing community-based resources. TSD evaluates instructional programs and curriculum based on a variety of formative and summative assessments, including student performance on State of Texas Assessments of Academic Readiness (STAAR) and the Stanford Achievement Test, Tenth Edition (SAT-10), testing. TSD develops a comprehensive assessment plan that includes baseline, diagnostic, formative, and summative assessment data. In addition, the Special Needs Department uses the Special Needs Assessment Program (SNAP) to assess special needs students who may not qualify for all district-level assessments. The instructional and administrative staff use this information to plan for students,

student groups, and school continuous improvement. TSD uses the data to develop instructional plans, determine students' class placements, plan staff development, and guide the activities of certain groups. These groups include the response to intervention (RTI) committee, child study team, student support teams, and the site-based decision-making team. TSD also uses the data to develop the district and department improvement plans. TSD stores student performance data in two databases: Eduphoria, which teachers can access, and a proprietary database for administrative use. STAAR test results are used for internal planning purposes. TSD reports SAT-10 results to the Texas Education Agency (TEA) as one indicator of the quality of learning, according to the school's memorandum of understanding (MOU) with the agency. In 1998, TSD and TEA entered into an MOU agreement that outlines a set of quality indicators to evaluate student performance. The MOU requires that TSD annually evaluate students' academic progress on state assessments, norm-referenced or criterion-referenced instruments, completion of courses, credits, 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. The MOU specifies the quality indicators for each of the three school levels. In accordance with the MOU agreement, TSD administers the SAT-10 and uses the results to assess student progress. TSD measures student performance on the SAT-10 against the deaf and hard-of-hearing norms established by the Gallaudet Research Institute at Gallaudet University in Washington, D.C. TSD students with the most severe cognitive disabilities are evaluated on mastery of IEP objectives, not SAT-10 scores. **Figure 2-4** shows that TSD has consistently met or exceeded the MOU academic and nonacademic indicators from school years 2011-12 to 2014-15.

In addition to the regular academic curriculum, TSD has several programs to support and enrich student learning. TSD has a bilingual program that consists of English and ASL. Students arrive at TSD with a variety of communication modalities. Students may have a strong English background, ASL background, both, or neither. Some students arrive at TSD semilingual, knowing some signing and some English lip reading, or speechreading, but they may not be proficient. The goal is for each student to leave TSD bilingual in English and ASL. TSD does not have a state bilingual designation because students do not exit ASL. In most bilingual programs, students exit the program after they master the target language. At TSD, students are taught ASL and English from

FIGURE 2-4
TEXAS SCHOOL FOR THE DEAF STUDENT PERFORMANCE COMPARED TO ACADEMIC AND NONACADEMIC INDICATORS SET IN THE TEXAS EDUCATION AGENCY'S MEMORANDUM OF UNDERSTANDING SCHOOL YEARS 2011-12 TO 2014-15

SCHOOL	2011-12		2012-13		2013-14		2014-15	
	TARGETED	ACHIEVED	TARGETED	ACHIEVED	TARGETED	ACHIEVED	TARGETED	ACHIEVED
Academic Indicators								
Elementary	75.0%	91.0%	80.0%	91.0%	80.0%	89.0%	80.0%	87.0%
Middle	80.0%	97.0%	80.0%	97.0%	82.0%	97.0%	82.0%	96.0%
High	85.0%	93.0%	85.0%	92.0%	85.0%	89.0%	80.0%	87.0%
Nonacademic Indicators								
Elementary	90.0%	96.0%	90.0%	95.0%	90.0%	96.0%	90.0%	91.0%
Middle	90.0%	94.0%	90.0%	95.0%	90.0%	96.0%	90.0%	92.0%
High	90.0%	97.0%	90.0%	95.0%	90.0%	95.0%	90.0%	91.0%

SOURCE: Texas School for the Deaf, Memorandum of Understanding Report to the Texas Education Agency, school years 2011-12 to 2014-15.

prekindergarten to grade 12. Beginning with a five-year grant in 1997, TSD has participated in the Star Schools Project that became the ASL/English Bilingual Education and Professional Development teacher-training program. The Star Schools Project developed a professional development curriculum for English and ASL instruction. Professional development that addresses the knowledge, assessment, instruction, and application of existing bilingual research is important because English is a linear text language and ASL is a visual language; hence, they do not align. Bilingualism, neurology, and the acquisition of languages is a rapidly emerging area of research.

TSD teachers in the early childhood education program work closely with families to enhance language use at home. Teachers work with families to encourage the use of printed materials in English, spoken English when appropriate, and ASL consistently. TSD offers ASL as an elective to students in kindergarten to grade 6. High school students receive ASL levels one, two, and three instruction as a foreign language credit. ASL classes focus on grammar, syntax, rules, and structure. TSD uses data from the Pearson Education, Inc., Developing Writer's Assessment and the Visual Communication and Sign Language Checklist to assess students' language proficiency, identify gaps, and implement strategies to address them.

Another program implemented by TSD to enrich student learning is the gifted and talented (GT) program. In school year 2012-13, TSD began planning for incremental GT program implementation, in order to meet the needs of its students and community. Implementation of the GT

program began in school year 2013-14 with screening for kindergarten to grade five. In school year 2014-15, TSD provided services for seven students in kindergarten to grade six and assessed middle school students. In school year 2015-16, TSD began providing services to middle school students and assessed high school students. In school year 2016-17, TSD plans to complete the GT program implementation. GT services will be offered at all grade levels. TSD assesses all new students for the GT program when admitted. Students are screened using the picture-based Naglieri Nonverbal Ability Test, Second Edition (NNAT2); the Cognitive Abilities Test (CogAT); the Torrance Tests of Creative Thinking (TTCT); and parent and teacher questionnaires. If students do not score high enough on these assessments for inclusion in the GT program, an appeals process may be used. Parents and teachers can also nominate students for the program. At the end of the semester, TSD provides a description of GT services offered and provides training to parents on how to support GT students at home.

In elementary grades, TSD's GT program is a weekly program in which students engage in independent learning experiences or conduct research projects. These projects are based on the Texas Performance Standards Project (TPSP) guidelines appropriate to each grade level. TPSP aligns with the TEKS and is a resource for differentiated instruction to GT students. The TPSP provides GT-related standards, curriculum, and assessments for kindergarten to grade 12. In high school, TSD individualizes GT programming according to student interest. TSD does not offer advanced placement

courses because of the high costs for teacher training and curriculum development in relation to the number of qualified and interested students.

In addition to the academic curriculum, TSD provides students with post-graduation career guidance by offering college counseling and technical training. TSD's Career and Technical Education (CTE) program is one of the largest offered by schools for the deaf in the United States. TSD students enroll in at least one CTE course per year. For school year 2014–15, 197 TSD high school students enrolled in CTE courses. During the first year of program enrollment, students are enrolled in business information management and professional communication courses. Before graduation, students either enroll in advanced CTE courses or a work preparation course, where they learn work-readiness skills and then work off campus.

TSD offers endorsements in five areas in compliance with the Texas Foundation High School Program graduation plan. The culinary arts (part of the program's hospitality cluster), hospitality and tourism, and welding (part of the manufacturing cluster) areas each established business advisory committees which include professionals, business owners, educators, and parents. TSD offers 25 CTE courses in eight out of 16 career clusters. The career clusters include:

- education and training;
- hospitality and tourism;
- manufacturing;
- architecture and construction;
- arts, audio–visual technology, and communication;
- science, technology, engineering, and mathematics (STEM);
- business management and administration; and
- transportation, distribution, and logistics.

For school year 2014–15, TSD's CTE program had 12 teachers, two teacher assistants, an administrative assistant, two workforce development specialists, a CTE supervisor, and a Ranger Press manager. The Ranger Press is a student-run business specializing in custom-print products, including digital printing and graphic design. Ranger Press, established in 2010 with proceeds from a Texas Workforce Commission grant, serves TSD and other area businesses. Ranger Press returns all profits to the business for operational costs. The

Career Center, a component of the CTE program, has two career counselors and a transition specialist.

TSD offers Career and Transition Services (CTS). CTS hosts an annual career fair for high school students to explore and gather information about post-secondary career options. The event includes recruiters from Gallaudet University and Rochester Institute of Technology–National Technical Institute for the Deaf, in Rochester, N.Y., who present information about their academic programs and support services. The event also presents a group of deaf working professionals who discuss the requirements, training, and challenges for their fields of work.

TSD encourages junior and senior students to enroll in classes at Austin Community College (ACC). For school year 2015–16, 12 TSD students enrolled in courses at ACC. TSD does not have an articulation agreement with ACC, but the school is developing an MOU agreement to define the relationship with the college. High school students may establish online portfolios of their work, test results, and awards. Career counselors have biweekly meetings with students to help with college applications and to complete the Free Application for Federal Student Aid (FAFSA) documentation.

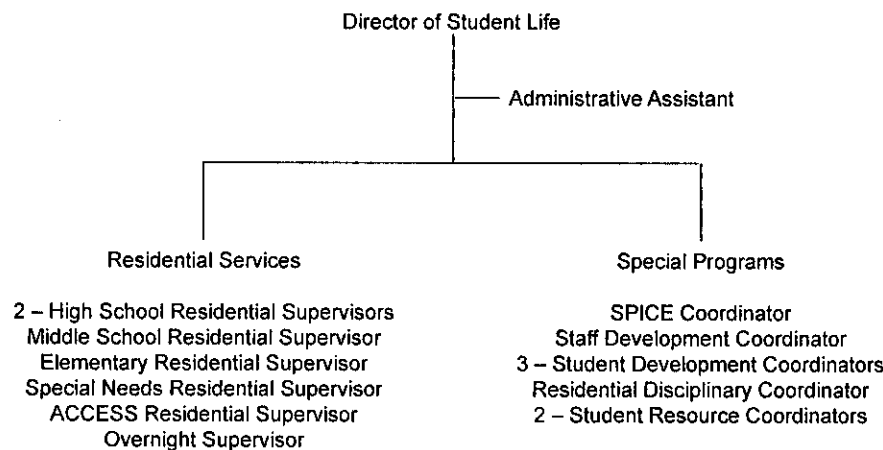
TSD provides a range of student support services, modifications, and accommodations to help each student access their education. Support services include:

- audiology services – TSD provides audiological exams for students, staff, and the community. TSD also provides amplification services that include hearing aid evaluations, fittings, and verification. For school year 2014–15, TSD employed two educational audiologists and one audiologist assistant to provide these services;
- psychological services – Counseling and psychological services are provided through Licensed Specialists in School Psychology and Licensed Professional Counselors. For school year 2014–15, TSD employed one lead psychologist and eight counselors;
- occupational therapy (OT) – TSD has two occupational therapists that collaborate with parents, teachers, and other educational staff to implement students' IEPs;
- physical therapy – TSD has one physical therapist who conducts evaluations, provides direct therapy to students, meets with parents and teachers to review student progress, identifies and purchases special equipment, and trains staff about the special equipment;

- speech therapy – TSD has six speech language pathologists (SLP) who provide direct and indirect speech, language, and communication services to students, consult with staff on communication methods and strategies, and evaluate incoming students for placement and services;
- vision services – TSD has a certified teacher for the visually impaired who provides consultative and direct services for students with visual impairment as well as deaf-blindness. Staff also includes four interventionists who work with deaf-blind students to ensure access to the curriculum being taught in the classroom as well as the community. Services include functional vision evaluation and learning media assessments; consultation with classroom teachers, paraprofessionals, and an orientation and mobility specialist; and liaison activities to appropriate agencies and programs;
- interpreting services – Interpreters assist students with communication in ARD meetings, school-based assessments, and extracurricular activities. Interpreters also provide communication access as part of the outreach activities;
- orientation and mobility (O&M) specialist – The O&M specialist conducts evaluations and trains students regarding safe and independent mobility;
- behavior support staff – TSD employs three district behavior support coordinators, an at risk specialist, a Disciplinary Alternative Education Program (DAEP) teacher, two alternative instruction teachers, and six behavior support assistants; and
- health services – TSD has a Student Health Center with a stand-alone clinic that can admit and house up to 12 students. The center is open 24 hours a day, five days a week, and on some weekends for specific students. The center is staffed with a Student Health Center director, 11 registered nurses, three licensed vocational nurses, a health center assistant, and an administrative assistant. Nursing staff work in three shifts. The center dispenses about 350 routine medications daily and treats 140 students daily for nonroutine health issues. The center works with parents regarding required immunizations, tuberculosis testing, and physical exams for sports participation. The center also coordinates student access to physicians, including an ear, nose, and throat specialist (who works at the center several times a week), a psychiatrist (who sees students every two weeks), and a family practice physician (who comes three times a week). The center maintains paper files of student health records.

TSD’s Student Life Division provides services for residential students. TSD has 15 residential buildings onsite including dormitories and cottages. Residential students reside on campus five days a week unless extracurricular activities require them to stay for weekend events. TSD uses a curriculum that emphasizes social, physical, intellectual, cultural, and emotional (SPICE) areas as the foundation for its residential program. Students develop target goals in each area of SPICE and plan ways to meet their goals. **Figure 2-5** shows the Student Life Division organization. The director of student life oversees the residential programs, which TSD organizes by grade level, and the special programs.

**FIGURE 2-5
TEXAS SCHOOL FOR THE DEAF STUDENT LIFE DIVISION
SCHOOL YEAR 2015-16**



SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

Figure 2–6 shows the job descriptions for each position in the Student Life Division.

and 8:00 pm to 12:00 am Sunday. The night residential educators work 11:50 pm to 7:50 am Sunday to Thursday.

To facilitate the residential life staff coverage, the residential educators work 3:00 pm to 12:00 am Monday to Thursday

In accordance with industry practices, TSD’s residential program student-to-staff ratios are established by grade level

**FIGURE 2–6
TEXAS SCHOOL FOR THE DEAF STUDENT LIFE DIVISION SERVICES
SCHOOL YEAR 2015–16**

POSITION	JOB RESPONSIBILITIES
Director of Student Life	ensures systems to support the students' development; additional duties include forecasting, planning, developing, promoting and evaluating programs and services that are focused on providing a diverse student body with opportunities for personal growth and leadership; and determines consequences for violations of center expectations
Administrative Assistant	supports the director of student life and Student Life Residential Services
Residential Supervisors	schedule weekly team meetings to review students' goals and progress; monitor behavior intervention plans (BIP) and determine consequences for violations of center expectations; and review, monitor, and address incident reports
Day Residential Educators	teach basic self-help and self-care skills related to independent living and social skill development; manage student behavior in accordance with the code of conduct or individual behavior plans, including intervention in crisis situations and physical intervention for students as necessary in accordance with individualized education programs and the Mandt System, which is the Texas School for the Deaf's (TSD) preferred method of managing aggressive behavior; develop, implement, and monitor student activities; act as a chaperone of students for off-campus activities and as needed for traveling home; and respond appropriately to emergencies, and notify appropriate staff and parents; make parental or guardian contact once a week or as required by supervisor; may enter students' rooms and restrooms to check on students' safety and personal hygiene
Night Residential Educators	monitor and supervise students during night-shift hours; wake students in the morning at each student's room; supervise students walking to and from the residential cottage or dormitory; administer appropriate behavior support; carry out the instructions of the night supervisor and residential supervisors; assist students in proper grooming, personal hygiene, table manners, and cottage and dorm duties; document bed checks of students at approximately 15-minute to 30-minute intervals by checking each room and observing and noting student activity; work in area assigned by night supervisor; complete necessary dorm or cottage records, reports, paperwork, and prepare materials for programs; obtain and maintain certification in the Mandt System for behavior support; and keep detailed records and reports; are able to occasionally safely lift and carry students or objects that weigh 45 pounds or more
Overnight Supervisors	ensure compliance with procedures and ensure that verbal and written communication between each shift meets TSD's expectations; and manage the night residential educators
Social, Physical, Intellectual, Cultural, and Emotional (SPICE) Coordinator	implements the SPICE curriculum; serves as a resource to residential staff for managing, planning, and structuring activities or using instructional materials for residential students; develops and evaluates spiral living skills curriculum across appropriate grade levels and age levels; coordinates the development of student enrichment activities intended to enhance self-esteem, pride, confidence, and problem-solving skills; identifies age-appropriate topics parallel to child development and cognitive development; coordinates programs, arranges field trips, and invites guest speakers to support staff in providing monthly educational nights; and oversees, assesses, and evaluates students' progress in developing skills; oversees and trains day residential educators in using the SPICE database; monitors the Mount Bonnell Privilege System and the SPICE database

FIGURE 2-6 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF STUDENT LIFE DIVISION SERVICES
SCHOOL YEAR 2015-16

POSITION	JOB RESPONSIBILITIES
Staff Development Coordinator	coordinating professional development, training, and mentoring new employees for residential staff
Student Development Coordinator	reviews and tracks monthly activity requests; ensures that individual student activity goals are met; provides support for field trips and ensures that materials for activities are readily available; and monitors and tracks each student's attendance in after-school clubs
Residential Disciplinary Coordinator	manages Residential Disciplinary Center (RDC); confers with students regarding their behavior issues and reviews incidents; provides guidance to students when necessary, assisting students in recognizing and modifying unacceptable behavior; intervenes promptly to reduce the frequency of problems; ensures that all procedures related to behavior programming, behavioral expectations, and the school's code of conduct are followed; and provides student workshops concerning behaviors that have resulted in RDC placement in an attempt to prevent similar or repetitive behaviors.
Student Resource Coordinator	provides support to students as it applies to their BIPs; ensures goals are met and plans are supported with resources ensuring the students success; and works in collaboration with all dorm staff, primarily residential supervisors

SOURCE: Texas School for the Deaf, March 2016.

with an emphasis on younger children that require more supervision. TSD student-to-staff ratios in the residential program are:

- Elementary Residential Program – 4:1;
- Middle School Residential Program – 6:1;
- High School Residential Program – 8:1; and
- the ACCESS Residential Program ratio varies based on the individual needs of the students.

ACCOMPLISHMENTS

- ◆ TSD has implemented a dual mentoring system to comprehensively support the needs of beginning teachers.
- ◆ TSD has established an effective transitional living program to serve deaf and hard-of-hearing students ages 18 to 22 who have graduated from high school but need more transition-related training to prepare them for independent living and employment.
- ◆ TSD offers a range of extracurricular activities to its students to improve their social skills, self-esteem, and sense of school spirit and morale.

FINDINGS

- ◆ TSD lacks formal processes and procedures to manage its instructional and assistive technology resources and systems to meet students' educational needs.
- ◆ TSD supports only an American Sign Language and English bilingual program, although the Texas Education Code encourages the use of a variety of language modes to accommodate students' needs.
- ◆ TSD does not efficiently conduct ARD committee meetings to minimize the professional staff time required to participate in these meetings.
- ◆ TSD lacks processes to ensure that all families of deaf students with autism living outside of the Austin area receive support services to manage their children in their home environments.
- ◆ TSD has not maximized opportunities to enhance support services in the Student Life Division to improve the effectiveness of student life and residential services.
- ◆ TSD lacks a process to effectively communicate student discipline concerns among classroom teachers and residential staff.

RECOMMENDATIONS

- ◆ **Recommendation 6:** Develop, implement, and document formal processes and procedures of instructional and assistive technology in the educational service delivery area.
- ◆ **Recommendation 7:** Analyze supplementing the use of ASL with other modes of communication.
- ◆ **Recommendation 8:** Implement an ARD support infrastructure, scheduling system, and meeting management strategies that more equitably distribute chairing responsibilities and optimize the time required for principals and other professional staff to prepare for and attend ARD meetings.
- ◆ **Recommendation 9:** Collaborate with service providers in the students' local education agencies (LEA) of residence to provide in-home training to parents of students with autism who attend TSD, reside on campus during the week, and return home each weekend, for breaks, and for the summer.
- ◆ **Recommendation 10:** Establish a committee from affected departments to make recommendations for how to implement best practices to improve the residential services program.
- ◆ **Recommendation 11:** Develop a process to enhance communication of students' behavior issues among classroom teachers and residential staff, and develop a report or database to track all disciplinary occurrences.

DETAILED ACCOMPLISHMENTS

DUAL MENTORING SYSTEM

TSD has implemented a dual mentoring system to comprehensively support the needs of beginning teachers.

Beginning teachers often report challenges that include managing classroom discipline, motivating students, dealing with individual differences, parent relations, planning class work, evaluating student work, insufficient materials and supplies, students' personal problems, and relations with colleagues. TSD developed a mentoring system that addresses these challenges and is responsive to beginning teachers' perceived needs. TSD assigns two mentors to beginning or new teachers: a curriculum mentor and a peer mentor.

Mentors work with teachers during the teachers' first two years at TSD.

The Curriculum, Instructional Support, and Assessment Department assigns a curriculum staff to coach new teachers in instructional strategies and to meet with new teachers every few weeks. At the beginning of the school year, the respective principal assigns a peer mentor who is an experienced teacher in the same content area as the new teacher. The peer mentor has at least three years of deaf education experience, is a highly qualified teacher, and has a proven record of classroom effectiveness. Peer mentors receive a two-hour mentoring training at the beginning of the school year. **Figure 2-7** shows the training challenges that beginning teachers face, their areas of need, and how the dual mentoring system addresses these needs. The training also reviews the role and responsibilities of the peer mentor and what peer mentors are expected to do with regard to meetings, communications, classroom observations, assistance, and monthly reports.

During the training, mentors discuss the difference between the roles of the peer mentor and the curriculum mentor. **Figure 2-8** shows the letter agreement and a confidentiality agreement for mentors. Mentors receive a \$900 stipend for working with first-year teachers and a \$450 stipend for working with second-year teachers.

Figure 2-9 shows the monthly reports that the peer mentors prepare of the activities they conduct with new TSD teachers.

The dual mentoring system provides close support to the teacher from two different mentors. The peer mentor is on the same campus, is in the same department, and teaches the same content area. The curriculum mentor provides curriculum support and coaching. The dual mentoring system, according to the curriculum supervisor, ties informal observational feedback with broad needs such as IEP development, curriculum, and resources. Establishing this dual mentoring program enables TSD to foster a nurturing environment of its teaching staff.

ADULT LEARNING PROGRAM

TSD has established an effective transitional living program to serve deaf and hard-of-hearing students ages 18 to 22 who have graduated from high school but need more transition-related training to prepare them for independent living and employment. The ACCESS Program targets three areas: transition planning, employment skills, and independent living skills. It is an instructional program within the

**FIGURE 2-7
OVERVIEW OF TEXAS SCHOOL FOR THE DEAF'S MENTORING SYSTEM FOR BEGINNING TEACHERS
SCHOOL YEAR 2015-16**

BEGINNING TEACHERS' NEEDS	MENTOR'S ROLE
Ideas about instruction	discuss planning, student work, and lessons; review student assessment information and the Texas Essential Knowledge and Skills standards; and provide guidance on ways to engage students in the content
Personal and emotional support	stress the need for life outside the classroom; be available to listen; recognize the new teacher as a peer; remind the new teacher that making mistakes is normal; designate a time for sharing and discussing issues; and socialize outside the workplace
Advice on locating and accessing materials and resources	show the new teacher around the building; provide information about special services available in the building; explain the textbook process; explain the chain of command; explain record-keeping procedures; and help develop efficient procedures
Information on school procedures	review school rules; explain processes for accessing materials and resources; review schedule for meetings; describe special activities; and explain unwritten rules
Additional techniques for management	discuss student attendance policies; help with class seating and room arrangement; provide guidance on organizing the first day and first week of school; assist in organizing materials and establishing procedures; provide examples of letters to families and caregivers; explain when to contact families and caregivers; identify methods for documenting family and caregiver contact; and explain written progress report forms and procedures.

SOURCE: Texas School for the Deaf, Teacher Induction Program, Peer Mentor Training, April 2016.

Academic Affairs Division with 31 staff, including teachers, full-time and part-time job coaches, employment and workforce specialists, nurses, and an intervener. The ACCESS Program also includes staff from other departments including counselors, social workers, and behavior specialists. In school year 2014-15, the program served 66 students who reside in a variety of living arrangements that support their levels of independence.

To customize the program to students' needs, TSD conducts a transition planning survey of parents and teachers of students enrolled in ACCESS. The survey explores the student's skills and attitudes, levels of responsibility, interactions with others, basic academic skills, habits and wellness, and abilities to plan for success. The survey asks the

parent or teacher to assess the student on each of these areas as a strength, average, needs improvement, or not applicable.

At age 14, each student's ARD committee develops a transition services inventory as part of students' post-secondary employment and living goals plan. The inventory includes information regarding: a student's strengths, interests, and preferences; the student's need for additional skill development; parents' or guardians' concerns regarding transition planning; the student's concerns related to career and transition planning; the student's self-described disability; and accommodations and assistive technology needed in higher grades and for ACCESS placement. The ACCESS curriculum addresses topics associated with life management, personal management, and career management. These topics include adult living, employment (including

**FIGURE 2-8
TEXAS SCHOOL FOR THE DEAF TEACHER MENTORING SYSTEM CONFIDENTIALITY AGREEMENT
SCHOOL YEAR 2015-16**

Teacher Induction Program Confidentiality Triad

TSD Peer Mentors have a collegial, nonevaluative, and confidential relationship with their new teachers. Trust is a critical component. To maintain that trust, all discussion and observation notes are confidential.

Communication among the Peer Mentors, new teachers and building administrators is encouraged and based on the following guidelines.

Principals/Supervisors have a contractual obligation to observe new teachers in the classroom. Peer Mentors will not share with the administrator information that is gathered through observations, conversations, or other communications with the new teacher.

Peer Mentors will stress to new teachers the importance of developing trust and open communication with their Principals/Supervisors. When an issue is of a serious nature, the Peer Mentor may suggest that the new teacher consider bringing it to the administrator's attention.

Peer Mentors will communicate concerns directly to the Principal/Supervisor only if they perceive that students in the new teacher's classroom are at a serious risk (e.g., physical or verbal abuse, lack of supervision, etc.). New teachers have the right to be informed that serious concerns have been forwarded to the building administrator.

If the Principal/Supervisor initiates a Teacher in Need of Assistance Plan for the new teacher, the Peer Mentor may be asked to act as one resource to assist the new teacher in meeting the goals of the plan. The Peer Mentor must agree to this arrangement and clearly understand the scope of his/her responsibilities before signing onto the plan.

If a Peer Mentor is unsure of whether or not information shared should remain confidential, s/he is advised to contact ___ via email, phone, or videophone.

SOURCE: Texas School for the Deaf, Teacher Induction Program, April 2016.

**FIGURE 2-9
TEXAS SCHOOL FOR THE DEAF EXAMPLE OF A TEACHER AND PEER MENTOR COLLABORATIVE LOG
SCHOOL YEAR 2015-16**

TEACHER:	PEER MENTOR:	DATE:
Focus Area(s): Class Management and Grade Book		Next Meeting Date:
What procedures did we use today?	<input type="checkbox"/> Observing <input type="checkbox"/> Demonstration <input type="checkbox"/> Video <input type="checkbox"/> Cross-observation <input type="checkbox"/> Lesson Taping <input type="checkbox"/> Reflecting <input type="checkbox"/> Problem <input type="checkbox"/> Providing <input type="checkbox"/> Other: _____	
	Solving Resources:	
What's Working:		Current Focus – Challenges – Concerns:
Teacher's Next Steps:		Mentor's Next Steps:

SOURCE: Texas School for the Deaf, Teacher/Peer Mentor Log Template, April 2016.

on-the-job training), social skills, and recreational skills. Each classroom has a teacher and job coach and may have additional support staff. TSD organizes ACCESS into three clusters and eight classes based on the levels of training and support students need. The ACCESS cluster for classes one to four is for students who need more support and accommodations; the ACCESS cluster for classes five to seven is for students who need less support; and class eight is for students who attend group or individual employment without assistance.

The ACCESS Program uses a transition curriculum and a Unique Learning System (ULS) curriculum. ULS is an online, standards-based set of interactive tools developed for students with special needs to access a curriculum. The ULS curriculum uses three levels of differentiation, depending on students' abilities and skill levels, and rigorous, standards-based materials intended to meet instructional needs. The ACCESS program purchased the three-volume Transitions Curriculum, a multi-year program published by The James Stanfield Company. ACCESS students spend approximately 90 minutes daily in

formal classroom instruction that addresses the units, goals, and skills in the Transition Curriculum. Not all the curriculum objectives may be necessary or appropriate for all students. In these cases, teacher teams develop full year timelines, added resources, and modifications as needed.

The ACCESS Program has 30 active work sites. The goal is to enable ACCESS students to experience two to three jobs during their time in the program. The employment specialists serve as the liaisons with community businesses and also work with teachers to match student interests with job sites. The program uses a community-based instruction approach to teach in settings outside the school and to help students develop age-appropriate skills for functioning outside the school environment. TSD assigns students that need more support to group work sites. Job coaches may stay onsite with students. Students in ACCESS clusters for classes five to seven and class eight may be at work alone, and teachers will visit weekly to observe their progress. This process supports the program's goal of student independence.

Teachers and coaches monitor and evaluate the student's worksite progress and performance by using an ACCESS Worksite Observation Form, which is completed weekly by coaches and monthly by teachers. The program staff developed this form to: rate students' soft skills and work skills; identify student strengths; document areas of concern and tasks observed; and record how students demonstrate appropriate safety precautions. The form also identifies additional modifications or support if needed and readiness for work. ACCESS staff enters the information from the form into the Career and Transition Services database, and hard copies are stored for student access. Students exit the

program when they find jobs, move to group homes, enroll in college, or age out.

Figure 2-10 shows that about 71.0 percent of TSD staff and 56.0 percent of parents consider the ACCESS program and its independent and transition skills component effective.

The ACCESS staff conducts periodic exit surveys of former students. In October 2015, TSD contacted the 95 students who exited ACCESS from school years 2012-13 to 2014-15. Of the 66 students who responded, 25 are attending college, 24 are employed part-time or full-time, and others have moved out of state or are in other programs.

EXTRACURRICULAR ACTIVITIES

TSD offers a range of extracurricular activities to its students to improve their social skills, self-esteem, and sense of school spirit and morale. The extracurricular activities integrate academics through collaboration among teachers, administrators, and staff responsible for the activities. TSD has an extensive athletics program that offers 30 sports programs with 25 teams, and supports 200 athletes from grades three to 12. The school also offers extracurricular activities ranging from theater productions to STEM activities and teams.

TSD middle school and high school students stage two performing arts productions each year. The theater productions integrate math, history, character analysis, and science. Students in the mill and cabinetmaking class have built stage props for the productions.

Tech Girls is a STEM initiative for girls in grades six to 12, promoted and provided by the Girl Scouts of Central Texas

**FIGURE 2-10
TEXAS SCHOOL FOR THE DEAF PARENTS AND STAFF RESULTS OF LEGISLATIVE BUDGET BOARD SURVEY
FEBRUARY 2016**

Survey item: The Adult Curriculum for Community, Employment, and Social Skills (ACCESS) Program and its independent and transition skills component are effective.

RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	NOT APPLICABLE	TOTAL
Independent and Transitional Skills Program							
Staff	20.0%	51.0%	22.0%	6.0%	0.0%	0.0%	242
Parents	24.0%	32.0%	36.0%	2.0%	2.0%	4.0%	76
ACCESS Program							
Staff	23.0%	48.0%	24.0%	3.0%	1.0%	1.0%	242
Parents	24.0%	18.0%	45.0%	3.0%	1.0%	8.0%	76 (1)

NOTE:

(1) ACCESS program parents surveyed include four parents who responded to the Spanish translation of the survey.

(2) Percentages may not add to 100% due to rounding.

SOURCE: Legislative Budget Board School Review Team, February 2016.

Council in economically disadvantaged schools where 40.0 percent or more of the students participate in the National School Lunch Program, a federally assisted meal program in schools. Tech Girls is primarily funded with grants from partners such as the RGK Foundation, Kodosky Family, 3M, Dell YouthConnect, the Webber Foundation, the Alice Kleberg Reynolds Foundation, and the Best Buy Children's Foundation. Projects are hands-on and STEM-focused. Topics have included electronics, underwater remotely operated vehicles, cosmetic chemistry, robotics, drones, computer program coding, ice cream chemistry, and wearable technology. Students are also involved in multiple competitions. Tech Girls is in its fourth year at TSD. The group meets weekly after school and involves three TSD staff—a middle school math teacher, a robotics teacher, and a middle school teacher assistant—and a volunteer college student. On average, 10 girls attend the weekly meetings.

TSD students participate in several interscholastic competitions, including:

- the Culinary Bowl, an annual competition for deaf students; the TSD team consists of six students;
- Math Counts, sponsored by the National Technical Institute for the Deaf;
- the Academic Bowl, an annual competition on world knowledge, hosted by Gallaudet University; during school year 2015–16, TSD's student team won first place in the Southwest Regional Academic Bowl against 20 teams and entered the national competition in Washington, D.C., where it won eight more matches for 18 consecutive wins;

- the First Tech Challenge science and technology competition with other high school students in the area, was hosted by Vandergrift High School in Leander ISD; TSD's Robotics team, the Blue Chargerbots, placed in the top 12 out of 83 teams; the team is an extension of a TSD robotics class and has two mentors who work for the IBM company (a software engineer and a hardware engineer);
- TSD students entered a welding competition hosted by ACC; and
- TSD participates in eight sporting events at the Special Olympics of Texas (SOTX): aquatics, bocce ball, golf, bowling, flag football, basketball, soccer, and track and field. The school hires dorm staff as coaches and encourages special needs and ACCESS students to participate. During school year 2014–15, TSD hosted its first SOTX sports awards ceremony and presented 26 TSD special needs and ACCESS students with certificates and medals.

Figure 2–11 shows that a high percentage of TSD staff and parents agreed or strongly agreed that TSD has effective social skills and self-determination programs and recreational and leisure skills programs. More than 57.0 percent of TSD staff considered TSD's social skills and self-determination program effective; nearly 73.0 percent considered TSD's recreational and leisure skills program effective. About 75.0 percent of the parents who responded to the survey considered TSD's social skills and self-determination program effective; about 81.0 percent considered TSD's recreational and leisure skills program effective.

FIGURE 2–11
TEXAS SCHOOL FOR THE DEAF PARENTS AND STAFF RESULTS OF LEGISLATIVE BUDGET BOARD SURVEY
FEBRUARY 2016

Survey item: The Texas School for the Deaf has effective social skills and self-determination programs and recreational and leisure skills programs.

RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	NOT APPLICABLE	TOTAL
Social Skills and Self Determination Program							
Staff	13.0%	44.0%	26.0%	13.0%	3.0%	1.0%	240
Parents	30.0%	45.0%	15.0%	9.0%	0.0%	1.0%	76
Recreational and Leisure Skills Program							
Staff	17.0%	56.0%	21.0%	5.0%	1.0%	1.0%	241
Parents	34.0%	47.0%	12.0%	4.0%	1.0%	1.0%	76 (1)

NOTE:

(1) Category includes four parents who responded to the Spanish translations of the survey.

(2) Percentages may not add to 100% due to rounding.

SOURCE: Legislative Budget Board School Review Team, February 2016.

DETAILED FINDINGS

PROCESSES AND PROCEDURES (REC. 6)

TSD lacks formal processes and procedures to manage its instructional and assistive technology resources and systems to meet students' educational needs. TSD lacks formal processes and procedures in several areas including management of assistive technology (AT) resources, management of student data, and use of instructional technology software.

Assistive listening technology is any item, piece of equipment, or product system that is used to increase, maintain, or improve the functional capabilities of deaf children. TSD lacks an AT management process for its assessments, inventory and materials. AT evaluations and recommendations involve several professional specialties. The specialists serving students with visual impairments evaluate the need for low-vision devices and aids to orientation and mobility. The audiologist evaluates the need for and provides assistive listening technology. The SLP evaluates the need for augmentative communication devices. Occupational therapists (OT) and physical therapists (PT) evaluate the need for assistive technology for daily living activities and mobility. In the classroom, teachers use low-technology visual supports such as picture symbols, graphics, photos, videos, manipulatives, and voice output devices. Staff conducts new AT evaluations every three years or earlier, if recommended, during an ARD committee meeting.

Each of the professional staff keeps AT inventories. For example, the vision specialist has an inventory of vision equipment; the OT and PT have inventories of seating and sensory equipment; and the audiologist has an inventory of hearing aids and other assistive listening devices. Teachers share and distribute AT supports among other teachers and classrooms. No centralized inventory documentation is kept to track the location of these support materials, AT devices, software and applications or to use as a reference when identifying appropriate assistive technology for specific students.

Although the SLP communicates with a number of professionals involved in AT assessment and in ARD meetings, TSD does not have a formal AT team to effectively and efficiently coordinate, document, share, and implement these services. Without a standing AT team, redundancy exists in AT assessments. Delays occur in organizing AT assessments, which cause students to wait for needed accommodations and support. The absence of an AT

assessment policy has also increased the time needed to convene the professional staff. According to the TSD SLP who is responsible for AT services, new staff conducting AT assessments struggle to implement the AT process without guidance. The lack of process and procedures also introduces the risk that identifying the need for assessment and implementing the assessment would not be consistently conducted with students.

TSD also lacks a dedicated AT leader position responsible for coordinating all AT assessments and inventories. The lack of an AT coordinator reduces the efficient use of resources, the quality of assessments conducted, and the effectiveness of assistive technology identified considering the rapid technological changes in the assistive technology field. An AT coordinator would identify the appropriate professional staff to determine student needs, ensure staff expertise through continuous training, oversee the completion of AT assessments, and ensure implementation. An AT coordinator would guide the AT assessment protocol, receive training, and maintain an AT equipment database.

Best practices suggest that schools develop a formal AT team with expertise in a range of assistive technology used across all grade levels and departments to provide students with more options and ensure consistency.

TSD uses the eSped system to manage information, but the school lacks comprehensive quality control processes and procedures for the timely migration of student information to this system. eSped is a cloud-based student information management tool for special student populations. The system electronically manages, tracks, and archives student data. The system is updated to comply with federal and state requirements. To effectively serve the needs of its students, TSD must have accurate, complete, and readily available data to develop the individual support each student needs to succeed. TSD plans to use this system as the repository for all of its student records. The system has data management modules that could be used to assess and meet the students' needs related to RTI, full individual assessments, ARD, IEP, English Language Learners, and Medicaid clients. The U.S. Medicaid program is a joint federal-state partnership to provide medical care to recipients of cash assistance, children, pregnant women, the elderly, and disabled persons.

TSD prepared an implementation plan that consisted of a timeline for migrating from a database to the new system. The timeline for implementation originally spanned six years, starting with testing of the system in school year

2013–14 and full implementation in school year 2019–20. TSD revised the timeline in May 2016 to fully implement eSped during school year 2016–17. The special education/records office specialist is managing this implementation. TSD staff involved with the implementation did not provide any information to other TSD staff about the migration process, its phases, or the timeline for full implementation. The plan identifies the schools, grade levels, trainers, TSD staff participating in the process, and activities to be completed each year. However, TSD does not have a formal process or quality control procedures for entering data into eSped. Consequently, multiple staff enter data into this system without any checks for data accuracy, completeness, controlled access, or other quality controls. Without quality controls, the existing implementation process of this system increases the risk of incomplete, inaccurate, or outdated data, which could affect TSD's plans to meet students' needs.

Regarding instructional technology assessment and training, TSD lacks a process for assessing and documenting the effectiveness of its instructional technology software programs and applications. It also lacks a formal instructional technology training process for new and existing staff.

Formal processes and procedures provide a common frame of reference, provide a method of consistent communication, and describe how a program operates. These processes ensure consistent communication about what each process is, how it should be applied, and who is responsible for its successful execution. Such processes also offer a clear understanding of the inputs or triggers and what the expected results should be upon process completion. Documentation ensures continuity and consistency transcending staff changes, such as retirement and other staff separation. TSD does not document many of the processes and procedures that staff use. No process is in place to assess the effectiveness of instructional technology, which hinders TSD from ensuring that the instructional technology it uses has a positive effect on student performance.

TSD should develop, implement, and document formal processes and procedures of instructional and assistive technology in the educational service delivery area.

The director of academic affairs, with representatives of the division's five departments, should review educational service delivery programs to identify areas where formal processes and procedures have not been developed but would be beneficial. Best practices suggest that schools establish professional learning communities (PLC) that include teachers and administrative staff. PLCs collaborate to

determine broad goals and processes. After these goals are identified, the director of academic affairs should assign specific members of the review team with the responsibility for the development of processes and procedures in their respective areas. The processes and procedures developed should include a timeline for development, implementation steps, and resources needed, and should identify staff involved in implementation. The processes and procedures developed should incorporate best practices and, to the extent feasible, adapt processes and procedures proven to be effective in other schools. The team should review these processes and procedures, and refine and implement them. The director of academic affairs should monitor implementation during the first year. The team should review implementation at the end of the first year and adjust the processes and procedures as needed.

This recommendation could be implemented with existing resources.

METHODS OF INSTRUCTION (REC. 7)

TSD supports only an American Sign Language (ASL) and English bilingual program, although the Texas Education Code (TEC) encourages the use of a variety of language modes to accommodate students' needs.

Pursuant to TEC, Section 29.302:

“(a) The legislature finds that it is essential for the well-being and growth of students who are deaf or hard of hearing that educational programs recognize the unique nature of deafness and the hard-of-hearing condition and ensure that all students who are deaf or hard of hearing have appropriate, ongoing, and fully accessible educational opportunities. Students who are deaf or hard of hearing may choose to use a variety of language modes and languages, including oral and manual-visual language. Students who are deaf may choose to communicate through the language of the deaf community, American Sign Language, or through any of a number of English-based manual-visual languages. Students who are hard of hearing may choose to use spoken and written English, including speech reading or lip reading, together with amplification instruments, such as hearing aids, cochlear implants, or assistive listening systems, to communicate with the hearing population. Students who are deaf or hard of hearing may choose to use a combination of oral or manual-visual language systems, including cued speech, manual signed systems, and American Sign Language, or may

rely exclusively on the oral-aural language of their choice. Students who are deaf or hard of hearing also may use other technologies to enhance language learning.

(b) The legislature recognizes that students who are deaf or hard of hearing should have the opportunity to develop proficiency in English, including oral or manual-visual methods of communication, and American Sign Language.”

ASL is the predominant sign language of deaf communities in the United States. According to Gallaudet University, ASL is “a visual-spatial-tactile language with its own grammar and syntax. The shape, placement, and movement of the hands, as well as facial expressions and body movements convey meaning. ASL uses signs representing ideas, manual signals, and an alphabet (finger spelling). ASL is not a manual version of English, and its grammar and syntax are not the same as English.

Manual-visual systems differ from ASL because they combine speaking and signing simultaneously. Proponents believe that they help with learning written and spoken English, because English words are manually reproduced in the same order. According to Gallaudet University, a manual-visual system such as Signing Exact English (SEE), strives to be an exact representation of English.

TSD has a bilingual program, and its goal is to ensure that students access English and ASL. Students at TSD may access English only in its printed form and some may access English through its printed form as well as its spoken form. TSD’s instructional goal is for students to have ASL as their natural visual language in grades kindergarten to grade 12. TSD does not offer instruction in English-based, manual-visual languages.

Texas has 53 Regional Day School Programs for the Deaf (RDSPD) to provide educational deaf and hard of hearing students from surrounding school districts. For example, the Abilene RDSPD’s communication philosophy is to support a variety of communication options. In the Abilene RDSPD, students may choose to communicate through the language of the deaf community, ASL, or through any of a number of English-based manual-visual languages. Students may also choose to use spoken and written English, including speech reading or lip reading, together with amplification instruments, such as hearing aids, cochlear implants, or assistive listening systems, to communicate with the hearing population. As an overall comprehensive approach, there will

be an emphasis on Conceptually Accurate Signed English. In alignment with TEC, Section 29.303, the program agrees that each student’s unique communication mode is respected, used, and developed to an appropriate level of proficiency.

TSD should analyze supplementing the use of ASL with other modes of communication.

The TSD superintendent, jointly with the director of academic affairs and the supervisor of curriculum, instructional support, and assessments, should review data from Texas RDSPDs and schools for the deaf in other states that use alternative communication options. This group should explore the process for incorporating other modes of communications, identify and evaluate resources, identify training programs, and develop recommendations for supplementing the use of ASL with other modes of communication. The superintendent should present the recommendations to the TSD board for review and approval.

This recommendation could be implemented with existing resources.

ADMISSION, REVIEW, AND DISMISSAL (REC. 8)

TSD does not efficiently conduct ARD committee meetings to minimize the professional staff time required to participate in these meetings.

IDEA requires schools to establish an ARD committee for each student receiving special education services to develop an IEP for that student. The ARD committee is composed of the student’s parents and school staff involved with the student.

An IEP includes information about a student’s existing levels of academic achievement and functional performance; the student’s participation in state and district assessments; measureable academic and functional annual goals that the ARD committee believes the student can accomplish in a year; transition services; and related services, including supplementary aids and services. Related services may include transportation and developmental, corrective, and other support services needed to receive a free appropriate public education (FAPE). The U.S. Code of Federal Regulations (CFR), Title 34, Section 300.323, requires that the ARD committee meet at least once a year to review the student’s IEP and determine whether the annual goals are being met. The ARD committee may meet more often in response to a parent’s request, if a student shows lack of progress, if new information on the student is provided, or for other reasons.

All TSD students require an annual ARD meeting. TSD implements all annual ARD meetings in the spring of each school year instead of on the ARD's respective anniversary dates throughout the year. According to TSD, the ARD season starts in January, and scheduling can cause delays because of the limited availability of required committee members. Convening all annual ARD meetings in the spring occupies principals and other professional staff, limiting their time to attend to other responsibilities. Preparing for, chairing, and attending ARD committee meetings is the most time-consuming activity in which TSD staff engage. However, the organization, preparation, and staffing that TSD has for handling ARDs is not clearly defined or used and has not been adapted to facilitate the increase in the number of TSD students and the increased complexity of their needs.

Each school schedules its own ARD committee meetings and forwards details of the ARD to the registrar, who assembles a master schedule. This disparate scheduling may hinder professional staff who work across school levels to attend meetings, which require their expertise. Professional staff includes occupational therapists, physical therapists, audiologists, and other staff. Although TSD invites LEAs to participate in annual ARD committee meetings for their respective students, LEAs have not historically attended ARD committee meetings because most TSD students enroll through parent referral, not LEA referral.

ARD committee meetings are lengthy, consuming a large number of principal, professional, and instructional staff hours. TSD principals spend a large percentage of their time directly involved in scheduling, preparing for, attending, and chairing ARD committee meetings. When principals chair the meetings, they attend for the duration. According to TSD staff, the first ARD committee meeting is convened upon a student's admission, and lasts approximately four hours. The length of annual ARD committee meetings may vary across grade levels and student needs. However, according to principals, ARD meetings typically last two to three hours, in addition to preparation time.

TSD has one ARD facilitator position. The ARD facilitator and the special education/records office specialist process, review, and prepare all ARD documentation for accuracy and compliance with the special education laws (i.e., IDEA) for all students, across all school departments and grade levels, including the ACCESS program. These two staff ensure that the IEP data is accurate and updated. The ARD facilitator and the special education/records office specialist meet

weekly and divide the tasks necessary to document the ARD process.

Principals, assistant principals, curriculum staff, and the ARD facilitator may all chair ARD committee meetings. Although principals are responsible for chairing ARD meetings, they are not always available and thus assign other staff to chair meetings or specific categories of meetings. For example, the ARD facilitator chairs all ARD meetings for new students. In addition, the high school principal assigns specific students to the ARD facilitator and she chairs their annual and non-annual ARDs. The ARD facilitator also may chair a meeting if the scheduled chair is not available. During school year 2014–15, the ARD facilitator chaired 94 ARD meetings.

Compiling information in preparation for the ARD meetings and after the meeting is challenging and time-consuming. TSD's database is the central depository of students' IEP information. According to the ARD facilitator, the ARD committee meeting staff review related data in preparation for meetings. However, TSD staff state that ARD information in the database system is not always complete or updated. The reason for this discrepancy is that handwritten changes made during ARD meetings are not always entered or are entered incorrectly into the system. TSD does not have a process to monitor and ensure that post-ARD information is complete and accurately entered into the system.

Figure 2–12 shows that preparing for annual ARD committee meetings, chairing them, and updating students' IEPs subsequent to the meeting required an estimated 1,855 staff hours for school year 2014–15, or 46 staff weeks, based on a 40-hour work week. Based on data that TSD principals provided, the average amount of time required to prepare for, chair, and complete post-ARD updates was 2.5 hours at the early childhood education (ECE) and elementary school level; 3.0 hours at the middle school level; 3.0 hours at the high school level; and 8.5 hours for students in the special needs program.

Overall, principals chaired 43.6 percent of the annual ARD committee meetings. Other staff, such as assistant principals, curriculum specialists, and the ARD facilitator, chaired 56.4 percent of the ARDs. The percentage of annual ARD meetings that principals chaired varied across schools. The ECE and elementary school principal chaired 50.6 percent of the annual ARD meetings for that school; the middle school principal chaired 58.5 percent of the middle school's annual ARDs; the high school principal chaired 34.0 percent of the

high school's annual ARDs; and the special needs principal chaired 34.4 percent of the program's annual ARDs. The ECE and elementary school principal worked 225.0 hours for the elementary school's annual ARD meetings; the middle school principal worked 156.0 hours for that school's ARD meetings; the high school principal worked 212.4 hours on the high school's ARD meetings; and the special needs principal worked 178.5 hours for the program's ARD meetings.

Other staff tasked with chairing annual ARD meetings worked 220.0 hours for ECE and elementary school meetings, 110.5 hours for middle school meetings, 412.1 hours for high school meetings, and 340.0 hours for ARDs involving special needs students. **Figure 2-12** does not include estimates for any other staff attending ARDs or estimates for non-annual ARDs.

The ARD facilitator and the special education/records office specialist prepare the data and documents for the ARD committee meetings. These staff reduce the amount of preparation time required of principals and other staff chairing meetings. However, the existing infrastructure of conducting ARDs only during the spring, with a single ARD facilitator assisted by the special education/records office specialist, is inefficient considering the large student population and the increase in the number of students with multiple disabilities, which require more documentation.

TSD has not implemented any districtwide strategies to reduce the ARD committee meeting length or to make the meeting more efficient. TSD's ECE and elementary school teachers often meet with parents before the ARD committee meeting to discuss the student's progress and needs. This

FIGURE 2-12
TEXAS SCHOOL FOR THE DEAF STAFF PREPARATION FOR ANNUAL ADMISSION, REVIEW, AND DISMISSAL MEETINGS AND ACTIVITIES
SCHOOL YEAR 2014-15

STAFF CHAIRING MEETINGS	(IN HOURS)					TOTAL (4)
	ANNUAL MEETINGS	PREPARATION FOR MEETING	MEETING DURATION	AVERAGE DURATION	POST-ARD ACTIVITIES	
ECE and Elementary School	178	1.0	0.5 to 2.0	1.0	0.5	445.0
Principal	90					225.0
Other staff	88 (2)					220.0
Middle School	82	1.0		2.0	0.3	266.5
Principal	48					156.0
Other staff	34 (2)					110.5
High School	197	0.5		2.0	0.7	624.5
Principal	67					212.4
Other staff	130 (2)					412.1
Special Needs Department	61	2.5	2.5 to 6.5	4.5 (3)	1.5	518.5
Principal	21					178.5
Other staff	40 (2)					340.0
Total annual ARDs	518 – 100%					1,854.5
Total ARDs principals chaired	226 – 43.6%					771.9
Total ARDs other staff chaired	292 – 56.4%					1,082.6

NOTES:
 (1) ARD=Admission, review, and dismissal; ECE=Early Childhood Education.
 (2) Estimated.
 (3) Calculated average.
 (4) Totals may not be exact due to rounding.
 SOURCE: Texas School for the Deaf, March 2016.

additional step helps to shorten the meeting and makes it more effective. This approach was not followed by any of the other TSD divisions. TSD has not evaluated the adequacy and efficiency of its existing ARD infrastructure; its method of scheduling all its annual ARD meetings in the spring; or of having each school schedule meetings independently of the other schools' schedules. TSD has not considered other methods of organizing its ARD meetings.

The Texas School for the Blind and Visually Impaired (TSBVI) has increased the efficiency of scheduling, organizing, and conducting the meetings. ARD meetings last from 60 minutes to 80 minutes. The annual ARD meetings are scheduled near or at the anniversary dates of the initial ARDs. TSBVI's assistant principals and lead teachers facilitate the meetings.

TSBVI assistant principals also supervise IEP development and implementation. The lead teacher confers and coordinates with students, staff, parents, and local school districts as appropriate to develop IEPs for assigned students; facilitates ARD planning meetings and ARD meetings; and trains teachers regarding documentation needed for ARD meetings (e.g., goals and objectives, modifications, reports, assessments, graduation plans).

In addition, TSBVI has ARD assistants and an ARD scheduling coordinator. The ARD assistants are familiar with special education and the ARD process and procedures. These assistants help with preparation for ARD committee meetings, including processing documents and facilitating associated communication with local school district representatives and parents. The ARD scheduling coordinator assists with scheduling ARD committee meetings, manages online calendars and spreadsheets related to ARD scheduling and documentation; manages collection and tracking of ARD documents; and manages ARD-related, cloud-based storage.

TSBVI has developed a cloud-based storage unit using the application LiveBinder. Cloud storage stores data on a remote server that is managed by a third party and is accessed from the Internet. TSBVI's storage unit includes detailed information for TSBVI staff on how to prepare for and participate in ARDs. It also includes special education-related reference information. Before the ARD committee meetings, the ARD team has planning meetings that the lead teacher chairs. In these planning meetings, which last about 1.5 hours, the team, including the student's advisor, formulates its recommendations for IEPs and ensures

agreement among the team members. The ARD committee chair sends the draft IEPs to the students' LEAs in advance of the ARD committee meetings so that LEA staff have time to incorporate TSBVI's input into students' IEPs.

TSD should implement an ARD support infrastructure, scheduling system, and meeting management strategies that more equitably distribute chairing responsibilities and optimize the time required for principals and other professional staff to prepare for and attend ARD meetings.

TSD's director of academic affairs, principals, assistant principals, and the ARD facilitator should analyze the existing ARD scheduling methodology, staffing, planning, preparation, meeting structure and strategies, and time and resources required per ARD meeting. The analysis of the system should identify areas of difficulty and factors contributing to these difficulties, areas in need of improvement, and additional resources needed. The ARD team should research alternative approaches to the process that could result in a lower level of effort and more efficient use of resources. The team should explore the use of scheduling annual ARD committee meetings on the anniversaries of students' ARDs. The team should prepare an annual calendar, specifying the distribution of ARDs throughout the school year. Based on the mapping of the distribution of ARD meetings, the team should estimate the support infrastructure needed, using the following assumptions:

- TSD would identify existing staff to assist the ARD facilitator and the special education/records office specialist with scheduling, preparation work, and documentation for the meetings conducted throughout the year;
- principals, assistant principals, curriculum specialists, and other staff would equally share the chairing duties for ARD committees; and
- TSD would centrally schedule ARD meetings and would consider the availability of professional staff who serve students across schools.

The ARD team would estimate the number of new-admission ARDs and the number of nonannual ARDs expected. The team would consider these totals to determine how to staff the ARD meetings on the anniversary dates. The team should also consider strategies for more efficient and shorter ARD meetings. Potential strategies may include the following:

- a pre-ARD planning meeting wherein the team reviews recommendations for the IEP and ensures agreement among staff;
- a pre-ARD meeting or conference with the parents to discuss in detail the student's progress and areas of need;
- preparing a meeting agenda with time specified for each topic, circulating it to the respective team before the ARD meeting, and obtaining agreement; and
- monitoring the duration of ARD meetings, identifying deviations from time specified in the agenda, and developing tactics to address these deviations.

Before implementing the modified ARD system, TSD should conduct meetings with staff who participate in ARD meetings, present the modified system, and request feedback. Based on staff feedback, the ARD team may refine the system. TSD should present the refined system to staff participating in ARD meetings and train them on the ARD procedures. The ARD team should monitor implementation of the modified system. This monitoring should include collecting data on a representative sample of ARD meetings during the school year with regard to preparation time, meeting duration, use of agenda, use of other tactics, and satisfaction with the meeting outcomes.

This fiscal impact assumes that, due to the inefficiency of the existing ARD structure, scheduling the ARDs throughout the school year would not require additional resources. However, TSD should evaluate the recommended process, when it is implemented, and determine if additional support staff resources would be needed to efficiently facilitate ARDs. If TSD determines that additional support staff would be needed, the agency should include the request in its 2020–21 biennial Legislative Appropriations Request.

FAMILY SUPPORT SERVICES (REC. 9)

TSD lacks processes to ensure that all families of deaf students with autism living outside of the Austin area receive support services to manage their children in their home environments.

During school year 2015–16, TSD had 36 students who were autistic in addition to being deaf. Like many TSD students, these students reside at TSD during the week and travel home for weekends, breaks, and summers. Students with autism may have difficulty generalizing, or applying, skills from one environment to another therefore, in-home

training of parents helps students with autism learn social skills in a variety of settings. TSD families' in-home training addresses behavior management, interpersonal skills, and communications across all settings, thereby fostering continuity. The lack of in-home training for families of students with autism outside the Austin area has negative short-term and long-term effects on these students' abilities to generalize skills learned in the school environment to their home and local environments. In the short term, this lack of training limits parents' ability to provide continuity and reinforce what students have learned at TSD. Considering TSD's objective of preparing all of its students to return to their home communities, lack of parent training also has a long-term effect.

IDEA, Section 89.1055(e)(3), requires that in-home training of parents of students with autism should be considered by each ARD committee to "assist the child with acquisition of social/behavioral skills (for example: strategies that facilitate maintenance and generalization of such skills from home to school, school to home, home to community, and school to community.)" The student's ARD committee may define what type of in-home training is appropriate.

Best practices suggest that in-home training occur in person between the trainer and the student's family. However, the ARD committee could also determine that in-home training consists of videos made available to the family to learn specific skills. Schools often provide information about local resources that are available to parents and families of students with autism. Resources may include parent support groups, workshops, videos, conferences, and materials intended to increase parental knowledge of specific teaching or management techniques related to the child's IEP.

TSD should collaborate with service providers in the students' local education agencies (LEA) of residence to provide in-home training to parents of students with autism who attend TSD, reside on campus during the week, and return home each weekend, for breaks, and for the summer. TSD should also continue to work with Community Resource Coordination Groups (CRCG) to apply for non-educational funds and parent/in-home training from community agencies. All families of students with autism enrolled at TSD would benefit from having support in maintaining and generalizing skills from school to home. The TSD Family and Student Advocacy Services Department's parent liaisons, jointly with the ERCOD outreach department, should contact the respective LEAs and Regional Education Service Centers (ESC) of students with autism

enrolled at TSD and identify local resources to provide in-home training to these students' families. TSD should work with these LEAs and ESCs in adapting the in-home training that the school has developed. TSD can also develop videos of its in-home training with assistance from its audio-visual technicians and disseminate these videos to families residing outside of the Austin area. TSD can upload its in-home training videos on its parent website, and the parent liaisons can provide instructions to families on how to access the videos. The Family and Student Advocacy Services Department can include in its newsletters information about accessing in-home training either through a local provider, online through the parent website, or through videos.

This recommendation could be implemented with existing resources.

STUDENT LIFE SERVICES (REC. 10)

TSD has not maximized opportunities to enhance support services in the Student Life Division to improve the effectiveness of student life and residential services.

The Student Life Division at TSD provides services for students from kindergarten to post-secondary grades in dormitories and cottages. Residential students reside on campus five days a week, unless extracurricular activities require them to stay for weekend events. TSD's residential program offers students an array of developmental programs that support long-term goals in education, life skills, and employment training.

TSD's residential curriculum is referred to as SPICE, an acronym for social, physical, intellectual, cultural and emotional. Students from kindergarten to post-secondary years develop target goals and progress in each area of the program annually. Day residential educators work closely with students to help them identify their strengths and areas that need improvement. Activities related to SPICE include storytelling, cooking, budgeting, organizing, clubs, off-campus excursions (supervised and dependent on age), movies, and guest lectures. Staff document student skills obtained in the SPICE database. The SPICE coordinator monitors the database to ensure that students are active with their goals and are scheduled in activities that would assist with achieving success. If a student is not progressing or achieving success with her or his goals, the SPICE coordinator schedules a team meeting with the day residential educators, counselors, and student life supervisors for further discussion.

The Student Life Division's Office of Student Development supports various organizations throughout the school year. Each student has the opportunity to choose and participate in programs and extracurricular activities. Some of these programs and activities include performing arts, after-school clubs, monthly enrichment activities, and the student worker program.

Although TSD operates and maintains student life and residential services programs, opportunities exist for improvement in this area of the school's operations.

Figure 2-13 shows three areas the review team identified for improvement. The figure shows TSD's existing practices compared to best practices for managing student life and residential services.

TSD should establish a committee from affected departments to make recommendations for how to implement best practices to improve the residential services program. The committee should determine the necessary implementation steps and make recommendations to the director of student life by the end of school year 2016-17.

This recommendation could be implemented with existing resources.

STUDENT DISCIPLINE (REC. 11)

TSD lacks a process to effectively communicate student discipline concerns among classroom teachers and residential staff.

TSD has a student code of conduct, and each department has a discipline matrix showing behaviors and consequences. These consequences consider a student's disability, intent of behavior, severity of behavior, and behavior history. Disciplinary consequences may include a warning or conference, lunch or after school detention, reflection time, in-school or residential disciplinary center suspension, out-of-school suspension, or referral to DAEP. TSD implements the positive behavioral intervention and supports (PBIS) model, which involves establishing behavioral support and social culture for students to achieve social, emotional, and academic success. PBIS focuses on establishing and sustaining primary (schoolwide), secondary (classroom), and tertiary (individual) systems of support to improve students' lives in personal, health, social, family, work, and recreational areas. The model makes certain misbehaviors less effective, less efficient, and less relevant. Thereby, desired behavior becomes more functional.

**FIGURE 2-13
TEXAS SCHOOL FOR THE DEAF STUDENT LIFE AND RESIDENTIAL SERVICES
SCHOOL YEAR 2015-16**

STUDENT LIFE SERVICE	BEST PRACTICES	TEXAS SCHOOL FOR THE DEAF (TSD) PRACTICES
Counseling services	Residential schools that provide counseling services in the evening support residential staff who are not licensed to provide psychological services. Some psychological needs may require immediate evaluation or intense counseling that the residential staff may not be equipped to provide due to their lack of qualifications. Effective programs provide certified counselors in the evening to give students in need of psychological support access to effective individual counseling. Providing certified counselors in the evening leaves residential staff available to conduct their regular duties of supervising all residential students.	Counseling services are limited after school hours. No certified counselors are available onsite in the evening to provide psychological services to residential students. Counselors are available on call. However, in the event of a life-threatening situation, on-call counselors may not be sufficient. TSD uses residential staff to provide monitoring support, even though they are not licensed to provide psychological services.
Student worker program	Effective residential schools have training programs that are aligned with industry certifications and are structured to meet career objectives. For example, students in the U.S. Department of Labor's Job Corps education and training program receive customer-service training during their first month in the program.	Students that work in TSD's Office of Student Development building, the Deaf Smith Center, lack the opportunity to obtain industry credentials, such as customer service certificates and ServSafe food service certifications. These credentials would enable students to document their skills on their resumes.
Life skills curriculum	Best practices for a life skills curriculum dictate that students identify life skills goals in areas in which they need to improve. Goals should be reevaluated or reestablished as students master each skill. Effective programs establish goals and evaluate them frequently so that students are able to measure their growth.	The residential curriculum of social, physical, intellectual, cultural, and emotional areas (SPICE) sets student's goals once each year. Students' goals are updated annually, and aspects of the SPICE curriculum are analyzed and determined for students' training needs.

SOURCE: Legislative Budget Board School Performance Review Team, April 2016.

TSD also uses the Mandt System as part of its student behavior management approach. The Mandt System is a comprehensive, integrated approach to preventing, de-escalating, and intervening when an individual's behavior poses a threat of harm to themselves or others. The system focuses on building healthy relationships to ensure emotional, psychological, and physical safety. Staff track incidents' frequency, locations, intensity, and duration, and document how a student responds to disciplinary consequences.

Students could also have Behavior Intervention Plans (BIP) with measureable goals as part of their IEPs. Staff monitor the students who have BIPs through incident reports and formal and informal observations. TSD's schools have safe zone rooms for students that are used for problem solving, peer conflict resolution, and other behavior support. Each safe zone room has a behavior support staff to assist the student.

Most of the student disciplinary incidents are violations of the student code of conduct. **Figure 2-14** shows a summary of student disciplinary incidents that involved a violation of the student code of conduct and were reported to TEA's Public Education Information Management System for school years 2012-13 to 2014-15.

TSD has an established student behavior management system. However, TSD staff stated that behavior issues that occur in the classroom are not effectively communicated to residential staff who supervise the students after the school day ends. TSD staff stated that receiving information about incidents during the school day would assist them to more effectively manage behavior in the dorms after school.

In addition to a lack of communication between teaching and residential staff, TSD also lacks a mechanism to track and analyze discipline incident data schoolwide. At the time of the onsite review, TSD reported and tracked disciplinary occurrences by individual students. TSD staff

**FIGURE 2-14
TEXAS SCHOOL FOR THE DEAF SUMMARY OF STUDENT DISCIPLINARY INCIDENTS
SCHOOL YEARS 2012-13 TO 2014-15**

ACTION REASON	DESCRIPTION	ACTION CODE	DESCRIPTION	2012-13	2013-14	2014-15
21	Violation of Student Code of Conduct	01	Expulsion	(1)	0	0
		05	Out-of-school Suspension	12	22	20
		06	In-school Suspension (ISS)	333	347	275
		07	DAEP (2)	6	30	14
		26	Partial Day ISS	0	0	(1)

NOTES:

(1) Numbers less than five have not been cited pursuant to the Family Educational Rights and Privacy Act, U.S. Code of Federal Regulations, Title 34, Part 99.1, and the Texas Education Agency procedure OP 10-03.

(2) DAEP=Disciplinary Alternative Education Program.

SOURCE: Texas Education Agency, Public Education Information Management System, March 2016.

complete and submit school behavior reports and residential reports into a database. The document used to record negative behavior is similar to an incident report. The system records the following information:

- name of staff submitting the report;
- staff department;
- reason for submitting the report;
- name of student;
- time and date;
- location of the incident;
- identify victim and perpetrator;
- identify behavior according to Class A and B violations defined in the Texas Education Code, Chapter 37;
- summary of incident; and
- summary of steps taken with the student.

Although the electronic form enables TSD staff to track incidents for a specific student, the form does not provide an updated history on the status of the discipline program and processes. Residential schools often use comprehensive databases that provide a history based on a week, month, semester, or year showing the effectiveness of the discipline program. These schools are capable of tracking repeated negative behaviors, frequency, and the effectiveness of behavior consequences. The databases provide statistics on specific behaviors and the periods and departments in which they occur. Residential schools that track outcomes schoolwide can perform more

concrete analyses and identify the areas that need improvement with systems or policies. Tracking information of this nature also allows schools to identify any additional staff training needs. TSBVI has developed and implemented an Online Student Incident Reporting (OSIR) system for staff to input and address behavior issues promptly. 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 distributed electronically to all staff. Staff reviews the report immediately and takes action. The residential director or assistant principal receiving the SIR is required to contact the parent in case of incidents requiring a restraint or mail a copy to the student's parents within one school day of the use of the intervention or disciplinary consequence.

TSD should develop a process to enhance communication of students' behavior issues among classroom teachers and residential staff, and develop a report or database to track all disciplinary occurrences. TSD should meet with representatives from TSBVI to learn about the OSIR system and how it could be adapted for use at TSD.

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 2. EDUCATIONAL AND STUDENT LIFE SERVICES							
6. Develop, implement, and document formal processes and procedures of instructional and assistive technology in the educational service delivery area.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7. Analyze supplementing the use of ASL with other modes of communication.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
8. Implement an ARD support infrastructure, scheduling system, and meeting management strategies that more equitably distribute chairing responsibilities and optimize the time required for principals and other professional staff to prepare for and attend ARD meetings.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9. Collaborate with service providers in the students' LEAs of residence to provide in-home training to parents of students with autism who attend TSD, reside on campus during the week, and return home each weekend, for breaks, and for the summer.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
10. Establish a committee from affected departments to make recommendations for how to implement best practices to improve the residential services program.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11. Develop a process to enhance communication of students' behavior issues among classroom teachers and residential staff, and develop a report or database to track all disciplinary occurrences.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 3. COMMUNITY ENGAGEMENT

The Texas School for the Deaf's (TSD) community engagement function requires communicating and engaging stakeholders in the deaf community regarding decisions and operations. The school's stakeholders include students, staff, school districts, parents and guardians, residents, and businesses across the state. Stakeholders must be aware of issues facing the school, support its priorities, and respond to its challenges. Communication tools include public meetings, the school's website, campus-to-home communications, extracurricular activities, and other media outlets.

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

TSD's mission is to provide a continuum of direct educational services for deaf and hard-of-hearing students from birth to age 22. TSD also serves as a statewide educational resource center on deafness. Consequently, Texas School for the Deaf's (TSD) community engagement function requires communicating and engaging stakeholders on two fronts. One is to the students, families, professionals, business and community partners related to the TSD campus community, and the second is to the stakeholders who are connected to deaf education interests and programs across the state. Community engagement to TSD's campus community occurs in a multitude of departments, in official schoolwide committees, site-based teams, the Department of Family and Advocacy Services, and the Superintendent's Office. TSD's Educational Resource Center on Deafness (ERCOD) promotes community engagement on a statewide basis.

ERCOD provides outreach support, resources, and programs for approximately 7,000 deaf and hard of hearing students statewide, their families, and the

professionals who serve them. ERCOD has 22 staff who focus on community engagement and outreach with additional support from two staff in the Academic Affairs Division, the superintendent's administrative assistant and the general counsel.

Figure 3–1 shows the major responsibilities of TSD's community engagement and communications staff for school year 2015–16.

The TSD Strategic Plan 2015–2019, dated July 7, 2014, guides the school's community and parental involvement initiatives. The TSD board policies govern public information and open records activities. The TSD Parent and Student Handbook 2016–17 communicates necessary information to parents and opportunities for parent involvement. Organizations such as the Parent Teacher Staff Organization (PTSO) and Texas School for the Deaf Foundation (TSDF) rely on bylaws to procedurally govern membership.

TSD's parent and community engagement efforts are primarily initiated by ERCOD, the school's District Advisory Committee, and the PTSO. ERCOD offers a comprehensive outreach program with statewide services to deaf students and their families and provides support for all communication options, including ASL, Listening and Spoken Language, English signs, and Spanish bilingual interpreters.

TSD has established a District Advisory Committee (DAC) pursuant to the Texas Education Code (TEC), Section 11.251, school policy, and with the direction of the TSD Governing Board. TSD's DAC is composed of parents, teachers, students, administrators, community representatives, and other school staff. The DAC collaborates on planning, budgeting, curriculum, educational and residential programming, staff development, and school organization. The DAC also provides assistance in the development, evaluation, monitoring, and annual revision of the District Improvement Plan (DIP), and provides input and comments on TSD student performance. **Figure 3–2** shows TSD's DAC composition. The total membership is 38, with 15 voting members and 23 nonvoting members.

FIGURE 3–1
TEXAS SCHOOL FOR THE DEAF COMMUNITY ENGAGEMENT AND COMMUNICATIONS STAFF RESPONSIBILITIES
SCHOOL YEAR 2015–16

POSITION	DEPARTMENT	RESPONSIBILITIES
Director of Educational Resource Center on Deafness (ERCOD)	ERCOD	<ul style="list-style-type: none"> • develops priorities, standards, and schedules for achieving outreach goals and objectives of strategic plan; • directs evaluation activities for all Texas School for the Deaf (TSD) statewide outreach functions; • works to expand outreach services to new and underserved populations; • plans, develops, implements, coordinates, monitors, and evaluates policies and procedures related to ERCOD services; • oversees development and implementation of outreach services and resources with students younger than age three; • fulfills designation as state lead for family involvement initiatives through resource development, services, and programs; • expands reach of ERCOD services through online offerings, both static and interactive; • represents ERCOD and TSD at meetings, conferences, planning committees, seminars, advisory groups, boards, and panels; • collaborates with other agencies, organizations, and entities that are natural partners for improving outcomes for deaf and hard-of-hearing children and their families; • cultivates and advances statewide interest and recognition of ERCOD as a central, professional, and unbiased source of information and support for deaf and hard-of-hearing children, their families, and professionals; and • works with TSD Foundation to increase funding and relationship development.
Information and Publication Specialist	ERCOD	<ul style="list-style-type: none"> • produces and coordinates publications about the school; • uses desktop publishing hardware and software to write, edit, design and produce publications; • solicits and identifies newsworthy stories and photo opportunities related to TSD's programs, staff, students, and their families; • ensures that concept, design, copy, and scripts of materials are accurate, consistent, effective, and result in polished, professional publications; • coordinates printing of materials with internal or external printing, duplication, and distribution; • meets established timelines and deadlines for school publications and distributions of materials; • assists in writing copy for publications; and • performs TSD website technical tasks and ensures that links are active and updated.
Outreach and Community Relations Specialist	ERCOD	<ul style="list-style-type: none"> • develops and maintains relationships statewide for more efficient and expansive service delivery in the form of partnerships and collaborations; • markets ERCOD as a valuable resource serving deaf and hard-of-hearing students, families, and professionals statewide for consumer and public awareness and for securing additional grants, business partnerships, and collaborations; • collaborates with ERCOD staff to assist in projects and resource development; • supports the work of the Texas School for the Deaf Foundation (TSDF) by providing information and technical assistance; and • volunteer coordination, public and community relations.
Outreach Specialist	ERCOD	<ul style="list-style-type: none"> • provides support services statewide to families of deaf and hard-of-hearing children; • increases public awareness of the deaf and hard-of-hearing population and issues statewide; • increases statewide recognition of ERCOD as a central, professional, and unbiased source of information and support for deaf or hard-of-hearing children and their families; and • expands outreach services to new and underserved populations (e.g., American Sign Language (ASL) programs in public schools and universities, teacher training programs in deaf education, interpreter training programs, Hispanic families, rural families, foster and adoptive families, families of hard-of-hearing children).

**FIGURE 3-1 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF COMMUNITY ENGAGEMENT AND COMMUNICATIONS STAFF RESPONSIBILITIES
SCHOOL YEAR 2015-16**

POSITION	DEPARTMENT	RESPONSIBILITIES
Hispanic Family Liaison	Academic Affairs	<ul style="list-style-type: none"> interprets sign language and provides Spanish translations for phone calls, meetings, presentations, and other forums as needed; translates all school information, including weekly parent newsletters and updates, and other documents (report cards, progress notes, individualized education programs (IEP)); serves as admission, review, and dismissal (ARD) and IEP liaison; interprets all ARD meetings for students whose parents or guardians' primary language is Spanish; liaison and initial point of contact for Hispanic families to meet with teachers, nurses, counselors, social workers, and residential staff; and teams with ERCOD to provide outreach programs for Hispanic deaf and hard-of-hearing students and their families throughout the state.
Parent Support Specialist	Academic Affairs	<ul style="list-style-type: none"> organizes and provides parent workshops addressing a variety of topics based on identified needs; coordinates parent volunteers in the Special Needs Department, Early Childhood Education (ECE) Program, and Elementary School; provides support in the development of the Parent Teacher Staff Organization (PTSO), such as working with PTSO officers and participating in PTSO meetings; distributes information to TSD parents and students regarding available local, state, and national programs and agencies that support individuals with disabilities; and serves as a resource to school staff regarding community resources for parents and students.
Family Involvement Specialist	ERCOD	<ul style="list-style-type: none"> networks with families and educational programs through online communications, phone calls, meetings, and workshops; provides families with the opportunity to establish supportive relationships with other families of deaf and hard of hearing children; and works with community and professional groups to coordinate, improve, and stimulate interest in a statewide network and to secure support.
Statewide Family Services Coordinator	ERCOD	<ul style="list-style-type: none"> coordinates and manages contracts, budgets, and staffing for parent support programs such as Guide by Your Side, Family Weekend Retreats, and the family portion of the Statewide Conference on Education of the Deaf; networks with parents and educational programs throughout the state through online communications, phone calls, meetings, and workshops; provides parents with the opportunity to establish supportive relationships with other parents of deaf and hard-of-hearing children; and develops a database of parents who indicate interest in being a part of a statewide parent network.
Director of Academic Affairs	Academic Affairs	<ul style="list-style-type: none"> serves as chair of the District Advisory Committee and oversees the development, implementation and monitoring of the District Improvement Plan with the superintendent and other division directors; and makes contact with governmental agencies, business and civic organizations, and the community to provide needed information and to promote the school's educational initiatives.
Career and Technical Education Supervisor	Academic Affairs	<ul style="list-style-type: none"> assists in the development, management, facilitation, and evaluation of Career and Transition Services including Career and Technical Education (CTE) and the Adult Curriculum for Community, Employment, and Social Skills (ACCESS) Program; and works collaboratively with administrators, staff, and teachers to ensure the delivery of comprehensive career development and transition services for deaf students ages three to 22 to help prepare students to graduate.
General Counsel	Legal Services	<ul style="list-style-type: none"> provides guidance regarding open records requests, legal advice, opinions, and consultation to the superintendent and staff as appropriate.

FIGURE 3-1 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF COMMUNITY ENGAGEMENT AND COMMUNICATIONS STAFF RESPONSIBILITIES
SCHOOL YEAR 2015-16

POSITION	DEPARTMENT	RESPONSIBILITIES
Administrative Assistant	Executive Office	<ul style="list-style-type: none"> provides electronic communication to a variety of stakeholders as related to community engagement; edits public information and community engagement-related information, the quarterly publication <i>Lone Star, Journal of the Texas School for the Deaf</i>, the annual report, and other documents; updates handbooks, manuals, newsletters, and other documents to inform TSD stakeholders; and assists with maintaining the school's master calendar and open records requests.
Parent Infant Lead Teacher, Teachers, Teacher Assistants	ERCOD	<ul style="list-style-type: none"> collaborates with Texas Early Intervention, Development of Individual Family Service Plans conducts home visits, assessments and transition planning to IDEA Part B, provides classroom instruction.
Career and Technical Education Preparation Teacher	Academic Affairs	<ul style="list-style-type: none"> finding offsite\business placement opportunities for students to work off campus
Employment Specialist Teacher	Academic Affairs	<ul style="list-style-type: none"> finding offsite\business placement opportunities for students to work off campus

SOURCE: Texas School for the Deaf, March 2016.

FIGURE 3-2
TEXAS SCHOOL FOR THE DEAF DISTRICT ADVISORY COMMITTEE
SCHOOL YEAR 2015-16

VOTING GROUPS	REPRESENTATIVES	NONVOTING GROUPS	REPRESENTATIVES
ECE and Elementary School	1	Parent representatives	2
Middle School	2	Community representatives	2
High School	2	Academic Affairs Division administrators and staff	16
Special Needs	2	Student Life Division administrators and staff	3
ACCESS	1	Total Nonvoting Representatives	23
Career and Technical Education	2		
Parent Representative	1		
Community Representative	1		
Academic Affairs administrators and staff	1		
Student Life administrators and staff	1		
Student representative	1		
Total Voting Representatives	15		
Total Representatives			38

NOTE: ECE=Early Childhood Education Program; ACCESS=Adult Curriculum for Community, Employment, and Social Skills Program.
 SOURCE: Texas School for the Deaf, March 2016.

Figure 3-3 shows a sampling of TSD's parent and community engagement programs initiated by ERCOD, DAC members, and the PTSO.

The Legislative Budget Board (LBB) School Review Team surveyed TSD staff and parents in March 2016. Figure 3-4 shows that 75.9 percent of parents surveyed and 77.4 percent of staff surveyed responded that TSD communicates with parents in a timely manner. Additionally, 85.1 percent of parents

**FIGURE 3-3
TEXAS SCHOOL FOR THE DEAF PARENT AND COMMUNITY ENGAGEMENT PROGRAMS
SCHOOL YEARS 2014-15 TO 2015-16**

PROGRAM	DESCRIPTION	PROGRAM	DESCRIPTION
Opening Day Celebration	The school year begins with a themed celebration to bring the school and community together.	A Day with Nyle DiMarco	DiMarco shared how he used his ability to sign and facial expressions in his acting and modeling career, appearing on the television drama <i>Switched at Birth</i> and the game shows <i>America's Next Top Model</i> and <i>Dancing with the Stars</i> .
National Association of the Deaf (NAD)	TSD hosts a workshop led by NAD's representative, for parents with deaf or hard-of-hearing children.	The Toddler Learning Center	The program serves children birth to age three with a combination of home visits for all ages and classroom instruction from 18 months to 35 months. Children learn skills to thrive through the social opportunities they have with peers, and access to adults who model fluent languages including American Sign Language (ASL), English, and Spanish.
Deaf Awareness Week	TSD observes Deaf Awareness Week with events including an outdoor movie night, Deaf Awareness Night, and open house events.	MakerBot Replicator 3D Printer Science Fair Project	The school's robotics lab added two new three-dimensional printers. This TSD Foundation-supported effort enhanced the science education program for TSD's students.
Hispanic Heritage Awareness	From mid-September to mid-October each year, TSD recognizes the contributions of Hispanic and Latino Americans to the U.S. and celebrates Hispanic heritage and culture.	Story About Calvin Young	A TSD alumnus shared how his TSD experience prepared him for a successful traveling career.
Hands and Voices Leadership Conference	A conference organized by an international, parent-led organization that provides support to families with children who are deaf or hard of hearing. The theme of the 2015 workshops was <i>Uniquely Created: Strongly United</i> .		

SOURCE: Texas School for the Deaf, Lone Star, Journal of the Texas School for the Deaf, Fall 2015.

**FIGURE 3-4
TEXAS SCHOOL FOR THE DEAF PARENTS AND STAFF SURVEY RESULTS
MARCH 2016**

STATEMENT	GROUP	RESPONDENTS	STRONGLY AGREE OR AGREE	NO OPINION	DISAGREE OR STRONGLY DISAGREE
TSD communicates with parents in a timely manner.	Parents	74	75.9%	5.2%	18.9%
	Staff	251	77.4%	17.5%	5.2%
TSD Provides consistent family outreach and support services.	Parents	74	85.1%	8.1%	6.8%
	Staff	252	77.4%	17.5%	5.2%

NOTE: Totals may not sum due to rounding.

SOURCE: Legislative Budget Board, School Review Team Survey, March 2016.

and 77.4 percent of staff responded that TSD provides consistent family outreach and support services.

Approximately 500 community business supporters and individual donors assist TSD with providing a quality learning and living environment for students. These supporters provide monetary and in-kind donations such

as cash contributions to the school, gift cards, T-shirts, food from local restaurants, and tickets to local recreational and al events. **Figure 3-5** shows a sample of businesses that contribute to the school.

Additionally, TSD staff reported that the school partners with Gallaudet University, Sam Houston State University,

**FIGURE 3-5
TEXAS SCHOOL FOR THE DEAF EXAMPLES OF COMMUNITY BUSINESS SUPPORTERS AND INDIVIDUAL DONORS
SCHOOL YEAR 2015-16**

1379 Family Sports Shop	Auction Booth Store	Baird Farrelly Criminal Defense, PLLC	The Chocolate Maker's Studio
Academy Sports and Outdoors	Austin Black Car Service	BGK Architects	Clark Travel Inc.
Alamo Draffhouse Cinema	Austin Lawn Service and Landscaping	Bicycle Sport Shop	Dominican Joe Coffee Shop
All About Luv N Care	AustiNuts	The Big Drip Ice Cream Parlor	New Orleans School of Cooking
American Laser Skincare	The Austin Sertoma Club	Birds Barbershop	The Paramount Theatre
The Anderson Foundation	Austin Sign Language School	Marye's Gourmet Pizza Pub	Phil's Icehouse
Applebee's International, Inc.	Austin Symphony	Maximum FX Salons	Point Venture Lions Club
The Art Institute of Austin	Austin Trust Company	Chevron U.S.A. Inc.	Rangel Concrete Co., Ltd.

SOURCE: Texas School for the Deaf, March 2016.

and Texas Tech University on occasion to identify staff trained to teach and work with deaf students and to help keep their academic programming and professional development updated.

TSD receives approximately five to 10 public information requests annually. Additionally, ERCOD answered 48,000 requests for technical assistance and information. The superintendent's administrative assistant logs, processes, and ensures compliance with the Texas Public Information Act by immediately responding to most requests.

ACCOMPLISHMENTS

- ◆ TSD has established a comprehensive outreach program with statewide services to deaf and hard-of-hearing students and their families.
- ◆ TSD has an active and engaged PTSO that assists with fund-raisers, hosts activities and field trips, and provides volunteer support.
- ◆ TSD's partnership with the Texas School for the Deaf Foundation provides scholarships and instructional grants to students, teachers, and classrooms.

FINDINGS

- ◆ TSD's efforts to develop community and business relations are managed by multiple staff, which limits opportunities to maximize efficiency and support for the school.
- ◆ TSD's existing PTSO structure and activities do not maximize opportunities to involve residential students' parents who reside outside of the Austin area.

RECOMMENDATIONS

- ◆ **Recommendation 12:** Establish a community and business relations specialist position to coordinate the school's efforts in this area and to obtain additional volunteer and partnership support for TSD.
- ◆ **Recommendation 13:** Develop and implement a strategy to better engage parents in the PTSO who reside outside the local Austin area.

DETAILED ACCOMPLISHMENTS

STATEWIDE COMMUNITY ENGAGEMENT AND OUTREACH

TSD has established a comprehensive outreach program with statewide services to deaf and hard-of-hearing students and their families. ERCOD provides support for all communication options, including American Sign Language (ASL), Listening and Spoken Language, English signs, and Spanish bilingual interpreters. ERCOD provides outreach support, resources, and programs for approximately 7,000 deaf and hard-of-hearing students statewide, including the 584 TSD students in Austin, in addition to their families and the professionals who serve them. ERCOD offers services in five areas, including birth (birth to age three), family, student, professional, and communication and development.

Birth to Age Three Services

ERCOD places significant emphasis on early intervention for deaf education and services. TSD's Parent Infant Program, for children from birth to three years, includes home visits with families and morning classes in the school's Toddler Learning Center. ERCOD serves approximately 20 to 30 children and their families annually through this program. TSD offers ongoing

workshops for parents and opportunities for playdates for families. In addition to these onsite services, the ERCOD 0-3 outreach specialist coordinator provides training statewide for deaf and hard-of-hearing infants and toddlers. The outreach specialist coordinator develops online materials and information, and works with other state agencies and organizations to develop service delivery and ensure that deaf and hard-of-hearing infants and toddlers are identified and start receiving intervention services as early as possible.

Family Services

Three ERCOD parent liaisons provide direct resources and support families statewide, answering questions on the telephone, through email, and through walk-in requests. The Hispanic Family Liaison provides direct service to Spanish-speaking parents and translates materials into Spanish. ERCOD offers programs such as Family Signs and the Shared Reading Project, meeting with parents in person or using videoconference programs for remote instruction to parents in sign language and how to read to their deaf and hard-of-hearing children. Parent liaisons also facilitate an annual event called Family Weekend Retreat for approximately 60 families and assist with the biennial Statewide Conference of Education of the Deaf, which offers workshops targeted to parents' needs. ERCOD supports the Guide by Your Side parent support program in conjunction with the state chapter of the Hands and Voices organization. ERCOD contracts with or employs 12 guides and interpreters around the state to support these programs.

Student Services

Student-focused services include an introduction to ASL storytelling; student retreats; summer programs; a science, technology, engineering and mathematics (STEM) camp, and STEM-related activities. Through events such as Discovery Retreats and Summer Programs, ERCOD provides students in mainstream educational environments the opportunity to interact with deaf and hard-of-hearing peers and role models. ERCOD operates three retreats annually, serving approximately 275 students. STEM learning opportunities are available to students through camp and special events. Remote services to students include numerous online resources and interactive ASL storytelling with approximately 200 participants statewide in about 20 locations.

Professional Services

Through three one-week sign language courses, ERCOD delivers professional development annually to approximately 500 interpreters, teachers of the deaf, and teachers of ASL. ERCOD and TSD staff provide planning and support for the biennial

Statewide Conference on the Education of the Deaf, which features speakers and presenters for approximately 700 attendees. Throughout the year, ERCOD provides workshops, trainings, presentations, and consultations to school districts, agencies, and other stakeholders in deaf education. ERCOD offers opportunities for professionals to observe best practices in TSD classrooms including developing and maintaining online materials, resources and videos available to students, parents, classroom teachers, interpreters and other professionals. The classroom tools cover a variety of subjects and ability levels, align with state standards and are accessible through sign, captions, and voiceovers. ERCOD staff serve on numerous committees and work groups, and participate in collaborative efforts intended to improve learning outcomes for deaf and hard-of-hearing children from birth to age 22 statewide.

Communication and Development

TSD disseminates information about TSD and its ERCOD programs statewide through print, social media, websites, and news outlets. ERCOD publishes and distributes TSD's quarterly journal, *Lone Star*, and an informational brochure that explains TSD's service offerings and outreach programs. This brochure is required as part of information and resource sharing during an annual individual family service plan or individualized education program meeting for all deaf and hard-of-hearing students in Texas. ERCOD maintains TSD's website and collaborates with Regional Education Service Center XI (Region 11) to provide a website of all statewide resources and programs available to children, families, and professionals in the deaf and hard-of-hearing community and the general public. ERCOD staff works closely with TSDF to identify and build relationships with potential donors and existing supporters. ERCOD's commitment to families begins in the early years of a deaf or hard-of-hearing child's life and remains throughout the child's enrollment in education whether at TSD or other programs statewide.

The efforts of ERCOD help to promote TSD's mission statewide to ensure that its students learn, grow, and belong.

Parent Engagement

TSD has an active and engaged PTSO that assists with fundraisers, hosts activities and field trips, and provides volunteer support. This group of approximately 300 members host activities and field trips for about 580 students enrolled at TSD. The organization also provides financial support for student activities such as International Studies travel, a student holiday fund, and a senior scholarship. TSD's PTSO formally recognizes its teachers annually during the school's Teacher Appreciation Week.

The PTSO provides parents with an opportunity to volunteer at the school and to assist with fund-raisers and other school support activities. According to the TSD Student and Parent Handbook, the PTSO also works to promote open communication, understanding, collaboration, and unity among parents, teachers, and staff. Parent and community volunteers submit a volunteer application, a criminal history authorization report from the Texas Department of Public Safety Computerized Criminal History System, and a copy of the applicant's state identification. PTSO leaders encourage all TSD parents, guardians, teachers, staff, and administrators to become members. The fee to join the organization is \$15 for a family membership and \$10 for an individual membership. Membership dues, fund-raisers, and donations enable TSD's PTSO to sponsor volunteer assistance to teachers in the classroom, provide supplemental educational materials and experiences, support school and family social interaction, and provide a nonbiased forum for sharing information on student issues.

Figure 3–6 shows PTSO activities and events for school year 2015–16. The PTSO sponsored about 19 events during the school year, including a registration day lunch, Deaf Awareness Week, a Box Tops for Education drive to raise funds for the school, teacher and staff appreciation, and a book fair.

TSD's PTSO is a valuable resource that helps to support the school and its students in ways that could not be feasible with the school's resources alone.

Education Foundation

TSD's partnership with TSDF provides scholarships and instructional grants to students, teachers, and classrooms. These awards fund academic initiatives and programs that might not otherwise be available through the school's resources. TSDF was established as a nonprofit organization, pursuant to the U.S. Internal Revenue Code, Section 501(c)(3), in 2001. At the time of the onsite review, the foundation's board of directors included 18 members, although the group's bylaws authorize up to 25 members. The foundation employs a part-time executive director and a part-time contract bookkeeper to manage daily functions. The executive director works with the TSDF board and assists with planning events, soliciting funds for the foundation, and handling administrative record keeping. The bookkeeper manages

FIGURE 3–6
TEXAS SCHOOL FOR THE DEAF PARENT TEACHER STAFF ORGANIZATION (PTSO) ACTIVITIES
SCHOOL YEAR 2015–16

MONTH	ACTIVITIES
August	<ul style="list-style-type: none"> • Registration Day • Registration Day Lunch • Sports Camp Registration • PTSO Weekend • Fund-raiser
September	<ul style="list-style-type: none"> • First PTSO Meeting of School Year • Deaf Awareness Week
October	<ul style="list-style-type: none"> • Box Tops for Education Drive • TSD Homecoming Booth Festival • PTSO Halloween Party
November and December	<ul style="list-style-type: none"> • Fall Book Fair • Five Below Fund-raiser • Fall Teacher and Staff Appreciation
January and February	<ul style="list-style-type: none"> • Box Tops for Education Drive • Read-a-Thon
April and May	<ul style="list-style-type: none"> • Officer Elections • Spring Book Fair • Spring Teacher and Staff Appreciation • Movie at the Pool Fund-raiser

SOURCES: Legislative Budget Board School Review Team, Onsite Interviews, March 2016; Texas School for the Deaf, March 2016.

the organization's financial recordkeeping and reporting. The funds that TSDF raises support TSD's efforts in literacy, outreach, career and technical education, STEM curriculum, and technology.

From 2001 to the end of school year 2013–14, TSDF raised or received endowment gifts valued at approximately \$2 million. The foundation awarded about \$750,000 in classroom and project grants for teachers and students and personal development grants for TSD's students and families. The typical grant ranges from \$5 to \$1,000. From school years 2013–14 to 2014–15, some of the projects the foundation funded for TSD include the following:

- expanded robotics program to serve all grade levels;
- awarded 45 grants to TSD teachers and outreach staff for innovative projects;
- purchased 40 tablet computers for the middle school and students with special needs in all grade levels;
- provided financial assistance for 35 students to attend TSD summer educational programs; and

- provided 10 parents with two semesters each of sign language instruction.

Figure 3–7 shows TSDF’s revenue sources for fiscal years 2012 to 2014. The foundation’s revenues were the highest in fiscal year 2012 at \$414,241, of which nearly half represented a single donation from an individual with a special interest in deaf education. The foundation raised \$171,292 in fiscal year 2013 and \$184,432 in fiscal year 2014. The foundation’s Diamond Gala Event and public contributions are the major annual fund-raising efforts.

As a result of the school’s relationship with the foundation, TSD supplements its educational services and programs for staff and students.

DETAILED FINDINGS

COMMUNITY AND BUSINESS RELATIONS (REC. 12)

TSD’s efforts to develop community and business relations are managed by multiple staff, which limits opportunities to maximize efficiency and support for the school.

TSD’s community and business partnerships function is shared among several TSD positions. At least five positions across two departments oversee aspects of the community and business partnerships, including the director of ERCOD, director of academic affairs, CTE Department supervisor, outreach and community relations specialist, and the information and publication specialist. These TSD community engagement-related positions perform only a portion of the duties that a community and business relations specialist position would typically perform. For

example, the outreach and community relations specialist performs outreach efforts, but these initiatives are mainly focused on expanding deaf services for students. These outreach efforts focus less attention toward expanding business, community, and volunteer partnerships. During the onsite review, the review team noted that staff within ERCOD and the Academic Affairs Division perform multiple roles to provide required services, leaving little time for outreach to community, business, and education partners. Although TSD has established these partnerships, the risk of having multiple staff conduct these efforts is that they could result in miscommunication or duplication of efforts with existing or potential partners. Additionally, with primary job responsibilities to provide student services, the existing staff managing this function could potentially neglect critical efforts to build partnerships for the students and the school.

As a best practice model to enhance communication and community engagement, the National School Public Relations Association suggests that schools establish a formal public relations function, which includes:

- community relations – establish a school liaison to develop meaningful, long-lasting partnerships with community groups such as key business groups, civic associations, education partners, and service clubs; plan and publicize the school’s parent, senior citizen, and community service programs; develop ways to bring community organizations into the schools; and serve as official school spokesperson to the media and community;

**FIGURE 3–7
TEXAS SCHOOL FOR DEAF FOUNDATION’S REVENUE SOURCES
FISCAL YEARS 2012 TO 2014**

FUND-RAISER	ACTIVITY	2012 REVENUE	2013 REVENUE	2014 REVENUE
Diamond Gala Event	Fund-raiser held in the spring	\$57,661	\$57,117	\$77,958
Halloween Event	Fund-raiser held in October	\$13,302	\$1,859	\$6,319
Other Fundraising	Cocktails at the Castle Dinner Event, Friends of the Foundation, Homecoming Event	\$7,398	(1)	\$6,061
Public Contributions	Contributions made throughout year, less direct expenses	\$63,484	\$97,441	\$79,625
Major Bequest	Major donor bequest	\$204,018	(1)	(1)
Grant Revenue	Meadows and Mitte foundations	\$57,585	(1)	(1)
Interest and Dividends from Endowment	Interest from Dividends	\$10,793	\$14,875	\$14,469
Total Revenue		\$414,241	\$171,292	\$184,432

NOTE: (1) No revenue was reported for this category.
SOURCE: Texas School for the Deaf Foundation, Revenue Sources Report, March 2016.

- student and staff recognition – publicize student and staff achievement; develop teacher and staff recognition programs;
- information station for the school – answer public and new resident requests for information; maintain background files; keep the school’s historical and budget passage records; and plans for the school’s anniversary celebrations; and
- public relations trainer – provide public relations training to parents, teachers, and staff in areas such as communicating with external organizations, recognizing that all stakeholders are effectively part of the school’s public relations team.

The superintendent and the director of academic affairs should establish a community and business relations specialist position to coordinate the school’s efforts in this area and to obtain additional volunteer and partnership support for TSD. Existing roles of TSD positions that perform community engagement functions should coordinate with the community and business relations specialist position in all efforts related to community and business relations.

This position should report directly to the director of academic affairs and develop, foster, and maintain community and business partnerships that promote TSD, its mission, activities, student accomplishments, and successes. The position should be charged with continuously raising the visibility of the school; developing innovative community, business, and higher education partnerships; and communicating with local media, the public, and community organizations. Other responsibilities should include:

- expand TSD’s existing base of volunteers to include businesses, civic organizations, and individuals with special areas of expertise needed to better support the school;
- identify and collaborate with higher education partners in Austin and across the state to provide ongoing professional development for TSD staff training at low or no cost;
- manage and supervise the public relations function, including issuing press releases for major school events, activities, and accomplishments to increase TSD’s visibility in the community;
- establish relationships within Austin and throughout Texas for technical education and job training; based on the career and technical education programming,

this position should establish and organize a quarterly community industry council with academic partners and potential employers to ensure students receive industry-relevant training, and provide internships and permanent job placement for TSD students and graduates; and

- collaborate with TSDF to assist with fundraising opportunities for the school.

The functions of this position could help to strengthen TSD’s presence with community groups, businesses, parents, and alumni, and to encourage participation with the school’s educational process and mission.

The director of academic affairs should work with TSD’s Human Resources (HR) Department to evaluate assignments of existing staff to determine whether the primary duties for a community and business relations specialist position could be performed within existing staff resources. If existing staff could not assume these duties, a fiscal impact would assume that this position is equivalent in the state classification system with a program specialist V position, as defined by the Texas State Auditor’s Office (SAO). Using the midpoint of SAO’s salary group B21, the annual salary would be \$63,616, and the benefits are \$21,871, based on 34.38 percent of the salary, for a total annual fiscal impact of \$85,487 (\$63,616 + \$21,871).

However, until the director of academic affairs and the HR Department evaluate the availability of existing staff resources to fulfill the duties of a community and business relations specialist position, no fiscal impact is assumed for this recommendation.

PARENTAL ENGAGEMENT (REC. 13)

TSD’s existing PTSO structure and activities do not maximize opportunities to involve residential students’ parents who reside outside of the Austin area. TSD’s PTSO is an active and engaged component of the school. However, because TSD is a residential school, many parents reside outside the area and have fewer opportunities to volunteer in PTSO programs and activities. Approximately 55.0 percent of TSD students are from the local Austin area, and 45.0 percent are from locations across the state.

Figure 3–8 shows that 50.0 percent of parents and 46.0 percent of staff who responded to the LBB review team’s survey agreed that TSD’s schools have a sufficient number of volunteers to help with student and school programs.

**FIGURE 3-8
TEXAS SCHOOL FOR THE DEAF PARENTS AND STAFF SURVEY RESULTS
MARCH 2016**

STATEMENT	GROUP	RESPONDENTS	STRONGLY AGREE OR AGREE	NO OPINION	DISAGREE OR STRONGLY DISAGREE
Schools have a sufficient number of volunteers to help with student and school programs.	Parents	74	50.0%	36.5%	13.5%
	Staff	250	46.0%	38.4%	15.6%

NOTE: Totals may not sum due to rounding.
SOURCE: Legislative Budget Board, School Review Team Survey, March 2016.

During onsite interviews, PTSO members stated that engagement opportunities for out-of-town parents are limited. Respondents said that a more effective method of communicating volunteer needs with parents who reside outside the Austin area is needed. PTSO members also stated that the base number of parent volunteers for school activities is insufficient. They also indicated that no effective framework is in place to support the needs of programs for age groups from toddlers to post-secondary students. Additionally, PTSO members said that an insufficient number of TSD staff are in parent support positions.

Education World, an online education resource magazine, publishes best practices to improve parental engagement in schools. Effective schools implement the following best practices to address PTSO challenges:

- engage families in school planning, leadership, and meaningful volunteer opportunities by establishing roles for parents on all decision-making and advisory committees;
- develop a structure for parents who reside outside of the school’s local area to participate in advisory committees remotely, via conference calls or videoconferencing; this structure helps parents to feel connected to the school and to support the school, even if they are not physically present;
- connect students and families to community resources that strengthen and support students’ learning and well-being; through school–community partnerships, facilitate families’ access to community-based programs, such as healthcare and human services, to ensure that families have resources to be involved in their children’s education;
- establish school–business partnerships to provide students mentoring, internships, and onsite experiential learning opportunities; and

- connect students and families to service-learning projects in the community.

TSD should develop and implement a strategy to better engage parents in the PTSO who reside outside the local Austin area. The superintendent should designate existing staff to work with the executive leadership team to plan and accomplish these objectives. The strategies should be incorporated into the community engagement section of TSD’s campus improvement plan.

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. COMMUNITY ENGAGEMENT							
12. Establish a community and business relations specialist position to coordinate the school's efforts in this area and to obtain additional volunteer and partnership support for TSD.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13. Develop and implement a strategy to better engage parents in the PTSO who reside outside the local Austin area.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 4. HUMAN RESOURCES MANAGEMENT

The Texas School for the Deaf's (TSD) human resources function is responsible for compensation and benefits; recruitment, hiring, and retention; administrative planning and duties; records management; staff relations and grievances; and staff evaluations. These functions are defined by either compliance-based or strategic-based responsibilities. Compliance-based responsibilities include assuring that an organization is following federal, state, and local labor laws in areas such as benefits, compensation and hours worked, records management, mandatory leave, discrimination, medical privacy, safety, termination, and eligibility to work. Strategic-based responsibilities include recruiting and retention, compensation and benefits, and staff relations.

Educating students is a labor-intensive undertaking. Labor costs consume approximately 80.0 percent of the average school 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. Staff must be adequately compensated and given opportunities for training. They must have access to benefits and services,

including grievance and conflict resolution services, to ensure that morale and productivity remain high. As a state agency, TSD coordinates with the Employees Retirement System (ERS) of Texas, the Texas Workforce Commission (TWC), the Comptroller of Public Accounts (CPA), and the Austin Independent School District (ISD) regarding staff salaries.

TSD is funded through legislative appropriations, federal funding, and grants. TSD is legislatively bound to a limit on the number of full-time-equivalent (FTE) positions that the school can hire. TSD's fiscal year 2016 FTE position cap was 434.6, a reduction of 24.6 positions from fiscal year 2015, when the cap was 459.2 positions. The school's total payroll costs for fiscal year 2015 constituted 79.6 percent (including 61.0 percent for salaries and 18.6 percent for other payroll costs) of total funding received. Fiscal year 2015 payroll constituted 74.5 percent (including 57.1 percent for salaries and 17.4 percent for other payroll costs) of total expenditures. **Figure 4–1** shows the school's payroll costs as a percentage of total revenues and total expenditures from fiscal years 2013 to 2015.

FIGURE 4–1
TEXAS SCHOOL FOR THE DEAF PAYROLL COSTS AS A PERCENTAGE OF TOTAL REVENUES AND EXPENDITURES
FISCAL YEARS 2013 TO 2015

CATEGORY	2013			2014			2015		
	TOTAL (IN MILLIONS)	PERCENTAGE OF REVENUE	PERCENTAGE OF EXPENDITURES	TOTAL (IN MILLIONS)	PERCENTAGE OF REVENUE	PERCENTAGE OF EXPENDITURES	TOTAL (IN MILLIONS)	PERCENTAGE OF REVENUE	PERCENTAGE OF EXPENDITURES
Total Revenues	\$31.3			\$37.8			\$34.4		
Salaries and Wages	\$20.4	65.2%	59.1%	\$20.8	55.0%	59.8%	\$21.0	61.0%	57.1%
Other Payroll Costs	\$5.6	17.9%	16.2%	\$6.4	16.9%	18.4%	\$6.4	18.6%	17.4%
Other Expenditures	\$8.6	27.4%	24.9%	\$7.6	20.1%	21.8%	\$9.3	27.0%	25.3%
Total Expenditures	\$34.5	110.2%	100.0%	\$34.8	92.1%	100.0%	\$36.8	107.0%	100.0%
FTE position (1) cap	462.0			462.2			459.2		

NOTES:

(1) FTE=full-time-equivalent positions.

(2) Totals may not sum due to rounding.

SOURCES: Texas School for the Deaf Annual Financial Reports, fiscal years 2013 to 2015; Automated Budget Evaluation System of Texas Report, fiscal year 2016.

TSD is a residential school that serves a special needs population that requires additional types and levels of staffing. TSD’s school year 2015–16 staff included 19.9 percent teachers and 34.1 percent support staff. From school years 2014–15 to 2015–16, TSD’s staffing composition decreased in central administration and auxiliary staff and increased in teachers, support services, and school administration staff. Although the FTE position cap was 459.2 for fiscal year 2015 and 434.6 for fiscal year 2016, the actual staff was 471.2 positions for school year 2014–15 and 467.9 positions for school year 2015–16. Effective in 2018–19, state agencies report to LBB when they exceed the FTE position cap by up to 10.0 percent. **Figure 4–2** shows a summary of TSD’s actual FTE positions by category for school years 2014–15 to 2015–16.

The Human Resources (HR) Department consists of a director and seven support staff. The district also has two sign language staff that report to the HR director. HR coordinates the payroll process, coordinates HR-related staff development, verifies staff certifications, guides staff completion of required certifications, and coordinates staff-related ERS benefit needs. HR staff are cross-trained to know each other’s tasks and to assist others during peak periods or extended absences. **Figure 4–3** shows the HR organization.

HR and Sign Language staff responsibilities include the following duties:

- the director of HR manages the HR Department; ensures the school’s compliance with labor laws and the TSD Governing Board staff policies; updates job descriptions; and manages staff relations;

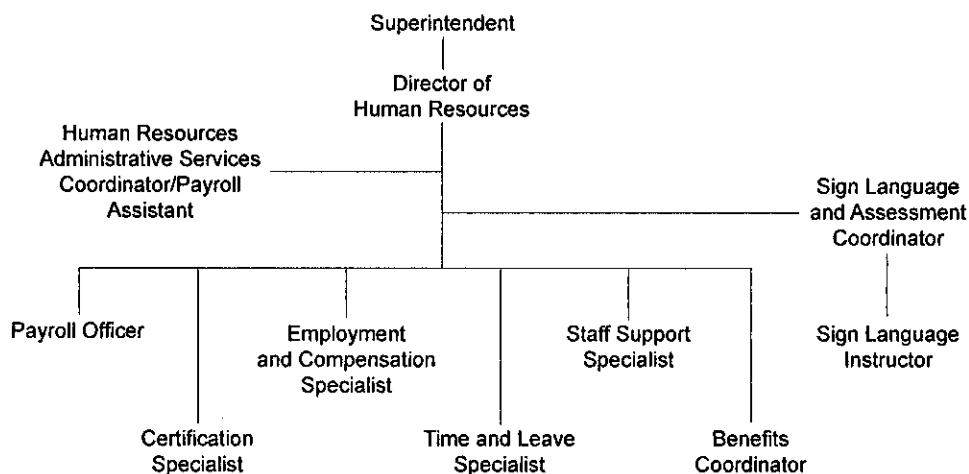
FIGURE 4–2
TEXAS SCHOOL FOR THE DEAF ACTUAL FULL-TIME-EQUIVALENT POSITIONS
SCHOOL YEARS 2014–15 TO 2015–16

STAFF	2014–15		2015–16	
	POSITIONS	PERCENTAGE OF STAFF	POSITIONS	PERCENTAGE OF STAFF
Teachers	87.2	18.5%	93.3	19.9%
Support Services	154.7	32.8%	159.5	34.1%
School Administration	11.0	2.3%	15.9	3.4%
Central Administration	52.9	11.2%	40.8	8.7%
Auxiliary	74.0	15.7%	59.5	12.7%
Residential	91.5	19.4%	99.0	21.2%
Total Staff Positions	471.2	100.0%	467.9	100.0%

NOTE: Totals may not sum to rounding.

SOURCES: Legislative Budget Board School Review Team; Texas School for the Deaf, May 2016.

FIGURE 4–3
TEXAS SCHOOL FOR THE DEAF HUMAN RESOURCES DEPARTMENT ORGANIZATION
SCHOOL YEAR 2015–16



SOURCE: Texas School for the Deaf, March 2016.

- the HR administrative services coordinator/payroll assistant assists with new teacher orientation on HR topics; manages the process for new hires to fill out all necessary paperwork; and assists with payroll and recruiting;
- the payroll officer processes all staff payroll information, including deductions and garnishments;
- the certification specialist verifies teacher certification and ensures that certifications are updated; issues contracts; assists with new teacher orientation on HR topics; manages onboarding for new hires; and assists with recruiting;
- the employment and staff development specialist coordinates professional learning opportunities for staff; seeks informal feedback from principals regarding professional development needs; and assists in coordinating the new teacher mentor program;
- the benefits coordinator enters staff benefits into the ERS system; provides benefit information during new staff orientation; tracks staff federal Family Medical Leave Act (FMLA) status; and coordinates annual staff benefit open enrollment with ERS;
- the time and leave specialist enters timekeeping data for contract and noncontract staff for payroll purposes; and sets up all new staff in the timekeeping system;
- the staff support specialist develops, implements, manages, and provides TSD's staff development program; and assists the director of HR in staff relation matters, including staff retention activities;
- the sign language and assessment coordinator develops, implements, evaluates, and conducts the sign language proficiency rating program; schedules Sign Communication Proficiency Interviews (SCPI), ratings and follow-up reports for staff and students; schedules and oversight of the SCPI team, sign language classes and sign language instruction; evaluates program activities; develops budget requests; coordinates outreach activities for regional day school programs; plans, assigns, and supervises the work of others; and provides advanced and technical support to Interpreting Services and sign language support schoolwide; and
- the sign language instructor plans and presents daily instructional activities for sign language classes; evaluates and documents appropriate data to monitor student and staff progress; and serves as an advisor.

TSD is required to administer three separate compensation plans and two separate classification systems. TSD's administration and operational positions, residential and some direct student support positions fall under the State of Texas Classification Plan. TSD also consists of unclassified positions such as teachers, audiologists, and other professional positions that provide direct student support, which are contract positions and are paid in accordance with Texas Education Code, Section 30.055, using Austin ISD pay scales. TSD also employs substitute employees who TSD pays using an hourly compensation system. TSD's director of HR is responsible for ensuring that staff are accurately classified according to their job responsibilities and tasks.

TSD maintains updated job descriptions. Each job description is based on a combination of the job description associated with the respective classification system and actual responsibilities and tasks performed by the incumbent staff. In calendar year 2016, TSD reviewed and updated its job descriptions.

FINDINGS

- ◆ TSD's HR Department leadership turnover and lack of staff training and professional development limit the department's ability to meet TSD's HR needs.
- ◆ TSD lacks an effective process for hiring and retaining qualified staff.
- ◆ TSD lacks consistent leadership training throughout the organization.

RECOMMENDATIONS

- ◆ **Recommendation 14: Develop and implement HR processes to become a strategic partner for the school's executive leadership team by becoming professionally certified and providing analytical information on staff trends.**
- ◆ **Recommendation 15: Implement a process to analyze staff termination rates and associated data to develop a comprehensive recruiting strategy and staff retention plan.**
- ◆ **Recommendation 16: Develop and implement a structured approach to professional development throughout the school.**

DETAILED FINDINGS

ORGANIZATION AND MANAGEMENT (REC. 14)

TSD's HR Department leadership turnover and lack of staff training and professional development limit the department's ability to meet TSD's HR needs.

The HR Department has been led by three directors since school year 2008–09. The director of HR started working with TSD in 2013 as the employee compensation specialist, became interim director of HR in April 2015, and was named the full-time director of HR in September 2015. The director of HR is certified as a Senior Certified Professional by the Society for Human Resource Management (SHRM). Other HR staff do not hold any HR certifications or receive specialized HR management training.

The HR Department is a TSD support function with the primary purpose of staff management. The department's purpose includes ensuring the school's compliance with labor laws. Responsibilities include the following:

- establishing policies and procedures to ensure compliance with federal and state employment laws, rules, and regulations;
- providing advisory services to TSD leadership in matters related to employment law and staff actions;
- providing analytical data to TSD leadership and managers that will enable them to identify potential issues, monitor staffing trends, and manage their payroll budgets;
- assisting staff in understanding their compensation, benefits, employment expectations, and conditions;
- establishing processes to ensure staff compensation competitiveness and equality;
- establishing processes to ensure fair hiring practices and to recruit skilled individuals;
- establishing processes to assist managers in managing staff performance and corrective actions when necessary;
- providing appropriate training and development;
- processing staff actions and terminations; and
- coordinating or conducting investigations in response to staff complaints, including response to complaints filed with the U.S. Equal Employment Opportunity Commission and the State Auditor's Office.

TSD's HR Department's processes are administrative and transactional and do not rise to the level of analytical and proactive. Transactional processing involves performing repetitive tasks for the purpose of completion to meet outcome objectives. Examples of transactional processing include job postings, background checks, and new-hire documentation and orientation. The HR Department completes many of these tasks with manual, paper-based processes. Analytical processes involve using data-based approaches to predict and solve problems. Using only manual processes makes it difficult for departments to use data and analysis to make high-level decisions.

Figure 4–4 shows industry standards and whether TSD meets each of those standards. In most of the tasks shown, the basic administrative activities related to those tasks are completed, such as completing documentation and managing files. However, the more analytical and proactive tasks, such as staffing analyses and prescreening staff applications for minimum qualifications, are typically not performed by the TSD HR Department or other TSD staff.

Because of the turnover in directors of HR at TSD, the HR Department has been challenged to establish systems to ensure that the HR staff receives consistent training, and to build confidence in the department. HR staff rely on the knowledge and expertise of the director of HR for routine decision making due to staff's lack of training and understanding of HR regulations and requirements. Because of the time required for daily tasks and responding to questions, the staff analysis that is typically performed by a director of HR is not being performed. TSD's executive leadership team is not provided management reports that would enable the team to make effective strategic staff planning and decisions. Additionally, the HR Department has not updated the staff handbook since 2009, and classification studies are not performed regularly to ensure that staff are appropriately classified and compensated for their responsibilities and tasks.

Bersin by Deloitte LLC provides research, tools, professional development, and HR advisory services. Bersin's 2011 human resources organization study concluded that overall spending levels, organization structure, and team size have less effect on business performance than HR professionals' skills. This study noted that effective HR organizations incorporate sophisticated forecasting and workforce analytics into their processes. These skills enable the HR organization to translate talent, business data, and external workforce segment data throughout a company into useful insights.

FIGURE 4-4
TEXAS SCHOOL FOR THE DEAF HUMAN RESOURCES ACTIVITIES COMPARED TO INDUSTRY STANDARDS
SCHOOL YEAR 2015-16

TASK	STANDARD	TEXAS SCHOOL FOR THE DEAF
Job Application Management	Prescreen applications for minimum qualifications	No
	Forward eligible applications to the person responsible for the hiring decision	Yes
Process New Hires	Collect all data necessary to employment, such as Social Security Number	Yes
Criminal History Check	Perform check before hiring	Yes
Certification Confirmation	Confirm certification before hiring	Yes
	Periodically check for expiring certifications	Yes
	Review certification status at contract renewal review	Yes
Hiring Process	Provide standard interview questions and a scoring rubric	No
	Provide interview training	No
	Provide scheduling assistance	No
	Manage new-hire paperwork	Yes
	Forward hiring recommendations to the superintendent	Yes
	Send job offer letters	Yes
Benefits Administration	Input benefit selections	Yes
Job Description Management	Regularly review and update job descriptions	Yes
Position Classification	Regularly review positions for correct classification	No
Contract Preparation	Use standardized forms to draft contracts for staff	Yes
Staff Evaluations	Evaluate teachers through the Professional Development and Appraisal System	Yes
	Evaluate staff manually	Yes
Hours and Leave Administration	Track staff hours and leave	No; timekeepers perform this task and submit results to the Human Resources Department
	Manage the substitute program	No; the director of academic affairs manages the program
	Document general policies on use of overtime	Yes
	Review compensatory time each pay period	Yes
	Regularly perform analysis of overtime, compensatory time, and leave	No
Staff Handbook	Compile staff handbook	Yes
	Update staff handbook annually	No; the manual has not been updated since 2009

SOURCES: Legislative Budget Board School Review Team; Texas School for the Deaf; March 2016.

Gaining HR-specific knowledge of labor laws and regulations enables staff to make decisions and address staff inquiries. This knowledge also facilitates balanced workloads and empowers multiple staff to resolve staff questions. Certified and knowledgeable staff provide for continuity of services in the event of extended absences or staff exits.

Networking with other HR professionals at regional and national seminars provides opportunities to receive updated information about changing employment laws, practices, and trends. Several organizations provide cost-effective HR knowledge sharing and training opportunities to gain general, Texas-specific, and school HR knowledge and best practices. These organizations include the following:

- SHRM is the world's largest HR professional society, and 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 per 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 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, quarterly publications, and a Certified Texas School Business Specialist designation that can be earned by school HR staff; and
- the Texas Association of School Personnel Administrators (TASPA) provides professional growth and networking opportunities to public school HR administrators and support staff; a portion of annual membership dues funds scholarships for prospective teachers in areas with short supply; TASPA also provides members with the opportunity to attend statewide conferences or regional workshops focused on relevant HR topics.

TSD's HR Department should develop and implement HR processes to become a strategic partner for the school's executive leadership team by becoming professionally certified and providing analytical information on staff trends. The director of HR should require staff to obtain appropriate HR certifications commensurate with their respective job responsibilities, update job descriptions to include the requirement, develop a plan for staff to obtain the identified certifications, and present the certification plan to the superintendent for approval. The director of HR should also develop an annual training plan for all HR staff and monitor progress to ensure that staff attend training.

The director of HR should develop management reports and distribute them to the executive leadership team each month. These reports should include staff statistics and demographics, staff turnover, overtime and compensatory time taken and used, vacancies and average time to hire, and workers' compensation claim trends. The director of HR should develop

analysis and report templates, and then write procedures on how to complete the analysis and reports. The director of HR should assign specific analysis and report preparation components to staff and train them. Staff should prepare their analysis and report sections each month for the director of HR to review and consolidate into one comprehensive management report.

All HR staff should begin working on obtaining their certifications during school year 2017–18 and plan to complete the certification by the end of school year 2018–19.

The fiscal impact assumes an annual cost of \$1,530 and a onetime cost of \$5,080. The annual cost per staff is \$190 for the SHRM membership fee, and the fiscal impact assumes four staff would become members, for a total annual cost of \$760. 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 four staff will become SHRM-certified, for a total onetime cost of \$5,080. The annual TASP membership for the school is \$80. The annual cost per staff is \$225 to attend the TASP conference, and the fiscal impact assumes that two staff would attend, for a total annual cost of \$450. 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 \$760 for SHRM, \$80 for TASP membership, \$450 for TASP training, \$150 for TSHRA membership, and \$90 for TASBO membership, for a total annual cost of \$1,530.

RECRUITMENT, HIRING, AND RETENTION (REC. 15)

TSD lacks an effective process for hiring and retaining qualified staff.

Termination occurs when staff leaves an organization either voluntarily or involuntarily. TSD experienced 126 terminations (26.7 percent of total FTE positions) during school year 2014–15. The largest turnover was in residential specialist positions for percentage of total terminations for the year (28.6 percent) and for the percentage of TSD's total FTE positions (7.6 percent). TSD's HR tracking information groups principals, teachers and supervisors into one position category. Eighteen staff in TSD's principal, teacher, or supervisor category left the school during school year 2014–15, which accounted for 14.3 percent of total terminations and 3.8 percent of FTE positions. **Figure 4–5** shows a summary of TSD's terminations by position.

FIGURE 4–5
TEXAS SCHOOL FOR THE DEAF STAFF TURNOVER RATES BY POSITION
SCHOOL YEAR 2014–15

POSITION	STAFF	PERCENTAGE OF TERMINATIONS	PERCENTAGE OF FULL-TIME-EQUIVALENT POSITIONS
Residential Specialist	36.0	28.6%	7.6%
Principal, Teacher, or Supervisor	18.0	14.3%	3.8%
Teacher Aide	15.0	11.9%	3.2%
Substitute Staff	22.0	17.5%	4.7%
Other (Bus Drivers, Nurses, Security, etc.)	35.0	27.8%	7.4%
Total	126.0	100.0%	26.7%
Full-time-equivalent Positions	471.2		

SOURCE: Texas School for the Deaf Turnover Reports, school year 2014–15.

From school years 2011–12 to 2013–14, the categories for principal, teacher, or supervisor experienced about a 3.0 percent increase in terminations each year, from 6.5 percent to 9.4 percent to 12.2 percent, respectively. In comparison, the residential specialist position showed much larger increases during that period, from 10.5 percent to 15.3 percent to 29.9 percent in school year 2013–14. Among teacher aides, termination rates decreased from 20.1 percent to 15.8 percent from school years 2011–12 to 2012–13, but significantly increased during school year 2013–14 to 25.8 percent.

The Texas Education Agency collects student and school staff data and compiles the results in annual Texas Academic Performance Reports (TAPR). TAPR measures teacher turnover percentages as the percentage of teachers from the prior fall who were not employed in the school the following fall, divided by the total teacher FTE position count for the prior fall. According to the school year 2014–15 TAPR, the average teacher turnover percentage was 16.4 percent for Regional Education Service Center XIII, and 16.2 percent for the state. TSD's 12.2 percent turnover rate for school year 2014–15 as a percentage of principal, teacher, and supervisor FTE positions was lower than those rates. However, because the TSD category also includes principals and supervisors, it is not an exact comparison.

TSD faces challenges in hiring staff with the required certifications and experience. TSD teachers are required to hold either a special education or deaf education certification and the appropriate content certification. Additionally, all teachers must the Texas Assessment of Sign Communications or Texas Assessment of Sign Communications – American Sign Language examinations and must have a sign skill of at

least advanced. These requirements make it a challenge to hire qualified teaching staff through traditional recruiting methods.

TSD uses the PeopleAdmin, Inc., software TalentEd for its online employment application system. Visitors to TSD's website click on an icon that takes them to a list of job postings. Applicants then click on the job descriptions and apply online. The HR staff receives applications and then sends them to the respective hiring managers for review, interview, and selection. As the process gets closer to hiring a candidate, HR staff verify certifications and prepare the required hiring recommendation documents for the superintendent's and board's approvals.

Additionally, many other TSD positions also require either a certification or experience in ASL. As a result, TSD recruits most of the teachers and staff through staff networking activities, such as conferences, seminars, and professional relationships. When the school has vacancies, staff posts them on TSD's website and, in accordance with Texas Government Code, Section 656.001, on WorkinTexas.com. Staff also posts vacancy announcements on university websites that have deaf education programs, such as Gallaudet University, Rochester Institute, and Lamar University, as well as relevant organizations, including DeafEd.net and CEASD.org. In addition, TSD attends job fairs at colleges with deaf education programs and provides employment opportunity information at various conferences related to deaf education.

TSD does not have a staff retention plan. Retention plans typically include: establishing an attractive benefits plan and salary schedule; implementing staff recognition activities; offering staff wellness programs; establishing opportunities for promotions; enabling staff to participate in effective

professional development opportunities; and then promoting these efforts throughout the year and during the recruiting process.

TSD's high staff termination rates have led to heavy workloads for staff across the school. HR's workload is increased due to the processes associated with terminations and hiring. Principals' and supervisors' workloads increase due to the need to constantly train new staff. Other staff workloads increase due to the need to cover tasks previously completed by the vacating staff. Additionally, TSD's lack of a formal recruiting strategy and plan, combined with a lack of conducting termination analysis by position, has led to ineffective use of human resources.

Turnover matters for three key reasons: (1) it is costly; (2) it affects a business's performance; and (3) it may become increasingly difficult to manage. Staff terminations cost 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 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 our turnover?

Effective recruiting strategies are well-considered plans that include short-term and long-term strategies for each position or job category. Organizations start by deciding what key talent they have the most difficulty to recruit and then determine 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 applicants 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 small cost; these programs take time to develop, and the benefits are long-term; and
- college recruiting – an essential building block in a comprehensive recruiting strategy; establishing relationships even in the first or second year of college and building on that relationship using social media and other tools 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 analyzed the tools used to source job candidates by organization size and industry. The tools used to source candidates varied by organization size and the organization's industry. **Figure 4-6** shows a summary of the top five candidate sourcing trends for organizations similar to TSD in relation to staff size of 100.0 to 499.0 FTE positions and in the government sector. The company website was the most common sourcing tool used in both types.

**FIGURE 4–6
RECRUITING TOOLS USED BY ORGANIZATIONS SIMILAR TO TEXAS SCHOOL FOR THE DEAF
CALENDAR YEAR 2016**

CANDIDATE SOURCING 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 5	54.0%

SOURCE: Society for Human Resource Management report, *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 the candidates that district recruiting staff met before; 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.

TSD should implement a process to analyze staff termination rates and associated data to develop a comprehensive recruiting strategy and staff retention plan. TSD’s director of HR should work with the executive leadership team to identify potential recruiting methods and sources for their respective functions. The director of HR should then develop a recruiting strategy by position that includes 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 either include information in the staff database for recruiting method or use a spreadsheet to show each staff hired, the recruiting source, employment date, and termination date (if any). The director of HR should annually conduct analysis to determine the number of staff who have remained with the school, how many have left, employment length, and the 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.

The director of HR should facilitate annual onsite job fairs that include campus tours so that the applicants can experience the environment and speak with staff before being hired.

TSD’s director of HR and the superintendent should develop and implement a comprehensive staff retention plan that supports the school’s strategic direction and is linked to budget priorities. The director of HR should establish a committee of teachers, school administrators, and the executive leadership 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.

The director of HR should analyze staff termination rates and determine the causes so that appropriate action and planning could occur.

This recommendation could be implemented with existing resources.

STAFF DEVELOPMENT (REC. 16)

TSD lacks consistent leadership training throughout the organization.

TSD is both a state agency and a school, requiring HR staff to ensure compliance with both state agency and education requirements for mandatory training, and to customize optional training opportunities to fit staff at a school for the deaf and hard of hearing. HR provides training to newly hired staff at all New Employee Orientations (two per month), mandatory trainings at the beginning of each school year to all staff, and one-on-one trainings as needed. In addition, HR works across division lines to facilitate training where possible, and to reduce or eliminate redundancy.

Each department is responsible for providing professional development opportunities for its staff. When school staff attend internal professional development, they are issued certificates and the certification is noted in HR's staff files. If staff attend external professional development conferences or seminars, they are requested to provide copies of the certificates issued for placement in HR's staff files. HR uses a database to track staff development and division directors have read only access to allow them to review training records for their staff.

TSD's training opportunities for staff include worker's compensation, FMLA, sexual harassment, bloodborne pathogens, reporting abuse/neglect, driver safety, and First Aid/CPR/AED. However, structured leadership training is lacking related to school policies and procedures, federal regulations, planning and communication, time management, and proactive management. The high turnover of leadership positions throughout the organization has contributed to the absence of strategic decision making and staff training. At the time of the onsite review, the director of HR was in the process of establishing a leadership development program and had added a staff support specialist to coordinate staff development.

Comprehensive professional development plans ensure that staff at all organizational levels receive training that contributes to organizational growth, enhances staff morale, and increases staff retention levels. Leadership development programs include strategic and career-track leadership training for staff who demonstrate leadership potential and an interest in administrative responsibilities. Establishing proactive leadership development programs provides a tool for organizational succession management.

TSD's HR Department should develop and implement a structured approach to professional development throughout the school. The superintendent should establish a professional development workgroup that consists of the director of HR, the staff support specialist, the director of academic affairs, the director of student life, the director of support operations, and the chief financial officer. The goal of the workgroup should be to develop a comprehensive professional development plan. The workgroup members should identify staff development goals and training needs for their respective functions. The director of HR should identify schoolwide staff development that includes policies and procedures, federal regulations, planning and communication, time management, and proactive management.

After the training goals and needs have been identified, the director of HR should compile the professional development plan. The plan should identify staff positions, training to be provided for each staff position, timing, the department responsible for coordinating the training (Academic Affairs or HR), and required budget and funding sources. The director of HR should then present the professional development plan to the superintendent and the board for approval. The director of HR and the director of academic affairs should then implement the professional development plan and ensure annual review and updates occur.

Since the time of the review, the director of HR has given the staff support specialist responsibilities that include developing and conducting leadership training through the school's Supervisor's Academy, staff development opportunities for all staff, working with divisions across the school to coordinate offerings to avoid duplication, and providing a centralized record keeping function using the agency's Staff Development database.

This recommendation could be implemented with existing resources. The fiscal impact assumes that funding to implement the professional development plan would come from applying funds that are allocated and expended by each department for professional development.

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. HUMAN RESOURCES MANAGEMENT							
14. Develop and implement HR processes to become a strategic partner for the school's executive leadership team by becoming professionally certified and providing analytical information on staff trends.	(\$1,530)	(\$1,530)	(\$1,530)	(\$1,530)	(\$1,530)	(\$7,650)	(\$5,080)
15. Implement a process to analyze staff termination rates and associated data to develop a comprehensive recruiting strategy and staff retention plan.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16. Develop and implement a structured approach to professional development throughout the school.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$1,530)	(\$1,530)	(\$1,530)	(\$1,530)	(\$1,530)	(\$7,650)	(\$5,080)

CHAPTER 5. FACILITIES AND SAFETY MANAGEMENT

As required by statute, facilities management at the Texas School for the Deaf (TSD) 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.

TSD is located in Austin, Texas and is the oldest continuously operating public school in the state. The campus covers approximately 67 acres with 48 buildings. TSD serves day students that live locally in the Austin area, and residential students that are from across the state and live in dormitories

and housing on campus. During school year 2014–15, TSD served 584 students, of which 322 (55 percent) were day students and 262 (45 percent) were residential students.

As a state agency, TSD coordinates with the Texas School Safety Center (TxSSC) and the State Office of Risk Management (SORM) to implement effective safety and security measures. In September 2013, TFC became responsible for TSD's facilities-related maintenance and operations after these responsibilities were transferred to the agency by the Eighty-third Legislature, 2013. TFC began managing the custodial and grounds services for TSD in September 2015 after these responsibilities were also transferred by the Eighty-fourth Legislature, 2015. TFC is responsible for facilities-related maintenance and operations for TSD including:

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

Figure 5–1 shows a detailed description of facilities services that TFC provides for TSD.

TSD's director of support operations is the school's designated staff with primary oversight responsibility for day-to-day facilities operations, management, maintenance, and building upkeep.

When TFC assumed responsibility of TSD's facilities functions, the agencies established a communication protocol

**FIGURE 5-1
TEXAS SCHOOL FOR THE DEAF FACILITIES SERVICES PROVIDED BY TEXAS FACILITIES COMMISSION
SCHOOL YEAR 2015-16**

SERVICE	DESCRIPTION
Work Orders	TFC responds to routine maintenance work requests submitted by the TSD Designated Representative through the TFC website.
Preventive Maintenance	TFC monitors heating, ventilation and air conditioning (HVAC) systems; emergency backup systems, including uninterruptible power supply and other 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/or replaces standard floor and wall coverings; standard windows and window treatments; doors and hardware; ceiling tiles; suspension system; exterior materials and finishes; roof; pavements; sidewalks and associated appurtenances; showers; tubs; sinks; and countertops and other flat surfaces, including caulking. TFC also repairs and/or repaints wall surfaces, as needed.
Mechanical, Electrical, and Plumbing Systems	TFC maintains, operates and repairs distribution systems; HVAC systems; water systems; electrical and lighting systems; and emergency electrical back-up systems.
Fire Protection Systems	TFC provides fire programming and maintains databases for fire 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 the facilities.
Elevator and Lift Systems	TFC conducts preventative and routine maintenance.
Grounds Maintenance	TFC provides grounds maintenance services for the TSD campus, including athletic fields. TFC maintains grounds supplies and equipment.
Custodial	TFC performs all custodial services on campus, including developing and implementing custodial cleaning standards and procedures, and routine staff training. TFC procures and maintains custodial supplies and cleaning equipment for all facilities.
Laundry	TFC collects, washes, dries, folds and redistributes all bedding, linens and tablecloths.
Trash Removal	TFC provides trash removal for the campus.
Waste Recycling	TFC collects recycling material from centralized collection areas within the buildings; delivers to specified exterior collection sites on campus; and hauls off recycled materials from exterior collection sites.
Fuel	TFC maintains the diesel and unleaded gasoline storage tanks and dispensing stations.

SOURCES: Legislative Budget Board, School Review Team, March 2016; Memorandum of Understanding between the Texas Facilities Commission and the Texas School for the Deaf, September 2013.

and a staff transition plan. All TSD facilities staff were transferred to TFC and a TFC maintenance manager, the primary contact for facilities services, supervises the staff. The maintenance manager works onsite at the campus. TSD provides training for all TFC staff and contractors who provide services at the campus. The purpose of this training is to educate each staff and contractor about the campus and how to interact with deaf and hard of hearing students.

TSD and TFC meet monthly to discuss facilities needs and maintenance requirements. They also meet as necessary to address other issues, such as school and state calendars, project schedules, outstanding work orders, and other maintenance or deferred maintenance items. Participants at these meetings include TSD’s director of support operations,

TSD’s property manager, TFC’s onsite maintenance manager, custodial and grounds manager, and custodial supervisor.

TFC’s onsite maintenance manager, custodial and grounds manager, and custodial supervisor meet with TSD’s director of support operations daily to discuss execution of critical work assignments to ensure service levels meet the school’s performance expectations. TFC assigns all other maintenance, grounds, and custodial staff to TSD based on the facilities’ requirements; assignments could be daily or monthly.

TFC staff perform facility maintenance and operation services Monday through Friday between 7:00 A.M and 5:00 P.M., excluding holidays. TFC coordinates facility maintenance on a 24-hour basis as some operations require

work on the facilities after normal business hours. The TSD director of support operations coordinates with the TFC maintenance manager to set the times and dates for scheduled preventive maintenance. TSD and TFC developed a mutually-agreed-upon preventive maintenance schedule that could be modified as necessary. TFC works with TSD to ensure that a minimal skeleton maintenance staff is available for state holidays that are not school holidays.

TFC staff also provide assistance with set-up and take-down for sporting events and student activities such as dances, registration, graduation, parents' weekend and other special occasions for the student body and staff. TSD grants TFC access to its master events calendar to facilitate planning, and TSD provides TFC a list of all regularly scheduled events held during the school year.

The TSD director of support operations and the chief financial officer (CFO) work together to coordinate contractual matters, planning, and construction. TSD employs a property manager who assists with the coordination of property operations.

TSD does not have a formal facilities department. **Figure 5-2** shows the reporting relationships for facilities functions. TSD's director of support operations and CFO report directly to the superintendent. TSD's property manager reports directly to the CFO. TFC's onsite management staff communicate with TSD's director of

support operations daily, as shown by the dotted line reporting relationship in **Figure 5-2**.

Figure 5-3 shows the major responsibilities for the TSD staff assigned to oversee and support facilities for the school.

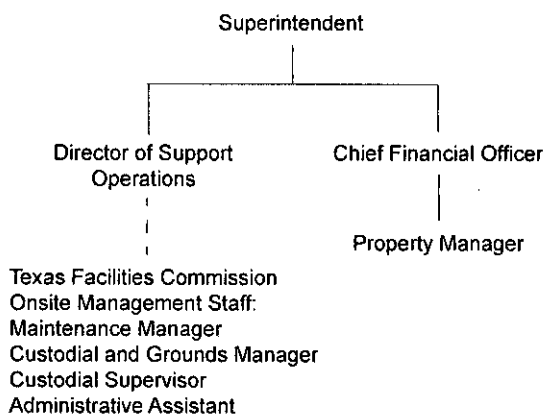
TSD submits electronic work orders to TFC for maintenance and operations services for all regular and routine physical equipment and facilities maintenance issues. To check on the status of submitted work orders, TSD staff contact TFC's onsite managers or the administrative assistant. Routine work orders are typically completed in four to five days unless parts or equipment are not immediately available. Emergency work orders are usually completed within one to two days. TFC completed 3,630 work orders for TSD from September 1, 2015 to June 1, 2016. TFC completed an average of 3,487 work orders annually for fiscal years 2014 and 2015. TFC's onsite maintenance manager reported that 169 work orders were outstanding at the time of the onsite review in March 2016.

TFC commissioned an architecture firm to provide long-range facilities planning services for TSD. Facilities planning involves a compilation of information, programs, policies, and facility data for a school. Facilities plans help schools analyze and prioritize alternatives for allocating facility resources. They also assist schools plan for facility needs during periods of growing or declining enrollment. Since TSD students enroll from communities across the state, the long-range facilities planning process is more complicated than a public school district. Planners have to project the likelihood of student enrollment in TSD from multiple communities. The planning process includes routine, emergency, and preventive maintenance and a deferred maintenance program to ensure that school facilities are functional and operational for many years.

In February 2016, the architecture firm completed a building assessment for TSD. The assessment was conducted through reviews of available original, renovation, and addition construction record drawings; investigation of known reported issues; TSD and TFC staff interviews; and field surveys of all buildings. The architecture firm prepared a report summarizing specific existing conditions, code and safety deficiencies, and proposed recommendations.

Figure 5-4 shows an inventory of each building on TSD's campus. The building inventory contains the name, use, age, and gross square footage of each building. The inventory also contains replacement cost per square foot, replacement value (at current cost), renewal cost (current cost of renovation)

**FIGURE 5-2
TEXAS SCHOOL FOR THE DEAF FACILITIES FUNCTION
REPORTING RELATIONSHIPS
SCHOOL YEAR 2015-16**



SOURCES: Legislative Budget Board, School Review Team, March 2016; Texas School for the Deaf, March 2016.

**FIGURE 5-3
TEXAS SCHOOL FOR THE DEAF FACILITIES STAFF RESPONSIBILITIES
SCHOOL YEAR 2015-16**

POSITION TITLE	MAJOR RESPONSIBILITIES
Director of Support Operations	<p>Ensures student support services, security, safety, and campus facilities are designed to maximize student success in a safe, positive, and healthy environment.</p> <p>Serves as the liaison with the Texas Facilities Commission (TFC) maintenance, custodial, and grounds staff to ensure that the campus operates and is maintained efficiently.</p> <p>Conducts daily meetings with TFC.</p> <p>Meets with manager/supervisors to ensure maintenance and custodial grounds projects are performed satisfactorily and meets expectations.</p> <p>Works collaboratively with other division directors to achieve strategic goals.</p> <p>Provides monthly facilities update to Texas School for the Deaf's Governing Board members.</p> <p>Ensures that physical facilities (buildings, grounds, equipment) are safe, accessible, and appropriate for the students and staff and necessary for the achievement of program objectives.</p>
Property Manager	<p>Negotiates, develops, and prepares leases, permits, contracts, and other property agreements.</p> <p>Coordinates rental of facilities and serves as contact to outside groups regarding the use of TSD facilities.</p> <p>Coordinates facility planning.</p> <p>Routinely inspects properties to ensure they are safe and to determine if repairs are needed.</p> <p>Oversees the preparation of periodic reports on the status of properties and lease expirations and annually reports information related to TSD properties to State Property Accounting and the General Land Office.</p> <p>Consults and communicates with other departments, agencies, and civic groups in furthering interest and/or action regarding a plan or program for the use of TSD resources.</p> <p>Oversees annual physical inventory.</p>

SOURCES: Legislative Budget Board, School Review Team, March 2016; Texas School for the Deaf, March 2016.

**FIGURE 5-4
TEXAS SCHOOL FOR THE DEAF BUILDING INVENTORY
SCHOOL YEAR 2015-16**

FACILITY	USE	YEAR BUILT-ACQUIRED	AGE	GROSS SQ. FT.	REPLACEMENT COST PER SQ. FT.	REPLACEMENT VALUE	ESTIMATED RENEWAL COST	FCI % (1)
Guard House	Security	1997	18	48	\$386	\$18,528	\$3,400	18.4%
Operations Complex	Office	1992	23	4,860	\$403	\$1,958,580	\$408,814	20.9%
TFC Maintenance	Maintenance Shop	1993	22	19,182	\$290	\$5,562,780	\$1,035,373	18.6%
Central Plant	Power Plant	1997	18	5,774	\$1,300	\$7,506,200	\$1,045,548	13.9%
Admissions	Office	1991	24	2,688	\$290	\$779,520	\$138,957	17.8%
Ford Building	Classroom	1995	20	37,002	\$374	\$13,838,748	\$4,016,986	29.0%
Pease Central Administration	Office	1978	37	14,500	\$403	\$5,843,500	\$1,040,745	17.8%
Seeger Gym	Gymnasium	1975	40	25,741	\$374	\$9,627,134	\$3,849,968	40.0%
Concession	Service Center	2004	11	1,519	\$374	\$568,106	\$37,024	6.5%
Colombo Pool & Gym	Natatorium & Gym	1997	18	35,290	\$524	\$18,491,960	\$5,265,167	28.5%
Davis Auditorium	Auditorium	1958	57	9,620	\$442	\$4,252,040	\$4,217,959	99.2%

FIGURE 5-4 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF BUILDING INVENTORY
SCHOOL YEAR 2015-16

FACILITY	USE	YEAR BUILT-ACQUIRED	AGE	GROSS SQ. FT.	REPLACEMENT COST PER SQ. FT.	REPLACEMENT VALUE	ESTIMATED RENEWAL COST	FCI % (1)
Deaf Smith Center	Recreation	1980	35	5,800	\$403	\$2,337,400	\$465,420	19.9%
Cottage 570	Housing	1958	57	4,625	\$451	\$2,085,875	\$1,891,608	90.7%
Access M	Dormitory	2004	11	6,713	\$451	\$3,027,563	\$456,484	15.1%
Cottage 569	Housing	1958	57	4,625	\$451	\$2,085,875	\$1,892,533	90.7%
SN Boys Dorm	Dormitory	2001	14	13,000	\$451	\$5,863,000	\$920,045	15.7%
SN Girls Dorm	Dormitory	2001	14	10,000	\$451	\$4,510,000	\$737,520	16.4%
Cottage 568	Housing	1958	57	4,625	\$451	\$2,085,875	\$1,892,533	90.7%
Cottage 567	Housing	1958	57	4,625	\$451	\$2,085,875	\$1,844,533	88.4%
Cottage 566	Housing	1958	57	4,625	\$451	\$2,085,875	\$1,845,658	88.5%
Cottage 565	Housing	1958	57	4,625	\$451	\$2,085,875	\$1,845,683	88.5%
Cottage 564	Housing	1958	57	4,625	\$451	\$2,085,875	\$1,858,383	89.1%
Access G	Dormitory	2004	11	6,713	\$451	\$3,027,563	\$456,484	15.1%
T-3 Human Resources	Office	1991	24	2,688	\$403	\$1,083,264	\$186,144	17.0%
Clinger Gym	Gymnasium	1928	87	13,175	\$374	\$4,927,450	\$5,608,214	113.8%
Toddler Learning Center	Classroom	1949	66	1,424	\$374	\$532,576	\$506,022	95.0%
Educational Resource Center on Deafness (ERCOD)	Residence	1949	66	2,059	\$451	\$928,609	\$336,910	36.3%
Guard House (Congress)	Security	2002	13	64	\$386	\$24,704	\$750	3.0%
Elementary School	Classroom	2001	14	74,600	\$386	\$28,795,600	\$5,723,616	19.9%
Elementary and Middle School Girls Dorm	Dormitory	2004	11	6,713	\$451	\$3,027,563	\$551,489	18.2%
Student Health Services	Health Center	2002	13	3,759	\$403	\$1,514,877	\$219,338	14.5%
Cafeteria Central	Cafeteria	2001	14	15,310	\$440	\$6,736,400	\$934,486	13.9%
Business Services	Office	1971	44	7,184	\$403	\$2,895,152	\$1,065,683	36.8%
Heritage Center	Museum	1949	66	4,448	\$403	\$1,792,544	\$665,146	37.1%
T-1 Trailer (not in use)	Vacant	1991	24	1,344	\$403	\$541,632	N/A	N/A
Elementary and Middle School Boys Dorm	Dormitory	2004	11	6,713	\$451	\$3,027,563	\$360,513	11.9%
Middle School, Administration, and High School	Classroom	1997	18	81,777	\$386	\$31,565,922	\$7,197,741	22.8%
Lewis Hall Dorm	Dormitory	1997	18	38,078	\$451	\$17,173,178	\$4,083,208	23.8%

**FIGURE 5-4 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF BUILDING INVENTORY
SCHOOL YEAR 2015-16**

FACILITY	USE	YEAR BUILT-ACQUIRED	AGE	GROSS SQ. FT.	REPLACEMENT COST PER SQ. FT.	REPLACEMENT VALUE	ESTIMATED RENEWAL COST	FCI % (1)
Koen Hall Dorm	Dormitory	1997	18	38,078	\$451	\$17,173,178	\$4,262,528	24.8%
Kleberg Building	Classroom	1983	32	8,790	\$374	\$3,287,460	\$1,550,011	47.1%
Transitional Apartments	Housing	1993	22	10,535	\$451	\$4,751,285	\$944,106	19.9%
Boiler Plant (old)	Vacant	1949	66	1,954	\$403	\$787,462	\$979,006	124.3%
General site work							\$7,281,868	
Total				549,518		\$232,380,166	\$79,623,604	

NOTE: (1) Facilities Condition Index.

SOURCE: Parkhill, Smith, and Cooper, Inc., Texas School for the Deaf Building Assessment Report, February 2016.

and the facilities condition index (FCI) percentage. FCI represents the ratio of renovation cost to the cost of a replacement building. According to the building assessment report, many facility planners consider building replacement when this ratio is above 66.0 percent. The FCI percentage provides a benchmark to compare the relative condition of a group of facility buildings and is primarily used to support asset management initiatives of federal, state, and local government facilities organizations.

Figure 5-4 shows that TSD's buildings range in age from 11 to 87 years. The total square footage of all buildings on the campus is approximately 550,000 square feet. The replacement value at the existing cost for TSD's facilities is approximately \$232.3 million and existing costs for renovation are \$79.6 million. Buildings with the highest estimated renovation costs include the Clinger Gym (\$5.6 million), the Elementary School (\$5.7 million), and the Middle School/Administration/High School building (\$7.2 million).

Because of TSD's history as the oldest public school in state, the school often renovates buildings with historic or community significance instead of replacing them. Figure 5-5 shows that TSD has 11 buildings in its campus inventory with an FCI in excess of 66.0 percent.

The building assessment recommended improvements and prioritized the recommendations using a specific classification system including:

Priority Category

- 1 - Critical (repair/replacement is urgent)
- 2 - Trending critical (repair/replacement needed within 12 months)

**FIGURE 5-5
TEXAS SCHOOL FOR THE DEAF BUILDINGS WITH FCI ABOVE 66.0 PERCENT
SCHOOL YEAR 2015-16**

FACILITY NAME	FCI (1)
Boiler Plant (old)	124.3%
Clinger Gym	113.8%
Davis Auditorium	99.2%
Toddler Learning Center	95.0%
Cottage 570	90.7%
Cottage 568	90.7%
Cottage 569	90.7%
Cottage 564	89.1%
Cottage 567	88.4%
Cottage 566	88.5%
Cottage 565	88.5%

NOTE: (1) Facilities Condition Index.

SOURCE: Parkhill, Smith, and Cooper, Inc., Texas School for the Deaf Building Assessment Report, February 2016.

3 - Necessary (repair/replacement needed within two to five years)

4 - Recommended (repair/replacement needed within 3 to 10 years)

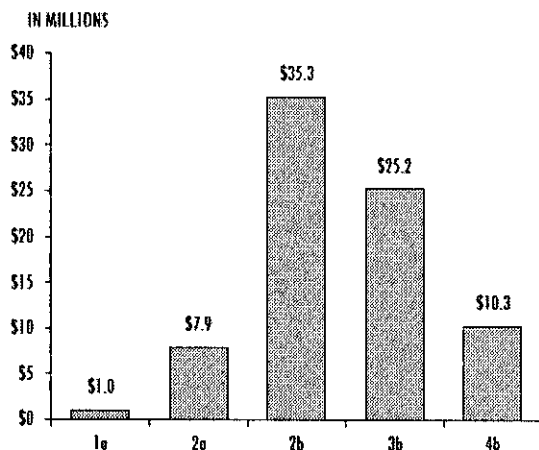
Priority Hierarchy

- A - Safety: health/safety at risk
- B - Necessity: vital tasks cannot be accomplished
- C - Efficiency: operating efficiency/cost effectiveness has been depleted

Figure 5-6 shows the TSD's building improvement costs by prioritized category.

The building assessment report divided improvements into a priority category and hierarchy. As shown in Figure 5-6, the largest cost category of improvements, at \$35.3 million, have a priority category 2 rating and a

**FIGURE 5-6
TEXAS SCHOOL FOR THE DEAF, BUILDING IMPROVEMENT
BY PRIORITIZED CATEGORY
SCHOOL YEAR 2015-16**



SOURCE: Parkhill, Smith, and Cooper, Inc., Texas School for the Deaf Building Assessment Report, February 2016.

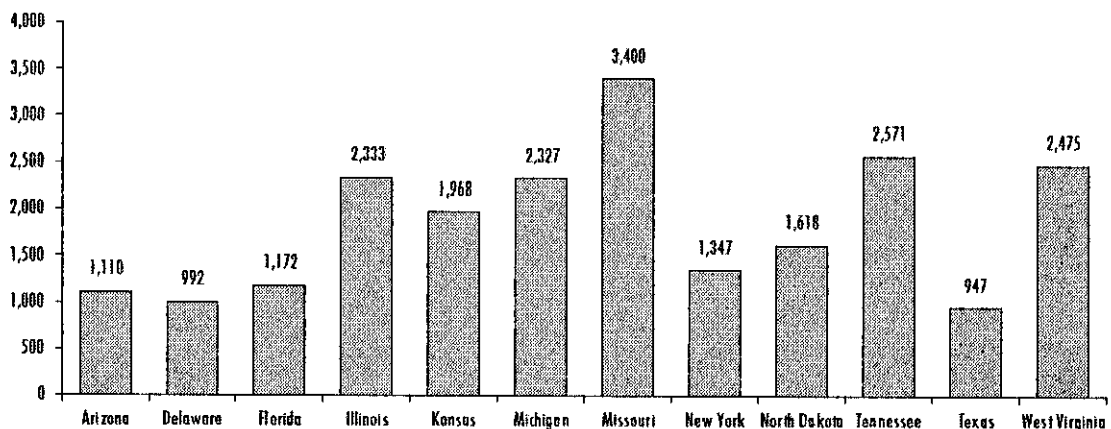
priority hierarchy b rating. These ratings indicate that the needed improvements are trending critical, which means that the repairs and replacements are needed within 12 months. The ratings also indicate that vital tasks might be hindered if improvements are not made.

Figure 5-7 shows how TSD's building square feet per student compares to similar school entities. With 947 square feet per student, TSD has the lowest building square feet per student compared to similar schools in 11 other states. Using TSD's school year 2015-16 enrollment of 580 students, the building assessment report found that TSD needs 635,746 building square feet for the school to be consistent with peers. Given the existing 549,518 square feet of space TSD maintains, the school is 86,228 square feet below its peers.

TSD does not maintain capacity statistics for instructional classrooms, and the review team could not independently assess classroom usage. However, during onsite interviews, TSD staff expressed agreement with the conclusions of the building assessment report. According to school staff, TSD's enrollment is projected to increase by approximately 15 percent each school year through 2020. Increased enrollment could cause overcrowding in the classrooms and residential facilities.

While the facilities function includes the maintenance and upkeep of the buildings, the safety function secures the

**FIGURE 5-7
TEXAS SCHOOL FOR THE DEAF PEER COMPARISON OF BUILDING SQUARE FEET PER STUDENT
SCHOOL YEAR 2015-16**

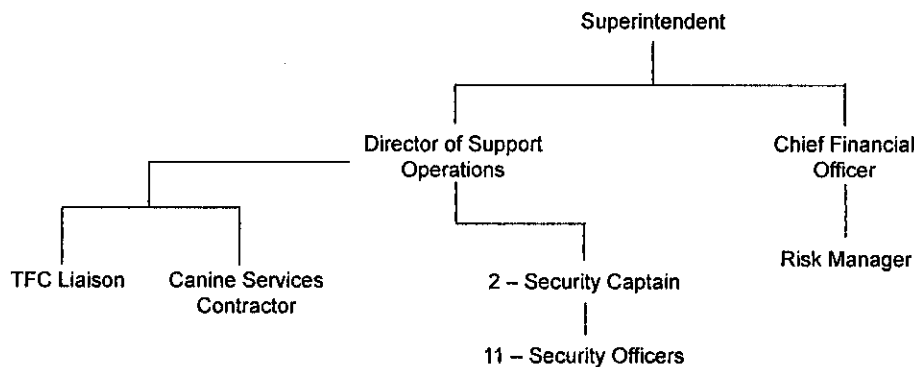


SOURCE: Parkhill, Smith, and Cooper, Inc., Texas School for the Deaf Building Assessment Report, February 2016.

facility, staff and students, and its contents. Several individuals and groups coordinate TSD’s safety and security function. **Figure 5–8** shows TSD’s safety and security organization. The director of support operations oversees the Security Department, which is composed of two security captains and 11 security officers. The risk manager reports directly to the chief financial officer (CFO) and monitors compliance with emergency drills and TSD’s Emergency Operations Plan (EOP).

Various positions at TSD outside of the Security Department and Risk Management Department also have safety and security responsibilities. For example, department safety officers (DSO) are staff nominated by department heads to serve as a resource to students and staff regarding safety and health concerns. TSD’s safety committee is composed of DSOs, the director of support operations, and security staff that meets regularly to review drills, safety procedures, and other safety and security issues. **Figure 5–9** shows the responsibilities of all TSD staff involved in safety and security at TSD.

**FIGURE 5–8
TEXAS SCHOOL FOR THE DEAF SAFETY AND SECURITY ORGANIZATION
SCHOOL YEAR 2015–16**



NOTE: TFC = Texas Facilities Commission.
 SOURCES: Legislative Budget Board, School Review Team, March 2016; Texas School for the Deaf, March 2016.

**FIGURE 5–9
TEXAS SCHOOL FOR THE DEAF SAFETY AND SECURITY STAFF RESPONSIBILITIES
SCHOOL YEAR 2015–16**

POSITION TITLE	MAJOR RESPONSIBILITIES
Superintendent	Ensures development and implementation of a staff safety and health program.
Director of Support Operations	Supervises the security captains and security officers to ensure compliance with safety and security policies and procedures.
Risk Manager	Monitors for compliance with procedures for fire and lockdown drills, and ensures compliance with the emergency operation plans and regulations. Works with division directors and department heads to implement safety and health practices in all programs. Supports the safety committee as a resource and provides departmental safety and health training of Department Safety Officers. Establishes, implements, monitors and evaluates all activities designed to assure safety at TSD.
Division Directors and Department Heads	Conducts on-going safety inspections of school buildings, grounds, and facilities in their areas and reports hazards.
Department Safety Officers	Conducts safety inspections, hazard reporting, and fire and lockdown drills within their areas and submits the necessary reports. Conducts safety training for staff, schedule and conduct emergency drills, and report any problems to the risk manager.
Security Captains	Supervises security officers and ensure compliance with security policies and procedures.
Security Officers	Conducts 24–hour patrol rounds and ensure the safety and security of students, staff, visitors, and state property. Security officers conduct patrol rounds in and around all buildings and facilities and look for potential safety or security hazards. Security officers are required to enter all shift events into the security log at the end of their shift.

SOURCES: Legislative Budget Board, School Review Team, March 2016; Texas School for the Deaf, March 2016.

TFC shares responsibility for safety and security at TSD. TFC has full responsibility for fire safety equipment and manages all fire protection systems. TFC also provides service and maintenance for all security controls and equipment, including building access control systems, security panels, surveillance systems, and locks. TSD contracts with Interquest Detection Canines of Central Texas for drug, alcohol, and firearm detection.

TSD has developed a departmental safety and risk management program policy and procedure manual. According to the manual, the main policy objectives for managing risk are to assist TSD in achieving its strategic objectives, safeguard TSD's assets, and create an environment where all staff assume responsibility for safety and risk management. The Risk Management Department has developed several safety manuals for use throughout the school. The TSD Safety Review Manual for Departments describes emergency safety procedures for use within departments. TSD annually prepares the TSD Safety and Emergency Notebook. The notebook provides guidance for department heads/principals, department safety officers, and other staff responsible for emergency procedures and safety drills. Elementary, middle, high, and special needs departments annually update their safety procedures handbooks. The TSD Employee Handbook provides safety and security expectations and procedures for staff.

In addition to safety and security staff policies and procedures, TSD's EOP outlines the school's approach to emergency management and operations. The plan describes TSD's emergency response organization and assigns tasks to specific primary and secondary staff.

Various agencies including the State Fire Marshal's Office (SFMO), SORM, the State Auditor's Office (SAO), and TFC have identified critical safety and security issues at TSD. When TFC assumed management of TSD's facilities, TSD had critical facilities needs that included security, fire, and emergency electrical life safety systems, among other capital project needs. The estimate to address those needs was projected to be approximately \$109.0 million.

Findings from audits and inspections by outside agencies primarily relate to the aging and defective fire alarm panels in many campus buildings, missing visual fire alarms, and non-functional security cameras. State Fire Marshal's Office inspection reports from fiscal years 2013 to 2014 show the existence of significant fire safety deficiencies during that time period. Many of the safety issues noted were severe

enough to require, as an alternative to closing the school, 24-hour fire watches on nine buildings until repairs could be completed.

In September 2014, SORM conducted a risk assessment for insurance purposes and to help identify hazards and exposures that could lead to lost or damaged assets or business interruption. SORM inspected seven buildings on the TSD campus and identified concerns such as fire alarm systems in need of repair and corroded automatic sprinkler heads. SORM noted that an inspection agency had previously red and yellow tagged fire alarm systems according to the urgency of the needed repairs. The risk assessment recommended that TSD hire a state licensed fire alarm system contractor to make necessary repairs to the fire alarm systems in the buildings that have been red tagged or yellow tagged. TFC's priority had been to resolve the red tagged equipment issues first and defer the yellow tagged equipment issues.

In October 2015, SAO performed an audit of deferred maintenance at TSD. The auditors conducted walkthroughs and examined 21 of TSD's fire alarm system control panels, including the control panels in the buildings on the fire watch list. The SAO determined that despite improvements and repairs, significant fire safety deficiencies still exist. TSD agreed with the audit findings and responded that TFC has implemented the first phase of the fire alarm system repairs. According to TSD, the second phase of the fire alarm system repairs will include a complete repair of all the deficiencies presented in the SAO report, as well as implementation of a fully functioning alert system that is in compliance with fire codes. The targeted completion date of the project is April 2017. Fire watches in key buildings are still in effect.

In March 2016, the SFMO inspected buildings on the TSD campus. The report identifies various safety and security issues including buildings lacking portable fire extinguishers, disabled fire alarm panels, missing inspection tags on fire extinguishers, improperly used extension cords, and inoperable emergency lighting units. The report acknowledges TSD's second phase fire alarm system repairs.

At the time of the onsite review, TFC and TSD were in the process of addressing audit findings. TSD staff including the superintendent, director of support operations, CFO, and security captains meet quarterly with TFC leadership, SORM, State Fire Marshal Office staff, and contractors responsible for replacing or repairing safety and security equipment to discuss corrective action for audit findings.

ACCOMPLISHMENT

- ◆ TSD developed a proposal of green energy conservation measures and received a national award.

FINDINGS

- ◆ TSD lacks a process to evaluate the full costs of renting its facilities to ensure the rental fee schedule is adequate to recoup all applicable usage costs.
- ◆ TSD lacks sufficient coordination and oversight of its safety and security function to ensure compliance with policies and procedures, government regulations, and strategic goals.
- ◆ TSD’s Security Department lacks professional development and training plans.

RECOMMENDATIONS

- ◆ **Recommendation 17: Conduct a facilities rental fee rate analysis in coordination with TFC to ensure that fees charged adequately cover all elements of operating, administrative, and capital costs.**
- ◆ **Recommendation 18: Improve management and oversight of the safety and security function and ensure that management reports, both internal and external, provide comprehensive and timely information to facilitate strategies and decision making.**
- ◆ **Recommendation 19: Assess security staff skill sets against the school’s needs and develop formalized professional development plans and training schedules to address deficiencies.**

DETAILED ACCOMPLISHMENT

NATIONAL FACILITIES GREEN AWARD RECOGNITION

TSD developed a proposal of green energy conservation measures and received a national award.

In 2011, TSD participated in a national competition and was selected as the grand prize winner for a green school makeover. As part of the total \$130,000 grand prize award, TSD received \$65,000 for school renovations and \$65,000 of technical assistance.

TSD’s proposal included goals to enhance recycling efforts and make improvements to facilities to conserve water and become more energy-efficient. Additionally, TSD proposed that if awarded the prize, the school would incorporate lessons about the benefits of green living into the school’s curriculum to educate the student body and spread habits to students’ home life to support a greener lifestyle.

Figure 5–10 shows TSD’s green initiatives in the areas of energy efficiency, water conservation, and waste and recycling.

By developing a successful green initiatives proposal, TSD obtained more funding to support the school’s activities in this area.

DETAILED FINDINGS

FACILITY RENTAL (REC. 17)

TSD lacks a process to evaluate the full costs of renting its facilities to ensure the rental fee schedule is adequate to recoup all applicable usage costs.

TSD regularly rents campus facilities for a fee to outside organizations. Facilities used for rentals include dormitory

**FIGURE 5–10
TEXAS SCHOOL FOR THE DEAF GREEN SCHOOL MAKEOVER IMPROVEMENT INITIATIVES
SCHOOL YEAR 2015–16**

AREA OF FOCUS	IMPROVEMENTS
Energy Efficiency	Retrofit light fixtures to allow for energy-efficient bulbs and motion-activated lights, and, thus, conserve energy. Cost savings from energy-efficient upgrades will be reinvested back into the education programs.
Water Conservation	Reduce water usage and consumption by installing hands-free faucets in lavatories and collecting rainwater in barrels to be used for watering the school grounds.
Waste and Recycling	Install hands-free hand dryers in restrooms to use less paper and save materials from going to the landfills. Install recycling bins near trashcans across campus to make recycling easier and encourage recycling campuswide.

SOURCES: Texas School for the Deaf, Green Makeover PowerPoint, March 2016; Global Green USA website, May 2016.

rooms for weekend and summer workshops at TSD, the auditorium for plays and productions, and the swimming pool for law enforcement exercises and training. TSD also rents its campus grounds to production companies for commercial and movie shoots.

Although renting facilities to outside organizations fosters community engagement and support for the school, this practice requires additional resources. TFC maintenance, custodial, and grounds staff assist with the set-up, break-down, and clean-up at the conclusion of these rentals. TSD staff also provides security. In addition to TFC and TSD labor costs, renting facilities incurs costs with wear and tear from the additional use. TSD has not evaluated whether rental fees adequately cover all elements of building usage, such as the decrease in physical condition, and has not assessed whether the rental fees provide full recovery of maintenance, custodial, grounds-keeping, and security costs.

Figure 5–11 shows the rental fee schedule for use of TSD facilities.

TSD averaged approximately \$207,000 annually in facility rental revenue from school years 2012–13 to 2014–15.

Although TSD has established a fee schedule and collects revenue from facilities rentals, TSD and TFC have not coordinated to gather data associated with rental costs, such as salary and benefits, and administrative and building capital costs to obtain the total cost of operating TSD’s facilities. TSD also has not performed a recent cost calculation to determine the appropriateness of its share of the costs to factor into the rate structure.

The School Facilities Cost Calculator, published by the 21st Century School Fund Center for Cities and Schools, provides a best practice model for evaluating the adequacy of facilities rental fee structures. This calculator is available at www.bestfacilities.org. The calculator assists schools to:

- determine the true cost of operating all of its facilities and grounds, including operating, administrative, and capital costs; and

FIGURE 5–11
TEXAS SCHOOL FOR THE DEAF FEE SCHEDULE FOR USE OF FACILITIES, BUILDINGS, AND GROUNDS
SCHOOL YEAR 2014–15

LOCATION OR EVENT	FEE/ADDITIONAL CHARGES	DEPOSIT
Auditorium	\$2,000 per day/\$400 minimum security charge. Security charge is \$200 per hour each additional hour. Additional charges for tables and chairs. Tables are \$20 each and chairs are \$5 each.	\$500
Cafeteria (no kitchen use)	\$500 per day.	\$100
Deaf Smith Center	\$400 per day/\$200 security charge.	\$200
Multi-purpose Room	\$250 per day.	\$100
Classrooms and other meeting rooms	\$150 per day.	\$100
Football Field	\$1,500 for day game, \$2,000 for night game/\$400 security charge.	\$500
Major events on field and track	\$2,000 per event/\$400 security charge.	\$500
Baseball Field	\$300 per event/\$200 security charge.	\$250
Seeger Gym	\$500 per day/\$200 security charge for first two hours, \$100 for each additional hour.	\$250
Texas School for the Deaf Gym	\$400 per day/\$200 security charge for first two hours, \$100 for each additional hour.	\$250
Clinger Gym	\$300 per day/\$200 security charge for first 2 hours, \$100 for each additional hour.	\$250
Track	\$15 per hour/security charge \$15 per hour.	\$100
Tennis Courts (each court)	\$25 per hour.	\$100
Colombo Swim Center	\$200 for the first two hours and \$50 for each additional hour.	\$200
Professional Commercial Shoot	\$3,000 per day/\$200 security charge.	\$500
Professional Movie Shoot	\$4,500 per day/\$400 security charge.	\$500

SOURCE: Texas School for the Deaf, March 2016.

- develop a transparent fee structure for joint use of its facilities, based on the real operating costs and school policies on community use.

Figure 5–12 shows a sample model to determine the true cost of operating facilities necessary to establish an appropriate rental fee structure. This sample shows the breakdown of operating costs, administrative costs, and capital costs.

Figure 5–13 shows a sample rental fee assessment model that provides different rate categories based on the users that rent the facilities. This figure defines four user types, which include program partners, civic users, community users, and private users. In this model, the fee structure for program partners and civic users is the lowest, charging a fee that includes the actual cost and 5.0 percent. The model applies the highest fee structure to private users, charging a fee that includes the actual cost and 25.0 percent to 50.0 percent.

TSD’s CFO should conduct a facilities rental fee rate analysis in coordination with TFC to ensure that fees charged adequately cover all elements of operating, administrative, and capital costs. The analysis should use similar factors described in Figure 5–12. TSD’s CFO should coordinate with TFC’s maintenance and accounting staff to obtain the data necessary to revise the rental rates. Once TSD develops a new fee structure, the CFO should review and assess the model at least every other year to ensure that rental rates are updated to recoup actual operating, administrative, and capital costs. Analyzing the facilities rental fee rate could

increase TSD’s revenue and decrease its cost associated with facilities rental.

TSD indicates that since the time of the onsite review, the school has revised its facility fee schedule to reflect market conditions and to recoup payroll costs for TSD staff that assist with the set-up and take-down for rental activities.

This recommendation could be implemented with existing resources and could generate additional fee revenue.

SAFETY AND SECURITY MANAGEMENT (REC. 18)

TSD lacks sufficient coordination and oversight of its safety and security function to ensure compliance with policies and procedures, government regulations, and strategic goals.

TSD’s governing board establishes comprehensive policies for staff safety and health programs that address the school’s exposure to staff accidents, injuries, and occupational diseases.

While TSD has established an infrastructure to manage safety and security, opportunities exist to enhance safety and ensure compliance with regulations. Areas for improvement include:

- regularly update the safety and security policies and procedures;
- ensure compliance with regulations, agency policies, and goals; and
- perform all required emergency-related drills.

**FIGURE 5–12
SAMPLE MODEL TO DETERMINE TRUE COST OF OPERATING FACILITIES
FEBRUARY 2014**

The operating expenditures are required to operate the facility safely and pay for utilities, custodial services, event setup, security, and overtime. In this example, the district’s total operating costs are \$5.65 per square foot.

OPERATING COSTS		Total District Cost	Share Dedicated to Facilities	Annualized Cost for Facilities	Annual Cost/SF
Facilities Operating Costs					
Utilities	\$	8,500,000		\$	0.23
Maintenance and Repairs	\$	19,027,519		\$	1.46
Custodial Services	\$	26,386,387		\$	3.83
Security	\$	6,238,555		\$	0.49
Custodial and Security Overtime	\$	430,220		\$	0.06
Total Facilities Operating Costs	\$	52,862,691		\$	5.65

These are the expenditures required to manage the operations and capital costs associated with the decision making, management, and oversight of school facilities. For some administrative cost categories, you will want to take a fraction of the total budget amount – for example, if the superintendent’s office spends 10% of its time attending to facilities-related issues, you can enter 10% in the Share Dedicated to Facilities column to calculate the real annualized cost. In this example, administrative costs are 63 cents per square foot.

ADMIN COSTS		Total District Cost	Share Dedicated to Facilities	Annualized Cost for Facilities	Annual Cost/SF
District Facility Office	\$	324,784	100%	\$	0.23
Real Estate Office	\$	409,269	100%	\$	0.09
Environmental Health Office	\$	1,246,896	100%	\$	0.13
School-Level Administration (Principal)	\$	21,000,000	10%	\$	5.28
Human Resources Administration	\$	9,728,837	10%	\$	0.49
Superintendent’s Office	\$	1,302,080	10%	\$	0.10
Payroll	\$	2,746,089	10%	\$	0.09
Office of Emergency Planning	\$	180,052	50%	\$	0.02
Purchasing Department	\$	2,056,328	5%	\$	0.01
District’s Insurance Cost	\$			\$	
Pensions & Benefits	\$			\$	
Total Facilities Administrative Costs	\$	7,015,920	10%	\$	0.63

These are the annual capital costs needed to keep facilities in a state of good repair. They are based on the estimated current replacement value and the number of years estimated for the building’s full depreciation. In this example, the annual capital costs are \$9.61 per square foot.

CAPITAL COSTS		Total District Cost	Share Dedicated to Facilities	Annualized Cost for Facilities	Annual Cost/SF
Capital Costs					
Long Term Debt Service	\$	1,824,426		\$	0.16
Capital Management Costs	\$	10,607,109		\$	0.38
Total Capital Costs	\$	89,580,388		\$	9.61

SOURCE: School Facilities Cost Calculator, 21st Century School Fund Center for Cities and Schools, February 2014.

**FIGURE 5-13
SAMPLE FACILITY RENTAL FEE ASSESSMENT MODEL
FEBRUARY 2014**

USER TYPE	DESCRIPTION	USER FEE STRUCTURE (1)
Program Partners	Nonprofit organizations or other public agencies that use the school facilities and whose primary purpose is to provide programs and/or services that are designed and operated to advance the academic success of the students in the school.	Actual Cost + 5.0%
Civic Users	Organizations or individuals from the local community who use the school facilities for civic purposes, such as voting, community meetings, informal recreation, and shelter in an emergency.	Actual Cost + 5.0%
Community Users	Nonprofit organizations or other public agencies that use the school facilities and whose primary purpose is to provide programs and/or services that serve the local neighborhood or community, but are not explicitly designed and operated to advance the academic success of the students in the school.	Actual Cost + 10.0%
Private Users	Organizations, for profit, that are using the facility to raise revenue.	Actual Cost + 25.0% to 50.0%

NOTE: (1) User fee structure is adapted from School Facilities Cost Calculator to fit TSD's unique circumstances.
SOURCE: School Facilities Cost Calculator, 21st Century School Fund Center for Cities and Schools, February 2014.

Although TSD's Security Department and Risk Management Department have drafted policies and procedures, the policies and procedures are not updated regularly and are outdated or incomplete. The Security Manual and Risk Management Manual were last updated in 2008 and include inaccurate or incomplete information on departmental organization structure, confidentiality, sensitive information, and sign language requirements for security officers.

Similarly, TSD's EOP is not current and does not fully comply with best practices for school EOPs. The TxSSC recommends that schools follow the United States Department of Education's (USDE) Guide for Developing High-Quality School Emergency Operations Plans. TSD's EOP was last updated in June 2013 and some components do not fully meet the USDE guidelines.

Figure 5-14 shows the components of TSD's EOP compared to the TxSSC's EOP guidelines.

Without updated policies and procedures, there is a risk that the Security Department and Risk Management Department would not continue to operate efficiently and effectively when attrition or turnover among senior staff occurs. TSD has experienced significant staffing changes affecting the Risk Management Department. In May 2014, the risk manager position became vacant, and in May 2015, the risk manager position was not covered for an extended time. In July 2015, the CFO, responsible for oversight of safety and security retired. TSD transferred the coordination for risk management to the Support Operations Division because two key positions, the Risk Manager and the CFO, were vacant. In November 2015, the CFO position was filled and

the risk management function was transferred back to the Business Services Division. At the time of the onsite review in March 2016, the risk manager position was vacant. In July 2016, TSD filled the risk manager position.

As part of the onsite review process, the review team noted several security violations. Security staff indicated that of 64 cameras onsite, only six cameras were operational. Security staff stated that the cameras provide poor views with only one angle of the targeted area visible. Many staff and students on campus did not wear identification badges, even though the TSD Employee Handbook requires staff to wear badges, and students are provided identification cards according to the TSD Student and Parent Handbook.

Another security concern is that TSD does not re-key building locks when staff report lost keys. During the onsite review, the review team noted a door to a school and a door to a residential facility that were unlocked. The door to the residential facility was propped open with a brick.

TSD also may be non-compliant with state business continuity requirements because the Risk Management Department has not identified backup staff for certain functions to ensure that critical deadlines are met. TSD did not provide the electronic copy of the Continuity Planning Crosswalk and any memorandum of understanding agreement regarding alternate sites that was due to SORM by October 31, 2014. State agencies must submit the completed crosswalk with the agency's Continuity of Operations Planning plan to SORM for evaluation in accordance with the Texas Labor Code, Section 412.054.

**FIGURE 5-14
TEXAS SCHOOL FOR THE DEAF EMERGENCY OPERATIONS PLAN COMPONENTS
SCHOOL YEAR 2015-16**

USDE (1) EOP (2) GUIDELINE	TSD'S (3) EOP CONTENTS
<p>The District EOP and related documents are reviewed at least annually by the District's School Safety and Security Committee, as established in Chapter 37.109 of the Texas Education Code (TEC). It shall be updated at least every three years as required by Chapter 37 of the TEC district audit process or as District policy changes dictate. Each update or change to the plan should be tracked. The record of changes, usually in table format, contains, at a minimum, a change number, the date of the change, the name of the person who made the change, and a summary of the change.</p>	<p>The date in the footer of the EOP is February 2006. The record of changes page indicates eight updates from November 2009 through June 2013. The type of modifications made in June 2013 are not specified. While the record of change indicates the location of the modifications, and that certain pages were updated at least every three years, the nature of the change is not described.</p>
<p>Promulgation Statement: Promulgation is the process that gives the plan official status and gives both the authority and the responsibility for staff to perform their tasks. The signed promulgation document is a public statement that formalizes the plan to be "in force."</p>	<p>Plan does not include a Promulgation Statement, and no page is signed by the superintendent or other authorities.</p>
<p>Overview and Purpose</p>	<p>Introduction section includes overview and purpose.</p>
<p>Situation and Assumptions</p>	<p>Situation and Assumptions section included in EOP.</p>
<p>Concept of Operations</p>	<p>Concept of Operations section included in EOP.</p>
<p>Organization and Assignment of Responsibilities</p>	<p>Functions and responsibilities included in EOP; however, does not list the responsibilities of the Security Department.</p>
<p>Direction and Control</p>	<p>Direction and Control section included in EOP.</p>
<p>Administration and Support</p>	<p>Administration and Support section included in EOP.</p>
<p>Plan Development and Maintenance</p>	<p>Plan development and maintenance included in EOP.</p>
<p>Appendices and Attachments</p>	<p>Attachments included in EOP; some information is repeated from prior sections.</p>
<p>NOTES: (1) USDE=United States Department of Education. (2) EOP=Emergency Operations Plan. (3) TSD=Texas School for the Deaf. SOURCES: Guide for Developing High-Quality School Emergency Operations Plans, U.S. Department of Education, Office of Elementary and Secondary Education, Office of Safe and Healthy Students, Washington, D.C., 2013; Texas School for the Deaf, March 2016.</p>	

TSD also lacks reports to allow management to monitor security issues that need to be resolved. TSD maintains security logs in a word processing file which identifies issues found during patrols; however, TSD does not prepare or present to management a monthly or periodic summary report to monitor and highlight critical and recurring security violations. The log shows comments for only two months, September 2015 and October 2015. Department safety officers indicated problems regarding locks and tornado shelter accessibility. The log does not indicate the action taken to resolve the issues.

In addition, neither the Security Department nor the Risk Management Department prepare and maintain a comprehensive report listing all safety and security-related audit findings, the date reported, and the status. Without this report, it is difficult to ensure that all issues are addressed and to identify which issues remain open and why. TSD

conducts status meetings with TFC and reports updates to the Governing Board, but there is a lack of a crosswalk from the audit finding to the outcome. Informative and comprehensive reports facilitate better decision making and ensures management and TFC can efficiently monitor the progress of all projects.

TSD's strategic plans do not reference safety and security, nor do they include an annual safety and security report to TSD's Governing Board. The risk manager presents training information and general updates regarding safety and security projects to the board, but TSD does not generate a standard report to ensure that the board is aware of the issues and the action plans to maintain a safe environment.

Although the safety committee regularly meets to review safety and security issues, TSD does not record the meeting minutes. The sign-in sheet provides evidence that the meeting

occurred and the participants who attended, but TSD does not record the key points of the meeting or any action plans.

TSD should improve management and oversight of the safety and security function and ensure that management reports, both internal and external, provide comprehensive and timely information to facilitate strategies and decision making. TSD’s director of support operations, risk manager, CFO, and safety committee should meet consistently to develop action plans for safety and security management. This team should also formalize reporting of safety and security issues and the plan for resolution of these outcomes. The risk manager should document the action plans and timeline and present the draft to the superintendent for approval. Once approved, the risk manager and director of support operations should update policies and procedures, meet and discuss them with staff and students, and diligently enforce the requirements.

This recommendation could be implemented with existing resources.

PROFESSIONAL DEVELOPMENT AND TRAINING (REC. 19)

TSD’s Security Department lacks professional development and training plans.

The Security Department does not maintain a formal professional development plan for security officers. The Security Department also does not send security officers to specialized security-related training, nor do they record and track the level of sign language competency for each officer. Security officers only receive general training that includes first aid/CPR and elevator maintenance.

Figure 5–15 shows the training for TSD security officers, which indicates two of the nine trainings offered are specialized for security staff: Deaf Sensitivity for Law

**FIGURE 5–15
TEXAS SCHOOL FOR THE DEAF TRAINING FOR SECURITY OFFICERS
SCHOOL YEAR 2014–15**

POSITION	MANDT (1)	FEMA (2) INCIDENT COMMAND	CHILD ABUSE PREVENTION	BLOOD BORNE PATHOGENS	EEO (3) DISCRIMINATION/ HARASSMENT	SUICIDE PREVENTION	DEAF SENSITIVITY FOR LAW ENFORCEMENT	HAZARD COMMUNICATION STANDARDS	SECURITY OFFICER TRAINING
Director of Support Operations	X		X	X	X	X		X	
Security Captain 1			X	X	X	X			
Security Captain 2			X	X	X	X			
Security Officer 1						X			
Security Officer 2	X		X	X	X	X	X	X	X
Security Officer 3	X		X	X	X	X	X	X	X
Security Officer 4	X		X	X	X	X	X	X	X
Security Officer 5	X		X	X	X	X		X	X
Security Officer 6			X	X		X		X	X
Security Officer 7			X	X	X	X			
Security Officer 8	X		X	X	X	X			
Security Officer 9									
Security Officer 10									
Security Officer 11									

NOTES:

- (1) Mandt is a relationally based behavioral management program that uses a continuous learning and development approach to prevent, de-escalate, and if necessary, intervene in behavioral interactions that could become aggressive.
- (2) Federal Emergency Management Agency.
- (3) Equal Employment Opportunity.

SOURCE: Texas School for the Deaf Training Records, March 2016.

Enforcement and Security Officer training. The remaining seven trainings are general training offered to all TSD staff.

The Security Department also does not ensure that security officers receive training to attain the intermediate level of sign language communication proficiency required by board policy. The Human Resources Department maintains a database of Signed Communication Proficiency Interview (SCPI) scores that contains the most recent results for each staff. **Figure 5-16** shows a summary of the SCPI for each officer. Only two of the 12 security officers have attained the intermediate level of sign language communication proficiency required by board policy.

FIGURE 5-16
TEXAS SCHOOL FOR THE DEAF
SIGNED COMMUNICATION PROFICIENCY INTERVIEW
MARCH 2016

POSITION TITLE	SCPI (1) STATUS
Security Captain	No Functional Skill
Security Captain	Intermediate
Security Officer	Novice
Security Officer	No Functional Skill
Security Officer	Novice
Security Officer	Survival Plus
Security Officer	No Functional Skill
Security Officer	No Functional Skill
Security Officer	Survival Plus
Security Officer	No longer with the agency
Security Officer	Pending
Security Officer	New Hire – no SCPI
Security Officer	Intermediate Plus

NOTE: (1) SCPI=Signed Communication Proficiency Interview.
 SOURCE: Texas School for the Deaf, March 2016.

Applicants are not required to have intermediate sign language skills when hired, but job descriptions state that security officers must demonstrate an intermediate sign language proficiency rating in accordance with board policy. TSD requires managers to review their staff's level of proficiency at each evaluation. New staff have 18 months to attain the required level of proficiency. Any staff who fall below the required signed communication proficiency for their position are required to achieve proficiency by taking classes. Managers track the staff's educational efforts and monitor to ensure that staff complete required training.

The TxSSC recommends that security staff receive specialized training such as that provided by the annual Texas School-Based Law Enforcement (TxSBLE) Conference. Attendees are typically school-based law enforcement officers, and they receive training in a variety of security and safety topics.

A formal professional development and training plan ensures security staff 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.

TSD's Security Department leadership should assess security staff skill sets against the school's needs and develop formalized professional development plans and training schedules to address deficiencies.

The director of support operations should meet with the superintendent and security captains to establish a departmental 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. TSD should identify training resources to address those training needs. If external resources are required, the director of support operations should coordinate with TSD management to ensure that a budget is available to provide those resources.

No fiscal impact is assumed for this recommendation until TSD determines if external resource training is needed.

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: FACILITIES AND SAFETY MANAGEMENT							
17. Conduct a facilities rental fee rate analysis in coordination with TFC to ensure that fees charged adequately cover all elements of operating, administrative, and capital costs.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
18. Improve management and oversight of the safety and security function and ensure that management reports, both internal and external, provide comprehensive and timely information to facilitate strategies and decision making.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
19. Assess security staff skill sets against the school's needs and develop formalized professional development plans and training schedules to address deficiencies.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 6. FINANCIAL MANAGEMENT

Financial management involves planning, managing, and safeguarding financial resources. The Texas School for the Deaf's (TSD) financial management functions include organization, management, and staffing; financial performance; planning and budgeting; administrative technology; accounting and payroll; cash management; internal audit; capital asset management and risk management. Unlike other school districts, TSD is a state agency and receives appropriations from the Legislature and uses state systems for accounting, payroll, and property management.

Effective financial management is dependent on an efficient organizational structure. Larger organizations typically have staff dedicated to financial functions, and smaller organizations like TSD have staff with multiple responsibilities. Financial performance must be evaluated on an ongoing basis to ensure TSD 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 promptly. 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, employ a variety of cash management techniques, and maximize investment earnings.

The internal audit function helps TSD accomplish its objectives by bringing a systematic, disciplined approach to evaluating and improving the effectiveness of risk management, control, and governance processes. Capital asset management functions identify and record fixed assets and establish policies and procedures to ensure property is regularly accounted for and protected from loss and theft.

Risk management involves protecting physical assets and staff against losses arising from unforeseen events. Effective risk management includes 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 of the potential for financial loss.

In summary, organized management structures; competent, trained staff; strong internal controls; efficient technological systems; and timely information ensure that all of these functions are executed successfully.

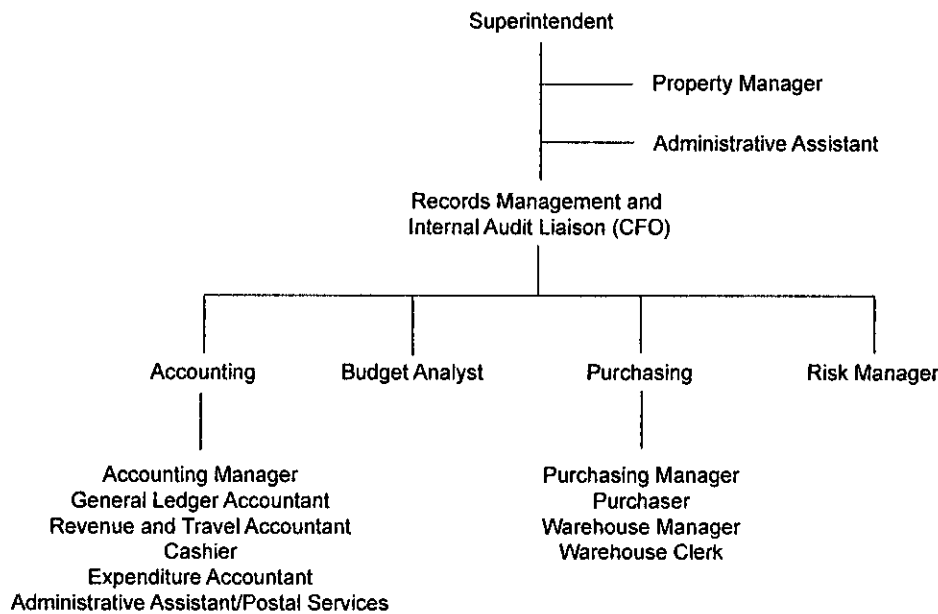
TSD's chief financial officer (CFO) leads the Business Services Division, which executes most financial functions. The CFO has been employed with TSD since November 2015. He has previous experience at state and federal agencies. The CFO is responsible for the Accounting and Purchasing departments. Two department directors lead these functions and report to the CFO. In addition, the CFO is the records management and internal audit liaison and has one administrative assistant. The outsourced internal auditor reports to the TSD Governing Board. **Figure 6-1** shows the Business Services Division organization structure.

As a state agency, TSD must adhere to the state's budget process, which operates on a two-year cycle. After the Legislature determines 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.

Figure 6-2 shows TSD's budget by method of finance. It includes the expended budget from the 2014-15 biennium and the appropriated budget for the 2016-17 biennium.

Figure 6-3 shows TSD's total appropriations by program. Classroom instruction and school administration make up 42.8 percent of the appropriations, and support services, residential programs, and outreach services make up the remaining 57.2 percent.

**FIGURE 6-1
TEXAS SCHOOL FOR THE DEAF BUSINESS SERVICES DIVISION ORGANIZATION
SCHOOL YEAR 2015-16**



SOURCE: Texas School for the Deaf, Business Services Division, March 2016.

**FIGURE 6-2
TEXAS SCHOOL FOR THE DEAF BUDGET BY METHOD OF FINANCE
FISCAL YEARS 2014 TO 2017**

(IN MILLIONS)				
METHOD OF FINANCE	EXPENDED/BUDGETED		BIENNIAL CHANGE	PERCENTAGE CHANGE
	2014-15	APPROPRIATED 2016-17		
General Revenue Funds	\$36.0	\$35.0	(\$1.0)	(2.6%)
General Revenue- Dedicated Funds	\$0.0	\$0.0	\$0.0	N/A
Federal Funds	\$4.1	\$3.9	(\$0.2)	(5.4%)
Other Funds	\$15.8	\$16.2	\$0.4	2.7%
Total, All Methods of Finance	\$55.9	\$55.2	(\$0.8)	(1.3%)

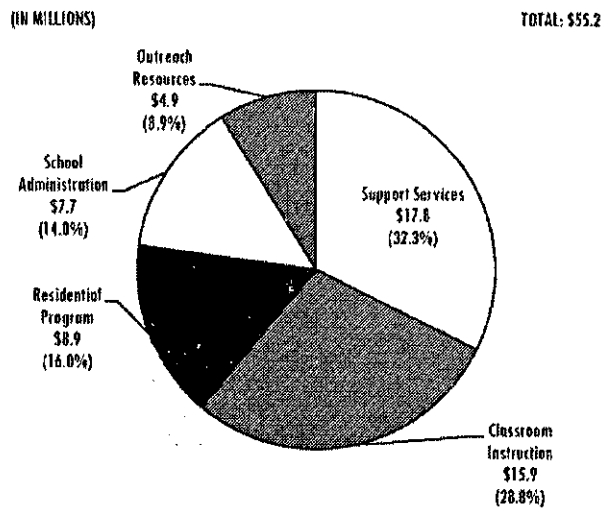
SOURCE: Legislative Budget Board, *Fiscal Size-up, 2016-17 Biennium*, May 2016.

Figure 6-4 shows TSD’s actual revenues and expenditures for fiscal years 2013 to 2015 as cited in its annual financial report. From fiscal years 2013 to 2015, TSD’s revenue increased 9.9 percent from \$31.3 million to \$34.4 million. During the same period, expenditures increased 6.9 percent, from \$32.1 million to approximately \$34.3 million. At the end of fiscal year 2015, TSD’s fund balance was approximately \$1.5 million.

Local school districts that place students at TSD are required by the Texas Education Code, Section 30.003, 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 TSD remit payment to the Commissioner of Education, who forwards it to TSD. These funds are appropriated to the school using the Appropriated Receipts method of financing; these funds totaled \$3.7 million for school year 2014-15.

FIGURE 6-3
TEXAS SCHOOL FOR THE DEAF APPROPRIATION BY PROGRAM
FISCAL YEARS 2016 TO 2017



SOURCE: Legislative Budget Board, *Fiscal Size-up, 2016-17 Biennium*, May 2016.

TSD is also eligible to apply for federal funding, pursuant to the federal 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 using the Federal Funds method of financing; these funds totaled \$90,921 for school year 2014-15.

TSD uses several applications to support the Business Services Division's operations. As required by the state, TSD uses the Uniform Statewide Accounting System (USAS) as its general ledger and accounts payable system. The State Internet Reporting System (SIRS) extracts information from USAS that TSD uses for budget-related reports. TSD processes payroll using the Uniform Statewide Payroll/Personnel System (USPS). TSD accounts for fixed assets using the Statewide Property Accounting (SPA) system. In addition to these statewide systems, TSD uses multiple versions of a personal finance accounting software to account for student activity funds and travel advances. TSD also uses an internally developed program called Trust Fund 2000 to account for student trust funds. TSD uses other spreadsheet and word processing software to support various accounting and reporting activities.

The Texas Comptroller of Public Accounts (CPA) is implementing a new enterprise resource planning (ERP)

FIGURE 6-4
TEXAS SCHOOL FOR THE DEAF ACTUAL REVENUES AND EXPENDITURES
FISCAL YEARS 2013 TO 2015

REVENUE/EXPENDITURE	(IN MILLIONS)			PERCENTAGE CHANGE 2013 TO 2015
	2013	2014	2015	
Total Revenues	\$31.3	\$37.8	\$34.4	9.9%
Total Expenditures	\$32.1	\$32.2	\$34.3	6.9%
Excess (Deficiency) Revenues compared to Expenditures	(\$0.8)	\$5.6	\$0.1	112.5%
Other Sources (Uses)	(\$0.1)	(\$5.9)	(\$0.6)	(50.0%)
Net Change in Fund Balance	(\$0.9)	(\$0.3)	(\$0.6)	60.0%
Beginning Fund Balance	\$3.6	\$2.7	\$2.1	(41.7%)
Restatements	\$0.0	(\$0.4)	\$0.0	0.0%
Ending Fund Balance	\$2.7	\$2.1	\$1.5	(44.4%)

SOURCE: Texas School for the Deaf, Annual Financial Report, March 2016.

system statewide. The Centralized Accounting and Payroll/Personnel System (CAPPS) will integrate activities across a common platform that will enable entered information to be used by other accounting functions. CAPPS is expected to streamline business operations, make transaction accounting more efficient, accurate, and automated, and improve reporting. TSD is scheduled to transition to CAPPS during fiscal years 2018 and 2019.

FINDINGS

- ◆ TSD lacks an efficient process to compile budget reports and reflect the agency's encumbrances to better inform budget decisions.
- ◆ TSD's Business Services Division lacks a practice to ensure consistency among the accounting computer systems used in addition to the state-required system.
- ◆ TSD lacks a process to efficiently manage the student trust accounts.
- ◆ TSD's accounts payable process is inefficient and labor-intensive.
- ◆ TSD's Athletics Department does not promptly submit timesheets to enable accounts payable staff to pay officials in a timely manner after officiating athletic events.
- ◆ TSD does not properly segregate duties with respect to the revenue and travel accountant's processing of travel advances.
- ◆ TSD lacks a process to ensure that adequate staff have the ability to perform all aspects of the payroll function.
- ◆ TSD lacks a process to efficiently make bank deposits for student activity and trust fund accounts.
- ◆ TSD lacks sufficiently communicated cash-handling procedures for student activity funds.
- ◆ TSD does not properly manage the outsourced internal audit function.
- ◆ TSD lacks an efficient process for inventorying fixed assets.

RECOMMENDATIONS

- ◆ Recommendation 20: Develop dynamic, interactive budget reports using SIRS expenditure information downloaded into a spreadsheet.
- ◆ Recommendation 21: Implement plans to upgrade to CPA's CAPPS accounting software.
- ◆ Recommendation 22: Explore implementing a payments website to give parents the option of making deposits to their students' accounts online.
- ◆ Recommendation 23: Establish a procedure encouraging vendors to send invoices electronically rather than through the postal mail services.
- ◆ Recommendation 24: Comply with the prompt payment law pursuant to the Texas Government Code, Chapter 2251, and pay sports officials promptly.
- ◆ Recommendation 25: Assign some of the revenue and travel accountant's travel advance duties to another position in the Business Services Division.
- ◆ Recommendation 26: Accelerate and focus cross-training efforts for the human resources administrative coordinator/payroll assistant position.
- ◆ Recommendation 27: Streamline the check processing and deposits process by adopting the remote check capture practice.
- ◆ Recommendation 28: Review and update the student activity fund procedures and provide training to all relevant staff.
- ◆ Recommendation 29: Adopt a board policy that requires the procurement of an external firm to conduct internal audit services at least every five years, and to implement procedures to ensure that TSD timely requests delegation of authority from the State Auditor's Office (SAO) to continue to contract for internal audit services.
- ◆ Recommendation 30: Require alternative staff instead of the property manager to inventory assets and enter information into the SPA system.

DETAILED FINDINGS

BUDGET REPORTS (REC. 20)

TSD lacks an efficient process to compile budget reports and reflect the agency’s encumbrances to better inform budget decisions.

TSD’s budget analyst is responsible for performing the administrative functions necessary to prepare and distribute budget reports. To prepare departmental budget reports, the budget analyst generates a spreadsheet report using SIRS to summarize expenditures by organization code. SIRS extracts information from the USAS system. The SIRS expenditure report provides strategy, organization, object, and general ledger code numbers. The SIRS expenditure report does not provide descriptions for the codes. The description for each line item is Expenditure Control – Cash. **Figure 6–5** shows an example of the expenditure report.

To provide reports to budget managers, the budget analyst manually rekeys the information into a spreadsheet and produces two reports. The first report shows budget totals by

division director for each of their organization codes. The second report shows budget totals by strategy. These reports also show department names, budgets for the departments, amounts expended as of the date of the reports, balances, and percentages of budgets expended.

Although these two TSD expenditure reports give new information to budget managers, they are time-consuming to prepare and lack key information. For example, the reports do not categorize expenditures by a description of the object of expense. Such categorization would enable budget managers to see the amount of each type of expenditure, such as supplies, utilities, and travel. In addition, the reports do not enable budget managers to manipulate the information for comparison. For example, managers cannot sort budget balances specifically for strategies that have a remaining budget of 50.0 percent or more. The budget reports also do not include encumbrances, which represent outstanding commitments. Therefore, the ending budget amounts are overstated and do not inform the budget manager of how much of the budget remains unspent and uncommitted.

FIGURE 6–5
TEXAS SCHOOL FOR THE DEAF SAMPLE UNIFORM STATEWIDE ACCOUNTING SYSTEM EXPENDITURE REPORT
MARCH 7, 2016

FMQuery: USAS ABEST Reconciliation (State Agencies)

All USAS Expenditures: Organization Code Summary

Agency 772 - Texas School for the Deaf
 FY 2016, AY 2016; Adjusted (Month 13) Balances

AY	Strategy	Org Code	LBB Object	Gl. Acct	Title	Balance
2016	3001	0581	2003	5500	EXPENDITURE CONTROL - CASH	1,779.37
			2009	5500	EXPENDITURE CONTROL - CASH	12,216.69
			3002	5500	EXPENDITURE CONTROL - CASH	69.95
			9999	5500	EXPENDITURE CONTROL - CASH	1,263.50
					Org Code 0581 Total	516,906.97
		0821	1001	5500	EXPENDITURE CONTROL - CASH	67,587.17
			1002	5500	EXPENDITURE CONTROL - CASH	534.40
			2009	5500	EXPENDITURE CONTROL - CASH	28,736.31
					Org Code 0821 Total	96,857.88
		0826	1001	5500	EXPENDITURE CONTROL - CASH	223,519.19
			1002	5500	EXPENDITURE CONTROL - CASH	5,617.55
			2009	5500	EXPENDITURE CONTROL - CASH	1,594.88
			9999	5500	EXPENDITURE CONTROL - CASH	1,300.19
					Org Code 0826 Total	232,231.81
		0841	2003	5500	EXPENDITURE CONTROL - CASH	463.43
			2009	5500	EXPENDITURE CONTROL - CASH	2,906.75
					Org Code 0841 Total	3,390.18
		0851	1001	5500	EXPENDITURE CONTROL - CASH	575.00
			1002	5500	EXPENDITURE CONTROL - CASH	2.69
			2009	5500	EXPENDITURE CONTROL - CASH	206.27
					Org Code 0851 Total	784.15
		0860	1001	5500	EXPENDITURE CONTROL - CASH	34,041.40
			1002	5500	EXPENDITURE CONTROL - CASH	170.20

SOURCE: Texas School for the Deaf, Business Services Division, March 2016.

Although the reports reflect actual expenditures, they do not reflect obligated amounts based on approved purchase orders. To address these issues, the budget analyst extracts expenditure information from USAS, reformats it in a spreadsheet, and then distributes the information to division directors.

To see specific transaction details, the budget analyst developed a series of spreadsheets for budget managers to track their detailed expenditures and encumbrances. The budget analyst refers to these spreadsheets as the department's "checkbook." Budget managers do not have access to review their expenditures in USAS. Therefore, they must maintain their own records and reconcile them to the budget reports that the budget analyst provides. The spreadsheets summarize expenditures by type. For each expenditure type, the spreadsheets show the details of the summary total including the date, requisition number, vendor, and amount. Each line item is shown in the summary. Staff input the information into the checkbook spreadsheets manually from source documents.

Ideally, budget managers should be able to review their budgets online. The Texas Historical Commission (THC) had difficulty providing useful budget reports to its division directors. To resolve the issue, THC's CFO used SIRS to download expenditure information for each division into

separate spreadsheets. The initial setup of the worksheets required additional effort because the CFO had to modify the information to meet THC's purposes. For example, the original budget and budget adjustments were added manually because this information was not a part of the initial download. After the initial setup of the spreadsheets was completed, the CFO needed only to download a new expenditure file into the spreadsheets each month to provide useful budget reports to division directors.

THC's CFO also added more detailed account information to the spreadsheet to reflect THC's unique operations and expenditure categories. The CFO added more descriptive information such as strategy, program, and subprogram descriptions. The CFO also incorporated elements to enable division directors to view budget information dynamically. For example, users can view expenditures by program, strategy, or organization and can select different dates for the information or dollar amount. Analysis is limited only by the data fields in the data set.

Figure 6-6 shows an example of THC's budget report using the spreadsheet's functionality. The four cells labeled Classification, Strategy, Division, and Program are linked to the underlying expenditure data set. As the user selects the options from each category, according to what data they wish to see, the budget report changes to display the selected

FIGURE 6-6
TEXAS HISTORICAL COMMISSION BUDGET REPORT
MARCH 31, 2015

TEXAS HISTORICAL COMMISSION							Budget Report as of March 31, 2015			
Budget Objects	Budget	Expenditures	Percent Expended	Encumbrances	Remaining Budget	Remaining Budget	Percent	Program / Historic Site		
1001 Salaries	913,707.00	493,498.73	55%	398,028.35	17,178.92		2%	Historic Sites - Fort Lancaster Site		
1002 Other Personnel Costs	26,922.00	9,750.23	36%	7,392.00	9,758.77		36%	Historic Sites - Fort McKavett Site		
2001 Professional Services	19,250.00	17,472.64	91%	-	1,777.36		9%	Historic Sites - Fulton Mahalon Site		
2002 Fuel	5,500.00	1,449.65	26%		4,050.35		74%	Historic Sites - Landmark Inn Site		
2003 Supplies	8,000.00	3,804.22	48%	1.31	4,094.47		51%	Historic Sites - Levi Jordan Site		
2004 Utilities	12,500.00	8,065.83	65%		6,434.17		51%	Historic Sites - Magoffin House Site		
2005 Travel	24,506.00	13,326.63	54%		11,179.37		45%	Historic Sites - Nimtz Museum		
2006 Rent - Buildings	3,500.00	1,428.57	41%		2,071.43		59%	Historic Sites - Sabine Pass Site		
2007 Rent - Other	9,000.00	2,668.88	30%		6,331.12		70%	Historic Sites - Sam Bell Maxey Site		
2009 Other Operating	318,516.00	85,584.37	27%	10,797.32	222,134.31		70%	Historic Sites - Sam Rayburn House Site		
4000 Grants	370,486.80		0%	326,500.00	43,986.80		12%	Historic Sites - San Felipe Site		
Grand Total	1,711,887.80	840,189.75		742,719.88	328,978.07			Historic Sites - Starr Family Home Site		

Classification	Strategy	Division	Program / Historic Site
Capital	A.1.1 Architectural Assistance	Administration	Historic Sites - San Felipe Site
Debt Service	A.1.2 Archeological Heritage Protect...	Archeology Division	Historic Sites - San Felipe Site (Capital)
Operating	A.1.3 Courthouse Preservation Initia...	Community Heritage Division	Historic Sites - Starr Family Home Site
Rider - Hispanic Her...	A.1.4 Historic Sites Program	Division of Architecture	Historic Sites - Varner-Hogg Site
Rider - Labels	A.1.5 Preservation Trust Fund	Historic Sites Division	Historic Sites Bonds - Prop 4 UB
	A.2.1 Development Assistance	History Programs Division	Historic Sites Bonds - Prop 8 UB
	A.3.1 Evaluate/Interpret Resources	Public Information and Education	
		Staff Services	

SOURCE: Texas Historical Commission, May 2016.

information. The model is interactive, user-friendly, and more useful to THC's budget managers than the previously used static budget.

TSD should develop dynamic, interactive budget reports using SIRS expenditure information downloaded into a spreadsheet. TSD's CFO and budget analyst should contact other state agency CFOs for assistance in developing budget reports using the Microsoft Excel software application. The CFO should instruct the budget analyst to review online resources for instruction on the software's features and tools. TSD should use SIRS to download a dataset of expenditures into an Excel spreadsheet.

The CFO and budget analyst should develop a pilot budget report and provide it to a select group of budget managers for comment and feedback. The CFO and budget analyst should incorporate the suggestions into a final budget report and present how to use the budget model to all TSD budget managers.

This recommendation could be implemented with existing resources.

ACCOUNTING SYSTEMS (REC. 21)

TSD's Business Services Division lacks a practice to ensure consistency among the accounting computer systems used in addition to the state-required system.

TSD uses six separate accounting systems to account for financial activity. In addition to USAS, USPS, and SPA, TSD uses an application built in-house on the FoxPro database management system to account for student trust accounts. TSD also uses two versions of a financial management software to account for student activity, travel advances, and athletic fund transactions. The cashier and the revenue and travel accountant use separate installations of the software. The cashier uses the software to account for student activity funds, and the revenue and travel accountant uses it to track travel advances. The Athletics Department uses another version to account for receipts and disbursements related to athletic events. **Figure 6-7** shows an overview of these systems, users, and purposes.

Using a variety of systems for these business functions is inefficient because the systems are not integrated and the users do not share information. Using one system for all users

**FIGURE 6-7
TEXAS SCHOOL FOR THE DEAF FINANCIAL MANAGEMENT SYSTEMS
MARCH 2016**

SYSTEM	PRIMARY USERS	PURPOSE	COMMENTS
Uniform Statewide Accounting System	Business Services Division	Serves as the state's general ledger for state agencies. The Comptroller of Public Accounts' (CPA) system for recording and reporting agency transactions including payments, receipts, budgets, and various reports.	Texas School for the Deaf (TSD) plans to upgrade to CPA's Centralized Accounting and Payroll/Personnel System (CAPPS) during fiscal years 2018 and 2019.
Uniform Statewide Payroll/Personnel System	Payroll Specialist	CPA-maintained payroll system that state agencies used to process, record, and manage payroll. Provides authorized staff with online access to agency payroll and staff information.	TSD plans to upgrade to CAPPS during fiscal years 2018 and 2019.
Statewide Property Accounting	Property Manager	System for state agencies to track and account for their property.	TSD plans to upgrade to CAPPS during fiscal years 2018 and 2019.
Trust 2000	Cashier	Used to account for student trust fund receipts and disbursements. Capable of generating lists of individual student balances. Otherwise, reporting and information-sharing capabilities are limited. Prompts when a student's account is insufficient.	TSD developed the program in-house using the FoxPro database management system. The program has been in use since 1999.

FIGURE 6-7 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF FINANCIAL MANAGEMENT SYSTEMS
MARCH 2016

SYSTEM	PRIMARY USERS	PURPOSE	COMMENTS
Quicken 2001	Cashier	Used to account for student activity fund receipts and disbursements. A separate account has been established for each student club. As funds are received and disbursed, the cashier records the activity, and issues monthly reports to student activity fund sponsors, such as the Athletics Department. Otherwise, reporting and information-sharing capabilities are limited.	The revenue and travel accountant reconciles the associated bank account.
	Revenue and Travel Accountant	Used to record and track staff travel advances. Staff may receive up to 85.0 percent of estimated travel expenses in the form of an advance. The revenue and travel accountant enters the advance information into the software and prints the advance check. Staff have five days to settle their advances after they return from trips. When the advances are settled, the revenue and travel accountant makes the appropriate entries in the software.	The revenue and travel accountant reconciles the associated bank account.
Quicken 2016	Athletics Administrative Assistant	Used to account for receipts and disbursements related to athletic events. Transactions are entered into the program from cash receipt forms and payment vouchers that are sent to the cashier, who deposits the money in the bank, prints checks, and records the transaction in the software.	Used exclusively by the Athletics Department to track receipts and disbursements from athletic events.

SOURCES: Legislative Budget Board School Review Team; Texas School for the Deaf, March 2016.

would enable financial integration for the entire school and make it easier for the Business Services Division to track financial activity. TSD recognizes the shortcomings of its financial and student information systems and has plans to replace both. In the financial area, the accounting, human resources, and payroll functions will be migrated to CAPPS during fiscal years 2018 and 2019. At the time of the onsite review, the CFO indicated that TSD was in the process of upgrading to a cloud-based version of the financial

management software, which is a web-based system hosted by a third party.

TSD should implement plans to upgrade to CPA's CAPPS accounting software. This conversion would enable the school to reduce the number of its accounting systems. The upgraded software also would streamline accounting processes so that information can be easily accessed and shared among user departments, such as between the Athletics Department and the cashier. The CFO should

ensure that the web-based system implementation moves forward and that the various systems are integrated into one system that can be shared by all stakeholders. The CFO should ensure that staff receive adequate training on the new system and implement appropriate security and access controls. This recommendation could be implemented with existing resources because TSD has already purchased the cloud-based application.

Since the time of the onsite review, TSD has fully transitioned to the cloud-based version of the financial management software.

STUDENT TRUST FUNDS (REC. 22)

TSD lacks a process to efficiently manage the student trust accounts.

TSD maintains trust accounts for each student. The students and their parents can deposit funds into the account. The cashier receives the funds either by mail or in person at the cashier's office and deposits them in the bank. The bank holds the funds in a single bank account, and the cashier accounts for each student's account using an internally developed program called Trust Fund 2000.

When students or parents bring or send money for deposit into the students' trust accounts, the cashier receives the money, provides receipts (for cash deposits), credits the students' accounts, prepares the bank deposit, and provides copies of the receipts to the director of student life. The cashier also provides a report of trust fund balances to residential supervisors to track the students' spending from their trust accounts. The revenue and travel accountant reconciles the trust fund bank account to the Trust Fund 2000 balances.

To withdraw funds, students must request permission from approved residential staff who contact the student's parent to receive approval. After the parent approves each withdrawal, the student obtains a pink check from residential staff, who maintain the checks stock in a safe. Parents approve each withdrawal to control students' spending. Pink checks are similar to a regular bank check except that they contain more information, such as account code, dorm description, and the name of the residential supervisor. Pink checks promote financial literacy by teaching students how to complete a check. **Figure 6–8** shows examples of a pink check.

A student completes the pink check, which must be approved by a residential supervisor. The nine residential supervisors have varying pink check approval limits. Six supervisors can

FIGURE 6–8
TEXAS SCHOOL FOR THE DEAF PINK CHECK FOR
STUDENT TRUST ACCOUNT WITHDRAWALS
MARCH 2016

BATCH NO.	TRAN TYPE	STUDENT NUMBER	TRANSACTION DATE	REFERENCE NO.
11652	F		3/29/16	

Name: _____
 Cottage: 1000 Hall Date: 3-29-16
 Pay to the order of: CASH \$ 20.00
 Student: _____ Dollars
 Houseparent: _____

CASH TRAN CODE	RECEIPT TYPE	REC. EXP. CODE
8	NA	

FUND	G.L. CONTROL	G.L. ACCOUNT	CCSI CENTER
31	28	000	9998

Memo: Off CAMPUS

SOURCE: Texas School for the Deaf, March 2016.

approve up to \$50, one can approve up to \$100, and the director of student life can approve up to \$200. When a student presents an approved pink check to the cashier, the cashier ensures proper approval and that the student has endorsed the back of the pink check. If all details are in order, the cashier gives the student cash from a \$3,000 petty cash fund.

The cashier retains cancelled pink checks in the petty cash box and uses them to reconcile and replenish the petty cash fund as necessary. When petty cash requires replenishing, the cashier prepares a check from the trust fund bank account. One of the six authorized signatories approves the check, which the administrative assistant/postal services staff takes to the bank to cash and returns the money to the cashier to be placed in the petty cash box.

Parents either mail or bring payments to the cashier to deposit funds to their students' trust accounts. Both methods are inefficient and require unnecessary time. Many companies offer online payment sites that enable parents to log on to students' accounts and deposit funds for on campus needs such as lunch and other school activities.

Technology makes it possible for organizations to eliminate paper-based cash transactions and trips to the bank. Payment portals allow schools to accept credit cards and electronic payments and to deposit funds automatically into bank accounts. The benefits of online payment sites include:

- eliminating the need to send cash to the cashier;

- eliminating trips to the bank;
- access anytime it is needed;
- low-balance notifications via email;
- detailed purchase history viewable online;
- monitoring of student spending;
- comprehensive reporting;
- viewing of updated balances; and
- security and convenience.

Many school districts use this type of technology to enable parents to deposit funds to students' lunch accounts. The Gatesville ISD uses online payment technology that enables parents to pay for school meals, check balances, and view students' accounts using mobile devices.

TSD should explore implementing a payments website to give parents the option of making deposits to their students' accounts online. Although a payment site would not eliminate the need for pink checks, it would provide a convenient option for parents and students to make the funds available for withdrawal using these checks. The CFO should conduct a search of vendors that provide this technology and contact several area schools that use it. Many payment site vendors provide initial consultations for free. Schools that are using the technology can provide TSD with useful insights into costs, benefits, and implementation issues. After the information has been obtained, the CFO should conduct a cost-benefit analysis of implementing this technology.

This recommendation could be implemented with existing resources. If TSD decides to implement the technology after conducting the recommended research, a cost would be applied for purchase and implementation. However, such costs cannot be estimated without the research information that the CFO would obtain upon implementing the recommendation.

Since the time of the onsite review, TSD has fully transitioned to a cloud-based financial management software. This allows parents to submit credit card payments and deposits online. The school now also uses wireless tablets to process card charges remotely, which the school uses at special events that require admission fees or payments.

ACCOUNTS PAYABLE PROCESS (REC. 23)

TSD's accounts payable process is inefficient and labor-intensive.

The expenditures accountant is responsible for processing most of TSD's accounts payable vouchers. The administrative assistant/postal services staff provides support to the expenditures accountant. This assistant position is responsible for paying other bills, such as athletic officials, food invoices, copier invoices, bulk mail charges, and utility bills. During fiscal years 2013, 2014, and 2015, TSD processed 4,006, 3,268, and 3,790 accounts payable vouchers, respectively.

Purchases begin with a purchase requisition, which, when approved, become a purchase order. However, TSD staff continue to refer to the purchase order as a purchase requisition because the approval is documented on the paper requisition form. Although the Purchasing Department scans purchase requisitions and stores them on a shared drive, the administrative assistant/postal services staff physically retrieves the paper purchase requisitions from the Purchasing Department each day and delivers them to the CFO's administrative assistant. The administrative assistant then date-stamps the purchase requisitions and records them in an electronic log. The administrative assistant distributes them to the expenditure accountant or administrative assistant/postal services staff, depending on who processes the payment.

Warehouse staff receive goods and complete receiving reports or stamp copies of the purchase requisitions as received. The receiving report contains all of the pertinent information about the goods. The warehouse clerk certifies that the goods are in good condition and conform to the specifications of the order. The warehouse stamp is placed on a copy of the purchase requisition and signed by the warehouse clerk certifying that the goods are in good order, unless otherwise noted.

Most vendors mail or deliver their invoices for goods or services to the school. The CFO's administrative assistant date-stamps all the invoices received and logs them into a monthly spreadsheet, which includes the date, name of vendor, invoice number, purchase requisition number (if available), and to whom the invoice is to be distributed. The administrative assistant then distributes the invoices to the appropriate accounting team member. The administrative assistant/postal services staff receives all invoices related to food, utilities, and mail. The travel and revenue accountant receives all travel-related invoices. The administrative

assistant sends all other invoices to the expenditure accountant. Two of TSD's contracted vendors send their invoices electronically.

Accounts payable staff email an invoice to the appropriate department if approval for goods or services is required. After the invoice is approved, accounts payable staff attach the approval to the original invoice. When the purchase requisition, receiving report, and invoice have been received, the accounts payable staff match the documentation, and a paper voucher is generated and entered into USAS. The paid paper voucher is filed in a storage cabinet.

Large paper volume and labor-intensive accounts payable processes result in slower processing times and a higher risk of errors. However, some of the inefficient and paper-intensive processes are associated with how TSD uses USAS. State agencies can use any or all components of USAS as their internal systems. Agencies also have the option to report required financial information from existing individual systems to USAS, if the agencies' reports conform to CPA's reporting and calculation requirements. TSD uses all components of USAS and does not have another general ledger system.

In using USAS, TSD must follow CPA's guidelines, but TSD has opportunities to improve accounts payable tasks to make them more efficient. **Figure 6-9** shows TSD's existing practices compared to industry standards and the benefits of the alternative process.

Comprehensive improvements to the accounts payable process will occur when TSD migrates to CAPPs, projected to be implemented during fiscal years 2018 and 2019. CAPPs provides an accounts payable module and maintains transaction and vendor data for paid invoices. This system includes invoice matching and verification with purchase orders and receiving documents. CAPPs also provides a robust audit trail for vendor and voucher information and will be integrated with the existing statewide vendor and accounting systems.

Accounts Payable Now & Tomorrow is an organization that promotes best practices in the accounts payable field. The organization published 101 Best Practices for Accounts Payable, Mary S. Schaeffer, 2013, which is excerpted at www.ap-now.com. One best practice cited is to develop a policy for encouraging vendors to email their invoices. This practice benefits the organization and the vendor. Organizations receive invoices quickly, and can route them for approval more quickly, resulting in quicker payment for the vendor. Accounts Payable Now & Tomorrow suggests the following best practices for emailing invoices:

- set up one email address to receive vendor invoices;
- provide the email address to vendors in welcome materials or annual letters;

**FIGURE 6-9
TEXAS SCHOOL FOR THE DEAF ACCOUNTS PAYABLE PROCESSES COMPARED TO INDUSTRY STANDARDS
SCHOOL YEAR 2015-16**

TEXAS SCHOOL FOR THE DEAF (TSD) PROCESS	INDUSTRY STANDARD	BENEFITS
Physically retrieve purchase requisitions from the Purchasing Department	Scan purchase requisitions to a secured shared drive for use by accounts payable staff and other staff	reduces paper; eliminates need to pick up physical copies daily; eliminates need to date-stamp and distribute purchase requisitions; eliminates risk of lost paperwork; and provides easy access, retrieval, and electronic distribution
Vendors mail paper invoices to TSD	Provide a secure, exclusive email address for accounts payable tasks and establish a policy that strongly encourages vendors to email their invoices	reduces paper; can be readily emailed to approver without making copies; and easier to generate electronic payment vouchers for filing on a secured drive
Paid paper vouchers are filed in a cabinet	Scan paid vouchers and store on a secured drive	electronic files are more durable and secure; less storage space is needed for electronic documents; and easier to retrieve and share information

SOURCES: Legislative Budget Board School Review Team; Texas School for the Deaf, March 2016.

- inform vendors to send only invoices to the email address, not other correspondence;
- inform vendors not to follow up with a mailed copy of the invoice;
- control access to the email address where invoices are to be sent; and
- upon receipt, review the invoice and forward for immediate approval.

The City of Charlottesville, Virginia, practices the following document-scanning best practices:

- adjust settings in the document-scanning program to increase the efficiency of the scanning process;
- prepare documents for scanning to promote consistency in organization, sorting, and indexing;
- use the batch and split method whereby documents are scanned as one large document at one time and then divided into multiple, smaller documents using the scanning software;
- make notes for post-scanning processing; and
- perform quality control.

TSD should establish a procedure encouraging vendors to send invoices electronically rather than through the postal mail services. This procedure should require TSD to scan all internal documentation related to accounts payable. TSD should also place electronic copies of purchase requisitions on a shared drive for accounts payable staff to access, rather than sending paper copies of purchase requisitions through interoffice mail. TSD should explore the benefits of scanning payment vouchers for electronic storage on a secure shared drive rather than storing paper vouchers in filing cabinets. These procedure changes streamline the accounts payable process by routing, managing, and storing invoices and purchase requisitions more efficiently.

The CFO should draft a procedure regarding emailed vendor invoices and work with Information Technology Services (ITS) to establish a secure, dedicated email

address. The CFO should coordinate with the Purchasing Department to notify all existing vendors of the procedure change and devise a means of informing new vendors of the process. The CFO should also coordinate with ITS and the Purchasing Department to establish a shared drive where scanned payment vouchers can be stored and shared with appropriate TSD staff. The CFO should devise a strategy for implementing document-scanning technology at TSD based on best practices.

Since the time of the onsite review, TSD now requires all vendors to submit invoices electronically to a specific TSD e-mail address, which is accessible by accounts payable staff and the accounting manager. Each invoice must include reference to the TSD document number, which expedites reconciliation and matching of documentation.

This recommendation could be implemented with existing resources using TSD's existing email and scanning technology.

SPORTS OFFICIAL PAYMENTS (REC. 24)

TSD's Athletics Department does not promptly submit timesheets to enable accounts payable staff to pay officials in a timely manner after officiating athletic events.

TSD risks violation of the Texas Prompt Payment Act with respect to some sports official payments. This statute requires that TSD pays its vendors within 30 days of the service performed. This process at TSD is unique because no other department submits timesheets to accounts payable staff. The Athletics Department manages and administers some athletic events that require sports officials to submit timesheets. TSD requires the officials to complete and submit timesheets after officiating football, basketball, or volleyball games. After the officials complete and submit their timesheets to the Athletics Department, the athletics director reviews and approves the timesheets before sending them to the Business Services Division. Accounts payable staff have requested that the Athletics Department submit sports official timesheets within three days to five days of an athletic event to facilitate prompt payment within 30 days. **Figure 6-10** shows the 12 instances when the Athletics Department did not submit timesheets on time during school year 2015-16.

**FIGURE 6-10
TEXAS SCHOOL FOR THE DEAF SPORTS OFFICIALS TIMESHEETS
SCHOOL YEAR 2015-16**

EVENT DATE	RECEIVED BY ACCOUNTS PAYABLE STAFF	PAYMENT DATE	DAYS FROM EVENT TO SUBMISSION	DAYS FROM EVENT TO PAYMENT
January 23	March 2	March 7	39	44
January 23	March 2	March 4	39	41
January 23	March 2	March 4	39	41
January 28	February 24	March 4	27	36
January 28	February 24	March 4	27	36
January 30	February 24	March 4	25	34
January 30	February 24	March 4	25	34
January 30	February 24	March 4	25	34
January 30	February 24	March 4	25	34
January 30	February 24	March 4	25	34
January 30	February 24	March 4	25	34
January 30	February 24	March 4	25	34
January 30	February 24	March 4	25	34
Average			29	36
Requirement			3-5	30
Variance from Requirement			24-26	6

SOURCES: Legislative Budget Board School Review Team; Texas School for the Deaf, March 2016.

The sports officials in these cases were paid six days late, on average. Although these are isolated cases, it is important that the Athletics Department comply with the rule of submission within three days to five days to ensure that TSD complies with the state's prompt payment law, set in the Texas Government Code, Chapter 2251. The statute states that a payment by a governmental entity is overdue on the thirty-first day after the later of:

- the date the governmental entity receives the goods in accordance with the contract;
- the date the performance of the service in accordance with the contract is completed; or
- the date the governmental entity receives and invoices for the goods or service.

TSD should comply with the prompt payment law pursuant to the Texas Government Code, Chapter 2251, and pay sports officials promptly. The CFO should instruct the athletics director to provide a calendar of events showing sports officials' work schedules. This calendar will assist the administrative assistant/postal services staff to anticipate the receipt of the officials' timesheets and to consult with

the athletics director if the timesheets have not been received within three days to five days.

This recommendation could be implemented with existing resources.

SEGREGATION OF DUTIES (REC. 25)

TSD does not properly segregate duties with respect to the revenue and travel accountant's processing of travel advances.

The revenue and travel accountant handles almost all aspects of accounting and reconciling travel transactions. These tasks include: reviewing travel advances, travel authorizations, and expense report forms; recording and reconciling travel advances; writing advance checks; maintaining the travel advance ledger in the financial management software; settling advances upon conclusion of trips; and reconciling the bank account. In addition, the revenue and travel accountant has access to the check stock. The only task the revenue and travel accountant does not perform with respect to travel advances is to sign the check, which must be performed by at least two of the following authorized signatories, regardless of the dollar amount:

- superintendent;
- CFO;
- accounting manager;
- general ledger accountant;
- budget manager; and
- purchasing manager.

In addition, the accounting manager reviews and signs off on the monthly reconciliation of the travel funds. This reconciliation must include full supporting documentation for all transactions.

TSD incurs about \$30,000 to \$40,000 per month in travel costs for students who return home each weekend, athletic teams that travel to sporting events instate and out of state, and staff that travel to conferences and recruitment trips. A state-contracted travel agency arranges all of TSD's travel requirements. The travel agency maintains sole possession of the travel credit card and charges all bookings to that card. Each month, the revenue and travel accountant receives a copy of the statement with all of the charges made to the travel account.

The homegoing travel coordinator in the Student Life Division coordinates student travel home each weekend. According to TSD, it is more cost-effective to send students home each weekend, accompanied by chaperones, than for students to remain on campus. The homegoing travel coordinator schedules the flights and chaperones to accompany minor students.

Traveling staff make their own travel arrangements through the contracted travel agency. Traveling staff provide detailed estimates of the cost of travel using rates and guidelines provided by CPA. Before making travel arrangements, traveling staff must complete travel authorization forms, and obtain approval from their supervisors.

At the beginning of each month, the revenue and travel accountant receives a bank statement showing all travel charges made during the previous month. Throughout the month, the revenue and travel accountant receives emails and travel authorization forms detailing travel information for the month. The revenue and travel accountant reconciles the travel charges with correspondence received during the month to verify that the travel occurred and that it was authorized. The revenue and travel accountant records the

travel charges in USAS using the appropriate department's organization code.

The Texas Administrative Code, Title 34, Part 1, Chapter 5, Subchapter C, Rule 5.22, provides that state agencies may establish an account for travel advances. The statute establishes rules and guidelines for such advances, including documentation requirements. Title 34, Part 1, Chapter 20, Subchapter F, Rule 20.308, establishes rules for the use of state credit cards for travel. Any state agency that is eligible to use the state contract for travel services is also eligible to use state credit cards for official state travel-related business. Staff that receive state credit cards receive bills directly and are responsible for making the payments. Staff obtain reimbursement for legitimate travel expenses after submitting properly executed and approved state travel vouchers.

The Texas Administrative Code authorizes state agencies to approve the issuance of state travel credit cards at their discretion. TSD has chosen to provide travel advances instead of state credit cards.

TSD's revenue and travel accountant processes all aspects of travel advances. TSD provides a travel advance of up to 85.0 percent of the total estimated cost of meals and lodging. TSD prepays airfare and hotel fees. Only estimated travel expenses are reimbursable. If staff incur a cost that was not preapproved in the detailed cost estimate, TSD does not reimburse the expense.

Staff seeking a travel advance must submit an approved travel authorization form and a travel advance form. The revenue and travel accountant processes the travel advance form, enters the advance information into the financial management software by staff name, and prints a check. The travel accountant also reconciles the associated bank account and has access to the check stock, which is maintained in a safe in the cashier's office. The revenue and travel accountant has access to the cashier's office and the safe, because this position is the backup cashier.

A lack of segregation of duties represents a weakness in internal controls that could result in undetected errors or misappropriation of funds. For instance, the revenue and travel accountant could forge a signature on a check, and the forgery would go undetected because no other position has control and access to the bank account, checks, and travel advance register in the financial management software.

Ernst & Young, a global accounting firm specializing in assurance, tax, transaction, and advisory services, defines

segregation of duties as a “basic internal control that attempts to ensure no single staff has the authority to execute two or more conflicting sensitive transactions with the potential to impact financial statements.” The firm has identified the following five components to implementing successful segregation of duties initiatives:

- business definition – understand the scope of sensitive transactions;
- technical definition – identify which applications are able to execute the defined sensitive transactions and how are they executed;
- testing – produce an analysis of users with conflicts regarding segregation of duties;
- mitigation – limit the potential effects of these conflicts; and
- remediation – correct these conflicts permanently.

TSD should assign some of the revenue and travel accountant’s travel advance duties to another position in the Business Services Division. For instance, the accounting manager could handle the reconciliation of the account so that the revenue and travel accountant is not both writing checks and reconciling the same account. This delegation would ensure that another position besides the approver of the bank reconciliation is involved in processing travel advances.

This recommendation could be implemented with existing resources.

CROSS TRAINING (REC. 26)

TSD lacks a process to ensure that adequate staff have the ability to perform all aspects of the payroll function.

TSD’s payroll function resides in the Human Resources (HR) Department. Staffing for payroll consists of a payroll accountant, a time and leave specialist, and an HR administrative coordinator/payroll assistant. At the time of the onsite review, the HR Department had two vacant positions, which required the HR administrative coordinator/payroll assistant to perform additional duties.

The payroll accountant has been in the position for 16 years and performs all of the major activities necessary to generate a payroll. The payroll accountant is the only TSD staff who has been trained to process payroll from start to finish.

Because TSD is both a state agency and a school, all staff employed by TSD are considered either exempt, contract, or classified, depending on the position. Classified positions adhere to the State’s Position Classification Plan. All TSD positions are classified except for the superintendent, who is exempt, and professional instructional positions, who are hired in accordance with employment contracts. According to the Texas Education Code, Section 30.055, professional instructional positions include:

- principals;
- supervisors;
- classroom teachers;
- school counselors; and
- other full-time, professional staff that are required to hold certificates issued pursuant to Subchapter B, Chapter 21.

In addition, TSD hires substitute staff who work as needed and are paid the hourly rate designated for their positions. TSD pays contract and classified staff on the first of each month. A supplemental payroll is processed on the fifteenth day of each month to pay shift differential, extra hours, overtime, substitutes (hourly staff), and stipends for contract staff.

Each staff is responsible for completing a monthly timesheet for time worked and leave used during the month. Staff review, verify, correct, and sign their timesheets, even if department administrative staff actually prepares the timesheet. In addition, supervisors must approve and sign the timesheet. After the supervisor approves the timesheet, the department timekeeper reviews and forwards the timesheet to the time and leave specialist for further review before the payroll accountant processes the payroll.

The payroll accountant enters staff payment information and performs the tasks necessary to generate a payroll. The accounting manager in the Accounting Department of the Business Services Division releases the payroll in the USPS system. Releasing the payroll in USPS means communicating to USPS that the agency’s payroll transactions are entered into the system and ready for processing. Steps involved in releasing payroll include logging into USPS, identifying transactions, and entering a release code. The Accounting Department does not review the payroll before the accountant releases it in USPS.

The HR administrative coordinator/payroll assistant helps the payroll accountant with certain duties. However, the assistant is not trained to perform all payroll duties. The absence of redundancy in the payroll function, which is a critical business process, results in risk of payroll processing issues if the payroll accountant is unable to perform these duties. Such issues could include payroll processing errors; noncompliance with local, state, and federal payroll policies; and disgruntled staff who are paid late or incorrectly. Effective cross-training ensures that critical functions will continue interrupted when staff that regularly perform the tasks are unavailable or leave the organization.

A Houston Chronicle website article regarding the benefits of cross-training cited that staff become more valuable members of a team and increase productivity with cross-training. The article outlines the following cross-training steps:

- ask all staff to list their essential job functions in addition to their job descriptions, which only provide a baseline;
- 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
- team new staff with veteran staff, and have newcomers cycle through several different departments or units within the same department.

TSD should accelerate and focus cross-training efforts for the human resources administrative coordinator/payroll assistant position. The superintendent should direct the HR director to fill the vacant positions in the Human Resources Department as soon as possible. When the positions are filled, the HR director should reassign all of the HR duties of the HR administrative

coordinator/payroll assistant and have that position focus solely on payroll duties. The HR director should change the position title from HR administrative coordinator/payroll assistant to payroll assistant. To establish redundancy within the payroll process, the payroll accountant should intensify and focus efforts to train the HR administrative coordinator/payroll assistant to process payroll from start to finish without assistance.

This recommendation could be implemented with existing resources.

CASH MANAGEMENT (REC. 27)

TSD lacks a process to efficiently make bank deposits for student activity and trust fund accounts.

The cashier processes checks from a variety of sources for deposit into the student trust and student activity fund bank accounts using standard bank deposit slips. Sources include student trust fund receipts, facility rentals, checks for students who qualify for Medicaid-funded medical care (a joint federal-state entitlement program), student activity fund checks, meal ticket sales, travel advance repayments, yearbook purchases, athletic ticket sales, book sales, fund-raising proceeds, and school play ticket sales. Each day, the administrative assistant/postal services staff takes deposits to the bank for deposit to either the student activity account or the trust fund account. **Figure 6-11** shows the number of checks deposited during fiscal year 2016, through February 2016. Around 110 checks, on average, are deposited in the student activity account each month and an average of 30 checks are deposited in the trust fund account.

When the federal Check Clearing for the 21st Century Act (Check 21) became effective in 2004, it enabled remote deposit capture. The legislation authorizes images made from original paper checks to be recognized electronically as valid. Therefore, deposits no longer need to be carried physically to financial institutions. Accordingly, check deposits can be made remotely, and therefore more efficiently. Checks can be scanned and processed electronically, enabling them to clear faster, thereby

FIGURE 6-11
TEXAS SCHOOL FOR THE DEAF CHECKS DEPOSITED INTO THE STUDENT ACTIVITY AND TRUST FUND ACCOUNTS
SCHOOL YEAR 2015-16 TO FEBRUARY 2016

ACCOUNT	CHECKS DEPOSITED						MONTHLY AVERAGE
	SEPTEMBER 2015	OCTOBER 2015	NOVEMBER 2015	DECEMBER 2015	JANUARY 2016	FEBRUARY 2016	
Student Activity	110	90	75	129	112	142	110
Trust Fund	21	39	36	19	24	38	30

SOURCE: Texas School for the Deaf, March 2016.

expediting cash handling, improving cash flow, reducing the risk of loss, and eliminating deposit-based fraud. Specific benefits of remote deposit capture include the following:

- reduced costs associated with manual efforts;
- later deposit cutoff time;
- elimination of posting errors;
- time savings by eliminating trips to the bank to deposit checks;
- reduced errors because deposits are validated and balanced when documents are scanned;
- streamline of deposit preparation and delivery;
- ease of use, decreasing training time and effort;
- enables cashier to spend more time attending customers; and
- secure electronic connection for deposits.

TSD should streamline the check processing and deposits process by adopting the remote check capture practice. The CFO should contact TSD's banking representative to discuss TSD's needs, ensure that the cashier's computer can support the technical requirements of remote deposit capture, enroll in the bank's remote capture program, and acquire and set up a check scanner. The cashier should learn the online check deposit process and begin depositing checks remotely. Training time for the cashier and a backup to learn to use the technology is minimal. TSD's bank provides an online promotional video that shows the convenience of the technology. TSD's bank charges \$40 per month for this service, which includes the check scanner and training for the cashier and backup staff. The annual costs would be \$480 per year.

Since the time of the review, TSD has entered into an agreement with a different financial institution that does not currently offer remote check capture. The CFO should review the possibility of using this technology if this financial institution adds this technology in the future or if TSD switches financial institutions to one that has this technology available.

STUDENT ACTIVITY CASH (REC. 28)

TSD lacks sufficiently communicated cash-handling procedures for student activity funds.

TSD maintains 116 student activity accounts. During fiscal years 2015 and 2016 (through January 2016), \$920,490 was deposited into student activity funds and \$727,869 was expended. As of

January 31, 2016, the balance in student activity funds was \$691,073. The source of most of the money in student accounts is from TSD's foundation. The superintendent oversees these funds, which she can use at her discretion to benefit students. The foundation also provides grants for various TSD programs that benefit students. Another large source of student activity funds is summer program activity fees. TSD uses these funds for summer programming for deaf and hard-of-hearing students from across Texas.

The 20 largest student activity funds had revenues exceeding \$10,000 during fiscal years 2015 and 2016 to January 2016. These funds represent 17.0 percent of the total number of funds and generated 82.0 percent of revenues and 75.0 percent of disbursements during the period. **Figure 6–12** shows an overview of these funds.

TSD has activity fund procedures. However, during the onsite review, TSD staff that handle activity funds did not know that the procedures existed. TSD has not edited the procedures since August 1998. The procedures include a list of fund categories, but there is not a category for all of the current student activity funds. Because TSD has not updated these procedures in almost twenty years and have not shared them with TSD staff that manage activity funds, the procedures may have little impact on how these funds are handled.

TSD should review and update the student activity fund procedures and provide training to all relevant staff. The superintendent should instruct the CFO to lead the project. The CFO should ask each sponsoring department to identify staff within the department who have any involvement with student activity funds. The CFO should require each department to document how it administers student activity funds within the department. The CFO should use this information to gain an understanding of how student activity funds are managed campuswide. For example, some student clubs may require unique procedures given the nature of their activities. However, the updated procedures should describe and make appropriate allowances for such situations. The CFO should organize a student activity fund procedures committee to assist with reviewing and updating the procedures. The committee should review, organize, and assimilate the information gathered from the departments to update the procedures. When the new version of the procedures is completed, the superintendent should review and approve the procedures and instruct the CFO to enforce them throughout TSD.

This recommendation could be implemented with existing resources.

**FIGURE 6--12
TEXAS SCHOOL FOR THE DEAF TOP 20 STUDENT ACTIVITY FUNDS
FISCAL YEARS 2015 TO JANUARY 2016**

ACCOUNT	RECEIPTS	DISBURSEMENTS	ACCOUNT	RECEIPTS	DISBURSEMENTS
Foundation Discretionary	\$129,644	\$42,414	High School Athletics Travel	\$24,110	\$29,337
Summer School Activity Fees	\$91,507	\$67,632	National Student Life for the Deaf and Hard of Hearing	\$21,302	\$21,302
TSD Foundation Grant	\$59,044	\$32,740	Culinary Arts	\$17,988	\$22,561
International Studies	\$56,203	\$37,050	High School Athletics Tournament Fee Expenses	\$15,202	\$13,545
Athletics	\$46,105	\$54,817	High School Athletics Specialty Team Wear	\$12,472	\$9,742
Student/Staff Special Events	\$42,692	\$54,414	Middle School Athletics Fee Collections	\$12,346	\$2,016
High School Athletics Airfare for the Deaf National Tournament	\$40,468	\$35,414	Drama	\$11,306	\$11,653
Communication Skills Workshop	\$39,870	\$33,931	Library	\$10,550	\$6,961
High School Athletics Admission Fee Collections	\$36,660	\$19,716			
Ranger Center	\$31,235	\$34,510	Total, Top 20 Funds	\$751,808	\$544,848
Ranger Press	\$26,932	\$7,425	Total, All Funds	\$920,490	\$727,869
High School Athletics Donations and Fund-raising	\$26,172	\$7,668	Percentage of All Funds Contributed by Top 20 Funds	82.0%	75.0%

SOURCES: Legislative Budget Board, School Review Team; Texas School for the Deaf, April 2016.

INTERNAL AUDIT (REC. 29)

TSD does not properly manage the outsourced internal audit function.

TSD's internal audit function has been outsourced to the same audit firm since at least 1999. Audit fees increased each year for the past three years. For fiscal years 2013, 2014, and 2015, the fees were \$24,615, \$29,175, and \$33,806, respectively. Since 1999, TSD has renewed its internal audit service contract with its auditor, Garza/Gonzalez & Associates. TSD lacks a procedure to use any type of procurement method to obtain and consider the costs for internal audit service from other potential vendors before renewing its contract with this firm.

TSD has neither reprocured since 1999 nor consistently requested delegation of authority from the State Auditor's Office (SAO). The Texas Government Code, Section 321.020, specifies that a state agency may enter into a contract for audit services only if: (1) the agency is authorized to contract with a private auditor through a delegation of authority from SAO; (2) the scope of the proposed audit has

been submitted to SAO for review and comment; and (3) the services of the private auditor are procured through a competitive selection process in a manner authorized by law. Additionally, the Eighty-fourth Legislature, General Appropriations Act, 2016-17 Biennium, Article IX, Section 6.20, cites the requirement for state agencies and higher education institutions that use appropriated funds to contract for audit services to obtain a delegation of authority to enter into such a contract. SAO has classified the delegation of authority into three categories, including financial audits, internal audit services, and other services such as performance and compliance audits.

Since TSD has been contracting for internal audit services, SAO has documented the receipt of only two TSD delegation requests, in November 2012 and in April 2016. SAO approved the 2012 request to be effective for fiscal year 2013, and the agency approved the 2016 request to be effective for fiscal years 2016 and 2017. At the time of onsite review, TSD had planned to issue a request for proposal (RFP) for internal audit services before the end of fiscal year 2016. TSD did not have a process to request its delegation of authority from

SAO before November 2012 or from the authorization's expiration at the end of fiscal year 2013 to April 2016.

The Institute of Internal Auditors (IIA) is an international organization whose goal is to enhance the internal audit profession. The IIA cites the benefits of auditor rotation as increased independence and objectivity, potential for fresh perspective, and potentially increased quality of work.

The Government Finance Officers Association (GFOA) recommends that governmental entities enter into multiyear agreements when contracting with independent auditors. Multiyear contracts enable greater continuity and minimize the potential for disruption in connection with the audit. The organization recommends that governmental entities use a competitive process for the selection of auditors periodically and that the process actively seeks all qualified firms available to perform the audit.

Many school districts have established policies to periodically use a competitive process to procure external firms that conduct internal audit services. For example, some school districts engage an auditor annually for a maximum of five years. At the end of the five-year period, the district issues an RFP. The process does not preclude the district from reengaging the contracted auditor. This approach ensures continuity of service, and provides assurance that audit fees are stable, and that other firms have an opportunity to compete to offer various audit approaches and insights.

TSD should adopt a board policy that requires the procurement of an external firm to conduct internal audit services at least every five years, and to implement procedures to ensure that TSD timely requests delegation of authority from SAO to continue to contract for internal audit services. The CFO should implement a monitoring process outlining the delegation of authority to ensure compliance with the law.

TSD should also conduct a cost-benefit analysis of continuing to outsource the internal audit function or to develop a TSD internal auditor position. The cost-benefit analysis could include shared services arrangements with other state agencies, such as the Texas School for the Blind and Visually Impaired, which has an internal auditor staff position.

The CFO should draft a policy for the superintendent's review and presentation to the board. The CFO should coordinate with the Purchasing Department to ensure that the auditor rotation requirement is included in the contract that results from the school's RFP.

This recommendation could be implemented with existing resources.

FIXED ASSETS (REC. 30)

TSD lacks an efficient process for inventorying fixed assets.

Texas state agencies are responsible for accurate and timely reporting of personal property information to SPA. The purpose of SPA is to control the state's personal property inventory. CPA sets policies and procedures and maintains security and data integrity of electronic data processing for the system. These policies can be viewed on the CPA's website at <https://fmx.cpa.state.tx.us>.

As a state agency, TSD's property is self-insured. Internal transfers of school property are rare. In September 2013, TSD transferred a large amount of its property to the Texas Facilities Commission (TFC) in connection with TFC assuming the role of property and facilities manager for the school.

The state agency head is responsible for the custody and care of agency property. The agency head ensures that the agency maintains adequate internal control procedures. Each agency head designates a property manager and informs CPA of the designee. With CPA approval, the agency head may designate more than one property manager. The agency head is still responsible for agency property and for ensuring that the property manager implements the duties prescribed by CPA's rules. The agency head must ensure that the procedures for accountability and safeguarding of the agency's property are distributed. All agency procedures must comply with CPA rules and requirements.

TSD's property manager inventories and affixes labels to all of the school's assets upon receipt. TSD's Purchasing Department sends the property manager a copy of all purchase requisitions, including items coded as fixed assets. If the items are technology-related, ITS staff send a copy of the requisition to the property manager. The warehouse receives all goods and either delivers them to the staff who placed the orders or notifies staff to pick up the goods. Warehouse staff notify the property manager when computers and other assets to be labeled are received. Warehouse staff provide the property manager with copies of the receiving reports.

The property manager takes a copy of the requisition to the warehouse with a roll of TSD-imprinted, barcoded asset labels. The property manager labels the assets and records the label numbers on the requisition. The property manager

enters the asset information from the requisition into the SPA system. Data entered include: asset description, serial number, label number, vendor name, date received, estimated useful life, date received, and other pertinent information.

Best practices suggest that schools use alternate staff to label assets and to enter assets into the tracking system. This practice enables managers to focus on other duties and results in more effective use of resources.

TSD should require alternative staff instead of the property manager to inventory assets and enter information into the SPA system. The property manager should decide which staff are most appropriate for this task. The Purchasing Department should provide a copy of all asset requisitions requiring inventory labels to the property manager. The designated staff should provide a copy of the requisition to the property manager after the item is received and entered into SPA. The property manager should use these documents to validate the information in the designated staff entries. This recommendation would streamline the process and eliminate the property manager's trips to the location where goods are received. It would also further segregate duties, thereby strengthening internal controls of fixed assets. The CFO should provide written instructions to the property manager and designated staff about the change in process. The property manager and designated staff should implement the process.

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.

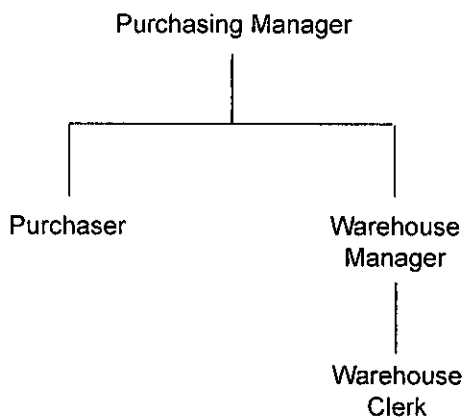
RECOMMENDATION	2017-18	2018-19	2019-20	2020-21	2021-22	TOTAL	ONETIME
						5-YEAR (COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 6. FINANCIAL MANAGEMENT							
20. Develop dynamic, interactive budget reports using the State Internet Reporting System expenditure information downloaded into a spreadsheet.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21. Implement plans to upgrade to the Comptroller of Public Accounts' Centralized Accounting and Payroll/ Personnel System accounting software.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22. Explore implementing a payments website to give parents the option of making deposits to their students' accounts online.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
23. Establish a procedure encouraging vendors to send invoices electronically rather than through the postal mail services.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
24. Comply with the prompt payment law pursuant to the Texas Government Code, Chapter 2251, and pay sports officials promptly.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
25. Assign some of the revenue and travel accountant's travel advance duties to another position in the Business Services Division.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
26. Accelerate and focus cross-training efforts for the human resources administrative coordinator/payroll assistant position.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
27. Streamline the check processing and deposits process by adopting the remote check capture practice.	(\$480)	(\$480)	(\$480)	(\$480)	(\$480)	(\$2,400)	\$0
28. Review and update the student activity fund procedures and provide training to all relevant staff.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
29. Adopt a board policy that requires the procurement of an external firm to conduct internal audit services at least every five years, and to implement procedures to ensure that TSD timely requests delegation of authority from the State Auditor's Office to continue to contract for internal audit services.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
30. Require alternative staff instead of the property manager to inventory assets and enter information into the Statewide Property Accounting system.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	(\$480)	(\$480)	(\$480)	(\$480)	(\$480)	(\$2,400)	\$0

CHAPTER 7. PURCHASING AND WAREHOUSING

Purchasing includes those activities involved in the identification and purchase of supplies, equipment, and services needed by schools, and the storage and distribution of goods. Goods and services must be obtained according to the specifications of the users and at the lowest possible cost. Contract management includes the school contracting engagements with other entities to provide services or programs. As a state agency, the Texas School for the Deaf (TSD) coordinates with the Texas Education Agency (TEA) and the Comptroller of Public Accounts (CPA). The Purchasing Department's main focus and responsibility is to facilitate the most cost-effective acquisition of goods and services to support TSD's educational mission and goals.

TSD's Purchasing Department is within the Business Services Division, and the purchasing manager reports to the chief financial officer (CFO). **Figure 7-1** shows the organization of the Purchasing Department.

FIGURE 7-1
TEXAS SCHOOL FOR THE DEAF PURCHASING
DEPARTMENT ORGANIZATION
SCHOOL YEAR 2015-16



SOURCE: Texas School for the Deaf, March 2016.

Figure 7-2 shows a summary of the Purchasing Department's operational budget. The majority of the budget is allocated to salaries and benefits.

FIGURE 7-2
TEXAS SCHOOL FOR THE DEAF PURCHASING
DEPARTMENT OPERATIONAL BUDGET
FISCAL YEARS 2015 TO 2016

CATEGORY	2015	2016
Salaries and Benefits	\$142,587	\$147,932
Other Consumable Supplies	\$800	\$800
Telecommunications	\$2,900	\$2,400
Travel	\$200	\$200
Other Operating Expenses	\$1,300	\$1,300
Maintenance and Repair	\$3,000	\$1,000
Computer Software	\$0	\$2,500
Furniture and Equipment	\$500	\$500
Total Budget	\$151,287	\$156,632

SOURCE: Texas School for the Deaf, March 2016.

The Purchasing Department uses commercial procurement software published by Array Computer Solutions called Advanced Procurement Systems for Windows. TSD uses this procurement software to generate purchase order forms, develop invitation for bid templates, and conduct other purchasing-related functions. The procurement software is for internal use only and does not integrate with the Uniform Statewide Accounting System (USAS) for Texas state agencies. This procurement software does not have a specific field to electronically capture the National Institute of Governmental Purchasing (NIGP) Commodity and Service Codes and USAS Purchase Category Codes (PCC). Therefore, TSD enters the data into the body of each purchase order. The NIGP codes enable the state to classify the dollar amount of purchases of goods and services. Staff use PCCs to document the purchase method, commodity type, and dollar category of purchases. TSD Purchasing Department staff enter the codes into USAS.

Consistent with state law, goods and services valued at or less than \$5,000 do not require bids for purchasing. However, goods and services valued from \$5,000 to \$25,000 require at least three bids, with two of those bids coming from historically underutilized businesses. TSD must acquire goods valued at more than \$25,000 and services valued at more than \$100,000 through CPA's Statewide Procurement Division.

FINDINGS

- ◆ TSD lacks an efficient process to manage the purchase of small-dollar requisitions.
- ◆ TSD lacks an efficient process to manage the use of inventory stored in the warehouse.
- ◆ TSD's management of instructional materials and textbooks is not completely documented to ensure consistency in the process.

RECOMMENDATIONS

- ◆ **Recommendation 31:** Reevaluate the recommended dollar-amount thresholds for purchase requisitions and procurement cards and the process used to assign procurement cards to the agency's departments.
- ◆ **Recommendation 32:** Review warehouse operations and implement a just-in-time (JIT) inventory strategy.
- ◆ **Recommendation 33:** Strengthen TSD's instructional materials and textbooks process by developing a local board policy and documenting each step of the process to efficiently track and account for these educational resources.

DETAILED FINDINGS

PURCHASING REQUISITIONS AND CARDS (REC. 31)

TSD lacks an efficient process to manage the purchase of small-dollar requisitions.

According to TSD staff, the previous CFO instructed staff to use procurement cards only for emergency purchases. As a result, most of TSD's purchases in recent years were procured through the purchase requisition process. **Figure 7-3** shows purchase order amounts less than \$250. For fiscal years 2014 and 2015, the percentages of the number of purchase orders less than \$250 was 46.9 percent and 49.2 percent, respectively. However, those amounts represented 2.5 percent and 3.7 percent, respectively, of the dollar value of purchases that TSD made during fiscal years 2014 and 2015. TSD staff stated that the large number of purchase requisitions causes the Purchasing Department an undue burden to manage, track, and process these requisitions.

Figure 7-4 shows the procurement card authorization limits by division or department. The Purchasing Department has not assigned procurement cards to some departments, such

FIGURE 7-3
TEXAS SCHOOL FOR THE DEAF PURCHASE ORDERS
FISCAL YEARS 2014 TO 2015

CATEGORY	2014	2015
Purchase Orders	2,335	2,155
Value of Purchase Orders	\$4.6 million	\$3.0 million
Purchase Orders Less than \$250	1,095	1,061
Value of Purchase Orders Less than \$250	\$118,135	\$109,586
Percentage of Number of Purchase Orders Less than \$250	46.9%	49.2%
Percentage of Dollar Value of Purchase Orders Less than \$250	2.5%	3.7%

SOURCE: Texas School for the Deaf, March 2016.

as the Human Resources Department. Transaction and monthly limits range from \$100 to \$5,000.

In September 2014, TSD revised its Procurement Card Program Administrative Procedures. Areas addressed in the procedures include:

- how to obtain a procurement card;
- responsibilities and liabilities;
- how to use a procurement card;
- prohibited purchases; and
- limits.

In addition to the assigned procurement cards, the purchasing clerk maintains a manual log and checks out procurement cards to staff upon request if the requisition meets the criteria. The purchasing clerk records in the manual log the requesters' name, date that the card was issued, and requisition amount, but not the date that staff submitted the card and receipts. The clerk updates the manual log when cards are checked out and in and follows up with staff who do not promptly return the cards. These additional steps increase inefficiency in the purchasing process. The department maintains vendor-specific credit cards for several chains. These stores include: HEB with a maximum limit of \$7,500, Office Depot with a \$2,000 maximum limit, Home Depot with a \$500 maximum limit per day, and Hobby Lobby with a maximum limit of \$750 per month. The previous CFO determined these card limits. At the time of the onsite review, TSD did not have documentation available to indicate the rationale for the limits and use of the cards or the last time the limits were

FIGURE 7-4
TEXAS SCHOOL FOR THE DEAF PROCUREMENT CARD AUTHORIZATION LIMITS
FISCAL YEAR 2016

DIVISION OR DEPARTMENT	CARDHOLDERS	TRANSACTION LIMIT (1)	MONTHLY LIMIT
Academic Affairs	0	N/A	N/A
ACCESS (2)	1	\$250	\$250
Accounting	0	N/A	N/A
Admissions	2	\$500	\$500
Athletics	5	\$150 to \$1,000	\$150 to \$1,000
Audiology	2	N/A	N/A
Chief Financial Officer	1	N/A	N/A
CTE (2)	2	\$250 to \$400	\$250 to \$400
Curriculum	0	N/A	N/A
ECE/Elementary (2)	1	\$250	\$250
ERCOD (2)	3	\$1,000 to \$5,000	\$1,000 to \$5,000
Food Services	1	\$1,000	\$1,000
Health Center	1	\$265	\$265
High School	1	\$250	\$250
Human Resources	1	N/A	N/A
Interpreting Services	0	N/A	N/A
Middle School	1	\$250	\$250
Physical Education Aquatics	1	\$1,000	\$1,000
Parent Infant Program	1	\$250	\$250
Purchasing	2	\$1,000	\$1,000
Residential/Student Life	2	\$250 to \$500	\$250 to \$500
Risk	1	\$100	\$100
Sign Language	0	N/A	N/A
Special Needs	0	N/A	N/A
Support Operations	0	N/A	N/A
Superintendent	0	N/A	N/A
Technology	1	\$1,000	\$1,000
Transportation	1	\$500	\$500

NOTES:

(1) The ranges within a division or department are due to the fact that multiple staff within that area have procurement cards with different limits.

(2) ACCESS=Adult Curriculum for Community, Employment, and Social Skills; CTE=Career and Technical Education; ECE=Early Childhood Education; ERCOD=Educational Resource Center on Deafness.

SOURCE: Texas School for the Deaf, March 2016.

reviewed. The HEB card is used for culinary and cafeteria services. The other merchant cards are designated for student activity accounts.

Best practice suggests that state agencies or school districts authorize staff to make small-dollar purchases using procurement cards. This practice eliminates a large portion

of the documentation and labor required by a purchasing department to process purchase requisitions and purchase orders. CFOs typically set dollar-amount thresholds that are feasible for the organization and require purchases of more than the threshold to use the requisition process and receive approval before purchases.

TSD should reevaluate the recommended dollar-amount thresholds for purchase requisitions and procurement cards and the process used to assign procurement cards to the agency's departments. The purchasing manager should prepare an analysis of the amount of each department's usage of the local store procurement cards. If a department does not have a procurement card, then it should be assigned a procurement card to meet its average spending limit.

The purchasing manager should recommend setting a minimum threshold of \$250 for purchase requisitions. Based on the spending analysis, the purchasing manager should present the results and recommendations to the CFO and the superintendent. When the recommendations are approved by the CFO and the superintendent, the purchasing manager should update the purchasing procedures and distribute them to all department heads and procurement cardholders.

Since the time of the onsite review, the CFO has issued procurement cards to more TSD staff and has increased the usage of procurement cards as opposed to purchase orders.

This recommendation could be implemented with existing resources.

WAREHOUSE (REC. 32)

TSD lacks an efficient process to manage the use of inventory stored in the warehouse.

TSD's 14,500 square foot warehouse is on the ground floor of the Pease Building on the school's campus. The primary use of the warehouse is to house consumables and maintenance, repair, and operations goods. TSD's warehouse staff also receives and stores fuel and dispenses it daily to buses, cars, trucks, carts, and lawnmowers. Fuel is stored in two underground 1,000-gallon tanks, including one each for diesel fuel and unleaded fuel. Although both tanks hold 1,000 gallons, federal regulations require that they are not filled to full capacity. The warehouse staff must closely monitor the ordering process so that the gallons ordered and delivered do not increase the fuel level at greater than capacity.

To determine which items to order and the applicable quantities, the warehouse manager runs the procurement software's reorder report, which shows the minimum and maximum balance and quantity in stock. When the minimum volume is reached, the warehouse manager

completes a purchase requisition and submits it to the CFO. The CFO reviews and confirms the need and order quantity based on the historical usage of the items. The procurement software's inventory item list report shows the stock number, location number, description, quantity, price, and value of each item in the warehouse. Warehouse staff use the procurement software for the following activities:

- issue stock;
- correct issues from stock (returns);
- receive stock;
- print a manual reorder list;
- issue fuel;
- receive fuel; and
- run reports for monthly inventory close.

TSD staff review the inventory list to determine the available warehouse inventory. Staff that require an item from the warehouse submit an Issues from Stock form to their department's head for approval. When the warehouse staff receive the form approving the order, the warehouse clerk completes the order and delivers the requested items. The requestor signs and dates the form. The warehouse clerk stamps the order form as complete, electronically scans the form, and uploads the scan to the procurement software. The warehouse clerk also enters the inventory issuance into the procurement software. TSD does not have a procedure that requires staff to check the inventory list before purchasing items from vendors.

The warehouse contains inventory valued at \$45,000, as of March 2016. TSD staff does not use some of this inventory, such as paper and cleaning supplies. TSD has phased out some of this inventory but continues to maintain it in the warehouse. TSD does not have a plan to dispose of surplus or obsolete property properly and remove the inventory from school records. The maintenance function transferred to the Texas Facilities Commission (TFC) in September 2013, and the custodial and grounds function transferred to TFC in September 2015. Since those transfers were made, fewer bulk products require maintenance in TSD's warehouse inventory. TFC houses some of its maintenance items in a designated section of TSD's warehouse.

Many organizations use a just-in-time (JIT) system, which refers to an inventory management system with objectives of having inventory readily available to meet demand, but not to

a point of excess in which the organization must stockpile extra products. Using a JIT system helps organizations decrease or eliminate inventory stock to the central warehouse.

TSD should review warehouse operations and implement a JIT inventory strategy. The purchasing manager should develop and implement a plan to eliminate all unnecessary inventory from the warehouse, including proper disposal of obsolete items. The warehouse manager should generate a report from the procurement software showing the last date that each inventory item was ordered and issued to assist with quickly identifying the obsolete and slow-moving items. The purchasing manager should also review and reduce the amount of inventory that TSD keeps in the warehouse and shift most orders to a JIT model. The CFO should also evaluate all warehouse operations and review staffing based on the shift to a JIT model.

This recommendation could be implemented with existing resources.

INSTRUCTIONAL MATERIALS AND TEXTBOOKS (REC. 33)

TSD's management of instructional materials and textbooks is not completely documented to ensure consistency in the process.

TSD is entitled to an Instructional Materials Allotment (IMA) each biennium from the State Instructional Materials Fund for each student enrolled in accordance with the Texas Education Code, Section 31. TSD may use the funds to acquire instructional materials, software, technological equipment, and for training in the use of instructional materials and other resources. The IMA balance does not expire, so TSD can carry a balance. TSD may submit requisitions for state-adopted materials through the state's online system operated by TEA, the Educational Materials System (EMAT). The EMAT system places the orders with the publishers, and the publishers deliver the materials to TSD. Another option authorizes TSD to use the allotment to purchase nonadopted instructional materials with the agency's funds and request reimbursement through EMAT.

TSD has an established process related to its instructional materials allotment, but the school does not maintain documentation to fully account for textbooks from the selection to the ordering process. TSD does not document related procedures, including the publisher and textbook selection process, issuing of textbooks, issuing of instructor's manuals, maintaining a comprehensive textbook inventory, use of IMA funding, and ordering replacements for lost textbooks.

The curriculum supervisor and one of the librarians, who is also the school instructional materials (IM) coordinator, are the primary staff who manage the instructional materials process. The five curriculum specialists in the Curriculum, Instructional Support, and Assessment Department are each assigned to a content area and to specific grade levels. Teachers receive instructional coaching and support from curriculum specialists in three areas, including the general curriculum, the modified curriculum, and the needs identified in the students' individualized education programs.

TSD's Board Policy EFAA, Instructional Materials Selection and Adoption (LEGAL), states that the board must adopt a local policy for selecting instructional materials and that final selections must be recorded in board minutes. Board policies are based on the Texas Association of School Boards' reference policies. TSD lacks a local board policy regarding the selection, ordering, tracking, and distribution of instructional materials. In October 2014, TSD's board approved the Textbook/Instructional Materials Committee to review the adoptions and make selection for TEA's Proclamation 2015, which regards a list of instructional materials adopted by the State Board of Education. The committee includes the curriculum supervisor, the district IM coordinator, curriculum specialists, middle school and high school principals, elementary school assistant principal, and several teachers, parent representatives, and community representatives.

According to staff interviews, when TEA issues a proclamation, or a need for instructional materials arises, the curriculum specialists research the available instructional materials. The curriculum supervisor schedules and conducts meetings with the Textbook/Instructional Materials subcommittees. Curriculum specialists and other subcommittee members vary depending on the subject areas, such as social studies, mathematics, or fine arts. The curriculum supervisor and IM coordinator participate in all subcommittees to provide general guidance. The applicable curriculum specialist leads the selection process at an in-depth level.

The committee attends fairs held at Regional Education Service Center XIII (Region 13) to review the instructional materials or review them online. The committee analyzes the strengths and weaknesses of the materials and confirms alignment with the Texas Essential Knowledge and Skills (TEKS). TEKS are the state standards for what students should know and be able to do through public education.

The committee then reaches a consensus on the selection of instructional materials.

After the committee makes its decisions, the curriculum supervisor presents the consensus to the board. If the board consents, then the board moves to approve the recommended adoptions. In most cases, the materials are acquired through the EMAT disbursement process. Upon board approval, the IM coordinator either places the order through EMAT or submits a disbursement request for nonadopted instructional materials that the school orders.

The curriculum supervisor initiates the purchase requisition form and submits the requisition to the director of academic affairs for the next level of approval. The director of academic affairs approves and forwards the purchase requisition to the purchasing manager. The purchasing manager generates the purchase order and orders the materials.

The warehouse staff notifies the curriculum supervisor when the instructional materials are delivered to the warehouse. The warehouse staff delivers the materials to the library. The curriculum supervisor informs the curriculum specialists when the materials are delivered. The curriculum specialists assist with cataloging materials and attaching barcoded labels and protective book covers. The two librarians enter the materials into the online instructional materials system inventory. The curriculum specialists may also assist with delivery of the instructional materials to the elementary school or high school. The librarians check out the materials to the applicable teacher in the online system and print an inventory report from the system. The teacher signs the inventory report to confirm receipt of the materials. The librarians file the inventory receipt. If the teachers pick up the materials from the library, then the librarians enter the teacher's name in the system to identify who receives the inventory.

During the school year, the IM coordinator periodically conducts instructional materials inventories to confirm whether teachers possess the assigned instructional material or for any unaccounted materials. This process is informally performed via email. Teachers are not required to complete a verification form to certify the inventory count. The IM coordinator also conducts an annual inventory at the end of the school year. If a student loses or damages the instructional materials, a form is used to charge the student a fine. If the teacher cannot account for all instructional materials, the teacher emails the principal, who notifies the IM coordinator. During onsite interviews, the curriculum supervisor said that

shortages rarely occur, so the school has not developed a form that would be used to report unaccounted textbooks.

Figure 7-5 shows TSD's IMA activity. The district carried a balance of \$9,812 from school year 2014-15 and had a remaining allotment of \$41,505 as of March 25, 2016.

FIGURE 7-5
TEXAS SCHOOL FOR THE DEAF INSTRUCTIONAL
MATERIALS ALLOTMENT
SCHOOL YEAR 2014-15 TO MARCH 25, 2016

CATEGORY	AMOUNT
School Year 2014-15 Remaining Balance	\$9,812
School Year 2015-16 Allotment	\$104,405
Total Allotment	\$114,217
School Year 2015-16 Disbursements	(\$72,712)
Remaining Allotment as of March 25, 2016	\$41,505

SOURCE: Texas Education Agency, Instructional Materials Allotment Report, March 2016.

A lack of written procedures increases the risk of required processes not being completed and noncompliance with the Texas Education Code or related TSD purchasing requirements. For example, TSD does not maintain an inventory throughout the school year, and teachers are not required to use a checkout system for removing materials. Inventory is stored in various rooms, and teachers may access and take the materials. A real-time inventory process is not maintained to ensure that books and instructional materials are properly accounted for, lost textbooks are minimized, TSD is reimbursed for lost textbooks, and surplus books are maintained and disposed of appropriately. In addition, instructional materials and textbooks are sometimes ordered before EMAT system approval.

TSD should strengthen its instructional materials and textbooks process by developing a local board policy and documenting each step of the process to efficiently track and account for these educational resources. The curriculum supervisor should meet with the Textbook/Instructional Materials Committee to discuss and draft the local board policy and procedures for all steps in the process. The curriculum supervisor should review the EMAT requirements and include the requirements in the local board policy and IMA procedures. The curriculum supervisor should submit the draft procedures to the director of academic affairs and CFO for review and approval. The director of academic affairs should then submit the draft procedures to the superintendent for review and approval. The superintendent

should then present the local board policy draft to the board for review and approval. After the local board policy and the instructional materials procedures are approved, the director of academic affairs should inform the curriculum supervisor to distribute and implement the procedures.

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 7. PURCHASING AND WAREHOUSING							
31. Reevaluate the recommended dollar-amount thresholds for purchase requisitions and procurement cards and the process used to assign procurement cards to the agency's departments.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
32. Review warehouse operations and implement a just-in-time (JIT) inventory strategy.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
33. Strengthen TSD's instructional materials and textbooks process by developing a local board policy and documenting each step of the process to efficiently track and account for these educational resources.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 8. CHILD NUTRITION SERVICES

The Texas School for the Deaf (TSD) Food Services Department provides meals to day and residential students each weekday during the school year and the summer. The Food Services Department also provides snacks served to residential students in the dorms and cottages, and boxed meals to students that stay on campus during the weekend for special events.

TSD participates in the federally funded School Breakfast Program (SBP), National School Lunch Program (NSLP), and the Afterschool Snack Program (ASP). The SBP, NSLP, and ASP are federal entitlement programs administered at the state level by the Texas Department of Agriculture. In accordance with SBP and NSLP, TSD receives cash assistance for breakfasts and lunches served that comply with program requirements. Meals must comply with federal nutrition guidelines and TSD receives different amounts of reimbursement based on the number of meals served in each of the benefit categories: free, reduced-price, and paid. The ASP provides reimbursement to TSD for serving nutritious snacks to students after the school day ends. The school also receives U.S. Department of Agriculture (USDA) commodities through the Schools/Child Nutrition USDA Foods Program based on the number of lunches served to eligible students each year. Through this program, USDA purchases products to help support agricultural markets and maintain a balanced supply of agricultural commodities. USDA provides these products to schools free of charge. During school year 2014–15, TSD received \$246,066 in federal reimbursements and \$14,527 in USDA commodities.

TSD meets the USDA's requirements to be designated as a Residential Child Care Institution (RCCI). As an RCCI, TSD's residential student population is considered institutionalized for income determination of eligibility for free meals. An institutionalized student is considered a one-person household because the student is not living with her or his natural family as an economic unit. Therefore, TSD is not required to obtain a meal application or signature from an adult living in the student's household. Program eligibility is based on income received by the institutionalized student who is defined as a family of one; the family's income is not included. As a result, all of TSD's residential students younger than age 21 are eligible for free breakfast and lunch. Approximately 50.0 percent of TSD's students are residential

and, therefore, qualify for free meals; the remaining 50.0 percent of TSD's population are day students and do not automatically qualify for free meals. TSD is required to obtain completed meal applications for day students to determine meal eligibility based on the student's family size and household income. TSD's school year 2015–16 student meal eligibility rates that include residential and day students are 56.0 percent eligible for free meals, 9.0 percent eligible for reduced-price meals, and 26.0 percent qualify to pay the full price. Although day students do not automatically qualify for free or reduced-price meals, the school does not require payment for meals served to students who are not eligible for free meals.

TSD uses a nationally recognized point-of-sale (POS) system to track meals served by eligibility category. The POS is also used to generate participation reports for meal reimbursement claims.

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). In this arrangement, school staff operate the food service department.

TSD employs the self-management model and manages all aspects of its food services programs without assistance from an outside entity. The Food Services Department is responsible for all operational aspects of the food services program, including preparing and serving meals, maintaining inventory, and preparing menus. The Business Services Division performs financial tasks for the food services program, including budgeting, accounting, qualifying students for free or reduced-price meals, and submission of meal reimbursement claims.

TSD’s purchasing agent prepares annual bids for the procurement of food and supplies for the Food Services Department. An annual purchase order, with which the school can purchase up to a specified dollar amount, is issued to the approved vendors. The Food Services Department then places weekly orders through the respective vendor’s website. All food shipments are delivered directly to TSD and stored onsite in the freezer, coolers, and dry goods storeroom. Food services staff verify deliveries, and the Food Services Department provides a delivery receipt to the Business Services Division to support the payment. TSD does not have any contracts for food service goods, services, or equipment maintenance.

The Food Services Department is a part of TSD’s Support Operations Division. The food services supervisor manages the department and reports directly to the director of support operations. The Food Services Department has 20 full-time staff, including the supervisor. Food Services Department staff work one of two shifts: 5:30 am to 2:00 pm or 11:00 am to 7:30 pm. **Figure 8–1** shows TSD’s Food Services Department organization.

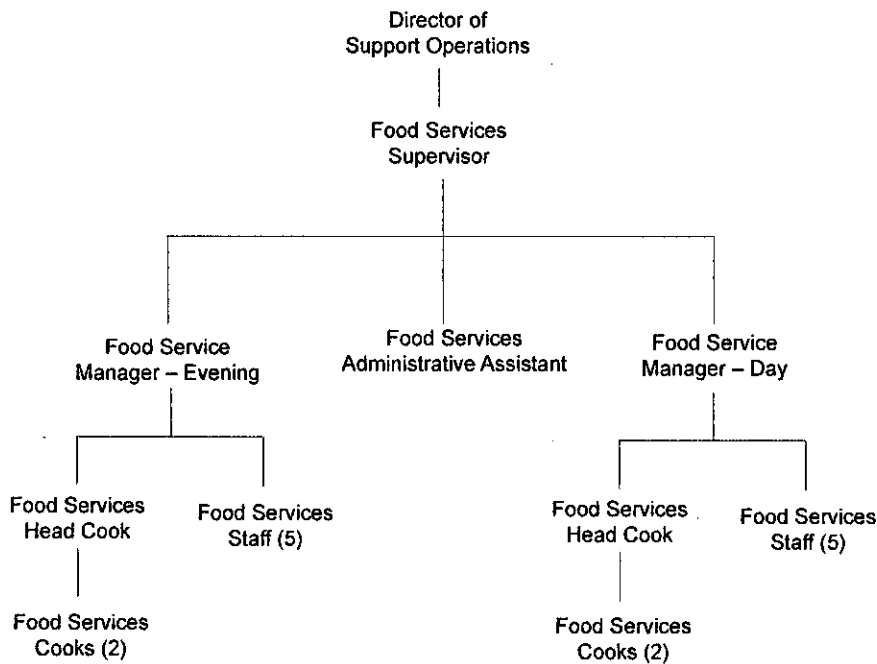
TSD has one cafeteria, and all meals are prepared and served onsite. Food services staff prepare and serve breakfast, lunch, and dinner Monday through Thursday. TSD serves breakfast

and lunch on Friday, and provides snacks to homegoing students Friday afternoon. TSD does not serve dinner on Friday because most of the students travel home that day. Occasionally, TSD serves meals on weekends due to major events.

Meals are served to students in the cafeteria’s two serving lines. Students come to the cafeteria at designated times, select their meals, and the cashier enters their names into the POS. Food services staff also prepare and package snacks that are served in the dormitories. Dormitory staff collect the snacks from the cafeteria each Monday and store the snacks in each dormitory’s refrigerator. Dormitory staff serve the snacks to students at designated times each day and indicate the snacks served on the rosters provided. Completed rosters are submitted to the food services supervisor each week to enter the snacks served in the POS system. Although most students travel home on the weekends, some students stay at TSD to attend special events. Food services staff prepare boxed meals for these students. Dormitory staff pick up and store weekend boxed meals in the dormitories and cottages.

The Food Services Department operating budget for school year 2014–15 was \$995,287, and actual costs for school year 2014–15 were \$1,274,668.

FIGURE 8–1
TEXAS SCHOOL FOR THE DEAF FOOD SERVICES DEPARTMENT ORGANIZATION, SCHOOL YEAR 2015–16



SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

Figure 8–2 shows TSD’s Food Services Department revenues by category for school years 2012–13 to 2014–15.

Figure 8–3 shows TSD’s Food Services Department expenditures by category for school years 2012–13 to 2014–15.

During school years 2014–15 and 2015–16, TSD’s breakfast and lunch participation rates remained the same. Among TSD students, including all residential and day students, 38.0 percent participated in the school breakfast program, and 89.0 percent participated in the lunch program.

ACCOMPLISHMENT

- ◆ TSD has established an effective process to ensure food services staff meet students’ special dietary needs.

FINDINGS

- ◆ TSD lacks a process to monitor and analyze Food Services Department financial data to make efficient management and operations decisions.
- ◆ TSD’s practice to provide free meals to all students, regardless of their eligibility classifications, results in a missed opportunity for additional revenue.
- ◆ TSD’s food service operation lacks sufficient oversight and written procedures to ensure proper food safety and handling operations.
- ◆ TSD lacks a process to monitor and promote participation in its school nutrition programs.
- ◆ TSD’s Food Services Department lacks a formal training plan or requirements for staff development, and the internal training provided is not documented.

**FIGURE 8–3
TEXAS SCHOOL FOR THE DEAF FOOD SERVICES
DEPARTMENT EXPENDITURES
SCHOOL YEARS 2012–13 TO 2014–15**

CATEGORY	2012–13 ACTUAL	2013–14 ACTUAL	2014–15 ACTUAL
Salaries and Benefits	\$402,214	\$450,593	\$509,237
Food	\$492,722	\$505,910	\$624,526
Contracted Services	\$2,564	\$14,041	\$4,571
Supplies	\$32,175	\$79,546	\$62,180
Other Expenditures	\$34,943	\$10,850	\$29,433
Furniture and Equipment	\$20,721	\$10,768	\$44,721
Total	\$985,339	\$1,071,708	\$1,274,668

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

RECOMMENDATIONS

- ◆ **Recommendation 34:** Evaluate financial information to improve the efficiency of food service operations.
- ◆ **Recommendation 35:** Develop and implement a process to charge day students for meals according to their eligibility classifications.
- ◆ **Recommendation 36:** Develop written food services operational procedures and enhance food handling.
- ◆ **Recommendation 37:** Implement programs and student food committees to increase meal participation.

**FIGURE 8–2
TEXAS SCHOOL FOR THE DEAF FOOD SERVICES DEPARTMENT REVENUES FOR SCHOOL YEARS 2012–13 TO 2014–15**

REVENUES FOR FOOD COSTS	2012–13 (ACTUAL)	2013–14 (ACTUAL)	2014–15 (ACTUAL)
Local (1)	\$22,220	\$29,574	\$23,512
Federal	\$199,394	\$288,707	\$246,066
Commodities (2)	\$13,909	\$19,620	\$14,527
General Revenue and other appropriations (estimated)	\$309,026	\$306,195	\$410,084
Total	\$544,549	\$644,096	\$694,189

NOTES:

- (1) Totals may not sum due to rounding.
- (2) Local revenues are the funds collected from teachers and adult guests for meals served at \$3.00 each.
- (3) Commodities are the value of the food products received through the Schools/Child Nutrition U.S. Department of Agriculture Foods Program.

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

- ◆ **Recommendation 38: Develop and implement a Food Services Department staff training plan that identifies required training hours and topics for each staff position.**

DETAILED ACCOMPLISHMENT

SPECIAL DIETARY NEEDS

TSD has established an effective process to ensure food services staff meet students' special dietary needs. TSD's Student Health Center staff notify the Food Services Department of a student's dietary restrictions or needs. The food services supervisor then works with the Student Health Center and a nutritionist from Regional Education Service Center XIII (Region 13) to develop special menus to meet the student's specific needs. Food services staff maintain an organized list of students' special dietary needs. The list is on the serving line facing the food services staff. When a student with special dietary needs passes through the serving line, the food services staff check the list to ensure that the student receives only food items that are listed. The placement of the special dietary needs list on the serving line provides for quick service and helps to ensure students' health and safety.

DETAILED FINDINGS

MANAGEMENT AND OPERATIONS (REC. 34)

TSD lacks a process to monitor and analyze Food Services Department financial data to make efficient management and operations decisions.

TSD operates food services as a nonprofit cost center rather than a self-sustaining activity, whereby all the costs of breakfast, lunch, and snacks are fully covered through federal and state reimbursements. Revenues received for meal reimbursements are deposited into the school's General Revenue Fund, and are accounted for in the designated food service account. The General Revenue Fund supplements operational costs not covered by federal and state reimbursements. TSD staff pay for their meals, and the revenue is credited to the General Revenue Fund.

The Food Services Department shares responsibilities for the operational and financial activities of the food services program with the Business Services Division. The Food Services Department manages food services staff and food preparation activities. The Business Services Division performs financial activities for the food services program. These activities include budgeting, consolidating food services financial reporting into the school's Legislative Appropriations Request and Annual

Financial Report, submitting meal reimbursement claims, depositing funds received for meal sales, and recording revenue.

However, the Business Services Division does not provide the Food Services Department with traditional management-level financial reports such as budget-to-actual comparisons, profit and loss statements, and cash flow statements. As a result, the Food Services Department lacks data to produce operating comparison reports such as labor and food costs, or meals per labor hour (MPLH). Neither the Business Services Division nor the Food Services Department generate meal participation reports to use as a management tool to improve student meal participation rates.

The Food Services Department also does not maintain a formal inventory system and does not regularly conduct physical inventories. The food services supervisor places weekly food orders based on the following week's menu and food inventory in stock at the time. The Food Services Department does not use a product pull system to maintain a running record of food products used, identify food left over for future use, or assist in inventory management. A pull system requires replacement of products only after they have been consumed. The inefficiencies caused by the lack of management controls of food services operations have resulted in high operational costs.

Efficiency in a food services department is typically measured by a school's cost per meal and staff productivity performance measures. However, TSD does not measure the efficiency of the Food Services Department and, as a result, the department does not have the information necessary to control food and labor costs. TSD does not calculate MPLH to determine staffing patterns. The Food Services Department also does not prepare food cost budgets to allocate food costs per meal served, nor does it control meal costs by precosting or postcosting the components of each meal served. This technique involves planning menus to ensure that each meal served does not cost more than budgeted. Precosting menus is a financial tool used to determine available revenue and budget food costs. Precosting menus involves estimating the cost per serving of each item on the menu. Menu costs include purchased food, commodities, labor, and overhead. Postcosting menus is a tool used to monitor efficient food usage and minimize food waste. This process includes determining the actual costs to produce the meal based on production and labor records and the number of meals served. Postcosting is conducted to ensure that actual meal costs match the estimated costs anticipated in the menu planning phase. Failure to precost and postcost meals could raise food supply costs and lower revenue.

In school year 2015–16, TSD’s chief financial officer (CFO) calculated the cost per meals served during school year 2014–15 and determined that each meal prepared costs an average of \$2.94. However, this calculation subtracted the NSLP reimbursement from the food costs and did not include snacks served or labor costs. Industry best practices for calculating cost per meal require identifying and including all costs associated with preparing meals such as food, labor, and overhead. These calculations are performed by meal period and do not deduct revenues received. When all costs are not identified and included, the menu cost is not accurate and can lead to overspending.

The School Nutrition Association’s April 2008 School Lunch and Breakfast Cost Study II found that the average cost incurred by schools to produce a lunch was \$2.91. **Figure 8–4** shows TSD’s average cost per meal served by cost category for school years 2013–14 and 2014–15. The total cost

per meal served was \$5.82 in school year 2013–14 and \$7.17 in school year 2014–15. These amounts are more than double the average cost noted in SNA’s 2008 study and the cost per meal calculated by TSD’s CFO.

The Food Services Department has expended more than its budget because of the failure to use reporting tools to guide decisions and operations. **Figure 8–5** shows budgeted costs and actual costs for school years 2013–14 and 2014–15. The Food Services Department actual costs were 20.2 percent more than its budget for school year 2013–14 and 28.1 percent more than budgeted for school year 2014–15.

The lack of adequate budgeting, operational monitoring, and accountability is reflected in the Food Services Department’s budget deficit. Failure to maintain a formal inventory system and take physical inventory at regular intervals places the school at risk of spoilage, misuse, theft, and higher food costs. Without detailed budgets and financial reports, the Food Services Department lacks accountability for financial results. The food services supervisor does not have the information necessary to consider the financial impact of decisions related to planning menus, assigning staff hours, and purchasing food and supplies.

An effective way of ensuring that costs are contained is to prepare budgets and monitor costs based on percentage of revenue. Best practices in the school food service industry recommend that four financial and operating reports be distributed to management and the board so that they can monitor and evaluate cash flow and take corrective action if needed. The reports are: (1) budget, (2) profit and loss statement, (3) balance sheet, and (4) cash flow statement.

FIGURE 8–4
TEXAS SCHOOL FOR THE DEAF AVERAGE FOOD COST PER MEAL SERVED
SCHOOL YEARS 2013–14 TO 2014–15

EXPENDITURE	2013–14 ACTUAL	2014–15 ACTUAL
Food	\$2.77	\$3.64
Labor	\$2.47	\$2.97
Other (Excludes Furniture and Equipment)	\$0.57	\$0.56
Total	\$5.82	\$7.17
Meals Served (Including Dinners and Snacks)	182,353	171,545

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

FIGURE 8–5
TEXAS SCHOOL FOR THE DEAF BUDGET COMPARED TO ACTUAL COSTS, SCHOOL YEARS 2013–14 AND 2014–15

EXPENDITURE	2013–14				2014–15			
	BUDGET	ACTUAL	DIFFERENCE	PERCENTAGE DIFFERENCE	BUDGET	ACTUAL	DIFFERENCE	PERCENTAGE DIFFERENCE
Salaries and Benefits	\$400,937	\$450,593	\$49,656	12.4%	\$466,022	\$509,237	\$43,215	9.3%
Contracted Services	\$8,538	\$14,041	\$5,503	64.5%	\$8,538	\$4,571	(\$3,967)	(46.5%)
Food	\$425,000	\$505,910	\$80,910	19.0%	\$450,000	\$624,526	\$174,526	38.8%
Supplies	\$22,000	\$79,546	\$57,546	261.6%	\$32,000	\$62,180	\$30,180	94.3%
Other Expenditures	\$12,977	\$10,850	(\$2,127)	(16.4%)	\$20,127	\$29,433	\$9,306	46.2%
Furniture and Equipment	\$22,000	\$10,768	(\$11,232)	(51.1%)	\$18,600	\$44,721	\$26,121	140.4%
Total	\$891,452	\$1,071,708	\$180,256	20.2%	\$995,287	\$1,274,668	\$279,381	28.1%

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

According to *Cost Control for School Foodservices* by Dorothy Pannell-Martin, Third Edition, July 2000, the leading requirement for cost control management is an accounting system and procedures that provide accurate and timely financial information and reports. Profit and loss statements should be compared each month, and to the same month of the previous year, to recognize sudden changes or possible errors. Additionally, profit and loss statements should be distributed within 10 days of the end of the month.

Figure 8-6 shows seven financial reporting tools and the optimal frequency that they should be prepared and distributed.

The financial reporting tools shown in Figure 8-6 highlight areas of strength in addition to improvement needs. Effective food service programs use them for comparisons to previous periods to spot trends, improvements, and decreases. These comparisons enable management to take appropriate steps in a timely manner.

TSD should evaluate financial information to improve the efficiency of food service operations. TSD should also take measures to bring operational costs in line with industry standards and hold staff accountable for outcomes.

The CFO should develop detailed budgets and income statements and use these tools to monitor Food Services Department operations monthly. The CFO should provide these reports to the director of support operations and food services supervisor, and the three staff should meet monthly to discuss deviations from the budget to make appropriate adjustments.

The food services supervisor should project the cost of serving dinner and provide the cost projection to the CFO to identify General Revenue Fund appropriations as a food services revenue source on internal financial statements to enhance financial monitoring.

The food services supervisor should develop a cost-per-meal budget and menus based on the budget. The food services supervisor should include cost-per-meal budgets for breakfasts, lunches, dinners, and snacks.

The food services supervisor should precost and postcost menu items. To precost menu items, the food services supervisor should determine the cost of each item required to prepare the meal. The costs are typically based on historical costs or vendor bid costs. To postcost menu items, the food services supervisor should use the invoiced price of the items actually used to prepare the meal.

FIGURE 8-6
TEXAS SCHOOL FOR THE DEAF USE OF FINANCIAL AND MANAGEMENT REPORTING TOOLS, SCHOOL YEAR 2015-16

REPORT	PURPOSES	OPTIMAL FREQUENCY	USED BY TEXAS SCHOOL FOR THE DEAF (TSD)
Budget: shows a plan for financial management according to each account	Enables 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.	Annually with monthly monitoring	Annual budget is prepared, but is not used for monthly monitoring.
Costing food and service	Enables comparisons between actual and forecasted performance. Enables informed decision making about purchases and the continuation of products and services.	Daily	No.
Revenue received from meals served	Enables identification of major sources of revenue such as free, reduced-price, paid, a la carte, or other meals.	Daily	Yes.
Balance sheet: shows the financial position of the account at a specific time	Enables a comparison of current balances with balances at the end of the month of the previous year.	Monthly	No. TSD operates the Food Services Department as a cost center in which all operational costs are included as part of the school's overall costs. Cost centers do not have their own assets; thus, balance sheets are not applicable.

**FIGURE 8–6 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF USE OF FINANCIAL AND MANAGEMENT REPORTING TOOLS, SCHOOL YEAR 2015–16**

REPORT	PURPOSES	OPTIMAL FREQUENCY	USED BY TEXAS SCHOOL FOR THE DEAF (TSD)
Profit and loss statement: shows amounts remaining after all expenditures are paid	Enables identification and analysis of increases or decreases in participation or expenses. Enables administrators to determine where key issues or problems exist.	Weekly or Monthly	No. Although TSD operates the Food Services Department as a cost center, the school has not prepared profit and loss reports to identify the level of General Revenue Funds required to support operations.
Statement of changes: shows changes in working capital from year to year	Enables the monitoring of net increases in working capital requirements.	Annually	No. TSD operates the Food Services Department as a cost center, and, therefore, statements of changes are not applicable.
Key operating percentages: trends, expenditures, and revenues across time	Enables monitoring of expenditures across time including: food cost percentage; labor cost percentage; other costs percentage; break-even point; inventory turnover; participation rates; average daily labor costs; and average hourly labor costs.	Monthly	No.

SOURCES: Texas School for the Deaf, Staff Interviews, March 2016; Cost Control for School Foodservices by Dorothy Pannell-Martin, Third Edition, July 2000.

The director of support operations should work with the CFO to develop operating target metrics, monitor outcomes monthly, and take appropriate action as necessary. The metrics should include:

- food cost percentage;
- labor cost percentage;
- other costs percentage; and
- meal participation rates.

The CFO should develop a detailed budget for the Food Services Department that allocates costs by percentage of revenues, including General Revenue Fund appropriations.

The director of support operations should work with the food services supervisor to develop the cost of each menu item served for each meal (precost) and ensure that these costs are in

agreement with the budget. The food services supervisor should prepare a postcost analysis of menu items served when invoices are received and provide this analysis to the director of support operations for review and appropriate action.

The Business Services Division should prepare monthly budget-to-actual reports and income statements and provide them to the director of support operations and food services supervisor for review and appropriate action. Justification and corrective action strategies should be provided for each category that is greater than the budgeted amount. TSD finance, operations, and food services staff should use these reports to monitor and track key operating and financial measures. Examples of key operation and financial measures include net profit or loss, student participation, MPLH, food costs, and wages. The director of support operations and the food services supervisor can also use the reports to identify and discuss favorable and unfavorable trends or variances

each month and adjust operations as appropriate. TSD has indicated that since the time of the onsite review, the food services department has begun maintaining a formal inventory system and regularly conducts physical inventories on a monthly basis.

This recommendation could be implemented with existing resources. Implementation of these recommendations could result in costs savings for the Food Services Department; however, cost savings cannot be accurately estimated due to lack of data.

STUDENT MEAL REVENUES (REC. 35)

TSD's practice to provide free meals to all students, regardless of their eligibility classifications, results in a missed opportunity for additional revenue.

As a result of being an RCCI, all of TSD's residential students are eligible for free breakfasts and lunches. Based on family size and household income, day students are eligible for either free, reduced-price, or full priced meals. TSD receives federal reimbursements and USDA commodities based on the number of lunches served to students. TSD uses a POS system to track meals served by eligibility category. The POS is also used to generate participation reports for meal reimbursement claims. Each student's meal eligibility classification is provided to the Food Services Department for entry into the POS system. As residential students and day students progress through the meal serving line, their meals are recorded into the POS system. Reports are generated from the POS system that summarize meals served by meal period and student classification. TSD submits these reports to the Texas Department of Agriculture for reimbursement. All residential students qualify for the free eligibility classification; therefore, TSD submits the free reimbursement rate for all meals for residential students.

Although TSD obtains the meal applications, makes the eligibility determination, and enters the eligibility status in the POS system, the school does not charge any students for meals served. Instead, the school uses General Revenue Fund to cover the costs of meals served to students that are not eligible for free or reduced-price meals. As a result, TSD is losing revenue. **Figure 8-7** shows an estimate of revenue lost based on school year 2014-15 meals served. TSD lost an estimated \$33,201 by providing 31,809 free meals to day students who were not eligible for free-of-charge meals. Estimated meal prices were calculated from the difference of the NSLP school year 2014-15 free reimbursement rate and the reduced-price and paid meal reimbursement rates.

FIGURE 8-7
TEXAS SCHOOL FOR THE DEAF ESTIMATED REVENUE
LOSSES FROM SERVING FREE MEALS TO DAY STUDENTS,
SCHOOL YEAR 2014-15

ELIGIBILITY	MEALS SERVED	ESTIMATED PRICE PER MEAL	REVENUES LOSSES
BREAKFAST			
Reduced-Price	1,316	\$0.30	\$395
Full Price	2,882	\$1.65	\$4,755
Subtotal	4,198		\$5,150
LUNCH			
Reduced-Price	20,217	\$0.40	\$8,087
Full Price	7,394	\$2.70	\$19,964
Subtotal	27,611		\$28,051
Total	31,809		\$33,201

NOTES: Totals may not sum due to rounding.
SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

TSD should develop and implement a process to charge day students for meals according to their eligibility classifications. The CFO should modify the pricing policy to charge day students according to their meal eligibility classifications. The superintendent should present the revised pricing policy to the TSD Governing Board for approval. After the revised pricing policy is approved, the superintendent should notify all day students' parents.

The director of support operations should develop and implement cash collection procedures for day students. These procedures include: (1) setting up online accounts for students so that they can pay through the school's website; and (2) training food services staff about cash-handling procedures for students that pay at the register.

The fiscal impact assumes the same number of day students and the same number of meals served each year as school year 2014-15. The additional revenue is \$33,201 each year, effective in school year 2017-18.

FOOD HANDLING AND SAFETY PROCEDURES (REC. 36)

TSD's food service operation lacks sufficient oversight and written procedures to ensure proper food safety and handling operations.

Although the director of support operations is responsible for food services, most food services operational activities are completed and monitored by the food services supervisor.

These activities include monitoring and training Food Services Department staff; maintaining clean facilities; ensuring that equipment is in good working order; completing daily meal production checklists; and saving food labels of new items prepared. The director of support operations holds informal and periodic meetings with the food services supervisor to discuss operations. Minutes and agendas are not maintained for these meetings. No evidence shows that the director of support operations monitors operations through management reports. TSD did not provide documentation that the director of support operations performs physical observations of food preparation or serving lines.

In addition to a lack of oversight, the Food Services Department does not have written departmental policies and procedures. The department follows the TSD Employee Handbook for staff management and general employee activities; however, the handbook does not contain procedures to guide food services operations. Food services staff perform their daily tasks based on verbal instructions and historic practices and procedures.

Insufficient oversight could cause food service staff to be inconsistent in following appropriate food handling and safety procedures. All schools participating in the NSLP program are required to have a food safety program that must be based on the federally adopted Hazard Analysis and Critical Control Point (HACCP) principles. HACCP is a management system in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement and handling, to manufacturing, distribution and consumption of the finished product.

TSD has a written food safety plan in place that is based on HACCP principles and serves as standard operating procedure for the Food Services Department. Although the school has these written procedures, during the onsite review, the review team observed that some food handling practices may not comply with HACCP principles. For example, food services staff measure temperatures of food when it is placed on the serving line and record refrigerator and freezer temperatures each day. However, staff do not measure and record the temperatures of the salad bar while it is in use. According to TSD's food safety plan, staff should take the internal temperature of food in the salad bar at least every two hours. TSD's lunch service exceeds two hours, therefore salad bar items left unchecked are at risk for higher than recommended temperatures. The Food Services Department

includes fresh, boiled eggs that have been shelled on the salad bar instead of precooked, hard-boiled eggs. Precooked, hard-boiled eggs are pasteurized to eliminate the potential bacteria and foodborne illness. In addition, during the onsite review, the review team observed food services staff removing food from freezers in advance of meal preparation. During this observation, labels were not placed on the food to indicate the intended use. Labels for planned use ensure that staff are aware of when the food began thawing to monitor that food thaws properly and to prevent products from being used for a meal other than as planned.

HACCP requires written procedures for food services operations that cover food handling and safety. Additionally, the HACCP principles require stringent food handling processes to be followed and appropriate equipment to be maintained and used to ensure food safety.

According to the USDA's Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles, published in 2005, schools should ensure:

- all food preparation areas must be clean and sanitary, including workers' hands, utensils, and food contact surfaces; appropriate measures must be taken to avoid cross contamination;
- temperature control practices must be in place, including keeping cold foods cold and hot foods hot; food must be cooked to proper temperatures and held at proper temperatures, and the temperatures must be recorded at regular intervals using a basic, properly calibrated food thermometer; and
- standard operating procedures should be developed and used for sanitation and to verify that proper temperatures are being observed, and for other aspects of a food service operation.

TSD should develop written food services operational procedures and enhance food handling. The director of support operations should ensure that food services staff are following food safety handling processes and verifying that the proper equipment is in place and operational.

The food services supervisor should implement a 48-hour breakout system. In this system, food services staff remove food items from the freezer 48 hours before use to thaw products properly. Staff label the food with the removal date and the planned usage date. This system also enables the manager to ensure that the proper amount of product is

available for the meal being prepared. Additionally, the food services supervisor should review all food items purchased and the intended use to ensure that foodborne illness risks are reduced.

The superintendent should direct the director of support operations to provide more oversight of food services and regular operational updates. The director of support operations should conduct weekly meetings with the food services supervisor. The director of support operations should also conduct regular surprise visits during food preparation and serving periods to ensure that food safety procedures are being followed and that all equipment is properly functioning. Since the time of the onsite review, TSD has indicated that the director of support operations is assigned lunch duties during the weekdays, and visually inspects the dining and kitchen operations during this time. The food services supervisor should provide refresher training to all food services staff about proper food safety and handling processes and monitor to ensure that they are followed.

This recommendation could be implemented with existing resources.

STUDENT MEAL PARTICIPATION (REC. 37)

TSD lacks a process to monitor and promote participation in its school nutrition programs.

The Food Services Department prepares standard menus to comply with the U.S. Healthy, Hunger-Free Kids Act of 2010, nutrition requirements. TSD's food services supervisor prepares annual menus with the assistance of Region 13 to ensure compliance with the USDA's nutrition requirements. TSD uses a five-week cycle menu, meaning that menus are planned for a five-week period and repeated.

Food services staff do not obtain student feedback through formal surveys or student food committees. Additionally, they do not have a nutrition education program. Nutrition education programs help students and families make healthier food choices by providing knowledge of food nutrition, portion sizes, dietary needs, and food label understanding. Schools can implement nutrition education programs through activities such as posters, special promotions, speaking events, and newsletters.

Meal participation rates are an important metric for management because they reflect how well food service operations are attracting students to eat nutritious meals at school. Meal participation rates are derived from comparing

the number of student meals served to the average daily attendance.

Figure 8–8 shows student meal participation rates based on average daily student attendance (ADA) and the average number of students eating meals each day, average daily participation (ADP).

FIGURE 8–8
TEXAS SCHOOL FOR THE DEAF MEALS SERVED BY PERIOD
SCHOOL YEARS 2013–14 TO 2014–15

MEAL (1)	2013–14	2014–15
Breakfast	34.0%	38.0%
Lunch	80.0%	89.0%
Dinner	32.0%	32.0%

NOTE: (1) Breakfast and lunch include day and residential students; dinner includes only residential students.

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

Breakfast participation at TSD for school year 2014–15 was 38.0 percent and lunch participation was 89.0 percent. An analysis of the percentage of students who eat school meals compared to the number that were eligible for free or reduced-price meals shows room to improve participation and increase federal reimbursements for both meal periods. **Figure 8–9** shows the percentage of students who ate school meals compared to the percentage of students who were eligible for each category and meal period. The student eligibility data for the approved reduced-price and full price is for day students only, because all residential students have free eligibility status. The approved free eligibility data includes both day and residential students.

FIGURE 8–9
TEXAS SCHOOL FOR THE DEAF MEAL PARTICIPATION
RATE BY PERCENTAGE OF ELIGIBLE STUDENTS PER
FEDERAL CLASSIFICATION
SCHOOL YEARS 2013–14 TO 2014–15

ELIGIBILITY	2013–14	2014–15
BREAKFAST		
Approved Free	40.0%	45.0%
Approved Reduced-Price	9.1%	12.8%
Full Price	11.3%	12.1%
LUNCH		
Approved Free	70.0%	73.4%
Approved Reduced-Price	72.6%	72.6%
Full Price	67.1%	84.0%

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

For school year 2014–15, 45.0 percent of the students who were classified as eligible for free breakfasts, 12.8 percent who were classified as eligible for reduced-price breakfast, and 12.1 percent who were not classified as eligible for free or reduced-price meals participated in school breakfast. Lunch participation for the year was stronger, but analysis shows an opportunity to increase participation. For school year 2014–15, 73.4 percent of the students who were classified as eligible for free lunch, 72.6 percent who were classified as eligible for reduced-price lunch, and 84.0 percent who were not classified as eligible for free or reduced-price meals participated in school lunch.

Opportunities exist for TSD to expand participation of the SBP and the NSLP. All meals except snacks are served in the school's cafeteria. Although TSD provides boxed breakfast for students who arrive late, TSD does not offer a breakfast-in-the-classroom program.

If TSD does not promote maximum participation in the school nutrition programs, a significant number of students may not receive the nutritional benefits made available through the SBP and the NSLP. Research demonstrates the importance of providing breakfast to children and youth. Children who eat a good breakfast tend to perform better in school, have better attendance, and exhibit fewer behavior problems. In addition, children who eat a good breakfast develop healthy eating habits, visit the school nurse less frequently, and are less likely to be obese. Many Texas school districts and charter schools have implemented breakfast-in-the-classroom programs to increase student participation. Similarly, the NSLP has continued to grow as an integral part of local education programs. According to the USDA Food and Nutrition Service (FNS), educators assert that children who do not eat properly are hard to discipline. Conversely, students who consume a nutritious lunch show a marked improvement in attitude. In addition, by failing to maximize participation in the SBP and the NSLP, TSD forgoes potential revenues from reimbursement claims for eligible students who do not participate.

Best practices suggest that schools remove barriers to student participation in the SBP and the NSLP. To increase meal participation, effective food service departments prepare nutritious food that is appetizing and well-liked by students. Manatee County School District in Bradenton, Florida, provides an example of how changes in menus or offering occasional themed menus can generate interest and increase participation. Manatee County School District received the 2014 USDA Best Practices Award for increasing student

lunch participation by 11.0 percent. The school district designated monthly theme days, including a special menu with a treat. Themed menus were marketed with posters, newsletter articles, morning announcements, and on the district's website. Themed days include a contest in which students could win prizes, such as movie tickets. Elementary schools have a monthly student planned meal. At the secondary level, limited menu items were offered one to two times per week, and choices included food items such as baked chicken wings and Korean-style fried chicken. Bulletin boards are also displayed in the cafeteria to provide menu promotional items and student interactive activities.

Houston Independent School District significantly increased participation in the SBP by implementing a breakfast-in-the-classroom program in approximately 30 schools. The district experienced an increase in student participation to 80.0 percent. As a result, the program was expanded to all schools in 2010.

TSD should implement programs and student food committees to increase meal participation. The Food Services Department should strive to increase breakfast participation to 48.0 percent by implementing a breakfast-in-the-classroom program and increase lunch participation to 94.0 percent. The director of support operations should establish a student food committee and meet monthly to discuss desired menus and how to increase meal participation for all meal periods.

The director of support operations should prepare a breakfast-in-the-classroom board policy and provide it to the superintendent to submit to the Governing Board for approval. The director of support operations should then prepare a procedure that outlines the roles and responsibilities of all staff involved. The procedure should include the following roles and responsibilities:

- food services staff are responsible for preparing breakfasts that can be easily transported and served to students in the classrooms and that provide for minimal cleanup;
- classroom staff are responsible for ensuring that each student in attendance is served a meal and that the respective student roster is accurately completed each day and submitted at the end of each week;
- food services staff are responsible for ensuring that breakfasts are maintained at the appropriate temperatures and delivered to the classrooms at the designated times;

- food services staff are responsible for collecting unused breakfasts and delivery equipment; and
- classroom staff are responsible for assisting students when needed.

The food services supervisor should identify breakfast food items that can be easily prepared and served in the classrooms within the established budget. The food services supervisor should prepare a cost per identified meal and then present the list to the director of support operations for review and approval. The food services supervisor should then revise breakfast menus accordingly.

The food services supervisor should identify any special equipment that may be needed to deliver breakfasts to the classroom. The director of support operations should coordinate with the food services supervisor to identify and apply for any grants or vendor incentives to obtain needed delivery and serving equipment.

The director of support operations should meet with TSD leadership, teachers, and residential supervisors to discuss the breakfast-in-the-classroom program, draft procedures, present proposed menus, address any potential concerns, and gain their support. The director of support operations should update the draft procedures and proposed menus in accordance with feedback from these meetings.

The director of support operations should coordinate with the superintendent, academic affairs director, and director of student life to determine serving times for breakfast in the classrooms. The superintendent should then approve the serving times and notify classroom staff of the program expectations, serving times, and their respective responsibilities. The food services supervisor should develop marketing materials to promote the breakfast-in-the-classroom program.

The food services supervisor should distribute related marketing materials to parents and TSD staff. The food services supervisor should train food services staff on the new breakfast item preparation and meal distribution. The food services supervisor should pilot the breakfast-in-the-classroom program in a few classrooms for a few weeks before the end of school. Lessons learned from the pilot should be incorporated into revised menus and procedures.

The fiscal impact assumes that TSD will increase breakfast participation by 10.0 percent to 48.0 percent and increase lunch participation by 5.0 percent to 94.0 percent. The fiscal impact assumes increasing participation will incur an additional 40 percent food cost and does not assume an additional cost for labor. This increase in meal participation will result in a total

projected five-year revenue increase of \$40,204 (Year one increase (\$5,988) + Years two, three, four, and five increases (\$8,554 x 4)).

Figure 8–10 shows an opportunity to increase revenue to the Food Services Department by \$8,554 annually if breakfast participation is increased to 48.0 percent of ADP and lunch participation is increased to 94.0 percent of ADP ((\$12,392 in reimbursements for free-priced meals + \$1,336 in reimbursements for reduced-price meals + \$529 in reimbursements for full-priced meals) - \$5,703 in food costs). The cost to prepare additional meals does not include labor. The Food Services Department has 20 full-time staff, including the supervisor, to serve students. Any additional equipment required for delivery to classrooms should be funded through grants and supplier donations.

STAFF TRAINING AND CERTIFICATIONS (REC. 38)

TSD's Food Services Department lacks a formal training plan or requirements for staff development, and the internal training provided is not documented.

TSD's food services supervisor provides monthly training to staff on topics such as hygiene, food safety, inventory management, and food handling. This training is not documented and does not include agendas and training materials.

On March 2, 2015, the USDA FNS published Professional Standards for State and Local School Nutrition Programs Personnel as required by the federal Healthy, Hunger-Free Kids Act of 2010, Section 306. The rule requires food service directors to have a bachelor's degree, or equivalent educational experience, with an academic major or concentration in food and nutrition, food service management, dietetics, or family and consumer sciences. The food services supervisor has a bachelor's degree and the required Texas Food Safety Manager certification. All food services staff have food handler permits. The USDA FNS also published minimum annual training requirements, which are as follows:

- school nutrition program director – 12 annual training hours;
- school nutrition program managers – 10 annual training hours; and
- school nutrition program staff – six annual training hours.

Although the food service supervisor provides monthly training, the review team could not verify whether the training meets USDA's minimum requirements because the Food Services Department does not maintain documentation of agendas, attendance sheets, or training materials.

FIGURE 8-10
TEXAS SCHOOL FOR THE DEAF PROJECTED REVENUE FOR BREAKFAST AND LUNCH, SCHOOL YEARS 2017-18 TO 2021-22

MEALS SERVED INCREASE ESTIMATE	BREAKFAST INCREASED TO 48.0 PERCENT			LUNCH INCREASED TO 94.0 PERCENT			TOTAL ANNUAL INCREASED REVENUE
	ADDITIONAL NUMBER OF MEALS SERVED	REVENUE PER MEAL	INCREASED REVENUE	ADDITIONAL NUMBER OF MEALS SERVED	REVENUE PER MEAL	INCREASED REVENUE	
Free	2,578	\$2.04	\$5,259	2,104	\$3.39	\$7,133	\$12,392
Reduced- Price	132	\$1.74	\$230	370	\$2.99	\$1,106	\$1,336
Full Price	288	\$0.29	\$84	1,011	\$.44	\$445	\$529
Total	2,998		\$5,573	3,485		\$8,684	\$14,257
Food Cost – 40%							(\$5,703)
Net Annual Revenue Increase							\$8,554
Net Increase Year 1 (1)							\$5,988
Net Increase Year 2							\$8,554
Net Increase Year 3							\$8,554
Net Increase Year 4							\$8,554
Net Increase Year 5							\$8,554
Total 5-Year Net Increase							\$40,204

NOTE: (1) The first year is calculated at 70.0 percent of potential because it is the first year of program implementation.

SOURCES: Legislative Budget Board, School Performance Review Team, March 2016; Texas School for the Deaf, March 2016.

The U.S. Child Nutrition Act, Section 7(g)(2), requires school food authority directors to receive training in administrative practices (including application, certification, verification, meal counting, and meal claiming procedures), nutrition, health and food safety standards and methodologies, and any other topics, as determined by FNS. These training topics must be offered to the school food authority staff, as applicable. TSD's food services supervisor covers these topics during the monthly training sessions.

Effective food service programs provide annual job-specific training to ensure that food services staff at all levels maintain and upgrade their skills to meet students' needs and to effectively implement the NSLP and food safety requirements. Several organizations and companies offer food safety training and certificate programs. Each of these programs incorporate the required topics such as food safety; biohazards, foodborne disease and food spoilage;

contaminants; preservation and temperature control; employee health and hygiene; cleaning and sanitizing; pest control; and facility design.

National Hospitality Training offers training and a comprehensive online food certification exam approved by the Texas Department of State Health Services.

Effective food service programs also ensure that all food services staff are ServSafe-certified, or an equivalent. ServSafe is a food and beverage safety training and certificate program administered by the National Restaurant Association that offers various food service certifications. The training program is accredited by the American National Standards Institute and the Conference for Food Protection. The Texas Department of State Health Services has approved the ServSafe online and classroom training and has accredited the ServSafe Texas Starters Online Course and Assessment.

Region 13 offers a two-day manager certification course at various times throughout the year. Region 13 also offers other training courses that cover topics such as financial management, menu planning, production records, marketing, and state requirements.

TSD should develop and implement a Food Services Department staff training plan that identifies required training hours and topics for each staff position. The food services supervisor should write and develop this training to meet the USDA FNS training requirements and state requirements. The plan should also define training topics that should be covered internally by the food services supervisor and the topics that should be provided by external parties. If external resources are required, the director of support operations should coordinate with TSD management to ensure that a budget is available to provide those resources.

The training plan should detail all required training topics by staff level and include a professional development progression for food services staff.

The food services supervisor should then present the training plan to the director of support operations for review. The director of support operations should then present the Food Services Department training plan to TSD's human resources director for review and approval.

The food services supervisor should also prepare agendas and training materials in advance of each month's staff training and maintain copies on file. The food services supervisor should provide copies of all training attended by staff, including internal, to the Human Resources Department for filing in staff files.

No fiscal impact is assumed for this recommendation until TSD determines what external resource training is needed.

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. CHILD NUTRITION SERVICES							
34. Evaluate financial information to improve the efficiency of food service operations.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
35. Develop and implement a process to charge day students for meals according to their eligibility classifications.	\$33,201	\$33,201	\$33,201	\$33,201	\$33,201	\$166,005	\$0
36. Develop written food services operational procedures and enhance food handling.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
37. Implement programs and student food committees to increase meal participation.	\$5,988	\$8,554	\$8,554	\$8,554	\$8,554	\$40,204	\$0
38. Develop and implement a Food Services Department staff training plan that identifies required training hours and topics for each staff position.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$39,189	\$41,755	\$41,755	\$41,755	\$41,755	\$206,209	\$0

CHAPTER 9. TRANSPORTATION SERVICES

A school's primary transportation responsibility is to transport students to and from school, on field trips, and to and from extracurricular events in a safe, timely, and cost-effective manner. To accomplish this goal, schools must 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 the events of breakdowns or accidents.

Texas School for the Deaf (TSD) has two departments related to transportation: the Transportation Department (daily transportation for students residing in the Austin area) and the Homegoing Transportation Department (weekend transportation for residential students residing outside the Austin area). TSD provides several service types, including regular daily route services from and to home for 237 nonresidential day students living within the Austin Independent School District (AISD) boundaries. In addition, TSD provides daily shuttles for students who were referred by surrounding school districts or parents outside of the Austin area. The sending districts provide transportation to a point within the AISD boundary at an agreed-upon stop along an existing bus route that has sufficient seating to accommodate these students. This district transportation ensures that TSD does not incur additional mileage while servicing these students. Some surrounding districts also transport day students to TSD on their own buses and at no expense to TSD.

TSD operates 11 single-run daily buses with one driver and one monitor on each bus. TSD has two substitutes for drivers and no substitutes for monitors. Substitute drivers cover when the bus monitors are absent. Two substitute drivers, assuming an industry-average ratio of 10.0 percent to 15.0 percent substitute drivers to total drivers, are sufficient for TSD.

TSD provides extracurricular transportation for TSD students to locations throughout the Austin area. These trips include events for athletics, job training, work study, and other trips associated with school events and student enrichment. Additionally, these trips include daily Homegoing transportation for locations that are close to TSD and do not require motor coaches. Transportation for

these trips occurs during the normal school day, after the normal school day and on days that school is not in session.

The Transportation Department provides transportation for students who participate in the Career and Technical Education work training programs. These work-training programs include businesses such as chain restaurants and retail stores. The Transportation Department also transport students to businesses that can show them new or innovative uses of technology, such as recycling, printing, and other industries. TSD provides this transportation using employee-owned vehicles that are operated by the staff. TSD transportation maintains records of all the locations visited, mileage for each trip, and the number of trips that occurred.

TSD provides student transportation services using vehicles that are not the yellow school buses. These vehicles are known as the white fleet. This fleet is composed of eight passenger vans and three cars that support transportation needs. These vehicles are not used for transportation to and from school; only the yellow school buses are used for school transport. Staffing for career and technical-related trips require one driver and chaperones. The number of chaperones depends on the number of students involved and whether a student needs individual assistance. TSD chaperones are weekend school staff who are available to travel with students throughout the trips.

The transportation coordinator oversees the school's transportation operations and reports to the director of support operations. Other transportation staff include two administrative assistants, a shop technician, 13 full-time school bus drivers, and 11 part-time monitors.

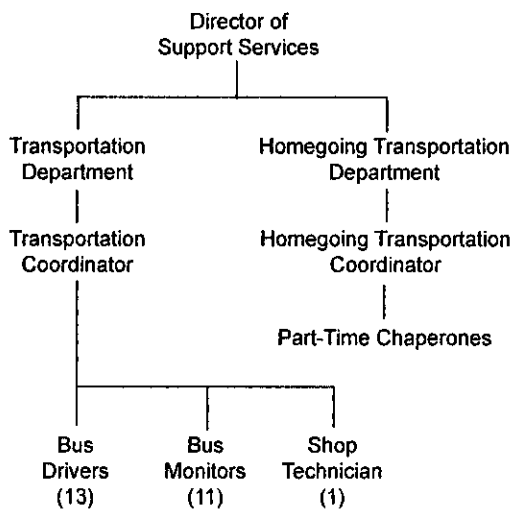
Additionally, TSD's Support Services Division provides weekend Homegoing transportation to students residing on campus during the school week but who live outside of the AISD boundary. This transportation provides the opportunity for residential students to be home with family and friends each weekend. Homegoing students travel home by vans, motor coach or airplane accompanied by TSD staff. TSD contracts for six motor coaches and the drivers from a vendor, and rents vans from a local car rental company. The weekend Homegoing transportation program drops students off at group stops where parents

meet the bus at a predetermined location and schedule set by the Homegoing transportation coordinator.

The director of support services oversees the weekend Homegoing transportation program, but this program is not a function of the Transportation Department.

Figure 9-1 shows the TSD Transportation Department organization.

**FIGURE 9-1
TEXAS SCHOOL FOR THE DEAF TRANSPORTATION
DEPARTMENT ORGANIZATION
SCHOOL YEAR 2015-16**



SOURCE: Texas School for the Deaf, Support Services, March 2016.

In the absence of the transportation coordinator, the administrative assistants manage transportation operations. The transportation coordinator provides oversight of the department and manages the department budget, state reports, school bus purchases (working directly with the Purchasing Department), staff training, and other staff matters.

One administrative assistant works with school staff to develop plans for student ridership, serves as the liaison with parents and assists with training. The other administrative assistant fulfills school bus routing and dispatching of buses, assigns staff on daily duties, and helps to train drivers and monitors.

TSD's school bus drivers work full-time, receive full benefits, and split shifts during the middle of the day between morning pickup and afternoon student drop-off. This split shift enables drivers to operate trips and shuttles during the day

for special transportation required for students. One-half of drivers work from 6:00 AM to 12:00 PM and from 3:00 PM to 5:00 PM (eight hours per day). The other half work from 6:00 AM to 8:00 AM and 11:15 AM to 5:15 PM (seven hours per day). The split shifts provide coverage for all regular routes to and from school and regularly scheduled trips during the day for cocurricular activities.

TSD's transportation monitors work part-time (scheduled for four hours per day) and do not receive benefits. Monitors are not typically needed during trips and shuttles during the school day because school staff travel with students during that time. The two administrative assistants and the shop technician are licensed to operate school buses and fill in as needed.

Most prospective staff learn of any vacancies via word of mouth. TSD advertises for drivers and/or monitors on an electronic billboard located near the campus. All monitors are deaf or hard of hearing and one school bus driver is deaf. The director of support operations indicated that Texas is the only state that authorizes a deaf person to operate a school bus. The only stipulation is that the driver must be performing his duties operating a bus that has students that are also deaf or hard of hearing.

The shop technician provides minor repairs of school buses on site, schedules all maintenance work provided by an external vendor, and provides a majority of the training of school bus drivers and monitors. TSD schedules vehicles for preventive maintenance based on days or mileage, depending on the type of service recommended.

TSD is entitled to a Texas Education Agency (TEA) transportation allotment pursuant to the Texas Education Code (TEC), Section 42.155 (j). Pursuant to this statute, TSD is entitled to a transportation allotment for eligible special education students paid on a previous year's cost-per-mile basis, with the maximum allowable rate set by appropriation. The transportation allotment is intended to be used for daily transportation. However, because TSD serves the entire state from a single campus, and because its transportation programs include weekend Homegoing, the Legislature appropriates additional General Revenue Funds for TSD transportation to cover the full cost of transportation programs. Homegoing Transportation absorbs all the costs involving weekends home transportation for residential students.

TSD's total appropriations for student transportation were \$2.1 million for fiscal year 2015, and \$2.3 million for fiscal year 2016. Figure 9-2 shows TSD transportation funding for fiscal years 2015 and 2016.

FIGURE 9-2
TEXAS SCHOOL FOR THE DEAF STUDENT
TRANSPORTATION APPROPRIATION
FISCAL YEARS 2015 AND 2016

OBJECTS OF EXPENSE	EXPENDED 2015	ESTIMATED 2016
Salaries and Wages	\$702,235	\$741,522
Other Personnel Costs	\$25,981	\$33,756
Professional Fees and Services	\$670	\$27
Fuels and Lubricants	\$87,472	\$59,115
Consumable Supplies	\$1,473	\$2,172
Utilities	\$414	\$0
Travel	\$77,670	\$76,448
Rent – Machine & Other	\$0	\$3,608
Other Operating Expenditures	\$217,252	\$103,432
Client Services	\$887,885	\$997,895
Capital Expenditures	\$142,311	\$239,548
Total	\$2,143,363	\$2,257,523

SOURCE: Texas School for the Deaf, January 2017.

TSD sends operation cost and mileage reports to TEA as required by TEC, Section 42.155. These reports help to determine the maximum limit of funds the school receives in accordance with the transportation allotment.

TSD's CFO and budget analyst determine which funds to move from one budget item to another to cover potential deficits. The most recent budget includes an increase of 4.0 percent from fiscal years 2014 to 2015 and an increase of 8.0 percent from fiscal years 2015 to 2016. For fiscal year 2016, TSD added 1.25 full-time-equivalent (FTE) positions in daily transportation and 1.33 FTE positions in Homegoing transportation due to an increase in student enrollment. Additionally, TSD's capital equipment purchase authority for fiscal year 2016 increased \$130,000 from fiscal year 2015. A minor increase in the maintenance and repair budget was necessary to buy new vehicles, due to the excessive age of some buses and vans.

Figure 9-3 shows TSD's operation cost summary from school years 2010-11 to 2014-15.

Figure 9-4 shows TSD transportation services by mileage and the per-mile cost for travel from school years 2010-11 to school year 2014-15.

Figure 9-5 shows that the annual expenditures for the weekend Homegoing transportation program have remained largely the same with only a slight decrease from school years 2012-13 to 2014-15. Expenditures include staff salaries, chaperone travel, student travel, and student services.

FIGURE 9-3
TEXAS SCHOOL FOR THE DEAF TRANSPORTATION OPERATION COST SUMMARY
SCHOOL YEARS 2010-11 TO 2014-15

COST	2010-11	2011-12	2012-13	2013-14	2014-15
Salaries and Benefits	\$553,846	\$599,119	\$631,540	\$610,675	\$614,631
Purchased (1)	\$559,116	\$597,711	\$546,788	\$543,186	\$630,427
Supplies and Materials	\$247,180	\$265,232	\$245,058	\$231,030	\$291,612
Depreciation and Other Operating Expenses	\$66,840	\$68,220	\$65,720	\$77,270	\$77,032
Debt Service	\$0	\$0	\$7	\$0	\$0
Total Operation Costs	\$1,426,982	\$1,530,282	\$1,489,113	\$1,462,161	\$1,613,702

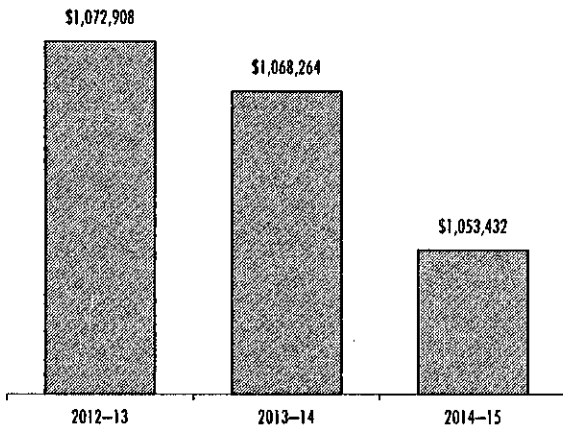
NOTE: (1) The purchase cost category is for the purchase of contracted motor coaches, professional fees, and van rentals.
 SOURCE: Texas Education Agency, March 2016.

FIGURE 9-4
TEXAS SCHOOL FOR THE DEAF TRANSPORTATION SERVICES MILEAGE SUMMARY
SCHOOL YEARS 2010-11 TO 2014-15

SERVICES	2010-11	2011-12	2012-13	2013-14	2014-15
Route-related Service	395,959	406,046	386,057	390,887	425,014
Extracurricular and Cocurricular Service	71,541	61,788	98,760	86,867	85,951
Other use	1,460	1,584	1,504	1,773	2,658
Total mileage	468,960	469,418	486,321	479,527	513,623
Cost per mile	\$3.04	\$3.26	\$3.06	\$3.05	\$3.14

SOURCE: Texas Education Agency, March 2016.

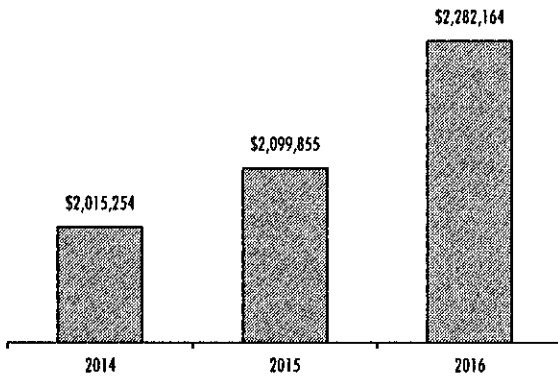
FIGURE 9-5
TEXAS SCHOOL FOR THE DEAF HOMOING TRANSPORTATION PROGRAM EXPENDITURES SCHOOL YEARS 2012-13 TO 2014-15



SOURCE: Texas School for the Deaf, March 2016.

Figure 9-6 shows the TSD transportation budget from fiscal years 2014 to 2016.

FIGURE 9-6
TEXAS SCHOOL FOR THE DEAF TRANSPORTATION BUDGET FISCAL YEARS 2014 TO 2016



SOURCE: Texas School for the Deaf, March 2016.

FIGURE 9-7
TEXAS SCHOOL FOR THE DEAF TOTAL COSTS FOR MILES TRAVELED SCHOOL YEAR 2012-13 TO 2014-15

SCHOOL YEAR	MILEAGE RATE	CAREER AND TECHNOLOGY SERVICE		EXTRACURRICULAR AND COCURRICULAR SERVICE	
		MILES TRAVELED	COST	MILES TRAVELED	COST
2012-13	\$1.08	27,972	\$30,210	98,760	\$106,661
2013-14	\$1.08	28,289	\$30,552	86,867	\$93,816
2014-15	\$1.08	26,821	\$28,967	85,951	\$92,827

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas Education Agency, March 2016.

Figure 9-7 shows that miles traveled and total costs for the extracurricular and cocurricular service and for career and technology decreased from school years 2012-13 to 2014-15. The transportation coordinator reported that TSD reduced the number of extracurricular trips overall, and that trips were combined among different groups to reduce transportation costs. These adjustments to scheduling resulted in a 12.9 percent reduction in costs.

ACCOMPLISHMENTS

- ◆ TSD has developed an efficient process to transport residential students home each weekend to regularly connect students with their families.
- ◆ TSD has implemented a routing system that makes possible a maximum one-way ride time for students of 90 minutes.
- ◆ TSD has established an efficient and effective vehicle maintenance and bus replacement schedule.

FINDINGS

- ◆ TSD lacks a method to evaluate the efficiency of its transportation services.
- ◆ TSD lacks written procedures about how to conduct and manage the transportation routing process.

RECOMMENDATIONS

- ◆ Recommendation 39: Develop a method to evaluate transportation data to ensure efficient transportation operations.
- ◆ Recommendation 40: Develop written procedures for weekly routing and weekend Homegoing transportation to ensure continued uninterrupted services.

DETAILED ACCOMPLISHMENTS

HOMEGOING

TSD has developed an efficient process to transport residential students home each weekend to regularly connect students with their families. The Homegoing transportation program provides for transportation by motor coach, airplanes, or shuttle vans for students who live within a two-hour radius of TSD. The program's transportation coordinator works with residential and school staff and parents to ensure that all pertinent student information is available to staff who travel with students. This information includes emergency contacts, food, and medications. Students younger than age 15 and students with special needs are accompanied by chaperones and school behavior specialists for the trips home. The transportation coordinator maintains a list of all students who travel and adjusts schedules depending on whether a student is not going home or is not returning to school the following week. These changes may occur if students have medical visits or other reasons they will not return via the normal weekend's home schedule of transportation.

TSD travel by motor coach does not provide for home stops. TSD has developed centralized stops, and parents must take their children to and from these locations. Motor coaches are used to travel to larger metropolitan areas where there is a higher concentration of students. The centralized stops are typically in areas such as shopping centers. Parents are eligible for reimbursement for mileage (at \$0.25 per mile) for travel to and from these bus stops, tolls, and any parking fees to travel to airports. Parents can elect to participate in this reimbursable program. The state sets the reimbursement rate. TSD reimburses parents twice a year after parents provide their mileage and receipts for additional costs. TSD reimbursed parents for weekend Homegoing transportation expenses from fiscal years 2014 to 2016 in the following amounts: 2014 – \$51,725; 2015 – \$73,717; and 2016 – \$57,932.

Students who live two hours or more from a central bus stop and can access an airport that is less than two hours from their residences are eligible for air transportation. If a parent opts not to fly the student, the student remains on the eligible list to fly. Parents are required to meet their children at the bus stops. If parents are not at the stop for a student, TSD staff will use the contact information to determine the parents' status. If the parent is not located within a few minutes of the bus stop, the bus will continue on its route so it does not make stops further on the route late. TSD contacts

the parent with an approximate time that the bus will return to the stop location on its return trip to Austin. TSD incorporates a smartphone application that notifies parents when the bus is expected to arrive at the pickup point. This application has worked well and has decreased lateness for parent pickup; it also notifies the parents if the bus is running late.

The Homegoing transportation coordinator schedules air travel through the state travel agency that provides for travel arrangement for government-related travel. Southwest Airlines is the primary carrier, and TSD purchases refundable tickets. Although these tickets may more expensive, they are refundable for future travel.

During school year 2014–15, TSD transported 217 residential students every weekend via the following methods of transportation:

- 192 students via motor coaches, averaging 32 students per motor coach;
- 14 students via airline; and
- 11 students via vans.

Figure 9–8 shows the destinations of the motor coaches and shuttle vans each weekend by school year. The number of motor coaches used remained steady at six in the last two reporting periods when TSD increased them from five in school year 2012–13. The number of shuttle vans used to transport students increased from two to three in school year 2014–15 from the previous two years.

TSD rents the vans used for the Homegoing transportation program. This practice reduces costs to the school by avoiding purchase and maintenance costs for vehicles that are used for 36 weekends per year. The vans are driven by TSD residential staff. TSD has an early dismissal on Fridays and begins the process of loading the vehicles with food and beverages and making sure all student contact information and medications are on board. The vehicles then deliver the students to the drop-off points and return that night back to Austin. On Sundays, the vehicles depart TSD for the furthest points of pickup and return inbound to TSD.

Staff are given the opportunity to work as chaperones' assistants on their days off. If they are scheduled on a workday, such as Sundays 8:00 PM to 12:00 AM, they work overtime until 8:00 PM. Effective May 2016, staff are reimbursed \$10 per day for meals when they ride as assistants on buses or vans and \$20 per day for meals when they fly with students.

**FIGURE 9-8
TEXAS SCHOOL FOR THE DEAF HOMEGOING TRANSPORTATION SCHEDULES
SCHOOL YEARS 2012-13 TO 2014-15**

ROUTE	OUTBOUND FROM TSD			INBOUND TO TSD		
	DAILY MILEAGE (1)	YEARLY TRIPS	ANNUAL MILES	DAILY MILEAGE (1)	YEARLY TRIPS	ANNUAL MILES
2012-13						
Dallas A	581	37	21,493	580	37	21,467
Dallas B	437	37	16,169	437	37	16,184
Houston A	489	37	18,075	490	37	18,112
Houston B	373	37	13,808	370	37	13,701
San Antonio and Laredo	557	37	20,620	445	37	16,465
Rock Springs Van	352	25	8,810	352	37	13,039
Bryan Van	265	37	9,794	265	37	9,794
Total	3,054	247	108,769	2,939	259	108,762
2013-14						
Dallas A	532	37	19,688	533	36	19,174
Dallas B	427	37	15,781	427	36	15,361
Houston A	486	37	17,997	486	36	17,482
Houston B	369	37	13,657	368	36	13,255
Laredo	462	37	17,094	464	36	16,686
San Antonio	171	37	6,312	170	36	6,113
Rock Springs Van	351	37	12,987	351	36	12,629
Bryan Van	265	37	9,790	263	36	9,461
Total	3,063	296	113,306	3,062	288	110,161
2014-15						
Dallas 1	421	37	15,592	420	36	15,113
Dallas 2	411	37	15,189	409	36	14,706
Dallas 3	473	37	17,501	477	36	17,165
Houston 6	376	37	13,894	376	36	13,518
Houston 4	490	37	18,112	489	36	17,590
San Antonio 5	474	37	17,523	472	36	16,996
Conroe Van A	330	37	12,206	330	36	11,880
Corpus Van B	344	37	12,717	358	36	12,881
Rock Springs Van C	357	26	9,287	344	26	8,934
Total	3,674	322	132,021	3,675	314	128,783

NOTE: (1) Round-trip mileage for one motor coach from the Texas School for the Deaf (TSD) campus in Austin on an outbound trip to the furthest point on the route and returning empty back to TSD on Friday. The inbound route travels from TSD to the furthest point out empty, and returns on the route while picking up students. For example, Dallas A travels out 290 miles and comes back 290 miles for the 580 miles on Friday.

SOURCE: Texas School for the Deaf, March 2016.

TSD develops a staff schedule needs list with dates and how many staff will be needed. The Student Life Division timekeeper sends an email to all staff announcing dates needing staffing. The staff sign up with the timekeeper

who then assigns staff to buses, vans, and flights. TSD plans to update this process to an online system for the next school year.

TSD provides food for students who have an allergy concern. In addition, TSD offers predetermined restroom stops along the route for those traveling by vans. In the event of an urgent concern, a stop selection along the route is determined by the van driver. Motor coaches are equipped with restrooms, television monitors, DVD players, satellite television, cushioned high-back seats with seat belts, and air conditioning. School buses and school cars are only used on these routes in the event of an emergency. TSD’s efforts to effectively manage the Homegoing transportation process ensures that its students remain connected to their families and home communities.

RIDE TIME AND ROUTING

TSD has implemented a routing system that makes possible a maximum one-way ride time for students of 90 minutes. TSD monitors changes in addresses and additions and deletions to the student population along with revised routing outcomes to determine if adding another bus is necessary to maintain the maximum ride time.

The average ridership per bus is 22 students for morning and afternoon bus routes. Buses travel 764 miles per day on regular morning and afternoon routes. TSD operates two midday routes for half-day kindergarten students that averages nine students per bus and travels 64 miles per day. One route returns morning kindergarten students home and the other picks up afternoon kindergarten students and takes them to school.

Average student ride time in the morning is 1 hour and 19 minutes, and in the afternoon it is 1 hour and 21 minutes. The longest ride time in the morning is 1 hour and 28 minutes, and in the afternoon the longest ride time is 1 hour and 40 minutes.

TSD begins transporting students at 18 months of age and through age 21, and regardless of grade level, all ages ride the same bus. The large geographic area and the transporting of all students together allows the school to use fewer assets to provide transportation. If students were not transported together, TSD would require two to three times the number of vehicles and staff depending on whether the school changed school start/end times. TSD start time is 7:55 AM for all grades and programs with a dismissal time of 3:20 PM.

Figure 9–9 shows TSD’s 11 bus routes with a ridership of 22 students per bus.

TSD does not have routing software to develop bus routes. Instead, TSD develops bus routes using a mapping website. This product is approved for use by TEA for school districts that have small numbers of bus routes where the cost of school bus specific software is not justified. The administrative assistants plot the student addresses within the application and then combine routes starting from the furthest point away in the morning and making the straightest routes possible to school based on the addresses. After these routes and times are charted, the information is exported into a spreadsheet to calculate the directions and distances between

**FIGURE 9–9
TEXAS SCHOOL FOR THE DEAF BUS ROUTES
SCHOOL YEAR 2014–15**

ROUTE	STUDENTS	AM ROUTE DURATION	PM ROUTE DURATION	AM MILES	PM MILES	TOTAL MILES
1	11	1 hr 24 min	1 hr 10 min	36	35	71
2	16	1 hr 33 min	1 hr 00 min	45	43	88
3	7	1 hr 32 min	1 hr 18 min	35	33	67
4	16	1 hr 34 min	1 hr 40 min	31	35	66
5	25	1 hr 36 min	1 hr 29 min	38	40	78
6	27	1 hr 34 min	1 hr 26 min	32	32	64
7	28	1 hr 35 min	1 hr 37 min	30	30	59
8	28	1 hr 37 min	1 hr 17 min	36	37	73
9	17	1 hr 36 min	1 hr 27 min	34	35	69
10	24	1 hr 36 min	1 hr 29 min	40	41	81
11	38	1 hr 17 min	1 hr 05 min	24	25	49
Total	237			381	386	765

SOURCE: Texas School for the Deaf, March 2016.

turns. The administrative assistant then enters student information and points of pickup and any notes that the driver and monitor may need about the student or stop location. Any changes in ridership or addresses on routes result in the administrative assistant determining if a student remaining on the same route is still the most efficient use of time and distance or if a change to another bus route is required.

Figure 9–10 shows that student ridership has grown from 398 riders during school year 2010–11 to 570 riders for school year 2013–14; ridership decreased to 565 riders for school year 2014–15. Ridership in the extended school year service (summer) has also increased from 202 riders during school year 2010–11 to 330 riders for school year 2014–15.

The Legislative Budget Board School Performance Review Team conducted stakeholder satisfaction surveys to measure customer perceptions of how well TSD provides transportation on time, maintains student behaviors on the bus, provides for timely delivery of students, and transports students home on weekends. The review team polled parents with a series of four questions regarding the transportation

performance. The survey received 71 responses to these questions.

Figure 9–11 shows the parent survey results with most respondents satisfied with TSD’s transportation services.

VEHICLE MAINTENANCE AND BUS REPLACEMENT SCHEDULE

TSD has established an efficient and effective vehicle maintenance and bus replacement schedule. TSD schedules vehicles for preventive maintenance based on days or mileage depending on the type of service recommended. The fleet consists of 16 school buses, including 11 daily route buses and five multipurpose buses that are used as route buses as necessary. One-third of the fleet is replaced every five years, which places the fleet on a 12-year to 15-year replacement plan.

The bus fleet is well kept and clean. No visible signs of active leakage of fluids were found on the ground, and all wheels were clear of any signs of leakage from worn seals. An interior inspection of unit No. 15, a 2014 bus, found it spotless. All emergency equipment was in place, the fire extinguisher was

**FIGURE 9–10
TEXAS SCHOOL FOR THE DEAF ROUTE SERVICES REPORT
SCHOOL YEARS 2010–11 TO 2014–15**

YEAR	MILEAGE		AVERAGE RIDERSHIP	
	HOME TO SCHOOL AND SCHOOL TO HOME	AUXILIARY AND EXTENDED SCHOOL YEAR	HOME TO SCHOOL AND SCHOOL TO HOME (DAILY)	AUXILIARY AND EXTENDED SCHOOL YEAR
2010–11	355,671	40,288	398	202
2011–12	358,365	47,587	514	297
2012–13	360,075	43,466	549	287
2013–14	354,891	38,492	570	304
2014–15	393,184	40,958	565	330

SOURCE: Texas Education Agency, March 2016.

**FIGURE 9–11
TEXAS SCHOOL FOR THE DEAF PARENTS SURVEY RESULTS, MARCH 2016**

SURVEY QUESTION	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
The bus driver maintains discipline on the bus.	22.5%	33.8%	38.0%	2.8%	2.8%
Buses arrive and depart on time.	21.1%	38.0%	30.9	5.6%	4.2%
The length of the student’s bus ride is reasonable.	16.9%	29.6%	38.0%	9.9%	5.6%
TSD has an effective process for transporting on-campus students to and from their homes on weekends.	22.5%	28.2%	43.7%	4.2%	1.4%

NOTES:

(1) Total may not sum due to rounding.

(2) Results include 71 responses for each question.

SOURCE: Legislative Budget Board School Performance Review Team, March 2016.

full, and the vehicle inspection was updated. Drivers are required to maintain the cleanliness of their assigned equipment. The shop technician regularly visually inspects vehicles to ensure no damage has occurred that went unnoticed or unreported.

TSD uses an electronic inspection system for before and after trips. Drivers use the system to document their inspections of each bus, which, by board policy, should be performed every time a school bus leaves TSD for a regular route or for extra trips. The system generates a report that management uses to verify that inspection have been completed.

Figure 9–12 shows an example of an electronic vehicle inspection report.

TSD has four buses that will be eligible for replacement within the next two years as they are 2001 and 2002 model years. TSD rotates buses among routes where possible to monitor mileage and age to avoid accumulating excess mileage on newer busses.

Figure 9–13 shows TSD's yellow school bus fleet consists of 16 school buses. Unit No. 1 is 15 years old and is out of service. Unit No. 7 was placed into service to cover the routes for unit No. 1.

Figure 9–14 shows TSD's non-yellow school bus fleet, also known as the white fleet. The Transportation Department oversees and tracks the maintenance of these vehicles that TSD assigns to its various departments. TSD maintains preventive maintenance inspection on these vehicles through the electronic system used for the buses. The departments shown in **Figure 9–14** include health services, laundry, food service, maintenance, and transportation.

School bus replacement is expensive. Keeping the existing fleet in operating condition helps reduce costs in the long-term.

Figure 9–15 shows that two of TSD's buses were replaced in 2010 with one bus replaced each year from fiscal years 2013 to 2015 for a total of five buses. TSD used General Revenue Funds to replace the buses.

The bus replacement schedule shown in **Figure 9–16** shows that one-third of TSD's fleet is replaced every five years. This frequency places the fleet on a 12-year to 15-year replacement plan, which is recommended by industry standards. The average accumulated mileage for TSD's bus fleet is 218,067. The average annual mileage per unit is 14,538. Based on industry standards, TSD bus fleet would average 14 years for

replacement, or 203,532 miles (14,538 average annual miles times 14 years). TSD's rate of replacement aligns with the industry recommended replacement schedule.

Preventive maintenance involves periodic replacement of fluids and filters and performing the manufacturer's recommended schedule of maintenance to keep the fleet operating. TSD schedules vehicles for maintenance based on days or mileage depending on the type of service recommended.

Type-A maintenance requires changing fluids and filters at a designated number of miles. TSD's annual mileage indicates that most vehicles receive two type-A appointments per year. Type-B maintenance involves a more in-depth review of other vehicle operating systems and is typically scheduled annually. TSD schedules the Type-B maintenance in the summer when vehicles are not used as frequently. This schedule prevents buses from being removed from service for major maintenance during the regular school year. Therefore, Type-B maintenance is scheduled on a number of days versus mileage. Most vehicles receive one Type-B maintenance per year. Some vehicles may only receive one Type-A appointment and one Type-B appointment per year due to lower usage.

TSD uses Agile Assets software for tracking assets, work orders, and preventive maintenance. TSD tracks these functions within this system, which reduces the errors that would result from using a separate system for tracking.

TSD conducts its schedule according to the manufacturer's recommendations. PM's based on mileage include a 30,000-mile transmission and differential fluids replacement and a 40,000-mile and 150,000-mile coolant flush. These two different mileages are based on the manufacturer's recommended mileage for each particular unit and vary depending on the type of vehicle being serviced.

Vehicle maintenance staffing can be determined by using a vehicle equivalency unit (VEU) rating that is used by the U.S. Air Force. The system provides a unit rating that starts at 1 for a sedan and increases based on the workload to repair heavier equipment. School buses typically range from 3.0 to 4.0 values per unit.

Figure 9–16 shows TSD fleet maintain records that includes year, make, model, vehicle type, if equipped with a wheelchair lift, mileage and the assigned vehicle equivalent unit rating used in this analysis.

The suggested units per mechanic is 85 to 120 units. The rating system also factors in variables that include the age of

**FIGURE 9-12
TEXAS SCHOOL FOR THE DEAF EXAMPLE ELECTRONIC VEHICLE INSPECTION SYSTEM REPORT
SCHOOL YEAR 2015-16**

ELECTRONIC VEHICLE INSPECTION PRE-TRIP AIR BRAKE REPORT

Organization/Operator Texas School for the Deaf		DOT/NSC No.	Report No. 87474	License Plate Number 121-7202	Jurisdiction No Registration Record
Asset No. 8	VIN Number 1BAKBCPA18F249218	MFG	In Service 08 Jun 2007	Mileage 149910	
Inspection Date: Thursday 04 Feb 2016 05:40		Inspection Duration: 00:13:12	Driver ID 26800035	Driver Name XXXXXXXX	
Assigned Asset Location Home			Location of Electronic Vehicle Inspection Report (EVID) 458 Elizabeth St W, Austin, TX 78704		
Asset: 8 (Standard)		Timestamp: 05:40:22 (Primary asset)			

THE FOLLOWING ITEMS HAVE BEEN INSPECTED IN ACCORDANCE WITH THE STANDARD/REGULATION (IF EQUIPPED):

ZONE	TIME	COMPONENTS	DEFECTS	VERIFIED
Right Front	05:41:47	Other, Windows/mirrors, Body, Brake Pod Pins, Reflectors/signs, Tires/wheels/lugs, Crossing Gate	N	Y
Engine Compartment	05:42:10	Other, Belts/hoses, Coolant, Oil, Trans/steer Fluid, Washer Fluid	N	Y
Left Front	05:42:28	Other Windows/mirrors, Battery, Body, Brake Pod Pins, Reflectors/signs, Stop Arm, Tires/wheels/lugs	N	Y
Front Lighting	05:44:02	Other, 4 Way Flashers, Amber Lights, Clearance Lights, Headlight/low/high, Id Lights, Red Lights, Turn Signals	N	Y
Left Rear	05:44:39	Other, Exit/door/release, Windows/mirrors, Body, Reflectors/signs, Tires/wheels/lugs, Exhaust, Fuel Tank Cap	N	Y
Rear Lighting	05:44:50	Other, 4 Way Flashers, Amber Lights, Clearance Lights, Id Lights, Red Lights, Turn Signals, Brake Lights, Rev Lights/warn, Strobe Light, Tail Lights	N	Y
Right Rear	05:45:09	Other, Exit/door/release, Windows/mirrors, Body, Reflectors/signs, Tires/wheels/lugs, Exhaust, Fuel Tank Cap	N	Y
Inside Rear	05:46:36	Other, Exit/door/release, Heat/cool/vent, Seats/belts, Windows/mirrors, Clean/clear, Emergency Exit Buzzers, Interior Lights, Roof Hatch, W/c Securements, Wheelchair Lift	N	Y
Brakes (air)	05:50:14	Anti-Skid, Applied Press Loss, Blood/path Kit, Cut In/out 90/120, Emer. Stop Sys20/40, Log Book, Low Air Warn 60, Other, Parking (hand), Service, Static Press Loss	N	Y
Inside Front	05:53:09	Other, Exit/door/release, Fire exit/1staid/tri, Gauges/ind/warn, Handrail/mod Pan, Heat/cool/vent, Regstr/ins, Seats/belts, Steering/horn, Windows/mirrors, Wipers/washer	N	Y

DEFECTS NOTED DURING THIS INSPECTION: (click to repair)

ZONE	COMPONENT	CONDITION	STATUS	TECHNICIAN:	REPAIR DATE:	REFERENCE NO.	DEFECT ID
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REVIEWER

Accepting Inspector: XXXXXX | Next Inspection Date: Thursday 04 Feb 2016 07:56

XXXXXX has reviewed this EVIR and acknowledges the certification that all required repairs have been performed.

NOTE: VIN = Vehicle Identification Number.
SOURCE: Texas School for the Deaf, March 2016.

**FIGURE 9-13
TEXAS SCHOOL FOR THE DEAF YELLOW BUS FLEET
SCHOOL YEAR 2015-16**

Unit Veh #	MFG Year	Make	Model	Type	Fuel	Camera	GPS	Zonar	Standard Seating	# WC & Lift	Purchase Date	Service Miles	Avg. Annual Mileage
1	2000	INTL	Bluebird	Bus-47	Diesel	Yes	Yes	Yes	48	No	8/2/2000	228,434	15,890
2	2005	BLU	Bluebird	Bus-28	Diesel	Yes	Yes	Yes	28	Yes-2	5/25/2004	168,223	15,073
3	2001	INTL	INTL	Bus-47	Diesel	Yes	Yes	Yes	47	No	6/29/2001	218,475	15,605
4	2001	INTL	INTL	Bus-47	Diesel	Yes	Yes	Yes	47	No	6/29/2001	217,499	15,535
5	2001	INTL	INTL	Bus-47	Diesel	Yes	Yes	Yes	47	No	8/16/2001	176,324	12,594
6	2002	INTL	Bluebird	Bus-28	Diesel	Yes	Yes	Yes	28	Yes-2	11/1/2002	202,768	16,016
7	2016	INTL	INTL CE	Bus-53	Diesel	Yes	Yes	Yes	53	No	3/30/2015	2,317	3 months
8	2008	BLU	Bluebird	Bus-28	Diesel	Yes	Yes	Yes	28	Yes-2	4/6/2007	143,743	17,615
9	2009	INTL	INTL	Bus-28	Diesel	Yes	Yes	Yes	24	Yes-2*	9/2/2008	111,941	16,389
10	2005	FRHT	Thomas	Bus-77	Diesel	Yes	Yes	Yes	71	No	10/15/2004	136,472	11,704
11	2011	INTL	INTL CE	Bus-42	Diesel	Yes	Yes	Yes	42	No	12/4/2009	88,443	16,080
12	2011	INTL	INTL CE	Bus-28	Diesel	Yes	Yes	Yes	30	Yes-2*	12/4/2009	95,001	17,272
14	2014	INTL	INTL CE	Bus-47	Diesel	Yes	Yes	Yes	47	No	1/6/2014	28,988	19,325
15	2014	INTL	INTL CE	Bus-47	Diesel	Yes	Yes	Yes	47	No	1/18/2013	44,325	18,392
16	2000	INTL	Bluebird	Bus-47	Diesel	Yes	Yes	Yes	48	No	8/2/2000	157,706	10,577

All buses have tinted windows and white roofs for lower interior temps.

NOTES: Veh = Vehicle; MFG = manufacturer; GPS = Global Positioning System; WC = wheelchair; INTL = International; Blu = Bluebird; FRHT = Freightliner; Avg = average.
SOURCE: Texas School for the Deaf, March 2016.

**FIGURE 9-14
TEXAS SCHOOL FOR THE DEAF WHITE BUS FLEET
SCHOOL YEAR 2015-16**

TSD ID #	Unit Veh #	MFG Year	Make	Model	Type	Primary Use	Assigned Department	Purchase Date	Service Miles	Avg. Annual Mileage	Avg. Annual Business
35586	19	1996	FORD	Aerostar	Van-7	Student Transport	Health Services	7/11/1996	135,989	7,088	7,056.4
39426	20	2010	FORD	E-150	Van-8	Student Transport	Transportation	9/21/2009	44,730	7,672	7,584.7
36999	21	2001	FORD	E-350	Van-15	Student Transport	Transportation	10/4/2000	115,972	7,778	7,671.9
37000	22	2001	FORD	E-350	Van-15	Student Transport	Transportation	10/4/2000	118,281	7,932	7,881.5
38350	24	2006	FORD	E-150	Van-8	Student Transport	Transportation	4/24/2006	67,414	8,171	8,120.5
41030	25	2014	CHEV	1500	Van-8	Student Transport	Transportation	3/5/2014	5,998	4,963	4,868.2
36180	26	1999	CHEV	Lumina	Car-9	Student Transport	Transportation	12/10/1998	118,985	7,362	7,282.8
38349	28	2006	FORD	E-150	Van-8	Student Transport	Transportation	4/27/2006	63,304	7,673	7,602.8
39425	29	2010	FORD	E-150	Van-8	Student Transport	Transportation	9/21/2009	42,803	7,341	7,271.7
39459	30	2010	FORD	Fusion	Car-5	Student Transport	Transportation	11/16/2009	40,000	7,168	7,077.4
39458	31	2010	FORD	Fusion	Car-5	Student Transport	Transportation	11/16/2009	37,852	6,783	6,732.5
37356	51	1995	CHEV	Chevyenne	Pickup	Supplies/Materials	Laundry	8/31/1995	*150604	11,665	11,613.7
35436	60	1995	GMC	P-3500	Box Van	Laundry Transport	Laundry	1/20/1996	*78851	4,027	3,995.4
36083	63	1998	DODG	1500	Pickup	Supplies/Materials	Maint. & Transp.	8/13/1998	117,260	6,897	6,865.4
36624	64	2000	FORD	Ranger	Pickup	Food Supplies	Food Services	9/20/1999	18,965	1,330	1,296.0
36747	66	2000	CHEV	G30	Walk-in Van	Supplies/Moving	Transportation	3/7/2000	22,758	1,386	1,354.4

*Service mileage for (2) vehicles is based on official transfer date of 8/31/15 to TFC. TFC actually began using vehicles in June 2015. Mileage in June is as follows: Unit #51 Service Miles=150,173 & Avg. Annual Mileage=11,778 Unit #60 Service Miles=78,451 & Avg. Annual Mileage=4,014

NOTES: TSD = Texas School for the Deaf; Veh = Vehicle; MFG = manufacturer; Avg = average; Maint. & Transp. = Maintenance and Transportation; CHEV = Chevrolet.
SOURCE: Texas School for the Deaf, March 2016.

the fleet and operating conditions. For example, school buses operating in typically colder climates and in mountainous regions may need more maintenance staff than an operation like TSD where conditions are typically warmer with flat to hilly topography. The VEU rating for TSD is 75.5, which indicates that one mechanic is sufficient to maintain their fleet.

DETAILED FINDINGS

TRANSPORTATION OPERATIONS (REC. 39)

TSD lacks a method to evaluate the efficiency of its transportation services. TSD submits required transportation data to TEA. However, TSD does not use this data or other transportation data to evaluate the school's transportation services. From school years

**FIGURE 9-15
TEXAS SCHOOL FOR THE DEAF BUS PURCHASES AND
REPLACEMENT
FISCAL YEARS 2010 TO 2015**

YEAR PURCHASED OR REPLACED	COST
2010	\$73,396
2010	\$78,968
2013	\$90,844
2014	\$90,992
2015	\$92,341

NOTE: General Revenue Funds are the method of finance for vehicle purchase or replacement.
SOURCE: Texas School for the Deaf, March 2016.

2010-11 to 2014-15, TSD's cost per mile has remained stable ranging from \$3.04 in school year 2010-11 to \$3.14 in school year 2014-15. The only exception was in school year 2011-12, when the school's cost per mile was \$3.26. TSD provides three transportation service types including regular weekly route services, daily shuttles for career and technical and dual credit students, and weekend Homegoing service. TEA's transportation reporting system does not require TSD separate the regular route and daily shuttle data.

Figure 9-17 shows TSD's cost per vehicle, student, and mile for daily transportation services from school year 2010-11 to school year 2014-15.

**FIGURE 9-16
TEXAS SCHOOL FOR THE DEAF VEHICLE EQUIVALENCY UNIT RATINGS OF MAINTAINED VEHICLES
SCHOOL YEAR 2015-16**

YEAR	MAKE	MODEL	TYPE - PASSENGERS	WHEELCHAIR LIFT	MILEAGE	VEU
1996	Ford	Aerostar	Van - 7	No	135,389	1.0
2010	Ford	E-150	Van - 8	No	44,730	1.0
2001	Ford	E-350	Van - 15	No	115,972	1.0
2001	Ford	E-350	Van - 15	No	118,281	1.0
2006	Ford	E-150	Van - 8	No	67,414	1.0
2014	Chevrolet	1500	Van - 8	No	6,998	1.0
1999	Chevrolet	Lumina	Car - 5	No	118,985	1.0
2006	Ford	E-150	Van - 8	No	63,304	1.0
2010	Ford	E-150	Van - 8	No	42,803	1.0
2010	Ford	Fusion	Car - 5	No	40,000	1.0
2010	Ford	Fusion	Car - 5	No	37,852	1.0
1995	Chevrolet	Cheyenne	Pickup	No	150,604	1.5
1995	GMC	P-3500	Box Van	No	78,851	1.5
1998	Dodge	1500	Pickup	No	117,260	1.0
2000	Ford	Ranger	Pickup	No	18,965	1.0
2000	Chevrolet	G30	Walk-in Van	No	22,758	1.5
2000	International	Bluebird	Bus - 47	No	226,434	3.8
2005	Bluebird	Bluebird	Bus - 28	Yes - 2	168,223	4.0
2001	International	International	Bus - 47	No	218,475	3.8
2001	International	International	Bus - 47	No	217,499	3.8
2001	International	International	Bus - 47	No	176,324	3.8
2002	International	Bluebird	Bus - 28	Yes - 2	202,768	4.0
2016	International	International CE	Bus - 53	No	2,317	3.8
2008	Bluebird	Bluebird	Bus - 28	Yes - 2	143,743	4.0
2009	International	International	Bus - 28	Yes - 2	111,941	4.0
2005	Freightliner	Thomas	Bus - 77	No	136,472	3.8

FIGURE 9-16 (CONTINUED)
TEXAS SCHOOL FOR THE DEAF VEHICLE EQUIVALENCY UNIT RATINGS OF MAINTAINED VEHICLES
SCHOOL YEAR 2015-16

YEAR	MAKE	MODEL	TYPE-PASSENGERS	WHEELCHAIR LIFT	MILEAGE	VEU
2011	International	International CE	Bus – 42	No	88,443	3.8
2011	International	International CE	Bus – 28	Yes – 2	95,001	4.0
2014	International	International CE	Bus – 47	No	28,988	3.8
2014	International	International CE	Bus – 47	No	44,325	3.8
2000	International	Bluebird	Bus – 47	No	157,706	3.8
VEU Rating						75.5

NOTE: VEU = vehicle equivalency unit.
 SOURCE: Texas School for the Deaf, March 2016.

FIGURE 9-17
TEXAS SCHOOL FOR THE DEAF TRANSPORTATION OPERATING COSTS PER UNIT FOR DAILY TRANSPORTATION SERVICES
SUMMARY
SCHOOL YEARS 2010-11 TO 2014-15

MEASURE	2010-11	2011-12	2012-13	2013-14	2014-15
Cost per vehicle	\$101,927	\$109,305	\$99,274	\$97,477	\$107,580
Cost per student	\$2,378	\$1,888	\$1,781	\$1,673	\$1,803
Cost per mile	\$3.04	\$3.26	\$3.06	\$3.05	\$3.14

SOURCES: Legislative Budget Board School Performance Review Team, March 2016; Texas Education Agency, March 2016.

TSD transportation operation and route reports do not identify costs by service type among the school attendance route service, extracurricular and cocurricular service, and extended school year service. Schools that maintain disaggregated transportation data by routes and services can compare their operation cost to other schools to identify areas of inefficiency. Segregated data allows schools to calculate performance indicators such as cost per bus, cost per student, and overall operation cost.

TSD should develop a method to evaluate transportation data to ensure efficient transportation operations. The transportation coordinator should allocate costs by service type to provide detail on cost per bus, cost per student and cost per mile by type of service that is provided by TSD. Unit costs for transportation to and from home would stand alone in this calculation, rather than including mixed costs from other services in the calculations. This would enable the Transportation Department to compare costs against prior year performance as well as against other schools.

This recommendation could be implemented with existing resources.

TRANSPORTATION ROUTING (REC. 40)

TSD lacks written procedures about how to conduct and manage the transportation routing process.

TSD operates student weekly routing and the weekend Homegoing transportation services without written procedures. The administrative assistant coordinates the dispatch and routing services for transportation. This position schedules the morning routes and midday routes to transport students to day activities. The administrative assistant prepares the schedules the day before and assigns the drivers by 8:00 AM daily. In the absence of the regular administrative assistant, no other staff performs these tasks. This practice could lead to disruption in service and customer dissatisfaction. The lack of routing procedures in TSD's operations is critical because changes could occur daily that could affect more than one route and require multiple changes to maintain maximum route times and efficiency.

TSD also has not documented the Homegoing transportation services procedures for route development and the expectations for parents to pick up students on time. During interviews, staff reported that parents do not understand the expectations to meet their children at stops according to route times. Parents also might not understand the procedures if they are not at the stop on time. This lack of documentation has resulted in parents not fully understanding expectations, and, in turn, some

parents have made demands on the program that cannot be fulfilled for all stakeholders. These demands include that students be provided home stops within a system that is developed for group stops.

Routing is one of the most important methods of providing efficient and effective transportation services regardless of the type of service being provided. Well-documented procedures provide for consistent route development and service delivery. Best practice suggests that school district transportation departments develop written routing documentation to ensure consistency in routing operations when staff changes occur.

The Student Transportation Services of Thunder Bay, Ontario, Canada routing manual includes the following considerations for developing efficient and effective routing operations:

- Student transportation services will evaluate their transportation routing and scheduling system annually. Regular adjustments during the school year are often required when transporting student with special needs;
- Are all bus students arriving on time for class?
- Are any buses arriving excessively early?
- Are all buses available to load passengers at dismissal time?
- Is there any overlap or duplication in bus routes?
- Is adequate supervision provided in the school loading areas by the building staff?
- Are the students required to use their assigned stop?
- Are walking conditions safe to bus stops if not a home pickup?
- If home pickups only are used, can students without physical or cognitive special needs be picked up at a location other than the home stop? and
- Are buses transporting fewer than 10 eligible students?

As a best practice, school district transportation departments compile the general routing knowledge of staff about the routing process and document this information in a single routing procedures manual.

TSD should develop written procedures for weekly routing and weekend Homegoing transportation to ensure continued uninterrupted services. The transportation coordinator, the administrative assistant and bus drivers should coordinate to develop a routing procedures manual. The manual should include types of service being provided, criteria for bus stop development, hazardous walking areas, traffic conditions at stop, location of known sex offenders, any restrictions on walk to stop distances, times buses are to arrive and depart schools, how a bus stop can be changed and who is authorized to make the change.

The Homegoing transportation coordinator should work with Residential Services Department staff to develop a procedure manual. The manual should include the procedures for parents meeting vans and motor coaches along the established stops and procedures if they are not there on time. TSD should include the procedures for the meeting of students and their chaperones at airports. The manual should also include procedures for chaperones on working with the students, how to handle transported medications and the process for returning the medications to parents or staff, handling of student records during the trip and ensuring accurate emergency phone numbers are available for parents and staff.

TSD should post the developed procedures on its school website and provide them to parents who may not have internet access. TSD should also provide the procedure manual to all incoming students' families during placement or student orientation meetings. TSD should also update all transportation procedures annually or more often if required.

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 9. TRANSPORTATION SERVICES							
39. Develop a method to evaluate transportation data to ensure efficient transportation operations.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
40. Develop written procedures for weekly routing and weekend Homegoing transportation to ensure continued uninterrupted services.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 10. TECHNOLOGY MANAGEMENT

The Texas School for the Deaf's (TSD) technology management function affects the operational, instructional, and financial functions of the school. Technology management requires planning and budgeting, inventory control, technical infrastructures, application support, and purchasing. TSD 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, and student attendance and grades). 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.

Every even-numbered year, state law requires that TSD prepare a strategic plan that includes the school's mission, vision, and business plan. The technology resources planning section of this plan defines the technology initiatives assessment and alignment for each of the school's technology projects.

Use of automation has enabled schools to enhance operational, instructional, and business programs. Technological advances in hardware and software, combined with affordable pricing, enable schools of all sizes to use information systems to perform vital functions. Information technology systems provide a number of benefits, including more efficient operations through speed of processing and increased information, integration of programs and communication networks.

TSD has a strategic goal to optimize the use of technology to provide living, learning, and working environments to prepare students for post-academic success. TSD's four technology strategies for school years 2011 to 2016 to achieve this goal include:

- redevelop the TSD website as a platform for the staff, students, and community that is informative,

accessible, appealing, and easy to manage by using a content management system (CMS);

- replace technology infrastructure to provide a more stable, efficient, and robust platform for providing network, voice, data, wireless, and video services to the TSD community;
- develop and communicate information technology standards and guidelines for students, staff, and the community that will enable all users to participate and work in a safe and secure network environment; and
- provide technology integration and training for staff.

The TSD Information Technology Services (ITS) Department provides multiple support services to implement these strategies with its network and systems, users, software, telecommunications, student technology initiatives, web applications, database development, and its multimedia and audiovisual equipment installation.

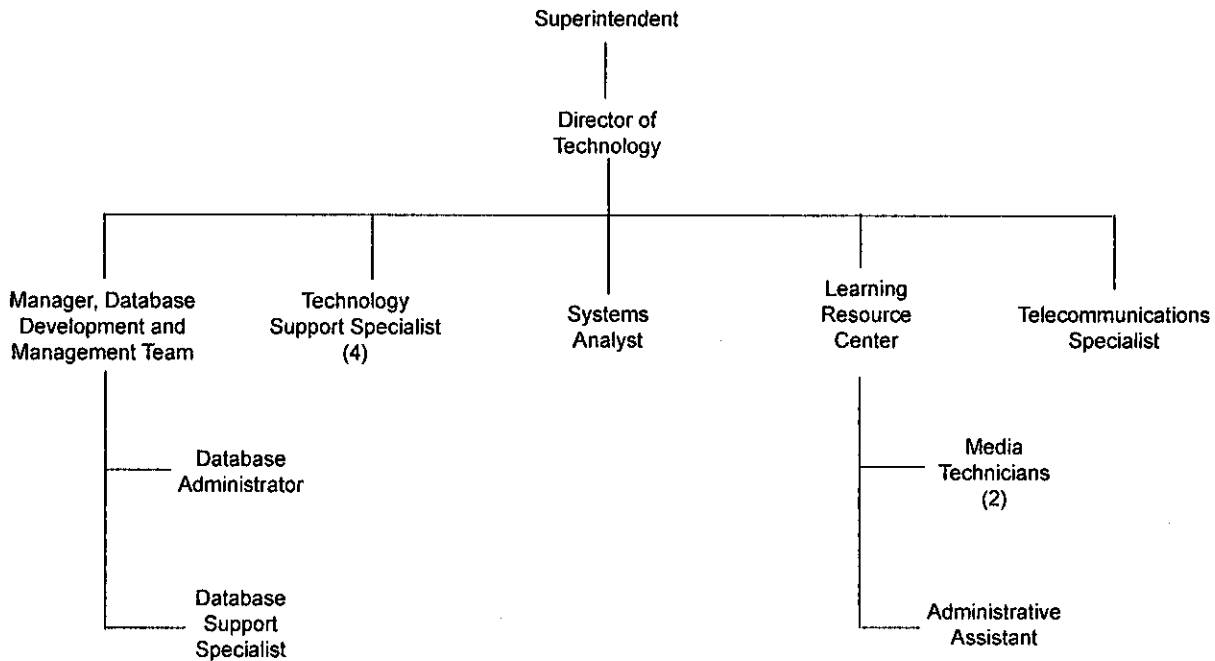
Figure 10-1 shows the TSD ITS Department organization, including its 12 staff.

Figure 10-2 shows the technology staff responsibilities.

TSD has computer labs located throughout the school for student access, and each high school student is issued a tablet computer. In addition, high school students may use laptop computers issued to high school and library staff. To enable teachers to integrate technology in the curriculum, many classrooms have been equipped with interactive whiteboards, document cameras, and liquid crystal display (LCD) overhead projectors. In addition, each teacher is issued a laptop computer.

The curriculum specialist in the Academic Affairs Division coordinates instructional technology. The curriculum specialist works with principals, instructional staff, and the ITS Department to coordinate, articulate, and align instructional technology priorities and practices. This work involves the ongoing development and implementation of instructional technology strategies and curriculum with special emphasis on language and literacy. This work is a resource to classroom teachers.

**FIGURE 10-1
TEXAS SCHOOL FOR THE DEAF ITS DEPARTMENT ORGANIZATION
SCHOOL YEAR 2015-16**



SOURCE: Texas School for the Deaf, ITS Department, March 2016.

**FIGURE 10-2
TEXAS SCHOOL FOR THE DEAF TECHNOLOGY STAFF
SCHOOL YEAR 2015-16**

POSITION/TEAM	RESPONSIBILITIES
Director of Information Technology Services (ITS)	Provides management and support for the school's computing, telecommunications, network and technology strategic planning; oversees management of the ITS budget; serves as the liaison with other departments of the school to meet their information technology needs.
Systems Analyst	Administers and supports all servers, network infrastructure, wireless environment, load-balancing computer cluster, antivirus and malware tools, and backup systems and tools.
Technology Support Specialist (1)	Provides helpdesk support for the user community that includes installing new hardware and software, and troubleshooting and resolving IT-related issues.
Telecommunications Specialist	Troubleshoots, repairs, tests, installs, customizes and maintains all communications systems, including mobile devices, video phones, and the voice over internet protocol (VoIP) system.
Learning Resource Center (LRC) Media Technicians and Administrative Assistant (2)	Coordinates and sets up all audiovisual equipment required for meetings and presentations; records and edits video; and photographs school functions.
Database Development and Management (DDM) team (3)	Oversees the development, administration, and management of all databases; provides data for all state and TSD requirements.

NOTES:

- (1) The ITS Department has three technology support specialists.
- (2) The ITS Department has two LRC media technicians.
- (3) The DDM team includes the database manager, database administrator, and database support specialist.

SOURCE: Texas School for the Deaf, March 2016.

TSD has a Technology Committee that meets as needed to identify, review, and develop technology project requirements. The Technology Committee includes the database manager and various school staff such as principals, teachers, data users and data support staff. **Figure 10-3** shows that TSD has available 26 instructional software applications.

The Texas Education Code requires schools to prepare improvement plans that include provisions for the integration of technology into instructional and administrative programs. The most effective technology plans contain clear goals, objectives, and action plans for technology projects. They assign individual responsibility for implementation steps and set deadlines.

The ITS Department’s operational budget for school year 2015-16 is \$789,326, or \$1,352 per student, based on a student enrollment of 584. **Figure 10-4** shows the ITS Department budget for school year 2015-16.

TSD received a state appropriation of \$200,000 to fund computer replacement. TSD also received \$55,000 in federal Individuals with Disabilities Education Act, Part B (IDEA-B), pass-through funding from the Texas Education Agency (TEA) to help fund its student laptop and tablet computers initiative.

In addition, TSD purchased \$5,120 of technology equipment with grant funds for school year 2015-16.

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 the hardware and software of the school is a primary responsibility of the ITS Department.

TSD barcodes all technology hardware and uses the Texas Comptroller of Public Accounts State Property Accounting system to manage and track hardware inventory. TSD follows the state’s recommendation of using a four-year replacement cycle for technology equipment, including desktop computers, laptop computers, tablet computers, printers, and servers. Each year at the beginning of the new budget cycle, the oldest technology inventory is identified for replacement. **Figure 10-5** shows the number of computers and tablet computers in use at TSD from all types of funding.

**FIGURE 10-3
TEXAS SCHOOL FOR THE DEAF INSTRUCTIONAL
SOFTWARE APPLICATIONS
SCHOOL YEAR 2015-16**

APPLICATION	LOCATION
ActivInspire interactive whiteboard application	Schoolwide
Adobe Cloud 2015	Graphic Design – High School
Atomic Learning	Schoolwide
Boardmaker	Special Needs Department
BrainPOP and BrainPOP Jr.	Lab Computers
CLASS IEP Individualized Education Program	Schoolwide
Discovery Education Streaming	Schoolwide
EBSCO library information services	Lab Computers and Instructional Staff
Encyclopedia Britannica	Lab Computers
Exploring Nature	Lab Computers
Facts4Me	Lab Computers
Final Cut Pro video editor	American Sign Language/ Video Classes
Learning A-Z: Science A-Z, Writing A-Z, and Vocabulary A-Z	Lab Computers and Instructional Staff
net Trekker digital resource library	Lab Computers and Instructional Staff
Pebble Go reading database	Lab Computers
Pixie	Lab Computers and Instructional Staff
Proloquo2go	Special Needs Department Tablet Computers
Renaissance Learning: Accelerated Math	Lab Computers
Renaissance Learning: Accelerated Reader 360, Star Math, Star Reading	Lab Computers and Instructional Staff
TexQuest: Gale, Adam Matthew Digital History Sites	Lab Computers and Instructional Staff
Type2Learn4	Lab Computers – Special Needs and Elementary Instructional
WorldBook Online	Lab Computers

SOURCE: Texas School for the Deaf, Information Technology Services Department, March 2016.

FIGURE 10-4
TEXAS SCHOOL FOR THE DEAF, INFORMATION
TECHNOLOGY SERVICES DEPARTMENT OPERATIONAL
BUDGET
SCHOOL YEAR 2015-16

CATEGORY	AMOUNT
Salaries and Benefits	\$574,054
Consumable Supplies	\$4,500
Postage and Freight	\$100
Telecommunications	\$5,000
Travel	\$1,700
Other Operating Expenses	\$11,800
Maintenance and Repair	\$6,400
Books and Reference Materials	\$200
Computer Software	\$53,100
Computer Equipment	\$92,472
Furniture and Equipment	\$40,000
Total Budget	\$789,326
Total Students	584
Average Per Student	\$1,352

SOURCE: Texas School for the Deaf, Information Technology Services Department, March 2016.

FIGURE 10-5
TEXAS SCHOOL FOR THE DEAF DESKTOP COMPUTERS,
LAPTOP COMPUTERS, AND TABLET COMPUTERS
SCHOOL YEAR 2015-16

COMPUTER	AVAILABILITY
Tablet: Apple iPad (Versions 1, 2, 3, and 4)	578
Laptop: Apple MacBook	242
Laptop: Apple MacBook Air	8
Laptop: Apple MacBook Pro	45
Desktop: Windows PC	1
Total Computers	874

SOURCE: Texas School for the Deaf, Information Technology Services Department, March 2016.

ACCOMPLISHMENTS

- ◆ TSD has maximized its distance learning resources to provide educational services to deaf and hard of hearing individuals throughout Texas.
- ◆ TSD used federal Schools and Libraries Universal Service Support E-rate Program funds to upgrade its network to provide a robust infrastructure to support increasing technology requirements.

FINDINGS

- ◆ TSD lacks a process to ensure that instructional and administrative technology users receive consistent training to effectively maximize the use of instructional technology resources.
- ◆ Management's access to data and reports is delayed due to needed data stored in six disparate information technology systems and databases.
- ◆ TSD's ITS Department staff lacks sufficient professional development and training to provide efficient support for all the technology used in the school.

RECOMMENDATIONS

- ◆ **Recommendation 41: Develop a process to assess training needs for TSD's user communities.**
- ◆ **Recommendation 42: Assess TSD's systems and develop a plan to facilitate common data access and easy report generation.**
- ◆ **Recommendation 43: Assess technology staff skill sets required to support the school's strategic initiatives and develop professional development plans and training schedules to address deficiencies.**

DETAILED ACCOMPLISHMENTS

DISTANCE LEARNING

TSD has maximized its distance learning resources to provide educational services to deaf and hard of hearing individuals throughout Texas. These resources include two key components: a video conferencing capability and a distance learning website. Videoconferencing extends access to educational resources, programs, and services to locations statewide. To provide maximum statewide outreach in the most cost effective manner, TSD uses videoconferencing technology to provide education resources. The distance learning website is a collaboration between Regional Education Service Center XI's (Region 11) Deaf and Hard of Hearing Services, and TSD's Educational Resource Center on Deafness. Both programs provide statewide services to improve educational outcomes for deaf or hard of hearing students.

The Crossroads resource website provides access to support, information, and resources for Texas deaf and hard of hearing students, their families, and the professionals who serve them. During school year 2014-15, the website had more

than 77,000 webpage hits. The website connects students to resources and programs structured to meet their needs. The website includes information about summer school programs, retreats, driver education, student tuition waivers, and online stories and books. Resources for parents include assessments and evaluations, a shared reading project, information about family weekend retreats, online sign language classes for parents and guardians, parent peer support, and statewide parent liaisons. For professionals, the website provides access to resources relating to the education of deaf and hard of hearing students.

Through TSD’s efforts and collaboration with other entities, the distance learning program expands the resources available to deaf and hard of hearing students, their family, and the professionals who serve them.

NETWORK INFRASTRUCTURE

TSD used the federal School and Libraries Universal Services Support E-Rate Program funds to upgrade its network to provide a robust infrastructure to support increasing technology requirements.

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 and through a series of local area networks. Maintaining a strong infrastructure and integrating these systems is critical to increased staff productivity, fewer data errors, and better customer service to students, parents and the community served by the school. A robust network infrastructure has the ability to address application errors, failure, and recovery without affecting the entire network.

TSD’s systems infrastructure is built on a wide area network framework that operates on a fiber-optic structure and provides 10 Gbps fiber backbone, with one Gbps wired Ethernet and 600 Mbps wireless connectivity throughout the campus. All school locations have a local area network to provide connectivity for local hardware devices. Standard administrative software is installed on all computers, and some user-specific applications are installed on certain computers.

Figure 10–6 shows the administrative software installed on school computers.

TSD has implemented so-called virtualized server architecture that reduced the number of physical servers from 43 to 12. Virtualized server technology provides the capability to

FIGURE 10–6
TEXAS SCHOOL FOR THE DEAF ADMINISTRATIVE SOFTWARE
SCHOOL YEAR 2015–16

SOFTWARE	LOCATION
Adobe Flash	Standard – All Computers
Alertus Notification System	Standard – All Computers
Apple Keynote	Standard – All Apple Computers
Apple Numbers	Standard – All Apple Computers
Apple Pages	Standard – All Apple Computers
Automated Purchasing System	Purchasing and Warehousing
Apple FileMaker Pro	Standard – All Computers
Mozilla Firefox Web Browser	Standard – All Computers
Google Chrome Web Browser	Standard – All Computers
Oracle Java	Standard – All Computers
Microsoft Office	Standard – All Computers
Parallels software manager	Human Resources, Security, and Business Office
Promethean ActivInspire	Standard – All Computers
Raptor	Security
Safari Web Browser	Standard – All Apple Computers
TalentEd	Human Resources

SOURCE: Texas School for the Deaf, Information Technology Services Department, March 2016.

divide one physical server into multiple isolated virtual environments. This reduction benefits the school by decreasing hardware and licensing costs, space requirements, and energy consumption. It also improves operational efficiency and makes the server environment easier to support and maintain.

E-rate is a federally funded program that assists schools to enhance their network and telecommunications infrastructures. The E-rate program provides discounts up to 90.0 percent to assist eligible schools to afford telecommunications and Internet access. The E-rate program is funded in cycles from July to June.

TSD qualifies for discounts of 90.0 percent for equipment and services. In school year 2005–06, TSD was allocated approximately \$3.5 million of E-rate funds to upgrade its network infrastructure. Across a span of nine years, TSD installed a robust fiber-optic network with wireless connectivity throughout the school. **Figure 10–7** shows the components of the network infrastructure.

FIGURE 10-7
TEXAS SCHOOL FOR THE DEAF NETWORK
INFRASTRUCTURE COMPONENTS
MARCH 2016

COMPONENT	EQUIPMENT
Network	Brocade Cores
	Brocade 10GB Switches
	Brocade 1GB Switches
	Meraki Wireless Access Points
	Palo Alto Firewall
Operating Systems	Apple OSX 10.X
	Microsoft Windows XP, 7, 8, 10, 2003, 2008
	VMWare Academic vSphere 5
	Apple Mac Pro Mini
Servers	Apple G5
	Apple xServ
	Dell R420
	Dell R610
Redundancy Storage	Dell 720xd
	Promise Vtrak E830f

SOURCE: Texas School for the Deaf, Information Technology Services Department, March 2016.

This robust network has ample bandwidth to support a variety of programs including videoconferencing capabilities, distance learning opportunities, computer labs, mobile devices, and computers or tablets in every instructional department on campus.

DETAILED FINDINGS

USER TRAINING (REC. 41)

TSD lacks a process to ensure that instructional and administrative technology users receive consistent training to effectively maximize the use of instructional technology resources.

TSD does not have a formal plan for training technology users. The curriculum specialist is designated as the coordinator for instructional technology training. The curriculum specialist receives occasional instructional technology training requests and coordinates training. In addition, this position often uses technology mentors to provide hands-on assistance to reinforce the previously provided training. The technology mentors are not part of the IT staff. They are technologically proficient teachers,

assigned by principals and department heads, who are paid a stipend to assist teachers and administrative staff with instruction to use technology equipment and software. They also do some minor troubleshooting, such as ensuring that nonworking equipment is plugged in or set up, assisting with logging on to systems or software, and training users in the proper use of a particular application. Technology mentors serve as the first line of support.

The ITS Department provides administrative technology training. Although new staff receives training, no process is in place for assessing the effectiveness of the training for the ongoing use of technology resources. During the review team’s interviews with instructional and administrative staff, lack of training was cited as a concern as it relates to understanding and fully using installed technology systems and tools.

TSD has developed the following technology training goals for administrators and instructional staff:

- train staff to better utilize technology to optimize a learning environment for students that is conducive to communication, accessibility, and enhanced learning;
- integrate into instruction the technology Texas Essential Knowledge and Skills (TEKS) for grades kindergarten to 8;
- teachers and students will make the best use of the tablet computers and desktop computers available for instructional purposes;
- students will practice digital citizenship (prepare students for a society full of technology) at all times;
- students will produce digital portfolios of their accomplishments (high school students); and
- teachers and curriculum staff will align available technology resources with the curriculum.

Figure 10-8 shows training offered to administrators, teachers, and support staff. This training is scheduled annually for new teachers and staff. These training offerings align with the school’s developed technology training goals for administrators and instructional staff.

Organizations that provide effective technology user training realize increased productivity and decreased manual processes. Effective training programs leverage

**FIGURE 10–8
TEXAS SCHOOL FOR THE DEAF TECHNOLOGY TRAINING FOR ADMINISTRATORS, TEACHERS, AND SUPPORT STAFF
SCHOOL YEAR 2015–16**

TRAINING		INTEGRATION-RELATED TRAINING	
Assessment Creator Training	Kahoot	Atomic Learning online technology training and professional development tool	Promethean ActivBoard Training for interactive whiteboards
Atomic Learning	NNAT – 2	Creation Applications – how to use specific applications on tablet computer to develop formative assessment	Proloquo2go
Canvas	Origo Math		
CLASS Web	Pearson Science Textbook Resources		
Eduphoria!	PowerSchool	Internet safety	Various individual training by technology mentors for programs and software subscriptions (e.g., TypeToLearn, etc.)
eSped	STARR		
Microsoft Excel	STARR – A		
Apple FileMaker Pro	STARR – Alternative 2		
Google Drive for Classroom	STAR Math		
Houghton Mifflin Harcourt math and science textbooks	STAR Reading		
How to use tablet computers as document cameras	TEKS Resource System Training		

NOTE: TEKS = Texas Essential Knowledge and Skills.
SOURCE: Texas School for the Deaf, Information Technology Services Department, March 2016.

various methods of training such as online, on-demand, or training for trainers’ methodologies to accommodate users’ learning preferences and locations. A best practice in educational institutions is to use educational technology for training to compensate for lack of time and to reduce cost. This training method makes training materials available at varying times and locations through the Internet.

The curriculum specialist and the director of ITS should develop a process to assess training needs for TSD’s user communities. TSD should develop training classes or identify additional training resources to address those training needs.

Since the time of the onsite review, TSD indicates they have appointed a staff development and training specialist to oversee the planning, management and tracking of all staff development.

No fiscal impact is assumed for this recommendation. Existing staff are conducting the training, and there is no expected additional cost for staff to conduct the training needs assessment.

DATA WAREHOUSE (REC. 42)

Management’s access to data and reports is delayed due to needed data stored in six disparate information technology

systems and databases. Schools submit required Public Education Information Management System (PEIMS) data in accordance with TEA’s PEIMS Data Standards to Regional Education Service Center XIII (Region 13). PEIMS data is used to allocate funding through the state’s Foundation School Program (FSP). However, because TSD is a state agency, it receives a biennial appropriation from the Legislature. TSD makes two PEIMS submissions per year to report required student data, incident and behavioral information.

Unlike most independent school districts, TSD does not have a dedicated PEIMS coordinator. The Human Resources and Student Support Services departments collect the teacher and student behavior and discipline data and submit to the Database Development and Management (DDM) team for PEIMS submission to Region 13. The DDM team formats the data and verifies data accuracy for submission. Since the time of the onsite review, TSD indicates they have identified a dedicated PEIMS coordinator.

These systems and databases do not interface or communicate with other systems. In many cases, to access data for required reporting purposes, the DDM team must develop a database to capture the data from multiple systems to generate the report. This development includes gathering data from the individual systems, placing the information in a compatible

format, then developing the database fields to store the data. For example, to capture all data pertaining to a specific student, staff would need access to six systems. **Figure 10–9** shows the student data in the six systems.

To date, the DDM team has 120-plus databases that provide access to data or produce reports. During the onsite review, the superintendent stated that data-driven decision making is growing at a faster rate than is feasible for the existing database team to manage and support.

TSD maintains and updates these systems independently from each other; therefore, the risk of inconsistent and erroneous reports increases. For example, two systems store student records with multiple entry points and no control or data synchronizing process. As a result, the data for a student could be different in each system. Both systems are accessed to build a report; therefore, data could be misleading or incorrect for that student. This inconsistency makes the report time-consuming to review and ensure the accuracy of the data. In some instances, reports have had errors.

The proliferation of systems has resulted in fragmentation of data, data redundancy, difficulty in generating reports for administrator and teacher use, and high training and maintenance costs. For example, keeping student records on multiple systems resulted in enrollment delays of two weeks

or longer while complete student information was being gathered.

Many schools have implemented a centralized data warehouse to keep all data required for analytical and reporting purposes. A data warehouse is a type of database that integrates copies of transactional data from disparate source systems and provisions them for common use.

TSD should assess systems and develop a plan to facilitate common data access and easy report generation. The director of ITS should work with TSD management to select members for a data warehousing project team. This team should determine what data should reside in a centralized data warehouse and evaluate data warehousing solutions. The database manager should research educational kindergarten to grade 12 data warehouse solutions and present them to the data warehousing project team for evaluation. The data warehousing project team and the Database Development and Management team should present the recommendations to TSD management for consideration and implementation. If TSD decides to implement a data warehouse, the agency should select a data warehouse solution vendor to implement and populate the data warehouse. The data warehousing project team and the director of ITS should work with the vendor to outline the specifications.

FIGURE 10–9
TEXAS SCHOOL FOR THE DEAF STUDENT DATA SYSTEMS
MARCH 2016

SYSTEM OR SOFTWARE	CONTENT
Class Systems (in the process of being replaced by eSped)	Student grade, Medicaid number (if they have one), student identification number, language of instructional delivery, Present Level of Academic Achievement and Functional Performance, Integrated Program, and progress monitoring documentation percentages by grading periods for the following content areas: math, reading, writing, science, social studies.
Apple FileMaker Pro	Assessment Results Database (DRA2, DWA, SAT10, Texas Primary Reading Inventory early reading assessment)
Eduphoria!	Student identification number, name, grade level, state standardized test scores (i.e., STAAR, TAKS), and teacher Professional Development and Appraisal System.
eSped (Replacing Class Systems)	Student name, address, phone number, Social Security number, UID, local identification number, BD, grade, age, eligibilities, FIE, schedule of services and related services, accommodations, Medicaid eligibility, parental permissions, BIP, AU supplement, STAAR testing results and recommendations, deliberations, student records and the admission, review, and dismissal process.
Power School	Attendance, basic demographics, PEIMS records information, student schedules, and grades (not transcripts).
Renaissance	Star Math and Star Reading results

NOTE: STAAR = State of Texas Assessments of Academic Readiness ; TAKS = Texas Assessment of Knowledge and Skills; PEIMS = Public Education Information Management System; UID =unique id; BD = behavior disorder; FIE = Full and Individual Evaluation; BIP = Behavior Intervention Plan; AU = Autism.
SOURCE: Texas School for the Deaf, March 2016.

The fiscal impact of this recommendation cannot be determined until the agency evaluates the needs for the data warehousing solution and the cost associated with its implementation, such as scope and features.

**PROFESSIONAL DEVELOPMENT AND TRAINING
(REC. 43)**

TSD's ITS Department staff lacks sufficient professional development and training to provide efficient support for all the technology used in the school.

Pursuant to the Texas Education Code, Section 21.451, staff development provided by a school must be conducted in accordance with minimum standards developed by the district and structured to improve education in the district. Staff development must include training in technology.

TSD's ITS Department identifies training requirements for technology staff during the annual review process. ITS Department management revises technology goals annually and identifies training required to support departmental needs. Training resources include vendors, webinars, online services such as Linda.com, trade organizations such as the Texas Computer Education Association (TCEA), and Regional Education Service Centers. Technology staff attended the following training during school year 2015–16:

- TCEA Conference;
- Information Security Forum;
- Apple certification training; and
- JAMF–Casper training.

The lack of planned training in some specific areas, such as software and hardware and for support of administrative and instructional technologies, requires TSD's technology staff to search for solutions to solve a problem. Some of these solutions include free online videos or calling the manufacturer for assistance. These extra steps in the process delay the ability of the technology staff to resolve technical problems in an efficient manner. The technology staff indicated that it takes them longer to resolve technical problems due to their lack of knowledge in some areas.

TSD's ITS Department's existing annual review process identifies the technology staff's professional development and training needs. However, although the needs are identified, the director of ITS does not use this process to

prepare a formal professional development plan containing training and budget needs. High-performing schools' technology departments include a formal professional development and training plan for staff to remain up-to-date regarding new technology and to continue striving to master existing technology. A professional development and training plan typically consists of clear guidelines for areas of improvement, including goals, reason for training, activities, milestones, resources, and a statement of consequences if no evidence of growth results.

TSD's ITS Department management should assess technology staff skill sets required to support the school's strategic initiatives and develop professional development plans and training schedules to address deficiencies.

The director of ITS should ensure that the training needs identified during the annual review process are incorporated into the department's formal professional development plan. The ITS Department's annual training budget is \$5,000. The director of ITS should work with the superintendent to expand the department's training budget to fund a departmental professional development and training plan. Additionally, the ITS Department should regularly evaluate its progress against the plan to determine needed adjustments to meet the school's changing technology needs.

No fiscal impact is assumed for this recommendation. The director of ITS should identify the gap between the funding needed to meet the training needs of ITS Department staff and the annual ITS training budget of \$5,000. The director of ITS should present the proposed training budget to the superintendent and the CFO as part of the budget process.

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 10. TECHNOLOGY MANAGEMENT							
41. Develop a process to assess training needs for TSD's user communities.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
42. Assess TSD's systems and develop a plan to facilitate common data access and easy report generation.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
43. Assess technology staff skill sets required to support the school's strategic initiatives and develop professional development plans and training schedules to address deficiencies.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0



