



# LEGISLATIVE BUDGET BOARD

## Vernon Independent School District

### Management and Performance Review

PREPARED BY LEGISLATIVE BUDGET BOARD STAFF

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SEPTEMBER 2024

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# EXECUTIVE SUMMARY

## LEGISLATIVE BUDGET BOARD SCHOOL PERFORMANCE REVIEW BACKGROUND

The Legislative Budget Board’s School Performance Review Team conducts comprehensive and targeted reviews of school districts’ and charter schools’ educational, financial, and operational services and programs. The Texas Legislature established the team in 1990. The Texas Government Code, Section 322.016, authorizes the Legislative Budget Board (LBB) to “periodically review the effectiveness and efficiency of the operations of school districts, including the district’s expenditures for its officers’ and employees’ travel services.”

The review team produces reports that identify accomplishments, findings, and recommendations based on the analysis of data and onsite observations of each district’s operations. The report recommends methods to decrease costs, increase revenues, reduce overhead, streamline operations, and improve the delivery of educational, financial, and operational services. School districts typically are selected for management and performance reviews based on a risk analysis of educational and financial indicators.

Before conducting the onsite visit, the review team requests and analyzes data from the district and multiple state agencies, including the Texas Education Agency (TEA), the Texas Department of Agriculture, and the Texas School Safety Center. For the Vernon Independent School District (ISD) review, the LBB School Performance Review Team obtained additional feedback on district operational, educational, and financial performance through surveys of parents and district and campus staff. While onsite, the review team gathered information through interviews and observations with district and campus administrators, staff, and members of the Vernon ISD Board of Trustees (board).

## VERNON ISD

The Legislative Budget Board’s School Performance Review Team visited the district in October 2023.

The review team identified 25 significant findings and recommendations based on the analysis of data and the onsite observation of the district’s educational, financial, and operational services and programs. Some recommendations are based on state or federal laws, rules, or regulations, and the district should address them

promptly. Other recommendations are based on comparisons to state or industry standards or accepted best practices, and the district should review these recommendations to determine the level of priority, appropriate timeline, and method of implementation.

Vernon ISD is located in Wilbarger County, approximately 50 miles northwest of Wichita Falls. The district is served by regional Education Service Center IX (Region 9). The state legislators for the district are Senator Charles Perry and Representative James B. Frank.

During school year 2022–23, Vernon ISD’s enrollment was 1,792 students, served by 300.5 full-time-equivalent staff positions. The district operates six campuses, including two elementary schools, one middle school, one high school, a dropout recovery school, and a maximum-security residential treatment facility. During school year 2022–23, the student population in Vernon ISD was identified as 49.3 percent Hispanic, 29.5 percent White, 8.0 percent Asian, 7.1 percent African American, 0.2 percent American Indian, and 5.9 percent reported as two or more races. Additionally, 71.5 percent of students were identified as economically disadvantaged.

## FINANCIAL OVERVIEW

During fiscal year 2023, Vernon ISD’s total actual operating expenditures from all funds were \$24.0 million, or \$13,448 per pupil. In comparison, the statewide per-pupil expenditures were \$12,389. Approximately 53.9 percent of Vernon ISD’s total actual operating expenditures were allocated to instruction, which is slightly less than the state’s allocation of 55.3 percent.

The district’s total fund balances increased by 5.3 percent from fiscal years 2022 to 2023, with a total fund balance for fiscal year 2023 of \$19.0 million. Vernon ISD operates on a fiscal year beginning September 1 and ending August 31.

For fiscal year 2024, Vernon ISD adopted a budget of approximately \$19.8 million. The district’s School Financial Integrity Rating System of Texas rating was C/Meets Standard for school year 2022–23. Vernon ISD received a Smart Score of 2.0, with an academic performance rating of Very Low Academic Progress and an Average spending rate in

**FIGURE 1  
VERNON ISD ACCOUNTABILITY RATINGS  
SCHOOL YEARS 2016–17 TO 2021–22**

DISTRICT/CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 AND 2020–21 (2)	2021–22
T.G. McCord Elementary School	Met Standard	Met Standard	F	Not Rated (Disaster)	Not Rated (4)
Vernon Elementary School (3)	Met Standard	Met Standard	F	Not Rated (Disaster)	Not Rated (4)
Vernon Middle School	Met Standard	Met Standard	D	Not Rated (Disaster)	C
Vernon High School	Met Standard	Met Standard	C	Not Rated (Disaster)	C
Districtwide	Met Standard	D	C	Not Rated (Disaster)	Not Rated (4)

NOTES:

- (1) The Legislature phased in a new accountability rating system for Texas public schools beginning in school year 2017–18, during which school districts received alphabetical ratings. Campuses received alphabetical ratings beginning in school year 2018–19.
- (2) Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic.
- (3) Vernon Elementary School was named Shive Elementary School for accountability purposes until school year 2022–23.
- (4) Pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, districts and campuses that would have received a rating of D or F for school year 2021–22 are designated Not Rated.

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2021–22.

2020. See **Chapter 3 Business Services Management** for more information about these rating systems.

**EDUCATIONAL OVERVIEW**

TEA issues accountability ratings for each district and campus. **Figure 1** shows the state accountability ratings for Vernon ISD’s campuses from school years 2016–17 to 2021–22. For school year 2021–22, the district received a Not Rated designation pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, which authorized the Commissioner of Education to assign a Not Rated label to a district or campus that would have received a D or F rating. The elementary campuses also received this designation. TEA did not issue ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic. The Vernon ISD Opportunity Center received its first academic accountability rating in school year 2021–22. The campus earned a B rating for that year, representing Vernon ISD’s only academic accountability rating higher than a C since TEA introduced the A-to-F rating system in school years 2017–18 and 2018–19.

**Figure 2** shows academic performance measures for Vernon ISD, Region 9, and the state. Vernon ISD’s academic performance rates less than those of the region and state for all measures, except the Texas Success Initiative assessment outcomes.

**ACCOMPLISHMENTS**

During its review, the LBB School Performance Review team identified noteworthy accomplishments resulting

from the district’s best practices. Subsequent chapters discuss 11 district accomplishments, including the following practices.

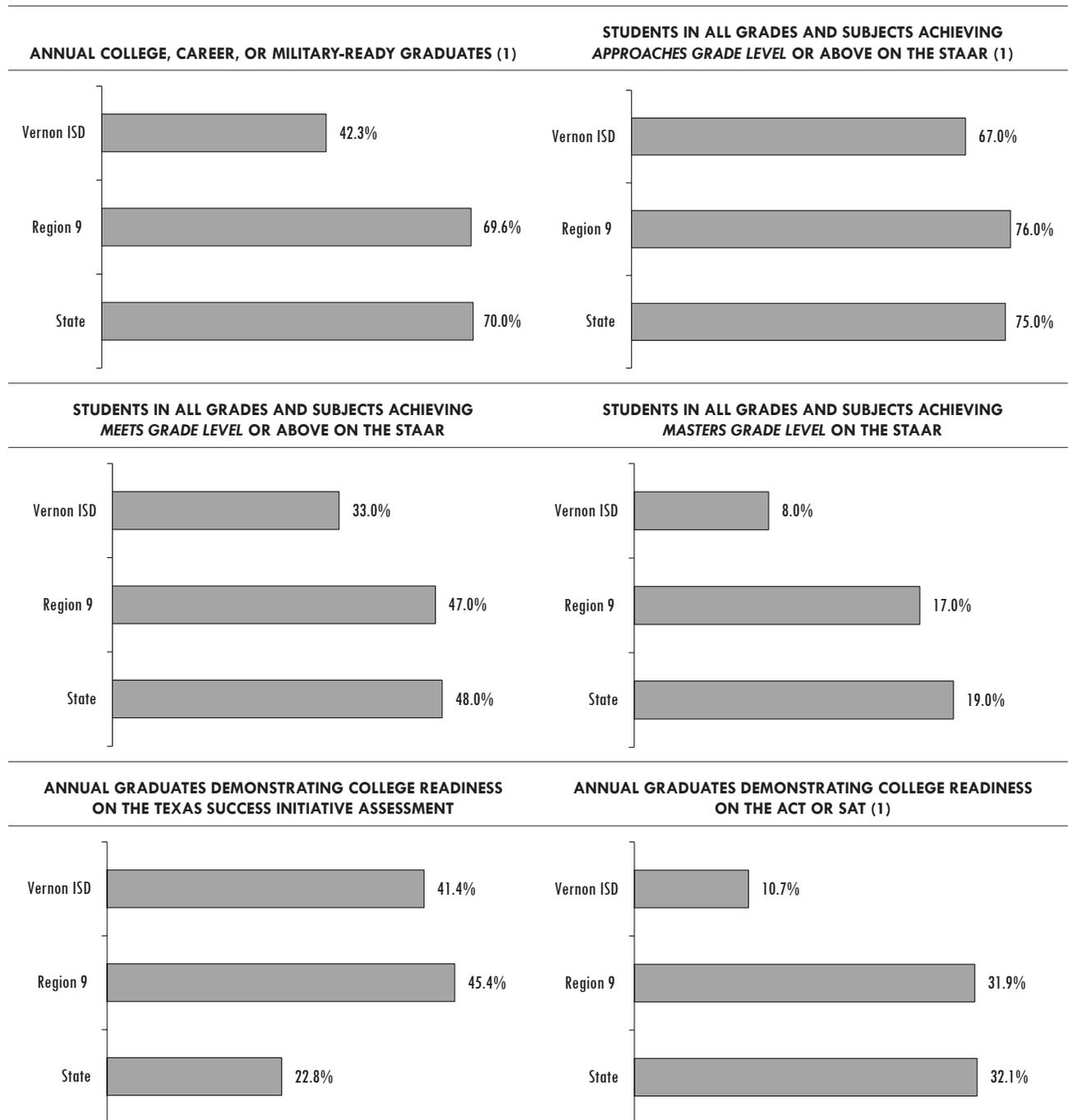
**INSTRUCTIONAL CYCLE**

Vernon ISD uses data to promote instruction that is responsive to students’ learning needs through an ongoing structured practice known as an instructional cycle. Lesson planning is guided by the Texas Instructional Leadership (TIL) Lesson Alignment model. Teachers plan independently and in cohorts to achieve alignment within grade levels, using campus and district-developed and vendor-provided curriculum-planning documents. Teachers submit lessons to campus leaders, who review the plans and provide feedback to teachers before they deliver the lessons.

Vernon ISD staff develop online assessments aligned with state standards and administer them to all students in a grade level or course. After administering common assessments, staff disaggregate and analyze assessment data to establish peer groups based on learning needs.

Ultimately, educators provide intervention, enrichment, or individualized instruction to students in a scheduled daily class that is modified every three weeks based on common assessment outcomes. This supplemental instruction is provided in a separate class, enabling the foundation classroom teachers to focus on delivering the planned curriculum. These data-informed processes enable staff to evaluate and respond strategically and efficiently to student learning needs throughout the school year.

**FIGURE 2**  
**ACADEMIC PERFORMANCE MEASURES FOR VERNON ISD, REGIONAL EDUCATION SERVICE CENTER IX (REGION 9),**  
**AND THE STATE**  
**SCHOOL YEAR 2022–23**



NOTE: (1) Students may demonstrate college, career, or military readiness (CCMR) in several ways. They can demonstrate readiness by earning an industry-based certification, earning dual course credit, meeting the passing standard on the Texas Success Initiative (TSI) Assessment, or achieving an established benchmark on a TSI exemption assessment, including the ACT, SAT, or certain State of Texas Assessments of Academic Readiness (STAAR) end-of-course exams. A complete list of CCMR indicators can be found in the Texas Education Agency’s Comprehensive Texas Academic Performance Reporting Glossary  
 SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2022–23.

**GIFTED AND TALENTED**

Vernon ISD has substantially improved its gifted and talented (GT) policies and practices. For example, during the fall of the 2022–23 school year, the district served 3.5 percent of its population in the GT program, significantly less than the 8.2 percent of students served statewide in GT programs. District leadership prioritized reviewing and improving the GT identification procedures to emphasize appropriate referral, assessment, and services for students. As a result, Vernon ISD's percentage of identified GT students nearly doubled in the spring semester of that school year.

Vernon ISD also revised GT policies and practices to align with the requirements and best practices outlined in the Texas Education Agency's (TEA) Texas State Plan for the Education of Gifted/Talented Students. For example, the district established a GT advisory group to review the district's GT policies and procedures and make recommendations for improvements. This group consists of community representatives, parents of GT students, school staff, and GT education staff. Vernon ISD also revised its GT manual for the first time since 2014 and posted it on the district website to be accessible to parents, the community, and students.

**COMMUNITY ELIGIBILITY PROVISION**

The Vernon ISD Child Nutrition Department increased revenues by implementing best practices for administering the federal Community Eligibility Provision (CEP) program. The CEP program enables districts in high-poverty areas to provide no-cost meals to all students. Although all students receive free meals through the CEP program, school districts receive varying reimbursement amounts based on the percentage of students identified as migrant, homeless, or in the care of the Department of Family and Protective Services, and those participating in programs such as Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, certain types of Medicaid, Head Start programs, and state-funded prekindergarten. However, a district can group its campuses strategically to optimize each group's average population of eligible students when submitting meals for reimbursements.

During school year 2022–23, Vernon ISD grouped its campuses participating in CEP, which were T.G. McCord Elementary School, Vernon Elementary School, and Vernon Middle School. The district was eligible for 92.2 percent of meals served at those campuses to be reimbursed at the free rate with this configuration. During school year 2023–24,

the district added Vernon High School and Vernon ISD Opportunity Center to the CEP program and reorganized its groupings to optimize the percentage of meals reimbursed at the free rate. The district formed three groups: (1) T.G. McCord Elementary School and Vernon High School, which are eligible as a group for 96.1 percent of meals reimbursed at the free rate; (2) Vernon ISD Opportunity Center, which is eligible for 100.0 percent reimbursement; and (3) Vernon Elementary School and Vernon Middle School, which are eligible as a group for 97.1 percent reimbursement. The 2023–24 free-meal reimbursement rates for each group are greater than the 2022–23 rate of 92.2 percent.

**POSITIVE BEHAVIOR INCENTIVES**

Vernon ISD implements effective and extensive positive behavior programs. All staff have received training in Capturing Kids Hearts, a professional development model that trains teachers and administrators to build meaningful relationships with their students, develop accountable classrooms, and improve academic performance. In addition, most campuses implement currency-based programs to reward students for good behavior. Students can use this currency, Lion Bucks or Cub Cash, to purchase items such as treats and toys at the end of each week in campus stores.

The district also has implemented several competitions to incentivize behavior and attendance. Vernon Elementary School rewards classes demonstrating positive behavior by presenting them with Paws Cards; the class that earns the most Paws Cards during a period is rewarded with a treat. Vernon Middle School and Vernon High School offer field trips and other incentives to students who earn passing grades, perfect attendance, and no disciplinary actions during the nine-week grading period, and high-attendance students are chosen randomly to receive a treat, such as shaved ice. In addition, at the high school, grade levels compete to achieve the highest attendance rate of the week. At the end of the year, the grade with the highest attendance rate earns a field trip to a theme park.

**FINDINGS AND RECOMMENDATIONS**

The following sections summarize the review team's findings and recommendations in each of the following categories:

- (1) organization and staffing;
- (2) policies and procedures; and
- (3) planning.

### **ORGANIZATION AND STAFFING**

An effective organizational structure and efficient staffing are essential to maintain a high-functioning school district. Administrators must manage their workload to balance supervisory responsibilities and executive duties. Employing experienced and highly qualified leaders and instructional staff can enhance the district's financial, educational, and operational performance and improve student achievement.

Vernon ISD's reporting structure and management systems do not support special programs and student services adequately. The job description for the assistant superintendent of operations outlines responsibilities for operations management, risk management, budget management, communications, and compliance. However, this job description does not align with the assistant superintendent of operations' reported responsibilities or management assignments described in the organizational chart. Specifically, this position manages services often referred to as special programs, which include special education, English as a second language, and support for students who are homeless or placed in foster care.

The assistant superintendent of operations has extensive responsibilities, both de facto and documented. The challenge of managing these responsibilities is compounded by the district's lack of operational procedures for consistent evaluations of noninstructional staff and effective internal communications. As a result, many of Vernon ISD's special programs and services staff could benefit from additional support and guidance. Without a balanced organizational structure, leadership may lack the background and capacity to evaluate and support staff and programs adequately. Insufficient support for special programs affects the most vulnerable student populations.

In addition, Vernon ISD lacks systems and processes to staff its campuses and departments strategically. Staffing decisions are made subjectively rather than objectively, often without consideration of data or best practices. For example, Vernon ISD does not have a process to determine whether paraprofessional staffing is sufficient to meet student and campus educational needs. Rather than using staffing formulas to determine appropriate paraprofessional staffing levels, district leadership considered staffing at neighboring districts, historical staffing data, and their subjective assessments of the paraprofessionals' engagement levels during campus visits. Staffing formulas, however, would account for student service requirements, grade level needs, enrollment trends, teacher counts, and paraprofessional categories when calculating recommended staffing levels.

The district also lacks strategic staffing processes in the Child Nutrition Department, as evidenced by disproportionate staffing relative to campus populations and meals served.

The following recommendations would assist the district's organization and staffing:

- modify the district's organization to include dedicated oversight, support, and evaluation of special programs and student services;
- assess district staffing levels and develop staffing allocation formulas based on best practices and student and campus needs; and
- evaluate the efficiency of Child Nutrition Department staffing in the district's cafeterias.

### **POLICIES AND PROCEDURES**

Local school board policies articulate the board's adopted positions on various matters and should align with the legal board policies, which outline relevant state and federal laws. District procedures specify how these policies should be implemented. Together, policies and procedures provide a framework for district operations, empowering staff to perform their duties effectively, efficiently, and consistently while adhering to applicable laws.

Although Vernon ISD recently reviewed and updated its board policies with an external organization, the district lacks board policies for several key areas. For example, Vernon ISD has not developed a detailed fund balance policy that establishes the district's priorities for the general fund. A district's fund balance, representing its assets minus liabilities at the end of the fiscal year, is an important safety net to guard against unforeseen financial events. Vernon ISD's total fund balance for fiscal year 2022 was equal to 9.1 months of its operating expenditures, exceeding the School Financial Integrity Rating System of Texas minimum standards and the recommendations from the Government Finance Officers Association. Although exceeding these standards does not violate law or rule, accumulating a fund balance without plans for its use raises concerns that the district is not managing its resources to maximize student support or operational efficiency. For example, an excessive fund balance could indicate that the district has established an unnecessarily high tax rate or that its budgeting practices are inefficient.

Additionally, Vernon ISD does not have a board policy to address bus replacement. School buses are a significant

capital expense, and a long-term transportation plan helps districts secure the most fiscally responsible vehicle repairs and acquisitions. In October 2023, Vernon ISD's fleet consisted of 25 buses, 10 of which were within the recommended age range for replacement. It is imperative that the district plan for the costly maintenance and replacement of vehicles in its aging fleet.

Vernon ISD also lacks procedures to guide the implementation of certain board policies. For example, the district's Human Resources Department lacks procedures to implement Board Policies CPC (LEGAL) and CPC (LOCAL), which outline the district's records management program requirements. If records are not maintained properly, confidential documents may be accessed inappropriately. Records retained longer than necessary pose a security risk, increase storage costs, and inhibit organizational efficiency. In addition, Vernon ISD does not have effective procedures to implement Board Policy DN (LOCAL), which requires district staff to receive their annual performance appraisals, including the evaluation criteria. The review team found evidence that formal evaluations are not performed consistently for noninstructional staff or educational aides. Similarly, Vernon ISD's Board Policy DC (LOCAL) requires the superintendent to define job positions' qualifications, duties, and responsibilities and ensure they are current and accessible. However, the district does not update job descriptions regularly, which violates board policy, increases legal exposure, and may foster organizational confusion. The following recommendations would improve the district's policies and procedures:

- adopt a board policy to identify the balance the district will maintain in its general fund and how it will use these funds;
- adopt a board policy to guide bus replacement and disposal based on the vehicle's mileage and age;
- develop written procedures outlining a formal, annual performance evaluation for all staff in accordance with board policy and the district of innovation plan;
- implement a process to review and update all job descriptions annually; and
- develop written standard operating and safety procedures, including safety protocols, for transportation staff functions.

## PLANNING

Effective school districts engage in ongoing strategic planning to identify their priorities, needs, and resources and allocate those resources accordingly. The review team identified opportunities for the district to improve operations through targeted planning strategies.

Staff reported that the Vernon ISD budget is developed without a strategic plan or related planning documents. Additionally, the district does not solicit sufficient input from stakeholders within the community or their campuses and departments. Consequently, the district lacks a comprehensive strategic planning process to establish measurable, time-bound goals, allocate budget and human resources, and address unforeseen setbacks.

Similarly, the district lacks a long-range facilities master plan, which would provide guidance for future construction and renovation programs. A comprehensive facilities master plan would identify district priorities, potential and ongoing projects, associated budgets and timelines, and relevant data such as enrollment projections. Vernon ISD also does not have a plan to manage, measure, or monitor its energy use.

Additionally, Vernon ISD lacks a wellness plan to guide nutrition education efforts in accordance with requirements of the federal Healthy, Hunger-Free Kids Act of 2010. A wellness plan identifies the district's nutritional education objectives, benchmarks, implementation activities, and methods for measuring implementation.

The district also lacks an efficient, long-range planning process for technology. Vernon ISD is developing a long-range technology plan. Additionally, the district does not have a technology advisory committee to provide feedback and support the district's technology goals.

The following recommendations would assist the district's planning:

- develop a proactive budget-planning approach that aligns spending with identified needs and goals and includes mechanisms for budgeting based on a consensus of long-term needs and use of resources;
- develop a comprehensive, long-range facilities master plan that includes an annual facilities audit and ongoing preventive maintenance;
- develop and implement an energy management plan to conserve energy and reduce annual energy costs;

- develop a comprehensive nutrition education and communication plan that involves electronic and print communication methods; and
- develop a long-range technology plan and establish a process to review and update the plan annually.

The following chapters summarize the district's accomplishments, the review team's findings, and numbered recommendations. Detailed explanations for the accomplishments and recommendations include estimated fiscal impacts. Each chapter concludes with fiscal data, when appropriate, showing the chapter's recommendations that have estimated savings or costs for school years 2024–25 to 2028–29.



# 1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT

## ACCOMPLISHMENTS

- ◆ Vernon ISD has established processes that support a strong working relationship between the superintendent and board members.
- ◆ Vernon ISD disseminates school board information to district employees, which promotes effective communication and transparency.
- ◆ Vernon ISD supports students and families by connecting them with a range of community resources and services.

## FINDINGS

- ◆ Vernon ISD lacks an efficient process for tracking required board member training.
- ◆ Vernon ISD lacks a consistent process for documenting board agendas and minutes.

## RECOMMENDATIONS

- ◆ **Recommendation 1: Develop and implement a formal tracking process to document that board members receive all required training.**
- ◆ **Recommendation 2: Develop and implement procedures for posting agendas and minutes, and clearly define which staff positions are responsible.**

## BACKGROUND

The governance and management of an independent school district provide a foundation for the effective and efficient education of students. In Texas, school districts are governed by an elected board of trustees, which is responsible for establishing performance goals, monitoring finances, and adopting policies. The superintendent is responsible for implementing policy, managing district operations, and proposing a budget to the board. The board and superintendent collaborate as a leadership team to advocate for the high achievement of all district students.

A school district’s community involvement function involves communicating with stakeholders and engaging them in district decisions and operations. District stakeholders include students, staff, parents, residents, and business owners. Stakeholders must be aware of and engaged in the

**FIGURE 1–1  
VERNON DEMOGRAPHICS  
CALENDAR YEAR 2022**

RACE/ETHNICITY	PERCENTAGE
White	64.2%
Hispanic or Latino	34.1%
Two or more races	14.8%
Black or African American	7.9%
Asian	4.2%
American Indian and Alaskan Native	0.6%

NOTE: Race and ethnicity are considered separate and distinct identities within U.S. Census Data. Hispanic or Latino origin is considered an ethnicity in census data and is asked in a separate question from race. Therefore, percentages shown may not sum to 100.0.  
SOURCE: U.S. Census Bureau, 2022 American Community Survey Five-year Estimate Subject Tables.

district’s issues, challenges, and priorities. Communication tools include public meetings, paper and electronic correspondences, engagement events, local media, the district’s website, and social media.

A successful community involvement program addresses the unique characteristics of the school district and the community. Community involvement plays a critical role in school systems. Community representatives and volunteers provide valuable resources that can enrich and enhance the educational system. In turn, the community benefits from an informed citizenry, an educated workforce, and future community leaders.

Vernon Independent School District (ISD) is located in Wilbarger County and a small portion of eastern Foard County, approximately 50 miles northwest of Wichita Falls. It spans 560.6 square miles and is served by regional Education Service Center IX (Region 9). According to the U.S. Census Bureau, the city of Vernon had a population of 10,018 in calendar year 2022. The population of Vernon has decreased by 8.9 percent since 2010. **Figure 1–1** shows the city’s demographics in 2022.

The city of Vernon is the seat of Wilbarger County and contains the county offices, the district court, and the county jail. Vernon College, a local community college, reported a fall 2021 enrollment of 2,358 students.

According to 2022 census data, the median household income of Vernon was \$47,528, with a poverty rate of 17.4 percent of households. Vernon ISD is in northwest Texas, according to the 2022 economic categorization report by the Texas Comptroller of Public Accounts (CPA). The industries that employ the most workers in northwest Texas are educational services, healthcare, and social assistance, which employ 34.2 percent of the workforce. The CPA report shows that from calendar years 2015 to 2020, total jobs in this region decreased by 3.7 percent, whereas total jobs in the state increased by 3.3 percent.

In school year 2022–23, Vernon ISD employed 300.5 full-time-equivalent staff positions. During the past five school years, student enrollment has decreased by 8.1 percent, from 1,950 in school year 2018–19 to 1,792 in school year 2022–23. **Figure 1–2** shows the student demographics of Vernon ISD for school year 2022–23.

The Legislative Budget Board’s (LBB) School Performance Review Team visited the district in October 2023, at which time the district operated six campuses: T.G. McCord Elementary; Vernon Elementary; Vernon Middle School; Vernon High School; Vernon ISD Opportunity Center, which is a dropout recovery school that includes the disciplinary alternative education program; and a maximum-security residential treatment facility that operates through a partnership with the North Texas State Hospital.

The Vernon ISD Board of Trustees (board) is the policymaking body authorized by statute to govern the district. The board’s responsibilities include the following duties:

- adopt goals and objectives for the district;
- adopt policies;
- hire and evaluate the superintendent;
- adopt an annual budget and tax rate; and
- seek to establish working relationships with other public entities to make effective use of community resources and to serve the needs of public school students in the community.

The seven-member board serves staggered, three-year terms, and elections are held every year on the May uniform election date. **Figure 1–3** shows Vernon ISD’s board members, their respective roles, and the initial year each was elected, as of October 2023.

The district conducts monthly public board meetings facilitated by the board president. As of October 2023, the

**FIGURE 1–2**  
**VERNON ISD STUDENT DEMOGRAPHICS**  
**SCHOOL YEAR 2022–23**

STUDENTS	PERCENTAGE
Hispanic	49.3%
White	29.5%
Asian	8.0%
African American	7.1%
American Indian	0.2%
Pacific Islander	0.0%
Two or more races	5.9%

SOURCE: Texas Education Agency, Texas Performance Reporting System, school year 2022–23.

**FIGURE 1–3**  
**VERNON ISD BOARD OF TRUSTEES**  
**SCHOOL YEAR 2023–24**

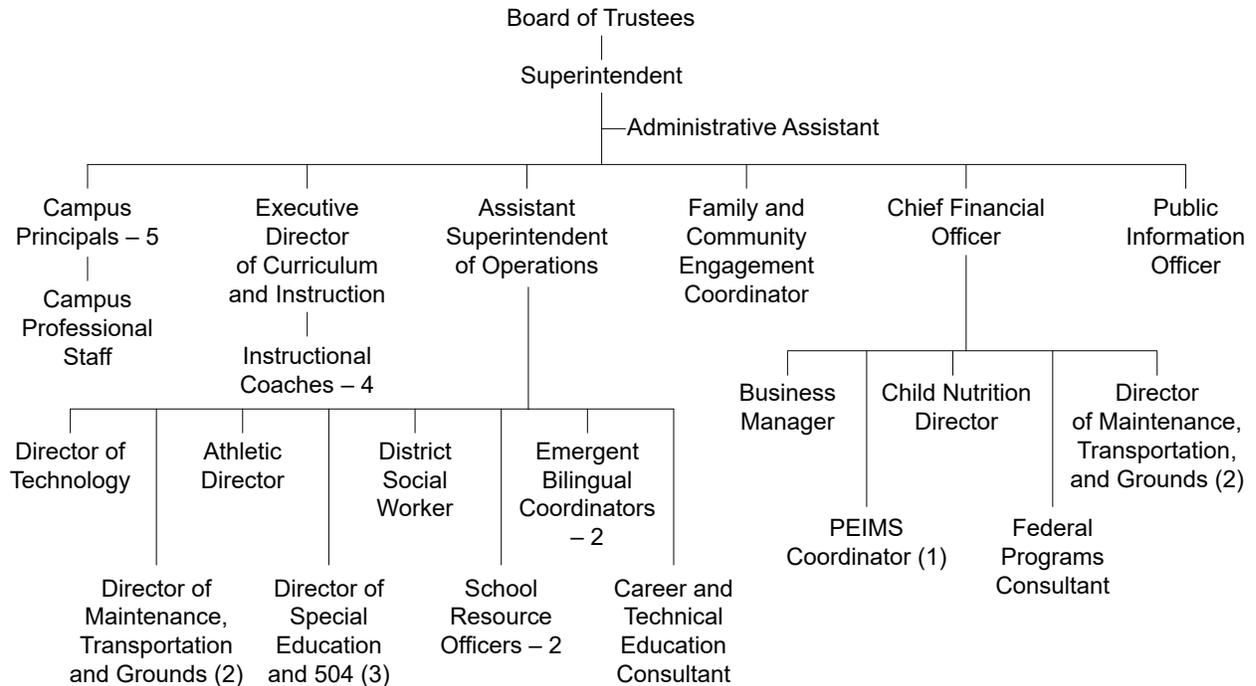
MEMBER	ROLE	YEAR ELECTED
Emory Byars	President	2012
Chris Lehman	Vice President	2017
Taylor Craighead	Secretary	2022
Carrie Hawkins	Member	2020
Patrick Parmer	Member	2021
Bryson Henry	Member	2022
Amanda Lehman	Member	2022

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

board typically meets on the third Monday of each month at 6:00 PM at the Vernon ISD Administrative Building. In compliance with the Texas Open Meetings Act, district staff post public notification of board meetings physically at the Vernon ISD Administrative Building and electronically on the district’s website. Board Policy BE (LOCAL) states that the district may call special meetings at the board president’s discretion or upon the request of two board members. From September 2022 to September 2023, Vernon ISD’s board held 13 regular meetings and 20 special called meetings. The board called three special meetings for dedicated board training and 10 special meetings to conduct the superintendent hiring process.

The public may attend all regular meetings and address the board regarding topics of interest. Individuals who want to address the board or provide public comment must register before the start of the meeting and indicate the topic of their

**FIGURE 1–4  
VERNON ISD’S ORGANIZATION  
SCHOOL YEAR 2023–24**



NOTES:

- (1) PEIMS=Public Education Information Management System.
- (2) The director of maintenance, transportation, and grounds reports to the chief financial officer for transportation and to the assistant superintendent of operations for maintenance and grounds.
- (3) 504=Section 504 of the federal Rehabilitation Act of 1973, which requires school districts to evaluate students for disabilities and provide free appropriate public education to qualified students.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

presentation. In accordance with board policy, an individual’s public comment is limited to five minutes per meeting. In addition, the board addresses personnel matters and other confidential topics in closed sessions as needed.

Dr. Kermit Ward has served as Vernon ISD superintendent since December 1, 2022. He oversees the management of the district’s daily operations and is charged with executing board policies. The superintendent reports directly to the board, and 11 staff report directly to the superintendent. However, five of these reporting positions are the campus principals, who also report to the assistant superintendent of operations for operational and disciplinary issues, according to staff. **Figure 1–4** shows Vernon ISD’s organization at the time of the review team’s onsite visit.

The Vernon ISD board members enrolled in the Lone Star Governance (LSG) program in June 2023. LSG is a continuous-improvement model of governance focused on

improving student outcomes through workshops, coaching, and ongoing support for governing teams. Through the LSG process, Vernon ISD’s board adopted specific five-year academic goals for the district and developed a dedicated board calendar in collaboration with an assigned coach.

The board evaluated the superintendent in December 2023 and will conduct annual evaluations during his tenure. As part of the collaborative LSG process, the superintendent and board developed an evaluation tool that includes goals for the superintendent, including campus accountability ratings, results of stakeholder surveys, and teacher turnover rates as indicators of progress toward district improvement.

The district’s engagement in the LSG process has led to an earlier preparation and distribution of board agendas and materials, which helps to increase the time board members have to prepare for meetings. The superintendent, in consultation with the board president, prepares the agenda

for all board meetings. Any board member may request that a subject be included on the agenda for a meeting. In school year 2023–24, district leadership requested that agenda items be submitted two weeks in advance of the next meeting. Board meeting materials are distributed to members' district email addresses at least seven days before the meeting. The materials contain a consent agenda that includes a summary of financial data disaggregated by functional area.

The review team observed the October 18, 2023, board meeting. The meeting functioned smoothly, and board members followed Robert's Rules of Order consistently. The review team's analysis of board meeting minutes from September 2022 to September 2023 found that board members attend meetings regularly.

The district reviews and updates its board operating procedures and board policies annually at the June board meeting. In school year 2022–23, this process was delayed until the August board meeting when the district considered proposed changes to its board policies from a recent comprehensive review by the Texas Association of School Boards (TASB).

Several staff are responsible for overseeing Vernon ISD's community involvement functions. In March 2023, the district hired its first public information officer, whose primary responsibilities include posting information on social media, writing news releases, and communicating with various organizations in the community. The district also employs a family and community engagement coordinator, who helps organize the parent teacher organization (PTO) members and assists with the volunteer process. Additionally, the district social worker provides students and families with information about resources in the area.

The district uses several methods to communicate with the public, including social media platforms, district and campus websites, newsletters, email, mass texts, and an electronic district application. Vernon ISD also develops and distributes electronic surveys for parents and community stakeholders to provide feedback on the district's programs and processes. The district's school year 2023–24 District Improvement Plan includes parent and community engagement goals that aim to engage parents' participation in their children's learning. Vernon ISD plans to increase engagement by 10.0 percent through regular communication and meetings between campus staff and parents.

Campuses also host events throughout the year, which include open houses, meet-the-teacher nights, movie nights,

awards assemblies, and holiday programs. Staff interview responses suggest that the district is active in recruiting parent and volunteer involvement, and the activity levels across campuses reportedly are increasing. The district's oversight process for all parent and community volunteers includes background checks and online volunteer training. The campus PTOs assist with events and activities, including homecoming, track-and-field day, face paintings, and field trips. The PTOs also contribute to campus morale by providing periodic teacher appreciation gifts and student reward prizes. The elementary school PTOs reportedly are more active than the secondary school PTOs.

Although the district does not have an education foundation, staff organize occasional fundraisers to contribute to the district activity fund. During school year 2022–23, the district held a benefit golf tournament that generated nearly \$16,000. This funding supported various events, including the homecoming carnival and prize distributions throughout the year.

The superintendent manages public information requests, which are routed to his district email address, and he then passes the request to the appropriate respondent. The superintendent reported receiving one formal public information request from January 2023 to October 2023.

## **DETAILED ACCOMPLISHMENTS**

### **WORKING RELATIONSHIPS**

Vernon ISD has established processes that support a strong working relationship between the superintendent and board members.

During interviews, board members and staff reported that the superintendent and board members have excellent working relationships. The board and the superintendent are required to work together to advocate for the high achievement of all district students, pursuant to the Texas Education Code, Section 11.1512(b)(1).

The superintendent communicates with board members weekly through a comprehensive email, as well as individual texts, calls, and follow-up emails as needed. All board members reported being well-informed of district operations and any issues that occur on the campuses.

Vernon ISD board members and the superintendent attended the LSG training in June 2023, which focused on team building and improving student outcomes. Since the training, the board and superintendent have collaborated

to develop student outcome goals, progress measures, and guidelines for the district's growth. Board members reported that the recent policy providing additional time to review board meeting materials has enabled them to ask more knowledgeable questions regarding agenda items, which informed their decision making. According to Hanover Research's 2020 brief, *Effective Superintendent & School Board Collaboration*, "strong communication and trusting relationships between school boards and superintendents positively impact school leadership and student achievement."

### **COMMUNICATION**

Vernon ISD disseminates school board information to district employees, which promotes effective communication and transparency.

The public information officer writes the *Boardroom Blast*, which is a newsletter summarizing regular school board meetings and which includes relevant context for staff. It includes who attended the meeting, the action items, the recorded motions and seconds for each item, and comprehensive notes on the discussion items. It also highlights any personnel changes within the district and lists the next scheduled board meeting.

Research suggests that effective communication within organizations is associated with increased levels of performance and service, and that effective districts consistently uphold transparent communication with staff regarding planning and decision making. The *Boardroom Blast* exceeds the statutory requirement of posting meeting minutes because it is more detailed and emailed directly to district employees. This proactive approach ensures that critical information is distributed promptly, promoting transparency and trust that enhances organizational cohesion.

### **COMMUNITY CONNECTIONS**

Vernon ISD supports students and families by connecting them with a range of community resources and services.

The district social worker serves as a liaison to strengthen home, school, and community partnerships to support student success. According to the Texas School Social Work Network, school social workers have "a unique multilevel perspective and are equipped with skills to address individual student mental health, family support, and crisis intervention." Texas school districts are not required to employ social workers. However, they are an important part

of a student support team and integral to students' education, as research has demonstrated that social workers can improve educational outcomes for students.

The district social worker provides counseling services for special education students and facilitates connections with community resources by maintaining a comprehensive list of services available for students and families. In cases where the school cannot address a student's needs, such as medical assistance, the district social worker collaborates with organizations in the community, seeking partnerships or donations to assist students. The social worker helped to establish a district partnership with Care Solace, which is a free, online, confidential mental health care coordination service that the district offers to students, staff, and their families in multiple languages. In addition, the social worker serves as the district liaison for homeless, foster care, military, and migrant students and families. The district social worker also assists with the Student Health Advisory Committee (SHAC) and publishes a monthly newsletter highlighting topics that affect students in the district. The October 2023 newsletter included the following topics:

- the importance of attendance;
- resources to quit vaping;
- bullying prevention, and
- details on community events.

Overall, employing a social worker who provides counseling, facilitates connections to community resources, and addresses diverse student needs demonstrates the district's commitment to fostering a supportive environment that enhances student well-being and academic success.

## **DETAILED FINDINGS**

### **BOARD MEMBER TRAINING (REC. 1)**

Vernon ISD lacks an efficient process for tracking required board member training.

Effective governance of local school districts requires well-prepared board members. Provisions in Texas law and rule govern the initial training and continuing education of school board members for this purpose. Continuing education requirements for school board trustees, developed by the State Board of Education, appear in the Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter A, Section 61.1. In addition, the Texas Government Code prescribes school board member training

**FIGURE 1–5  
OVERVIEW OF CONTINUING EDUCATION REQUIREMENTS FOR BOARDS OF TRUSTEES**

REQUIRED CONTINUING EDUCATION	FIRST YEAR IN OFFICE	SUBSEQUENT YEARS IN OFFICE
Local district orientation	3.0 hours within the first 120 days in office	Not required
Orientation to the Texas Education Code	3.0 hours within the first 120 days in office	Not required
Update to the Texas Education Code	Following each legislative session; training must be of sufficient length to address major changes	Following each legislative session; training must be of sufficient length to address major changes
Team building	At least 3.0 hours	At least 3.0 hours annually
Additional continuing education, based on the district’s framework for school board development	At least 10.0 hours within the first year in office	At least 5.0 hours annually
Evaluating and improving student outcomes	At least 3.0 hours within the first 120 days in office	At least 3.0 hours every two years
Education addressing sexual abuse, human trafficking, and other maltreatment of children	At least 1.0 hour within the first 120 days in office	At least 1.0 hour every two years
The Texas Open Meetings Act	At least 1.0 hour within the first 90 days in office	Not required
The Texas Public Information Act (PIA)	At least 1.0 hour within the first 90 days in office	Not required
Cybersecurity	Required to attend a training; hours vary by provider	Required to attend one training annually
School Safety	Must be complete within the first 120 days in office; hours vary by provider	Every two years

SOURCE: Texas Education Agency, School Board Training Requirements, October 2023.

in sections 551.005 for open meetings, 552.012 for open records, and 2054.5191 for cybersecurity.

**Figure 1–5** shows these continuing education requirements for school board members.

The district provided the review team with training records for all the current board members, except for Patrick Parmer. **Figure 1–6** shows a summary of Vernon ISD’s board members’ continuing education hours from January 2020 to September 2023.

As shown in **Figure 1–6**, the training hours provided by the district show that board members have not completed several required trainings. However, district training records may not accurately represent sessions attended by board members. Vernon ISD board members reported in interviews that they attended required trainings; however, the district lacks a process to consistently update board training hours to document that the board is compliant with requirements.

During interviews, board members reported multiple ways that hours of training are tracked. Several board members stated that they are required to enter training hours on

TASB’s website after they complete TASB trainings. When board members attend non-TASB trainings, board members reported they believe training certificates are sent to the superintendent’s administrative assistant to record. However, interviews with staff and board members did not clearly state how the district collects and records all the training hours from various sources.

Additionally, all but one board member participated in LSG Workshops during summer 2023, and the TASB Summer Leadership Institute during each of the last several school years. Board members attended multiple trainings at these events, which may have satisfied some of their requirements. However, board members may not have recorded all the trainings they attended at the TASB conference accurately. In addition, the training records do not include board members’ attendance at LSG trainings.

Furthermore, it is unclear whether the district complies with transparency requirements for board member training. The Texas Administrative Code, Title 19, Chapter 61.1(j), states that, at the last regular board meeting before an

**FIGURE 1–6  
VERNON ISD BOARD OF TRUSTEES RECORDED CONTINUING EDUCATION HOURS  
JANUARY 2020 TO SEPTEMBER 2023**

TRAINING	TRUSTEE BYARS (1)	TRUSTEE HAWKINS	TRUSTEE C. LEHMAN	TRUSTEE CRAIGHEAD	TRUSTEE HENRY	TRUSTEE A. LEHMAN
Local district orientation	(1)	6.0 hours	(1)	<b>0.0 hours</b>	3.0 hours	3.0 hours
Orientation to the Texas Education Code	(1)	3.0 hours	(1)	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>
Update to the Texas Education Code	2.0 hours in 2021	2.0 hours in 2021	2.0 hours in 2021	(2)	(2)	(2)
Team building	3.0 hours in 2020, 2021, 2022	3.0 hours in 2020, 2021, 2022	<b>3.0 hours in 2021</b>	3.0 hours in 2022	3.0 hours in 2022	3.0 hours in 2022
Additional continuing education, based on the district’s framework for school board development	(1)	<b>1.0 hour in 2020</b>	<b>2.0 hours in 2020</b>	<b>0.0 hours</b>	<b>1.0 hour in 2022</b>	<b>1.0 hour in 2022</b>
Evaluating and improving student outcomes	3.0 hours in 2021 (1)	3.0 hours in 2020; 6.0 hours in 2021	<b>0.0 hours</b>	<b>0.0 hours</b>	3.0 hours in 2022	3.0 hours in 2022
Education addressing sexual abuse, human trafficking, and other maltreatment of children	(1)	1.0 hour in 2021; 1.0 hour in 2023	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>
The Texas Open Meetings Act	(1)	<b>0.0 hours</b>	(1)	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>
The Texas Public Information Act	(1)	<b>0.0 hours</b>	(1)	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>
Cybersecurity	<b>0.0 hours</b>	<b>1.0 hour in 2020</b>	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>1.0 hour in 2022</b>	<b>1.0 hour in 2022</b>
School Safety (3)	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>	<b>0.0 hours</b>

NOTES:

- (1) Documentation requested by the review team did not include training records before 2019.
- (2) Board members elected in 2022 have not received updates on the Texas Education Code.
- (3) School safety training adopted by the State Board of Education is effective May 31, 2022.
- (4) The district did not provide training records for board member Patrick Parmer.
- (5) Amounts shown in bolded text indicate deficiencies in recorded training hours.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

election of trustees, the board president must announce board members who have completed, exceeded, or are deficient in meeting the required continuing education. Because board members are elected in May, this announcement should be made at the regular board meeting in April. However, a review of Vernon ISD’s April 2023 board meeting minutes did not include the announcement regarding training hours. Additionally, board members could not confirm that the board president announced their training outcomes.

Without consistently tracking board training or designating an individual to oversee the process, the district cannot validate which trainings board members attended. Continuing education provides board members with the essential knowledge and information needed to make the

best decisions for the district. Board member trainings also inform trustees of industry best practices and legislative updates that affect school districts. An absence of continuing education could hinder board members’ understanding of their roles and responsibilities and diminish their abilities to oversee district operations effectively.

**Vernon ISD should develop and implement a formal tracking process to document that board members receive all required training.**

To achieve this outcome, the superintendent should confirm that the administrative assistant and board members understand board training requirements, and assign the following duties to the administrative assistant:

- develop a master record of all board member trainings;

- access the TASB website quarterly and update the master training record with the hours board members completed;
- consult with the board members to determine which of the State Board of Education training requirements are due; and
- update board members quarterly regarding their training hours.

The superintendent should ensure that the board president publicly announces whether each trustee has completed, exceeded, or is deficient in meeting the required training. This announcement should be recorded in the board meeting minutes, which are required to be posted on the district's website.

The district could implement this recommendation with existing resources.

#### **BOARD MEETING DOCUMENTS (REC. 2)**

Vernon ISD lacks a consistent process for documenting board agendas and minutes.

Onsite interviews confirmed that the process for documenting board agendas and meeting minutes is ineffective and inconsistent. The superintendent's administrative assistant posts a physical copy of the meeting agenda at the Administrative Building at least 72 hours before the board meeting, in alignment with the Texas Government Code, Section 551.043. As of September 1, 2023, the Texas Government Code also requires each school district to post the agenda for board meetings on its website. The public information officer and the technology integration specialist are responsible for updating the district website; however, it is unclear whether either of them or additional staff is responsible for posting the agenda to the website.

The superintendent's administrative assistant records minutes for the board meetings with support from the assistant superintendent of operations. The board member elected as the secretary also records meeting minutes. Staff could not state confidently when the minutes are posted nor identify the individual responsible for posting the approved minutes to the website. As of December 4, 2023, Vernon ISD staff had not posted the meeting minutes for the October 2023 regular board meeting. Additionally, historical agendas and meeting minutes from July 2020 to December 2022 are not posted on the district's website.

Pursuant to the Texas Government Code, Section 551.022, and the Texas Education Code, Section 11.0621, the minutes and recordings of an open meeting are public records and must be available for public inspection and copying on request to the superintendent.

A governmental body, such as a school board, must be transparent and accountable to its community stakeholders, who have the right to be informed of its deliberations and decisions. A district that does not comply with statutory requirements eventually may erode trust within the school community, which damages relationships that are essential to a school district's success.

**Vernon ISD should develop and implement procedures for posting agendas and minutes, and clearly define which staff positions are responsible.**

To achieve this outcome, the district should complete the following tasks:

- the superintendent should develop a document that outlines the procedures and timeline for reviewing the board meeting agenda and board meeting minutes and for posting them to the district website;
- the superintendent should designate staff to post the board meeting agenda and to record and post board meeting minutes; these tasks should be completed in a timely manner in accordance with board policy and statutory requirements;
- the designated staff should be trained in the Texas Open Meetings Act, including statutory requirements regarding the development and posting of notices for board meetings; and
- the assistant superintendent should verify the agenda and minutes are posted online consistently and promptly, adhering to the guidelines in Board Policy BE (LEGAL).

The district could implement this recommendation with existing resources.

#### **ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

**PUBLIC INPUT AT BOARD MEETINGS**

During interviews, board members and staff acknowledged that public participation at board meetings was limited or nonexistent. The board allocates time for public comments at the beginning of each board meeting. Board members and staff reported that few parents attended or spoke at board meetings from January 2023 to October 2023. A review of board meeting minutes during this period confirmed this lack of public participation. Minutes and agendas for school board meetings from July 2020 to August 2022 were not available at the time of the review team's onsite visit; however, board members reported that public participation also was limited during previous school years.

Limited public participation at board meetings is not uncommon among districts that serve small communities such as Vernon ISD. Board members expressed the opinion that the community does not attend board meetings because they trust the board's decisions. However, the lack of public participation also could represent disinterest and disengagement in the district by parents and community representatives. Students' academic performance often improves when their families and community representatives are involved in the students' education. School board meetings can be a key point of access for community input and may indicate how effectively local families, students, and neighbors are engaged.

To improve community participation at board meetings, Vernon ISD should consider the following options:

- Occasionally relocate the board meetings to individual campuses. Vernon ISD typically conducts board meetings at the district's Administrative Building on the third Monday of each month. Meetings take place in a dedicated board room, where seating accommodates fewer than 30 people, including the board members and the district staff who are required to attend each meeting. During the October 2023 board meeting, which the review team attended, limited seating for community stakeholders would have been available if any had attended. Parents and community stakeholders also may be more comfortable attending board meetings at the campuses that students attend, and the environment at the campuses may be more inviting for community engagement. Additionally, varying the meeting location would provide the opportunity for board members to tour campus facilities;

- Post meeting agendas well in advance of the board meetings. At the time of the onsite visit, Vernon ISD posted the board meeting agenda to its website no earlier than 72 hours before the meeting. During school year 2023–24, the district modified its processes to have the agenda ready for staff and board members two weeks before the board meetings. Making the agenda available to the public this far in advance would provide community stakeholders with opportunities to know what will be discussed at the meeting and to plan to attend;
- Publish the board planning calendar on the district website. In school year 2023–24, Vernon ISD developed a board planning calendar as part of its engagement with the Lone Star Governance process. This calendar details the key events during the year that are essential to board planning, including dates of board meetings, trainings, and important school activities. Making this calendar available to the public at the beginning of the school year could help to increase public participation at meetings. For example, individuals who know months in advance that discussion and approval of the school budget will occur at the August board meeting may be more likely to attend; and
- Schedule periodic two-way community discussions and collaborative workshops, in compliance with the Open Meetings Act, that involve board members, educators, students, parents, and residents of the district. Unlike formal board meetings, these events present opportunities for community stakeholders to discuss solutions with board members and district staff in small groups. This collaboration could increase community trust in the board and encourage more public participation in board meetings.

**COMMUNITY INVOLVEMENT**

Vernon ISD lacks an effective and consistent process to inform parents and the community regarding district events.

Vernon ISD does not utilize an online district calendar to inform parents and the community of district events. Pursuant to the federal Every Student Succeeds Act, Public Law, Section 1116, schools that receive Title I, Part A, funds are required to develop and distribute to parents of participating children a written parent and family engagement policy. In accordance with this law, Vernon

ISD developed a school year 2023–24 Parent and Family Engagement policy that includes a projected yearlong list of 44 events, information sessions, and trainings for parents. These events include meet-the-teacher nights, parent training for the federal Free Application for Federal Student Aid (FAFSA), student showcases, and end-of-year award ceremonies.

Although the Parent and Family Engagement policy document describes events that will occur, it does not indicate specific dates, and the events are not listed on the district website's events page. Additionally, the policy states that these events will be posted on the district's Facebook page, but Vernon ISD had not posted the events on its social media platform as of October 2023.

The district should create a comprehensive calendar listing all district events and publish it prominently on the district's website to ensure transparency and accessibility to the public. In addition, the district should consider making the calendar accessible from its Facebook page to provide further opportunities for engagement.

#### **VOLUNTEER PROCEDURES**

Vernon ISD lacks a process to track, recognize, or assess parent and community volunteers who participate in district events.

The district maintains a dedicated website that encourages parents and the community to volunteer with the district. The website contains basic information regarding the volunteer process, including a link to a volunteer application and a description of the background check requirement. After submitting the application and passing the background check, volunteers complete an online training, receive a volunteer manual, and take a quiz, which they must pass before visiting campuses. However, the district does not track its number of volunteers, have a process for recognizing volunteers, or conduct any analysis of volunteer performance. Without these processes, the district is limiting its volunteer recruitment and retention efforts. During interviews, staff reported a need for more volunteers, especially at the secondary level, which has fewer volunteers than the primary levels.

The district should consider the following tasks:

- establish consistent volunteer tracking procedures, which could include recording the number and names of volunteers at each campus and the hours and activities in which they participated;

- establish a process to recognize volunteers, which could include an email or card to thank them or public recognition at a campus or district event; and
- establish a process to analyze how well the volunteer performed, which could include a simple form for staff to document how effectively the volunteer carried out the assigned tasks; this evaluation could help the district to determine who performs best at which tasks during future volunteer recruitment efforts.

#### **FISCAL IMPACT**

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address the findings and observations.

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## 2. EDUCATIONAL SERVICE DELIVERY

### ACCOMPLISHMENTS

- ◆ Vernon ISD uses a data-driven instructional cycle to provide targeted student interventions, refine instructional practices, and better meet students' needs.
- ◆ Vernon ISD establishes student learning goals, clearly communicates them to staff, and effectively integrates them into district practices and systems.
- ◆ Vernon ISD has made substantial changes to align its gifted and talented policies and practices with the Texas Education Agency's Texas State Plan for the Education of Gifted/Talented Students.
- ◆ Vernon ISD has implemented processes to align the collection sizes of its campus libraries with public school library standards.

### FINDINGS

- ◆ Vernon ISD's reporting structure and management systems do not support special programs and student services adequately.
- ◆ Vernon ISD does not have a process to determine whether staffing for paraprofessional services is sufficient to meet student and campus educational needs.

### RECOMMENDATIONS

- ◆ **Recommendation 3: Modify the district's organization to include dedicated oversight, support, and evaluation of special programs and student services.**
- ◆ **Recommendation 4: Develop a paraprofessional staffing allocation model based on best practice and student and campus needs.**

### BACKGROUND

The goals of a school district's educational service delivery functions are aligned with the academic goals of public education established by the Texas Legislature in the Texas Education Code, Section 4.002, which states that students in the public education system will demonstrate exemplary performance in reading, writing, mathematics, science, and

social studies. To achieve these goals, school districts must provide services to address the diverse learning needs of all students. These services include instruction that meets or exceeds state curriculum standards, assessment administration that satisfies state and federal requirements, and academic programs that adhere to applicable statutory and fiscal guidelines.

In Texas, the required curriculum standards are the Texas Essential Knowledge and Skills (TEKS). School districts administer standardized academic achievement tests, the State of Texas Assessments of Academic Readiness (STAAR), which are directly aligned to the TEKS for each grade level and subject. In addition, Texas school districts must deliver curriculum, instruction, and assessments to students within the legal parameters established by several state and federal programs, including special education programs, emergent bilingual/English learner programs, and compensatory education programs.

A district's size and structure often dictate how staff manage educational services. Regardless of a district's composition, the superintendent is responsible for the administration and leadership of the planning, organization, operation, supervision, and evaluation of the district's education programs and services, pursuant to the Texas Education Code, Section 11.201(d)(1). Likewise, principals are designated as the campus instructional leaders, in accordance with the Texas Education Code, Section 11.202(a). Additional staff often have significant roles supporting the superintendent and the principals in the administration and management of these services.

The successful delivery of educational services involves assessing campus and student needs, establishing district- and campus-level academic goals, identifying strategies to achieve those goals, addressing barriers to achievement, and monitoring students' academic performance and progress. In addition, a district's educational services should support teachers and students. Teacher support includes providing professional development and resources related to curriculum, instruction, and classroom management. Student support includes providing enrichment, interventions, accommodations, and modifications to foster academic growth.

**FIGURE 2-1  
VERNON ISD CAMPUSES AND ENROLLMENT  
SCHOOL YEAR 2022-23**

CAMPUS	GRADE LEVELS	ENROLLMENT
T.G. McCord Elementary School	Early education to grade one	337
Vernon Elementary School	Grades two to five	525
Vernon Middle School	Grades six to eight	371
Vernon High School	Grades nine to 12	532
Vernon ISD Opportunity Center	Grades nine to 12	12
North Texas State Hospital, Adolescent Forensic Program	Grades six to 12	15

SOURCE: Texas Education Agency, Public Education Information Management System Student Enrollment Report, school year 2022-23.

As of October 2023, Vernon Independent School District (ISD) operates six campuses: T.G. McCord Elementary; Vernon Elementary; Vernon Middle School; Vernon High School; Vernon ISD Opportunity Center, a dropout recovery school that includes the disciplinary alternative education program; and North Texas State Hospital, Adolescent Forensic Program (AFP), a maximum-security residential treatment facility. The district’s enrollment for school year 2022-23 was 1,792 students. **Figure 2-1** shows the enrollment at each Vernon ISD campus and the grade levels each serves.

**Figure 2-2** shows the student demographics of Vernon ISD compared to the student demographics of the state. For school year 2022-23, the district’s student population was notable for having 67.9 percent of students identified as at risk of dropping out of school, compared to the state’s at-risk population of 53.3 percent. A student is considered at risk of dropping out of school based on criteria outlined in the Texas Education Code, Section 29.081(d)(1). These criteria include placement in an alternative education program in the preceding year, homelessness, and identification as an emergent bilingual student.

**Figure 2-3** shows Vernon ISD’s academic accountability ratings from school years 2016-17 to 2021-22. North Texas State Hospital AFP and Vernon ISD Opportunity Center are registered as alternative education campuses. The North Texas State Hospital also is classified as a residential facility and, as such, is not evaluated under the accountability rating system.

The Texas Education Agency (TEA) issues academic accountability ratings to districts and campuses. The Vernon ISD Opportunity Center received its first academic accountability rating in school year 2021-22. The campus earned a B rating for that year, representing Vernon ISD’s

**FIGURE 2-2  
VERNON ISD STUDENT DEMOGRAPHICS  
SCHOOL YEAR 2022-23**

STUDENTS	DISTRICT	STATE
Hispanic	49.3%	53.0%
White	29.5%	25.6%
Asian	8.0%	5.1%
African American	7.1%	12.8%
American Indian	0.2%	0.3%
Pacific Islander	0.0%	0.2%
Two or more races	5.9%	3.0%
Economically disadvantaged	71.5%	62.1%
Emergent bilingual students/ English learner	15.7%	23.1%
At-risk	67.9%	53.3%

NOTE: Ethnic distribution percentages sum to 100.0 percent, but other student groups are included. Therefore, all demographic percentages shown do not sum to 100.0.  
SOURCE: Texas Education Agency, Texas Performance Reporting System, school year 2022-23.

only academic accountability rating higher than a C since TEA introduced the A-to-F rating system in school years 2017-18 and 2018-19.

**Figure 2-4** shows Vernon ISD’s educational service delivery organization.

As shown in **Figure 2-4**, the campus principals, assistant superintendent of operations, and the executive director of curriculum and instruction report to the superintendent and oversee educational services. The campus principals are the instructional leaders of their campuses. The executive director of curriculum and instruction manages four instructional coaches and oversees the district’s Curriculum and Instruction Department. The assistant superintendent of operations

**FIGURE 2–3  
VERNON ISD'S ACCOUNTABILITY RATINGS  
SCHOOL YEARS 2016–17 TO 2021–22**

DISTRICT/CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 AND 2020–21 (2)	2021–22
T.G. McCord Elementary School	Met Standard	Met Standard	F	Not Rated (Disaster)	Not Rated (4)
Vernon Elementary School (3)	Met Standard	Met Standard	F	Not Rated (Disaster)	Not Rated (4)
Vernon Middle School	Met Standard	Met Standard	D	Not Rated (Disaster)	C
Vernon High School	Met Standard	Met Standard	C	Not Rated (Disaster)	C
Districtwide	Met Standard	D	C	Not Rated (Disaster)	Not Rated (4)

NOTES:

- (1) The Legislature phased in a new accountability rating system for Texas public schools beginning in school year 2017–18, during which school districts received alphabetical ratings. Campuses received alphabetical ratings beginning in school year 2018–19.
- (2) Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic.
- (3) Vernon Elementary School was named Shive Elementary School for accountability purposes before school year 2022–23.
- (4) Pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, districts and campuses that would have received a rating of D or F for school year 2021–22 are designated Not Rated.

SOURCE: Texas Education Agency, Texas Academic Performance Reports, school years 2016–17 to 2021–22.

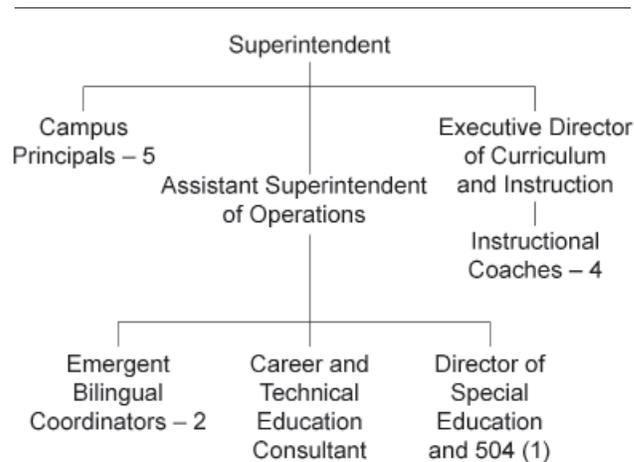
manages components of educational service delivery, including career and technical education (CTE), emergent bilingual, and special education services.

The campus principals report to the superintendent for all curriculum-related responsibilities. However, staff indicated that principals also reported to the assistant superintendent for operational and disciplinary issues. Campus principals direct and manage campus instructional programs, provide leadership to ensure high standards of instructional service, ensure compliance with district educational policies, and oversee teacher appraisals. Principals also develop classroom management and attendance strategies to facilitate effective instruction and learning on their campuses.

The Curriculum and Instruction Department includes the executive director of curriculum and instruction, along with four instructional coaches. The executive director of curriculum and instruction oversees the instructional coaches, the district’s curriculum management plan, onsite teacher professional development, summer school programs, and the gifted and talented program. In addition, the executive director of curriculum and instruction serves as the district coordinator of school improvement (DCSI). The DCSI oversees the work of campuses that TEA has identified for targeted support and improvement.

Each instructional coach supports an assigned campus: T.G. McCord Elementary School, Vernon Elementary School, Vernon Middle School, and Vernon High School. The coaches deliver professional development, support professional learning communities (PLC), and provide

**FIGURE 2–4  
VERNON ISD'S EDUCATIONAL SERVICE DELIVERY  
ORGANIZATION  
SCHOOL YEAR 2023–24**



NOTE: (1) 504=Section 504 of the federal Rehabilitation Act of 1973, which prohibits discrimination based on disability and requires school districts to provide free appropriate public education to each qualified student with a disability in their jurisdiction.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

instructional resource support for their campus. In addition, each coach provides specialized support in a curricular program, such as gifted and talented services, new teacher mentorship, substitute training, and summer school.

The assistant superintendent of operations oversees the Wilbarger Shared Services Arrangement (WSSA)

that provides special education services to Vernon ISD; the WSSA also serves Harrold ISD and Northside ISD. In addition, the assistant superintendent of operations manages the emergent bilingual coordinators who oversee the district’s English as a Second Language (ESL) program. The assistant superintendent of operations also oversees the CTE consultant’s work to support the strategic expansion and alignment of the district’s CTE curriculum.

**DETAILED ACCOMPLISHMENTS**

**INSTRUCTIONAL CYCLE**

Vernon ISD uses a data-driven instructional cycle to provide targeted student interventions, refine instructional practices, and better meet students’ needs.

As shown in **Figure 2–3**, the district consistently received poor academic accountability ratings. In December 2022, Vernon ISD hired a new superintendent with a strong background in curriculum who implemented the instructional cycle process at all campuses. By spring 2023, students received targeted instruction through the process.

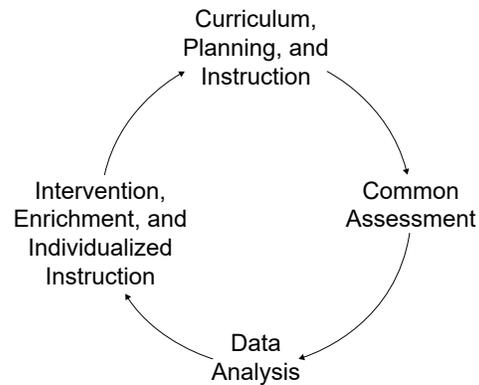
An instructional cycle is an ongoing, defined practice structured to promote teaching practices that are responsive to students’ learning needs. The first step of the cycle is curriculum planning and instruction, followed by a common formative assessment. Within each lesson cycle, the lesson plans, instruction, and assessment align to target student expectations from the TEKS. The TEKS describe what students should know and be able to do at the end of each grade level or course, and the student expectations identify the specific knowledge and skills that students must demonstrate.

Next, staff analyze the assessment results to determine students’ mastery of the student expectations. Based on these data, students receive three weeks of instruction targeted to their learning needs, and teachers gain insight into their instructional effectiveness.

**Figure 2–5** shows Vernon ISD’s instructional cycle.

The first step in the instructional cycle focuses on curriculum, planning, and instruction. Staff reported that Vernon ISD’s curriculum is supported by the TEKS Resource System, an online curriculum management system consisting of the following tools and resources:

**FIGURE 2–5  
VERNON ISD’S INSTRUCTIONAL CYCLE  
SCHOOL YEAR 2023–24**



SOURCE: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

- Vertical Alignment Documents, which present the expected progression of competencies and skills each year;
- a Year at a Glance, which provides an overview of the organization and pacing for the year’s instructional plan;
- the Instructional Focus Document, which is an organizational tool that articulates the details of each unit; and
- several other resources.

Lesson planning in Vernon ISD is guided by the Texas Instructional Leadership (TIL) Lesson Alignment model. Teachers plan in PLCs to ensure horizontal alignment. Teachers submit lessons online, and campus leaders review the plans, providing feedback to teachers before they deliver the lessons. Instruction is supported by campus leadership and instructional coaches who observe the lesson delivery and provide targeted support, strategies, and professional development opportunities to teachers based on their observations.

The second step in the instructional cycle is the common assessment. District leadership explained that teachers work together in PLCs to develop an assessment covering three weeks of instruction that will be administered to all students in the grade or course. Vernon ISD leadership also reported that teachers are expected to develop valid common assessments, meaning they accurately measure students’ mastery of the TEKS. To help support the assessment’s

validity, teachers are encouraged to use released STAAR questions that are available through DMAC, also known as Data Management for Assessment and Curriculum. DMAC is a web-based application that was developed and is maintained by regional Education Service Center VII.

After administering common assessments, Vernon ISD staff begin the data analysis process. Staff disaggregate common assessment outcomes to create peer groups based on learning needs. In addition, staff disaggregate assessment data by teacher, which provides insights into the effectiveness of specific instructional strategies. Teachers whose data indicate stronger learning outcomes are invited to model their teaching strategies for their peers. Finally, data are disaggregated by subpopulations to ensure that all student groups are learning and progressing proportionately to their peers.

The final step in the cycle is intervention, enrichment, or individualized instruction. Each campus schedules a class that is modified every three weeks based on common assessment outcomes. Students, placed according to their assessment results, engage in classes structured for their learning needs. Intervention classes focus on the student expectations indicated in the students' common assessment outcomes. Conversely, students who mastered all student expectations participate in enrichment activities. Some students receive more targeted instruction, such as ESL interventions or dyslexia instruction. This approach enables teachers to move forward with the planned curriculum in the foundation subject classroom, and students to receive supplemental instruction and interventions.

The district validates the formative three-week assessment data and establishes a benchmark of the students' summative academic learning with semiannual administrations of NWEA assessments. The not-for-profit education organization NWEA develops academic assessments that measure achievement and growth for students in kindergarten to grade 12 in subjects such as math, reading, language usage, and science.

Interventions intended to address gaps in knowledge through schoolwide, teacher-led targeted instruction in math and English are an evidenced-based best practice for school districts. Meta-analyses have shown these interventions are effective for students with academic difficulties. Vernon ISD implements this practice and uses these schoolwide systems to provide opportunities to students who can benefit from individualized instruction or enrichment.

Teachers in the district also use the common assessment data to inform instructional strategies, which enables students to benefit from the data in the intervention classrooms and the foundation subject classroom. Research demonstrates that PLCs engaging in structured discussions that investigate relationships between instructional practices, student work, and learning outcomes produce the strongest gains in student learning. In a 2018 report in *Educational Leadership*, Jenni Donohoo, John Hattie, and Rachel Eells noted the critical importance of helping educators link "their collective actions and student outcomes."

The instructional coach at each campus assists with data disaggregation and supports the aligned lesson-planning process. The implementation of this role in the district aligns with a 2018 examination of 60 studies conducted by researchers Matthew Kraft, David Blazar, and Dylan Hogan in *The Effect of Teacher Coaching on Instruction and Achievement: A Meta-analysis of the Causal Evidence*, which suggests that instructional coaching is one of the most positive school-based interventions.

The district's data-informed processes enable staff to strategically evaluate curriculum, instruction, and learning needs throughout the year and provide appropriate interventions.

### **LEARNING GOALS**

Vernon ISD establishes student learning goals, clearly communicates them to staff, and effectively integrates them into district practices and systems.

School districts are required to establish performance goals through several plans, including district improvement plans (the Texas Education Code, Section 11.252(a)); campus improvement plans (the Texas Education Code, Section 11.253(c)); early childhood literacy and mathematics proficiency plans (the Texas Education Code, Section 11.185(a)); and college, career, and military readiness plans (the Texas Education Code, Section 11.186(a)). Even if a school district develops a plan that fulfills all the requirements in the Texas Education Code, the district may compromise the effectiveness of its plan if it does not engage stakeholders, implement strategies to achieve the plan, or monitor the plan's progress. Vernon ISD, however, has developed procedures to implement these practices.

These statutes include requirements for districts to develop early childhood literacy, math proficiency, and college, career, and military readiness (CCMR) plans with specific,

**FIGURE 2–6  
VERNON ISD LEARNING GOALS  
SCHOOL YEAR 2023–24**

GOAL SUBJECT	GRADE LEVEL(S)	ASSESSMENT INSTRUMENT(S)	BASELINE (JUNE 2023)	TARGET (JUNE 2028)
Literacy	Grade 3	Grade 3 STAAR (1) Reading Assessment	36.0% of students meet or exceed grade-level standard	53.0% of students meet or exceed grade-level standard
Literacy	Kindergarten to grade 3	Common Formative Assessments and NWEA MAP Reading Assessment (2), (3)	34.0% of students meet or exceed grade-level standard	53.0% of students meet or exceed grade-level standard
Literacy	Grades 4 to 7	Common Formative Assessments and NWEA MAP Reading Assessment	31.0% of students meet or exceed grade-level standard	53.0% of students meet or exceed grade-level standard
Literacy	Grades 8 to 10	Common Formative Assessments and NWEA MAP Reading Assessment	41.0% of students meet or exceed grade-level standard	53.0% of students meet or exceed grade-level standard
Mathematics	Grade 3	Grade 3 STAAR Math Assessment	28.0% of students meet or exceed grade-level standard	48.0% of students meet or exceed grade-level standard
Mathematics	Kindergarten to grade 3	Common Formative Assessments and NWEA MAP Math Assessment	30.0% of students meet or exceed grade-level standard	48.0% of students meet or exceed grade-level standard
Mathematics	Grades 4 to 7	Common Formative Assessments and NWEA MAP Math Assessment	28.0% of students meet or exceed grade-level standard	48.0% of students meet or exceed grade-level standard
Mathematics	Grades 8 to 9	Common Formative Assessments and NWEA MAP Math Assessment	35.0% of students meet or exceed grade-level standard	48.0% of students meet or exceed grade-level standard
College, Career, and Military Readiness	Grades 9 to 12	Texas Success Initiative (TSI) Assessment (4)	27.0% of students meet or exceed TSI criteria in reading and mathematics	47.0% of students meet or exceed TSI criteria in reading and mathematics

NOTES:  
 (1) STAAR=State of Texas Assessments of Academic Readiness.  
 (2) The NWEA Measures of Academic Progress (MAP) assessment measures academic achievement and progress in certain subjects for students in kindergarten to grade 12.  
 (3) Common Formative Assessments are locally developed assessments that align with the Texas Essential Knowledge and Skills.  
 (4) The Texas Success Initiative assessment is used to determine students' readiness for entry-level college coursework.  
 (5) Goals shown are a sample, rather than an exhaustive list, of Vernon ISD's learning goals.  
 SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

quantifiable, annual goals for aggregate student growth specific to those areas. Vernon ISD expanded upon the requirements of the early childhood plan, which targets outcomes in grade three, and developed specific, quantifiable, annual campus goals for literacy and mathematics for kindergarten to grade 12.

**Figure 2–6** shows a selection of Vernon ISD’s learning goals.

Vernon ISD communicates the district’s learning goals to stakeholders by posting them on the district website and discussing the district goals, strategies, and relevant data in board meetings, as well as campus and district leadership meetings. In addition, the superintendent requires that principals integrate one of the district goals into their Texas

Principal Evaluation and Support System (T-PESS) Goal-Setting and Professional Development Plan. The process extends to teachers, who also integrate a district goal into their Texas Teacher Evaluation and Support System (T-TESS) Goal-Setting and Professional Development Plan. Vernon ISD’s approach to communicating and integrating district goals supports engagement and a shared understanding among staff.

The district’s attendance goals also have been communicated effectively to students at each campus. More importantly, the district has secured student buy-in through competitions and incentives. Campuses hold competitions among grade levels for the highest attendance rate. The district also offers

a field trip to the grade with the highest attendance rate for the fall semester.

Additionally, the district's CCMR goals are conveyed to students and staff at the high school campus. Campus leadership trained staff regarding the significance of the CCMR component and the pathways for students to meet readiness indicators. College and career readiness can be demonstrated through the following achievements:

- meeting the college readiness standards for reading, mathematics, and writing on the Texas Success Initiative assessment;
- earning dual-course credit, which is completing a course that earns credit for both college and high school;
- earning an industry-based certification (e.g., Adobe Certified Associate, Child Development Associate); and
- earning a level I or level II certificate from an institution of higher education (e.g., Level I Floral Certification, Level II Plumbing Certification).

During pep rallies at Vernon High School, campus leadership acknowledges students who have achieved CCMR indicators. This recognition fosters awareness among students and reinforces a sense of engagement with district goals.

Vernon ISD leadership acknowledged that district goal-making previously had been overlooked. However, the current superintendent has led the district to consider its goal-setting process as an active and collaborative system by involving district staff and students in understanding the learning goals and being invested in their outcomes. By adopting this approach, the district implements several best practices. Vernon ISD engages stakeholders in the goal strategies, the monitoring process, and the outcomes. This inclusive approach has enabled Vernon ISD to integrate learning goals into new and existing district systems.

### **GIFTED AND TALENTED**

Vernon ISD has made substantial changes to align its gifted and talented policies and practices with the Texas Education Agency's Texas State Plan for the Education of Gifted/Talented Students (State Plan).

The State Plan, adopted by the State Board of Education in 1990 and revised in 2019, provides requirements and guidance for districts as they meet the unique needs of their

gifted and talented (GT) population. The State Plan outlines performance measures for six aspects of GT service implementation, which are divided into the categories of accountability and exemplary. Accountability standards include services that are required by state law and State Board of Education rule. Exemplary standards include services that represent best practices for districts and educators who seek excellence for their GT students. **Figure 2–7** shows a subset of state plan standards that Vernon ISD is implementing.

Vernon ISD leadership conducted an informal evaluation of its GT program in December 2022. Based on classroom observation and student data, staff identified a discrepancy between the number of students who should be receiving GT services and the number of GT students identified by the district. During the 2022–23 school year, the district served 3.5 percent of its population in the GT program, compared to 5.8 percent of students who were served in regional Education Service Center IX (Region 9) and 8.2 percent of students statewide during that year. District leadership prioritized reviewing and improving the GT identification procedures to emphasize appropriate referral, assessment, and services for students.

Vernon ISD leadership established a GT advisory group, as required by the State Plan's Accountability Standard 1.2, to support districtwide efforts to improve the GT program. This group consists of community representatives, parents of GT students, school staff, and GT education staff. The group's primary responsibility is to review the district's GT policies and procedures and make recommendations for improvements. As part of the effort to revise the district's identification procedures, some staff visited a district with a strong GT program to gain insights and learn best practices. As a result of these efforts, Vernon ISD addressed the assessment processes and revised its GT manual for the first time since 2014. The updated manual is available online, in accordance with the State Plan's Accountability Standard 1.10.

As a result of the district's more aggressive identification procedures, the number of identified GT students nearly doubled. According to the GT coordinator, after implementing the updated assessment and identification procedures during school year 2022–23, Vernon ISD's GT program grew from 62 students to 123 students. **Figure 2–8** shows the percentage of GT students in Vernon ISD in the fall and spring semesters of school year 2022–23, compared to the percentage of GT students in Region 9 and the state during the same year. Vernon ISD's percentage of identified

**FIGURE 2–7  
STANDARDS FROM THE TEXAS STATE PLAN FOR THE EDUCATION OF GIFTED/TALENTED STUDENTS, APRIL 2019**

STANDARD	REQUIRED ACTIVITIES	CATEGORY
<b>Fidelity of Service</b>		
1.2	Gifted/talented (GT) student education policies and procedures are reviewed and recommendations for improvement are made by an advisory group of community representatives, parents of GT students, school staff, and GT education staff, who meet regularly for that purpose.	Accountability
1.10	Develop a comprehensive manual describing GT programs, services, assessments, and communication, which is accessible to parents, community, and students.	Accountability
<b>Student Assessment</b>		
2.22	In grades one to 12, qualitative and quantitative data are collected through three or more measures and used to determine whether a student needs GT services.	Accountability
2.24	Access to assessment and, if needed, GT services is available to all populations of the district (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.1(3)).	Accountability
<b>Service Design</b>		
3.1	Identified GT students are assured an array of learning opportunities that are commensurate with their abilities and that emphasize content in the four foundation curricular areas. Services are available during the school day throughout the school year. Parents are informed of these options (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.3(3)).	Accountability
<b>Curriculum and Instruction</b>		
4.1	An array of appropriately challenging learning experiences in each of the four foundation curricular areas is provided for GT students in kindergarten to grade 12, and parents are informed of the opportunities (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.3).	Accountability
4.3	A continuum of learning experiences is provided that leads to the development of advanced-level products and performances such as those provided through the Texas Performance Standards Project (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.3(2)).	Accountability
4.8	Provisions to improve services to GT students are included in district and campus improvement plans (the Texas Education Code, §§11.251–11.253).	Accountability
<b>Professional Learning</b>		
5.1	A minimum of 30.0 hours of professional learning that includes the nature and needs of GT students, identification and assessment of GT students, and curriculum and instruction for GT students is required for teachers who provide instruction and services that are a part of the district’s defined GT services (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.2(1)).	Accountability
5.6	Teachers who provide instruction and services that are a part of the district’s defined GT services receive a minimum of 6.0 hours annually of professional development in GT education that is related to state teacher GT education standards. (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.2(3), and §233.1).	Accountability
5.9.1	Counselors who work with GT students receive a minimum of 6.0 hours annually of professional development in GT education.	Exemplary
<b>Family and Community Involvement</b>		
6.2	Input from family and community representatives on GT identification and assessment procedures is invited annually.	Accountability

SOURCE: Texas State Plan for the Education of Gifted/Talented Students, Texas Education Agency, 2019.

GT students increased from 3.5 percent to 6.9 percent, surpassing the percentage of GT students in Region 9.

The GT coordinator confirmed that the current identification procedures rely on qualitative and quantitative data collected through at least three measures, in accordance with the State Plan’s Accountability Standard 2.22. Staff reported providing

additional teacher training regarding the nature and needs of GT students to support an equitable referral process. The GT coordinator stated that previously, referrals primarily consisted of students who earned top grades. However, after the training, referrals expanded to include students who demonstrate remarkably high levels of creativity, artistic capabilities, and leadership capacity, and students who may

be underachieving because they are not being challenged appropriately. As a result of expanded testing and referral processes, Vernon ISD is better able to reach all populations in the district, including special education and emergent bilingual students, in accordance with the State Plan’s Accountability Standard 2.24.

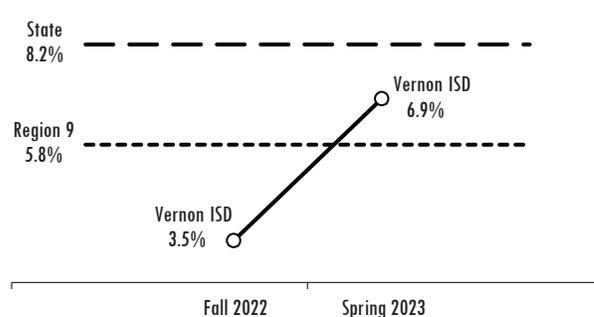
In addition, district leadership evaluated the existing curriculum and determined that it was not appropriately challenging and lacked differentiation for gifted and high-achieving learners. As a result, Vernon ISD invested in a GT curriculum for its middle school and high school honors courses and GT students. Additionally, the district established an accelerated pathway for middle school students in mathematics, which enables students to advance three grade levels in two years to complete Algebra I in grade eight. Furthermore, the district provides GT students with structured enrichment activities, such as the development of advanced-level products or independent research projects from the Texas Performance Standards Project. These opportunities align with curriculum requirements in the State Plan’s Accountability Standards 3.1, 4.1, and 4.3.

Notably, the Vernon ISD campus and district improvement plans (CIP and DIP) include goals to improve services to GT students. According to a Legislative Budget Board analysis of GT programs at certain Texas school districts, fewer than half of the districts followed the state plan requirement to incorporate GT student service goals in the CIPs and DIP in accordance with Accountability Standard 4.8. Vernon ISD uses the CIPs and DIPs to match GT services to students’ needs, and the district also sought community feedback through an end-of-year survey to improve its policies and procedures, in accordance with the state plan’s Accountability Standard 6.2.

Additionally, the district has implemented systems to meet GT Professional Learning standards. All teachers who provide small-group GT services and teach foundation subjects complete the 30.0 hours of foundational training and 6.0 hours of annual update training outlined in the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, Section 89.2. In addition, counselors and administrators complete this same GT training, which exceeds the State Plan’s accountability standard and meets the Exemplary Standard 5.9.1.

The Legislative Budget Board’s School Performance Review Team visited the district in October 2023. Onsite observations

**FIGURE 2–8**  
**PERCENTAGE OF IDENTIFIED GIFTED AND TALENTED STUDENTS IN VERNON ISD, REGIONAL EDUCATION SERVICE CENTER IX (REGION 9), AND THE STATE SCHOOL YEAR 2022–23**



SOURCES: Texas Education Agency, Texas Academic Performance Reports, school year 2022–23; Vernon ISD, October 2023.

and interviews confirmed that Vernon ISD’s GT program has made substantial progress in serving students and aligning its policies and procedures to meet the requirements of the State Plan.

**LIBRARY RESOURCES**

Vernon ISD has implemented processes to align the collection sizes of its campus libraries with public school library standards.

The district’s four libraries are housed at the T.G. McCord Elementary, Vernon Elementary, Vernon Middle School, and Vernon High School campuses. The Texas State Library and Archives Commission (TSLAC) adopts standards, in consultation with the Texas State Board of Education, for elementary school, middle school, and high school libraries.

TSLAC’s *School Library Programs: Standards and Guidelines for Texas* (2018) provides a framework for self-assessment and strategic planning that a school district should consider when developing, implementing, or expanding its library services. These standards are recommended, not mandated. TSLAC’s *Standards and Guidelines* are found in the Texas Administrative Code, Title 13, Part 1, Chapter 4, Subchapter A, Section 4.1, and are distinct from the School Library Program: Collection Development Standards outlined in the Texas Administrative Code, Title 13, Section 4.2, which were developed pursuant to House Bill 900, Eighty-eighth Legislature, Regular Session, 2023, known as the Restricting Explicit and Adult-Designated Educational Resources Act.

**FIGURE 2–9**  
**VERNON ISD LIBRARY COLLECTION SIZE COMPARED TO TEXAS STATE LIBRARY AND ARCHIVES COMMISSION STANDARDS**  
**SCHOOL YEAR 2023–24**

CAMPUS	ENROLLMENT (1)	COLLECTION SIZE (2)	BOOKS PER STUDENT	DISTINGUISHED LEVEL BOOKS PER STUDENT	COLLECTION DESIGNATION
T.G. McCord Elementary School	337	10,214	30.3	18	Distinguished
Vernon Elementary School (3)	525	22,814	43.5	18	Distinguished
Vernon Middle School	371	8,159	22.0	16	Distinguished
Vernon High School	532	12,335	23.2	16	Distinguished

NOTES:

- (1) Enrollment shows data from school year 2022–23.
- (2) Collection size shows data from school year 2023–24.
- (3) Vernon Elementary School previously encompassed two facilities, each with a separate library; data shown for its current collection size represents the combined holdings of both libraries.

SOURCES: Texas Education Agency, Texas Academic Performance Report, school year 2022–23; Texas State Library and Archives Commission, *School Library Programs: Standards and Guidelines for Texas*, 2018.

The TSLAC *Standards and Guidelines* define six levels of implementation: Distinguished, Accomplished, Proficient, Developing, or Improvement Needed. These standards consider the components of a school library program at each of these levels of implementation, offering districts a tool to evaluate and improve their library programs.

Based on the TSLAC *Standards and Guidelines*, Vernon ISD’s libraries operate at the Distinguished level for school library collection size, based on the number of books per student. For an elementary school, a collection size of 18 books per student or greater is considered Distinguished. Likewise, a collection size of 16 books per student or greater at a secondary campus is considered Distinguished. **Figure 2–9** shows the campus enrollment, collection size, books per student at each campus, and how that compares to the TSLAC *Standards and Guidelines*.

According to TSLAC guidelines, all campuses, regardless of total enrollment, must employ either a full-time or part-time certified librarian to meet any standard higher than Improvement Needed. However, smaller districts such as Vernon ISD can have difficulty recruiting and retaining staff who have completed the requirements to become certified as a school librarian in accordance with the Texas Education Agency’s State Board for Educator Certification standards. Vernon ISD collaborates with Region 9 to address this staffing issue. Region 9 sends a certified librarian to each campus library at least once a month to review the library’s resources, facilitate the purchase of books, and assist with other library duties. Staffing solutions such as this assistance help provide students with the services they need.

Research shows that effective school library programs correlate positively with student achievement. Keith Curry Lance and Bill Schwarz analyzed library staffing, spending, and collections in the 2012 study *How Pennsylvania School Libraries Pay Off: Investments in Student Achievement and Academic Standards*. The analysis found that library collection size positively correlated with assessment scores, and the relationship was strongest in the higher grade levels.

**DETAILED FINDINGS**

**ORGANIZATION AND REPORTING (REC. 3)**

Vernon ISD’s reporting structure and management systems do not support special programs and student services adequately.

At the time of the review, districtwide educational programs and services in Vernon ISD that are not assigned specifically to the executive director of curriculum and instruction are the responsibility of the assistant superintendent of operations. However, these responsibilities do not align with the assistant superintendent of operation’s job description. In addition, many educational programs and services are not evaluated adequately, and many educational services staff could benefit from additional support and guidance.

The executive director of curriculum and instruction supports instructional materials, new teacher mentorship and training programs, summer school opportunities, substitute training, data analysis for teachers, educator professional development, accelerated instruction, and interventions at TEA-identified campuses. The assistant superintendent of operations oversees the remaining

educational services, including special education, Section 504 services provided under the federal Rehabilitation Act of 1973, ESL, and support for students who are homeless or placed in foster care. These services often are referred to as special programs.

Although the assistant superintendent of operations manages educational service delivery functions, these functions do not align with the scope of his job description. As the job title suggests, the assistant superintendent of operations is primarily responsible for district operations rather than educational services. The job description for the assistant superintendent of operations includes the following duties in its primary purposes:

- the overall management, strategic planning, development, evaluation, and implementation of district maintenance and operations, warehousing, transportation, and technology functions;
- the district's risk-management operation to minimize risk and prevent loss or injury of district employees and property; and
- the development and implementation of a comprehensive districtwide environmental health and safety program to minimize hazards, safeguard the well-being of employees, and oversee compliance with all state and federal statutes relating to worker safety.

Education service is not listed among the job's purposes. The following responsibilities are included in the assistant superintendent of operations' job description:

- operations management (e.g., facilities, maintenance, warehouse, transportation, technology);
- risk management;
- safety;
- compliance with policies, rules, and laws;
- district budget;
- communication; and
- personnel management.

The assistant superintendent of operations' job responsibilities, both de facto and documented, are extensive and require the position to support educational service areas while overseeing the district's operational services. This

challenge is increased if a district does not have strong personnel management systems in place.

Vernon ISD management systems currently lack processes to ensure the consistent evaluation of programs and noninstructional staff. Although the district uses T-TESS for its instructional staff and T-PESS for its campus administrative staff, most remaining staff reported that they are not evaluated annually or formally. **Figure 2–10** shows the evaluation processes in place for educational programs and the staff who manage them.

Regular evaluations and annual evaluative conferences are considered best practices and are mandated by the school district's board policy. Vernon ISD's Board Policy DN (LOCAL) provides the following direction:

- all district employees shall be periodically appraised in the performance of their duties;
- employees shall be informed of the criteria on which they will be evaluated; and
- each employee shall have at least one evaluative conference annually.

Without efficient reporting structures and evaluation systems, supervisors are less likely to have the level of communication or insight necessary to ensure that staff receive adequate support. During onsite interviews, staff described several issues that could be addressed through improved management and reporting processes.

For example, diagnosticians, who are WSSA staff, determine students' eligibility to receive special education services by conducting initial evaluations. However, before an evaluation can be completed, several data elements must be collected and considered in accordance with state and federal laws. Currently, Vernon ISD has no designated staff to facilitate data sharing between WSSA staff and campus staff. Without a procedure or staff member in place to efficiently secure data or documentation, diagnosticians may have difficulties meeting timelines outlined in the federal Individuals with Disabilities Education Act (IDEA) and the Texas Education Code, Section 29.004. A lack of data-sharing protocols and systems could hinder the district's ongoing compliance with provisions of special education law.

Similarly, the Section 504 program is within the scope of both the WSSA staff and the campus staff. The WSSA has a contract with Vernon ISD, separate from the shared services agreement, specifically for Section 504 management.

**FIGURE 2–10  
VERNON ISD EVALUATION PROCESSES FOR EDUCATIONAL SERVICES  
SCHOOL YEAR 2023–24**

EDUCATION FUNCTION	STAFF EVALUATION	PROGRAM EVALUATION	DESCRIPTION
Career and Technical Education (CTE)	N/A (1)	Yes	The CTE director has served in this position for less than 1.0 year. The CTE Program is evaluated in accordance with Perkins V (2).
English as a Second Language (ESL)	No	Yes	The ESL coordinators are not evaluated. The ESL program is evaluated in accordance with the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.1265.
Gifted and Talented (GT)	No	Yes	The GT district coordinator is not evaluated. GT services were evaluated in school year 2022–23.
Homeless and Foster Care Support	No	No	Homeless and foster care services are overseen by the district social worker. Neither the district social worker nor the social worker’s programs are evaluated.
Instructional Coaching	Inconsistent	No	The executive director of curriculum, who oversees instructional coaches, was not evaluated during school year 2022–23. Staff report that a coaching program evaluation that aligns with the Texas Instructional Leadership framework is in development.
Instructional Cycle	Inconsistent	Yes	The executive director of curriculum oversees the instructional cycle. The instructional cycle is aligned with and can be evaluated by district math and literacy goal outcomes. (3)
Library Services	Inconsistent	No	Librarians are evaluated at the campus level; processes vary by principal. Library services are not evaluated.
Section 504 Services	No	No	Services provided pursuant to the federal Rehabilitation Act of 1973, Section 504, are overseen by counselors and the Wilbarger Shared Services Arrangement (WSSA). Counselors, the WSSA, and Section 504 services are not formally evaluated.
Special Education Services	Yes	No	The director of the WSSA is evaluated by the assistant superintendent of operations via a worksheet. The WSSA program at Vernon ISD is not formally evaluated.

NOTES:

- (1) The CTE Director had served the position for two months at the time of the Legislative Budget Board’s School Performance Review Team’s onsite visit.
- (2) Perkins V is known as the federal Strengthening Career and Technical Education for the 21st Century Act.
- (3) Certain district math and literacy goals are shown in Figure 2–6.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

Counselors provide Section 504 services for students on their respective campuses. Counselors are primarily responsible for guiding the development of each student’s academic ability, career, personal, and social abilities, as prescribed by the Texas Education Code, Section 33.006(a). However, as of the time of the review, counselors did not have a person or process to support them in these specific responsibilities, or with the additional duties outlined in Section 33.006 (b). Vernon ISD previously employed staff who provided leadership, coordination, and support, including Section 504 coordination. Counseling staff reported that they appreciated the leadership and support.

Vernon ISD staff reported difficulty staffing the campus counselor position in previous school years. As a result, the district decided to implement a pathway to support the

transition of current teachers into the role of certified campus counselors. The approach facilitates the advancement of staff who are pursuing the school counselor certification by allowing them to serve as “counselors in training” where they will take on responsibilities that align with their expected roles as certified counselors. Appropriate support and oversight of the counselor-in-training program will be important to the staff and the program’s continued success.

The district’s ESL program is performing well, according to TEA’s Results Driven Accountability system. TEA issued a determination level of 1, Meets Requirements, for Bilingual Education/ESL and Emergent Bilingual Students in Vernon ISD’s 2023 district report. Nonetheless, the emergent bilingual coordinators and their students could benefit from

additional curriculum-focused leadership, guidance, and support. For example, the secondary emergent bilingual coordinator supported the implementation of a dedicated class for ESL services at Vernon Middle School and found it better supported her students' progress than the small-group model that removed them from their classes. However, the coordinators can advocate only for campus-level changes.

Additionally, the district social worker currently operates in isolation, without the support of a team to provide feedback on strategies or work products. For example, in the 2022–23 school year, 0.7 percent of the district's students were in foster care, which is 3.5 times higher than the state's 0.2 percent. However, Vernon ISD's website does not provide information for students in foster care as it does for students who are homeless. A dedicated webpage for information about foster care would support compliance with the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter FF, as it relates to systems and supports for foster care youth and promote adherence with provisions of the Texas Education Code that conform to the federal Fostering Connections to Success and Increasing Adoptions Act of 2008.

The National Policy Board for Educational Administration's *Professional Standards for Educational Leaders* (2015) outlines best practices for school leaders who contribute to students' academic success and well-being. The standards represent research findings that indicate students learn best when educational leaders foster the professional capacity of teachers and staff. Vernon ISD cannot cultivate the professional capacity of its staff without a thoughtful reporting structure that aligns with staff needs and annual evaluations that support staff and program goals.

**Vernon ISD should modify the district's organization to include dedicated oversight, support, and evaluation of special programs and student services.**

By school year 2024–25, the superintendent should review the programs and staff assigned to the assistant superintendent of operations to ensure that responsibilities align with the job description. Programs such as ESL, Special Education, and Career and Technical Education should be overseen by the assistant superintendent of operations only to the extent that he is providing operational oversight, such as budget, safety, or compliance management.

Next, the superintendent, with approval from the board of trustees, should develop an executive director position that oversees special programs and student services. The executive

director would report to the superintendent. The primary responsibilities of this position would include special education, Section 504, English as a second language, and at-risk programs. The responsibilities of this position would include the following duties:

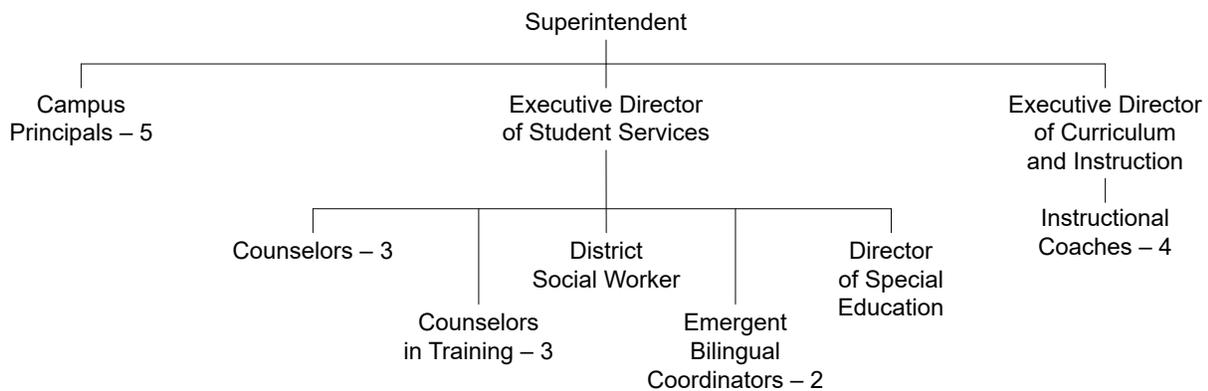
- serve as a liaison between the WSSA and Vernon ISD staff to support special education data-sharing protocols, communication, compliance, and the safety and success of students with disabilities;
- support, coordinate, and facilitate communication among the campus counselors and counselors-in-training;
- coordinate Section 504 program support and best practice service standards;
- provide leadership, guidance, and support to emergent bilingual coordinators, including advocacy, goal setting, progress monitoring, annual program evaluations, and board presentations;
- support the district social worker through goal setting, progress monitoring, and coordinated support from technology staff, counseling staff, and special education staff; and
- conduct evaluations for relevant programs and directly reporting positions annually.

Vernon ISD should consider transferring Section 504 responsibilities that are contracted to the WSSA to the new director. **Figure 2–11** shows the modified district organization with the proposed new position. However, Vernon ISD should analyze all district educational services and student services, including campus health services, library services, the Vernon ISD Opportunity Center, and the disciplinary alternative education program, to determine the most appropriate staffing organization.

Finally, the superintendent, in collaboration with the executive director of student services, executive director of curriculum and instruction, and campus principals, should establish specific, quantifiable goals for educational services and staff. The district's department and campus leadership should then implement systems to communicate and monitor program goals, and annually evaluate both staff and program outcomes. Program goals and outcomes should be transparent to all stakeholders engaging with that program.

The fiscal impact of these recommendations assumes that the district would add a dedicated, full-time leadership position

**FIGURE 2–11  
RECOMMENDED EDUCATIONAL SERVICE DELIVERY ORGANIZATION**



SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

to oversee student services. Assuming a salary of \$90,000 and a benefits rate of 20.0 percent, the total cost to the district to employ a director of student services would be \$108,000 (\$90,000 salary + \$18,000 benefits) annually. Assigning Section 504 responsibilities to the director of student services could result in annual savings for the district equivalent to the amount of the WSSA contract for these services. No fiscal impact is assumed for program and staff evaluations or the alignment of the assistant superintendent of operations responsibilities with his job description.

**PARAPROFESSIONAL STAFFING (REC. 4)**

Vernon ISD does not have a process to determine whether staffing for paraprofessional services is sufficient to meet student and campus educational needs.

Paraprofessionals, also known as educational aides, are certified instructional support staff whose duties may include tutoring, assisting with classroom management, or supporting a computer lab, media center, or library. Vernon ISD leadership stated that they did not use staffing formulas to allocate paraprofessionals to campuses. District leadership reported that they had suspended hiring paraprofessional positions, but they were considering resuming hiring. In the absence of staffing formulas, leadership considers staffing levels at neighboring districts, historical staffing data, and their subjective assessments of the paraprofessionals’ engagement levels during campus visits.

During onsite interviews, campus staff emphasized the need for additional paraprofessional support. In addition, staff reported instances when paraprofessionals were reassigned from their roles to serve as substitute teachers when none

were available, which appears to have contributed to the perceived paraprofessional shortage. It is important to note that substitute shortages are not unique to Vernon ISD. The *Texas Tribune* reported in February 2021 that “substitutes are harder to come by than in previous years.” Since the COVID-19 pandemic, school districts in Texas have been required to find “solutions on the fly, tagging in paraprofessionals and administrators to take over for teachers.” However, where the district faced two distinct staffing shortages for substitute teachers and paraprofessionals, its approach to addressing the substitute shortage exacerbated the paraprofessional shortage.

The assistant superintendent of operations reported that the district has implemented strategies to address the substitute teacher shortage, such as increasing the substitute teacher pay rate and expanding recruitment efforts. However, Vernon ISD leadership reported that, despite their recruitment efforts, their substitute teacher pool has the flexibility to decline jobs they deem undesirable. Therefore, substitute teacher openings for classrooms that are difficult to staff occasionally remain unfilled. In these instances, the district often relies upon paraprofessionals to serve as substitute teachers.

In addition to decreasing the number of staff available to serve as aides, using paraprofessionals as substitute teachers can place the district at risk of violating federal regulations. Employees who are paid 100.0 percent from federal funding or certain state allotment funds certify that they worked for that program only. By working outside that program as a substitute teacher, an employee would violate the terms of certification. For example, a special education paraprofessional

**FIGURE 2–12**  
**VERNON ISD PARAPROFESSIONAL (EDUCATIONAL AIDE) STAFFING LEVELS AND RATIOS**  
**SCHOOL YEAR 2021–22**

CAMPUS	STAFF		STUDENTS		STUDENT-TO-STAFF RATIOS		
	AIDES	TEACHERS	TOTAL	SPECIAL EDUCATION	TOTAL STUDENTS TO AIDES	TOTAL STUDENTS TO TEACHER	SPECIAL EDUCATION STUDENTS TO AIDES
T.G. McCord Elementary School	15.1	24.6	359.0	66.0	23.8	14.6	4.4
Vernon Elementary School	23.3	42.5	555.0	100.0	23.8	13.1	4.3
Vernon Middle School	9.5	33.0	418.0	65.0	44.0	12.7	6.8
Vernon High School	11.7	33.0	505.0	80.0	43.2	15.3	6.8

SOURCE: Texas Education Agency, Texas Performance Reporting System, school year 2021–22.

who substitutes in a general education class 8.0 percent of the time could not certify that she or he was assigned 100.0 percent to IDEA grant programs.

However, paraprofessionals whose positions are not funded through grant or allotment funds and those who complete time-and-effort documentation, which indicates that they may work on a grant-funded program but also perform other duties with appropriately documented time, may be reassigned from their regular responsibilities to serve as substitute teachers in classrooms without compromising grant compliance. Nonetheless, the potential fiscal implications of reassigning staff to serve as substitute teachers demonstrate the additional complexities of employing paraprofessionals as substitute teachers.

Furthermore, if a campus does not have adequate paraprofessional staffing, then students may not be receiving appropriate or even required academic support or services. Paraprofessionals fulfill many roles in a district, including assistance with special education services, general education services, and clerical duties. For example, Vernon ISD staffs paraprofessionals in the life skills classroom, the ESL program, and the libraries. **Figure 2–12** shows the school year 2021–22 paraprofessional staffing levels at the kindergarten to grade 12 campuses, as reported to TEA, along with the student and teacher data.

The LBB’s School Performance Review Team analyzed school year 2021–22 data due to an anomaly in the school year 2022–23 data. During school year 2022–23, the Vernon Elementary School teacher count decreased by 22.6 percent from the previous year, which would cause staffing formulas to recommend additional paraprofessional staffing. During onsite interviews, Vernon Elementary School campus

leadership reported that campus staffing was closer to school year 2021–22 levels.

As shown in **Figure 2–12**, student-to-teacher ratios vary by only 2.6 among campuses, while the student-to-paraprofessional ratios span a range of 20.2. Special education student ratios are included, as paraprofessionals often are employed to ensure students receive the services outlined in their individual education plans (IEP). The ratio of special education students to paraprofessionals at the secondary level is 1.5 times that of T.G. McCord Elementary. Although the staffing ratios in **Figure 2–12** may not fully capture the nuances required to align instructional needs with paraprofessional support, they can indicate to leadership that current paraprofessional staffing levels may not be adequate or equitable among campuses.

The Texas Association of School Boards’ (TASB) Human Resources (HR) Services provides strategic staffing guidance to school districts, including formulas for evaluating paraprofessional staffing needs in special education, general education, and clerical positions based on state averages. TASB HR Services advises districts to use local discretion to ensure staffing meets state and federal laws and individual student needs. Staffing formulas help districts assess and strategically meet staffing needs, but statutory obligations should take precedence over formula outputs. For instance, if a student’s IEP requires one-to-one paraprofessional support but a staffing formula based on the state average for paraprofessionals recommends a staffing level that would not allow for one-on-one support, the needs of the student and the legal requirements of IDEA must supersede the formula recommendation.

The TASB HR Services staffing guidance for special education paraprofessionals considers the total number of

**FIGURE 2–13  
VERNON ISD SPECIAL EDUCATION PARAPROFESSIONAL STAFFING LEVELS COMPARED TO RECOMMENDED STAFFING LEVELS  
SCHOOL YEAR 2021–22**

CAMPUS	VERNON ISD SPECIAL EDUCATION STUDENTS	RECOMMENDED SPECIAL EDUCATION STAFF (1)	VERNON ISD SPECIAL EDUCATION TEACHERS	RECOMMENDED SPECIAL EDUCATION PARAPROFESSIONALS (2)
T.G. McCord Elementary School	66.0	9.4	2.0	7.4
Vernon Elementary School	100.0	14.3	6.7	7.6
Vernon Middle School	65.0	9.3	3.3	6.0
Vernon High School	80.0	11.4	2.8	8.6

NOTES:

(1) The number of recommended staff includes teachers and paraprofessionals. The recommendation is based on a statewide ratio of 7:1 students to staff.

(2) The paraprofessional recommendation is the difference between the total recommended special education staffing amount and the special education teacher count provided in the Texas Performance Reporting System.

SOURCES: Texas Education Agency, Texas Performance Reporting System, school year 2021–22; Texas Association of School Boards, Strategic Staffing, 2021.

**FIGURE 2–14  
VERNON ISD’S RECOMMENDED GENERAL EDUCATION AND CLERICAL PARAPROFESSIONAL STAFFING LEVELS  
SCHOOL YEAR 2021–22**

CAMPUS	VERNON ISD STUDENTS	RECOMMENDED GENERAL EDUCATION PARAPROFESSIONALS (1)	RECOMMENDED CLERICAL PARAPROFESSIONALS (2)
T.G. McCord Elementary School	359	5.7	2.0
Vernon Elementary School	555	8.9	2.5
Vernon Middle School	418	5.0	3.0
Vernon High School	505	6.1	3.0

NOTES:

(1) The recommendation for an elementary campus is 16.0 general education paraprofessionals per 1,000 students; for a secondary campus, 12.0 general education paraprofessionals per 1,000 students.

(2) The recommendation for clerical staff is 4.5 paraprofessionals per 1,000 students with a minimum of two positions at an elementary campus and 5.5 paraprofessionals per 1,000 students with a minimum of three positions at a secondary campus.

SOURCES: Texas Education Agency, Texas Performance Reporting System, school year 2021–22; Texas Association of School Boards, Strategic Staffing, 2021.

special education students and staff. TASB recommends that the district determines the number of special education staff positions required to achieve a ratio of 7.0 special education students per special education staff. In this formula, staff refers to special education certified teachers and special education paraprofessionals. The 7.0-to-1.0 ratio is based on the state average for special education students to special education staff. **Figure 2–13** shows the total special education student populations at each campus, and the number of special education staff required to achieve TASB’s recommendation.

Similarly, the district must determine the appropriate number of general education and clerical paraprofessionals for each campus, based on statewide data. General education paraprofessionals include those who provide foundation or enrichment curriculum support. Examples of general education paraprofessionals

include physical education paraprofessionals and reading and language arts paraprofessionals. At the elementary level, TASB recommends a student-to-staff ratio for general education paraprofessionals of 16.0 positions per 1,000 students; at the secondary level, the recommended ratio is approximately 12.0 positions per 1,000 students.

The clerical paraprofessional recommendation is 4.5 positions per 1,000 students, with a minimum of 2.0 positions at the elementary level. The secondary campus recommendation is 5.5 positions per 1,000 students, with a minimum of 3.0 positions. Clerical paraprofessionals include library staff and front office staff. **Figure 2–14** shows the total student populations at each campus and the recommended number of general education paraprofessionals and clerical paraprofessionals based on TASB’s state average data and suggested metrics.

**FIGURE 2–15**  
**VERNON ISD’S TOTAL RECOMMENDED PARAPROFESSIONAL STAFFING LEVELS**  
**SCHOOL YEAR 2021–22**

CAMPUS	RECOMMENDED PARAPROFESSIONALS				ACTUAL PARAPROFESSIONALS	
	SPECIAL EDUCATION	GENERAL EDUCATION	CLERICAL	TOTAL	VERNON ISD	DIFFERENCE
T.G. McCord Elementary School	7.4	5.7	2.0	15.1	15.1	0.0
Vernon Elementary School	7.6	8.9	2.5	19.0	23.3	4.3
Vernon Middle School	6.0	5.0	3.0	14.0	9.5	(4.5)
Vernon High School	8.6	6.1	3.0	17.7	11.7	(6.0)
<b>Total</b>	<b>29.6</b>	<b>25.7</b>	<b>10.5</b>	<b>65.8</b>	<b>59.6</b>	<b>(6.2)</b>

SOURCES: Texas Education Agency, Texas Performance Reporting System, school year 2021–22; Texas Association of School Boards, Strategic Staffing, 2021.

The total number of paraprofessionals is derived by totaling the recommended number of special education, general education, and clerical paraprofessionals. **Figure 2–15** shows the recommended number of paraprofessionals from each category, the total recommended number of paraprofessionals per campus, and the actual number of paraprofessional staff employed at Vernon ISD campuses during school year 2021–22.

Based on the TASB staffing guidance, Vernon ISD is understaffed by 6.2 paraprofessional positions overall. This formula validates the initial findings shown in **Figure 2–12**, which suggest that understaffing is affecting the secondary campuses disproportionately. It is important to note that the TASB formulas do not specifically consider ESL paraprofessionals. However, emergent bilingual students are more frequently identified for ESL services in elementary grades, as they are more likely to meet ESL exit criteria with each year spent in the program. This need could justify additional paraprofessional staffing in Vernon ISD’s elementary grades.

TASB’s paraprofessional guidance also does not consider substitute teacher shortages. However, this issue is closely related to paraprofessional staffing because the district is reassigning paraprofessionals to serve as substitute teachers. When the demands on a school district exceed its available staffing resources, students can lose valuable instructional time and access to required services. Vernon ISD has implemented several processes to improve learning outcomes and address learning loss related to the COVID-19 pandemic. However, the district unintentionally could undermine those efforts by overlooking staffing processes.

**Vernon ISD should develop a paraprofessional staffing allocation model based on best practice and student and campus needs.**

Before school year 2024–25, the Vernon ISD superintendent, in coordination with the chief financial officer, should develop staffing allocation models that identify the appropriate number of special education, emergent bilingual education, general education, and clerical paraprofessionals to employ at each campus. In addition, Vernon ISD should develop a permanent substitute teacher position and a staffing allocation model for the position. A permanent substitute teacher position would be a full-time paraprofessional who is available to fill in for teachers throughout the district.

Although the TASB HR model is grounded in state averages, the district may choose any best practice or research-based staffing model to guide paraprofessional hiring. After a staffing allocation model is identified and implemented, campus and special education leadership should review the model’s recommendations to ensure they meet each campus’s needs and each student’s IEP requirements and base staffing decisions on those needs.

A permanent substitute staffing allocation model should be based on a thorough analysis of the district’s substitute teacher data. The analysis should consider substitute teacher usage at each campus, including substitute teacher positions filled by district staff in short-term and long-term positions during the past three years.

District and campus leadership should review final staffing decisions to ensure that staffing aligns with campus needs. Staffing models may not capture the following examples of specific campus needs:

- students whose IEP services require one-to-one paraprofessional support;
- emergent bilingual students who require paraprofessional support;
- life-skills classrooms, in which staffing minimums or ratios apply; and
- early childhood special education classrooms, in which staffing minimums or ratios apply.

This recommendation does not address the staffing needs of the disciplinary alternative education program, which the review team considered in the Safety and Security chapter.

No fiscal impact is assumed for this recommendation, as the district first should identify a staffing allocation model and conduct an analysis of its substitute teacher shortage to ensure that staffing levels are sufficient to meet student needs.

### **ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

#### **ELEMENTARY GIFTED AND TALENTED**

Although the district has recorded progress in serving its GT population, the district can improve certain services.

Vernon ISD does not consider its kindergarten students for GT services as required by the Texas State Plan for the Education of Gifted/Talented Students in Accountability Standard 2.20. The district's GT leadership is aware of this requirement and strives to develop a universal screening process for the kindergarten population. However, the district already is implementing several GT and district assessments, and staff stated that they have been struggling to add another assessment.

TEA guidance, however, does not require districts to use an assessment to consider kindergarteners for GT services. The TEA Equity in Gifted/Talented Education website states that districts have flexibility when evaluating kindergarteners for GT potential, which is emphasized as distinct from evaluating them for GT services. The website provides methods for evaluating kindergarteners for GT potential, including the use of planned experiences, teacher observations, and student products or portfolios, in addition to assessments.

Vernon ISD could consider using student portfolios in place of an additional assessment instrument when adopting a policy to consider all kindergarteners for GT services.

Additionally, Vernon ISD does not provide an accelerated curriculum for its GT elementary students. The district provides enrichment through small-group services with its campus GT coordinator, which is a valuable opportunity for GT students. However, the district did not purchase an elementary-specific curriculum when it identified that the current curriculum has no differentiation for students performing at a higher academic level than their peers. Vernon ISD should consider adopting an accelerated curriculum for the GT students in elementary schools.

In addition, the district established an accelerated pathway for middle school students in mathematics, enabling them to advance a grade level and complete Algebra I in grade eight. The district should consider offering similar opportunities in the elementary school for GT students.

By implementing these changes, the district will continue to advance its GT program.

#### **COMMUNICATION**

The district has not established systems to facilitate effective two-way communication between district and campus staff regarding curriculum and instruction.

District staff reported that, overall, communication between the campus and the district is open and that both parties could communicate readily when issues arose. Some campus staff agreed that communication channels between the campus and the district were open and effective, and some campus staff said that this communication often is a challenge. Campus staff reported that information is disseminated inconsistently by the district and feedback, in response, is provided hesitantly by the campuses. For example, some staff said that they are reluctant to share concerns with district leadership, fearing it could harm working relationships with colleagues or supervisors.

Poor communication also was evident at the campus level. Staff described an instance in which previous campus leadership had originated an intimidating environment for certain teachers after conducting a survey that did not garner the responses the leader had expected. Staff said that even though the leader was no longer at the campus, the fear of posing questions, concerns, or critiques remained. Staff also reported that district-level and campus-level surveys often lacked follow-up regarding whether or how

the district would use the response data. Based on such experiences, many campus staff reported concluding it was in their best interest to avoid surveys. Lack of candid feedback from some staff may hinder the district’s ability to make informed decisions.

Effective communication is crucial because when staff have clarity regarding a program’s priorities and objectives, they are empowered to support these goals where their roles intersect with them. However, when staff lack clarity regarding program goals, they may have unanswered questions or may draw inaccurate conclusions.

For example, staff reported varying levels of communication with instructional coaches. Campus staff who reported higher levels of communication with their coaches expressed enthusiasm for the program, while those who reported lower levels of communication expressed uncertainty about coaches’ commitment to them or their campuses. In the face of uncertainty, staff may infer that they or their campuses are not a district priority. In addition, survey feedback revealed that not all teachers were trained in DMAC, despite requests for the instructional coaches to provide training, which may compound campus-level feelings of neglect. Ambiguity and lack of feedback can distract staff from program goals, undermine coaching relationships, and affect student outcomes.

The superintendent, in coordination with the executive director of curriculum and instruction, should act to improve the district’s educational communication.

To begin, the superintendent should collaborate with the executive director of curriculum and instruction to implement systems that communicate education service program goals and goal outcomes, ensuring they are transparent to all stakeholders who engage with that program.

For example, instructional coaching goals may include each coach’s goal number of campus visits and training opportunities during a semester. Communicating this data and their rationale to staff can foster buy-in, whereas a lack of communication can breed concern or worse, mistrust. District leadership should monitor progress towards goals, promptly identifying and addressing underlying issues if sufficient progress is not achieved.

Next, the superintendent should delegate the following tasks to improve the district’s overall communication:

- develop procedures for scheduling meetings to ensure that notifications are sent in a timely manner, appropriate staff are included, and relevant decisions or action items are documented;
- establish feedback mechanisms such as surveys or suggestion boxes to enable staff to anonymously share questions, concerns, or ideas; and
- address staff concerns related to the confidentiality of survey feedback truthfully and provide staff with survey data analysis and an action plan after the collection of survey data.

**FISCAL IMPACT**

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

The Legislative Budget Board’s School Performance Review Team identified a fiscal impact for Recommendation 3.

RECOMMENDATION	2024–25	2025–26	2026–27	2027–28	2028–29	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
<b>2. EDUCATIONAL SERVICE DELIVERY</b>							
3. Modify the district's organization to include dedicated oversight, support, and evaluation of special programs and student services.	(\$108,000)	(\$108,000)	(\$108,000)	(\$108,000)	(\$108,000)	(\$540,000)	\$0
<b>Total</b>	<b>(\$108,000)</b>	<b>(\$108,000)</b>	<b>(\$108,000)</b>	<b>(\$108,000)</b>	<b>(\$108,000)</b>	<b>(\$540,000)</b>	<b>\$0</b>



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## 3. FINANCIAL MANAGEMENT

### FINDINGS

- ◆ Vernon ISD’s budget-planning process lacks sufficient stakeholder input and does not connect the budget to the district’s goals and objectives.
- ◆ Vernon ISD lacks a local, board-adopted fund balance policy to guide the district in short-term and long-term planning.
- ◆ Vernon ISD lacks procedures for tagging, inventorying, and disposing of district assets.
- ◆ Vernon ISD does not use electronic purchasing systems effectively and lacks sufficient procedures for credit card usage.

### RECOMMENDATIONS

- ◆ **Recommendation 5: Develop a proactive budget-planning approach that aligns spending with identified needs and goals and includes mechanisms for budgeting based on a consensus of long-term needs and use of resources.**
- ◆ **Recommendation 6: Establish a board policy to identify the level of fund balance the district will maintain in the general fund and how the district will use it.**
- ◆ **Recommendation 7: Develop and implement controls to manage district assets efficiently.**
- ◆ **Recommendation 8: Develop and implement a process to streamline purchasing functions and strengthen controls over credit card use.**

### BACKGROUND

An independent school district’s financial management function administers the district’s resources and directs risk management and purchasing operations.

Resource administration includes budget preparation, accounting and payroll, financial reporting, auditing, and ensuring compliance with state and federal laws and regulations. The Financial Accountability System Resource Guide (FASRG), which is adopted into the Texas Administrative Code, Title 19, Part 2, Chapter 109, Subchapter C, Section 109.41, and available on the Texas

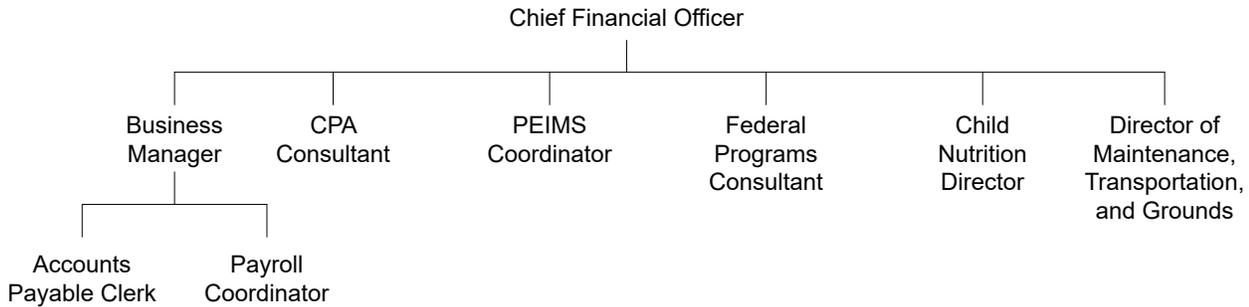
Education Agency (TEA) website, outlines financial accounting and reporting requirements that school districts must meet. Planning includes developing a long-term strategic plan, aligning spending priorities with district goals, and identifying and allocating resources.

Asset and risk management includes managing investments, capital assets, and insurance coverages. The goal of sound investment management is to maximize returns while ensuring the safety and liquidity of district funds to meet fluctuating cash-flow demands in accordance with the Texas Government Code, Chapter 2256. Capital asset management involves identifying a district’s property (e.g., buildings, vehicles, equipment) and protecting it from theft and obsolescence. Effective asset and risk management also includes ensuring that the district is protected from financial loss with cost-effective insurance premiums.

A school district’s purchasing and contract management function should enable the district to provide quality services, supplies, and equipment in a timely, cost-effective manner and ensure compliance with federal and state laws, including competitive bidding requirements outlined in the Texas Education Code, Section 44.031. An effective purchasing process requires districts to develop methods to select vendors and establish procedures for requisitions, purchase orders, and the receipt, storage, and distribution of goods and materials. Establishing strong internal controls is critical to protecting the integrity of the purchasing process and preventing fraud, waste, and abuse.

In school year 2022–23, Vernon Independent School District (ISD) operated six campuses and reported an enrollment of 1,792 students. Vernon ISD’s Business Office manages the district’s budget operations, accounts receivable and payable functions, and purchasing activities. **Figure 3–1** shows the organization of Vernon ISD’s Business Office. The chief financial officer (CFO) reports to the superintendent and directs the operation of all financial and business affairs of the district, including accounting, purchasing, Public Education Information Management System (PEIMS) reporting, grants management, food services operations, and transportation. The business manager’s responsibilities include cash management, bank deposits, and supervising the accounts payable and payroll functions of the district. The accounts payable clerk

**FIGURE 3–1  
VERNON ISD’S BUSINESS OFFICE ORGANIZATION  
SCHOOL YEAR 2023–24**



NOTE: CPA=certified public accountant; PEIMS=Public Education Information Management System.  
 SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

processes requisitions, purchase orders, and payments to vendors. The payroll coordinator processes employee compensation for the district. The PEIMS coordinator reports to the CFO and supervises the work of the campus secretaries, attendance clerks, and registrars who enter student data into PEIMS. The certified public accountant (CPA) consultant prepares bank reconciliations, journal entries, and the district’s annual financial statements. The federal programs consultant reports to the CFO and oversees compliance and program management for the district’s federal and state grants.

In November 2021, voters approved a \$40.0 million bond for the construction of a new facility for elementary students and upgrades to Vernon High School. These upgrades include a new front entry, a media center, four new classrooms, and collaboration spaces for the students. The district completed these projects, merging two elementary facilities to establish one campus serving grades two to five at the beginning of school year 2023–24.

Vernon ISD operates on a fiscal year beginning September 1 and ending August 31. For fiscal year 2024, Vernon ISD’s adopted budget is \$19,849,212, with revenues of \$19,607,548. **Figure 3–2** shows Vernon ISD’s actual financial data for fiscal years 2020 to 2022 and budgeted financial data for fiscal years 2023 and 2024 for the general fund. The largest expenditure categories for each of these years are instruction, which accounted for 58.6 percent of the total operating expenditures budgeted in fiscal year 2024, followed by facilities maintenance and operations, which accounted for 13.6 percent of total operating expenditures budgeted that year.

**Figure 3–3** shows Vernon ISD’s tax rate compared to peer districts from school years 2018–19 to 2022–23. Peer districts are districts similar in size and other characteristics to Vernon ISD used for comparison purposes. The Legislative Budget Board’s School Performance Review Team selected four peer school districts for Vernon ISD: Bowie ISD, City View ISD, Graham ISD, and Sweetwater ISD. The tax rate, adopted by the school district board of trustees pursuant to the Texas Education Code, Section 11.1511(b)(8), contributes to local revenue. The Vernon ISD Board of Trustees (board) adopted a lower tax rate than its four peer districts from school years 2018–19 to 2021–22. In school year 2022–23, Vernon ISD had the third lowest tax rate compared to peer districts.

School districts in Texas receive two financial ratings, the School Financial Integrity Rating System of Texas (FIRST) and Smart Score. School FIRST is the state’s school financial accountability rating system intended to hold school districts accountable for the quality of their financial management practices and for improving those practices. The goal of School FIRST is to enhance transparency, provide meaningful financial oversight, and drive improvement in public school finance. The Smart Score rating measures academic progress and spending at Texas’ school districts and campuses. This rating, which ranges from one star (very low) to five stars (very high), indicates a district’s success in combining cost-effective spending with measurable student academic progress. The district and campus Smart Score calculations use three-year averages to provide more stable and consistent measures that show less year-to-year volatility. The 2020 Smart Score rating results use data from school years 2016–17 to 2018–19.

**FIGURE 3–2  
VERNON ISD GENERAL FUND FINANCIAL DATA, FISCAL YEARS 2020 TO 2024 (1)**

CATEGORY	2020	2021	2022	2023	2024
<b>Revenue</b>					
Local Tax	\$8,428,835	\$8,659,415	\$8,210,074	\$8,364,757	\$7,274,611
Other Local and Intermediate	\$719,321	\$2,781,258	\$1,360,957	\$2,654,614	\$1,394,200
State	\$8,625,790	\$8,764,841	\$9,782,664	\$9,264,609	\$10,538,737
Federal	\$646,013	\$297,223	\$649,306	\$400,000	\$400,000
<b>Total Revenue</b>	<b>\$18,419,959</b>	<b>\$20,502,737</b>	<b>\$20,003,001</b>	<b>\$20,683,980</b>	<b>\$19,607,548</b>
<b>Operating Expenditures (2)</b>					
11 Instruction	\$10,360,588	\$10,744,670	\$9,347,182	\$11,150,830	\$11,623,567
12 Instructional Resources and Media	\$172,774	\$173,874	\$178,784	\$193,175	\$181,171
13 Curriculum and Staff Development	\$101,169	\$244,322	\$204,930	\$136,896	\$112,054
21 Instructional Leadership	\$191,773	\$201,233	\$215,476	\$213,623	\$241,086
23 School Leadership	\$1,059,130	\$1,176,473	\$1,346,265	\$1,254,622	\$1,440,747
31 Guidance Counseling Services	\$531,735	\$496,200	\$417,725	\$505,353	\$448,394
32 Social Work Services	\$3,415	\$27,330	\$77,651	\$64,865	\$84,262
33 Health Services	\$159,121	\$204,418	\$196,581	\$205,432	\$251,782
34 Transportation	\$472,652	\$470,110	\$444,803	\$654,394	\$592,874
35 Food Service Operation (3)	\$35,924	\$40,367	\$25,351	\$41,800	\$0
36 Extracurricular	\$686,731	\$745,516	\$814,711	\$824,636	\$794,471
41 General Administration	\$843,305	\$716,362	\$984,325	\$836,916	\$895,675
51 Facilities Maintenance and Operations	\$3,076,300	\$2,428,458	\$1,761,953	\$2,506,775	\$2,695,053
52 Security and Monitoring	\$55,830	\$56,128	\$75,458	\$127,513	\$123,120
53 Data Processing Services	\$327,220	\$330,835	\$361,128	\$348,596	\$364,956
61 Community Services	\$0	\$0	\$0	\$0	\$0
<b>Total Operating Expenditures</b>	<b>\$18,077,667</b>	<b>\$18,056,296</b>	<b>\$16,452,323</b>	<b>\$19,065,426</b>	<b>\$ 19,849,212</b>

NOTES:

- (1) Data for fiscal years 2020 to 2022 show actual expenditures, and data for fiscal years 2023 and 2024 show budgeted amounts.
- (2) Includes accounting codes used by school districts to identify the function of expenditures.
- (3) Vernon ISD participates in the federal National School Lunch Program and the School Breakfast Program. The district accounts for revenues and expenditures for these programs separately from the general fund in a special revenue fund.

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2019–20 to 2022–23.

Figure 3–4 shows Vernon ISD’s School FIRST and Smart Score ratings compared to peer districts. Vernon ISD scored a School FIRST rating of C/Meets Standard. Vernon ISD’s score was lower than all four of its peer districts, which all scored a School FIRST rating of A/Superior for school year 2021–22. Vernon ISD’s School FIRST rating was affected by the external independent auditor report for fiscal year 2022, which identified a material weakness in internal controls over financial reporting. This audit finding results in an automatic failure of a School FIRST Financial Competency Indicator, which prevents Vernon ISD from earning a School FIRST rating higher than C.

Since school year 2019–20, external auditors have identified deficiencies in the district’s internal controls over financial reporting. These findings were due primarily to the district’s failure to accurately record transactions in accordance with generally accepted accounting principles (GAAP). GAAP represent a set of accounting rules, standards, and procedures issued by the Governmental Accounting Standards Board that school districts must follow when compiling their financial statements.

Vernon ISD’s recurrent audit findings have harmed the district’s School FIRST ratings. Figure 3–5 shows the district’s School FIRST ratings from 2020–21 to 2022–23

**FIGURE 3–3  
VERNON ISD’S TAX RATE COMPARED TO PEER DISTRICTS  
SCHOOL YEARS 2018–19 TO 2022–23**

DISTRICT	2018–19	2019–20	2020–21	2021–22	2022–23
Vernon ISD	\$1.0800	\$0.9700	\$0.9664	\$0.9634	\$1.1468
Bowie ISD	\$1.2200	\$1.1500	\$1.1464	\$1.1239	\$1.0346
City View ISD	\$1.4200	\$1.3884	\$1.3747	\$1.3577	\$1.2751
Graham ISD	\$1.3470	\$1.2770	\$1.2770	\$1.2740	\$1.1890
Sweetwater ISD	\$1.2080	\$1.1298	\$1.1036	\$1.0268	\$0.9761

NOTE: Tax rates are calculated per \$100.00 in property valuation.  
SOURCE: Texas Education Agency, School District Adopted Maintenance and Operations and Interest and Sinking Tax Rates, school years 2018–19 to 2022–23.

**FIGURE 3–4  
FINANCIAL RATINGS FOR VERNON ISD AND PEER DISTRICTS**

DISTRICT	SCHOOL FIRST RATING (1)	SMART SCORE (2)	SMART SCORE ACADEMIC PERFORMANCE RATING	SMART SCORE SPENDING RATING
Vernon ISD	C/Meets Standard	2	Very low academic progress	Average spending
Bowie ISD	A/Superior	2.5	Average academic progress	High spending
City View ISD	A/Superior	2	Low academic progress	High spending
Graham ISD	A/Superior	2	Low academic progress	High spending
Sweetwater ISD	A/Superior	1	Very low academic progress	Very high spending

NOTES:  
(1) School FIRST=Financial Integrity Rating System of Texas. The 2022–23 School FIRST ratings are shown and based on data from school year 2021–22.  
(2) Smart Score ratings use three-year averages. The 2020 Smart Scores are shown and based on data from school years 2018–19, 2017–18, and 2016–17.  
SOURCES: Texas Education Agency, School Financial Integrity Rating System of Texas, school year 2022–23; Texans for Positive Economic Policy, 2020 Smart Scores.

**FIGURE 3–5  
SCHOOL FINANCIAL INTEGRITY RATING SYSTEM OF TEXAS RATINGS FOR VERNON ISD AND PEER DISTRICTS  
SCHOOL YEARS 2020–21 TO 2022–23**

YEAR	BOWIE ISD	CITY VIEW ISD	GRAHAM ISD	SWEETWATER ISD	VERNON ISD
2020–21	A	A	A	A	C
2021–22	A	A	A	A	F
2022–23	A	A	A	A	C

SOURCE: Texas Education Agency, School Financial Integrity Rating System of Texas, school years 2020–21 to 2022–23.

compared to peer districts. Vernon ISD’s ratings ranged from C to F during this period. Peer districts received A ratings for all years shown.

Staff attribute the district’s audit findings and corresponding School FIRST ratings to accounting errors, staff turnover, and lack of accounting expertise in the Business Office. In February 2021, the district’s long-serving business manager retired and was replaced by an individual who resigned in August 2021. During these transitions, the district failed to perform routine accounting functions such as preparing

bank reconciliations. To prepare for the fiscal year 2021 financial audit, the district hired a consultant to complete and correct several months’ financial reports and reconciliations; however, the work involved was too extensive to complete by the annual financial report (AFR) submission deadline. As a result, Vernon ISD submitted its AFR to TEA late. In addition, external auditors made numerous audit entries, some material to the district’s financial statements. Auditors also found that the district did not adhere to effective internal controls, such as third-party reviews and approvals of the bank reconciliations and journal entries. As

**FIGURE 3–6  
VERNON ISD BUDGET PROCESS AND TIMELINE  
FISCAL YEAR 2024**

February 2023	Inform principals and administrators of the budget process and meet as a team and individually to review current-year balances and trends.
March 2023	Business/Finance Department Budget Planning Meeting
April 28, 2023	Budget training
	Budget worksheets and guidelines distributed to principals and directors
May 12, 2023	Budget worksheets due to the Business Office. Administrators/Directors submit their proposed budgets (line items and new program budgets)
	Prioritized list of major projects is due to superintendent; to include costs associated with proposed school programs, buildings/grounds, equipment, and technology projects
June 12–16, 2023	Directors and administrators meet to review proposed campus and department budgets
July 17–21, 2023	Budget Workshop with Board of Trustees and set Salary, Stipend and Extra Duty Pay Schedules
July 25, 2023	Receive Certified Tax Values from Wilbarger County and Foard County Appraisal Districts
July 26– August 10, 2023	Post Notice of Public Hearing for Budget Adoption and Tax Rate published in newspaper and Notice of Intent to Set Tax Rate published in newspaper and posted to district website (10–30 days before public meeting)
August 28–31, 2023	Public hearing on proposed budget
	Board of Trustees adopts budget and tax rate and approves certified tax roll and final budget amendments for prior year.

SOURCE: Vernon ISD Budget Calendar, fiscal year 2024.

a result of these issues, the district received a School FIRST rating of F for fiscal year 2021.

To address the issues causing their recurrent audit findings, Vernon ISD hired a part-time CPA consultant in school year 2023–24. The consultant assists with complex journal entries and bank reconciliations and helps the Business Office prepare the district’s financial statements for annual financial audits.

**DETAILED FINDINGS**

**BUDGET PROCESS (REC. 5)**

Vernon ISD’s budget-planning process lacks sufficient stakeholder input and does not connect the budget to the district’s goals and objectives.

The Vernon ISD budget process for fiscal year 2024 began in February 2023, and the board approved the budget in August 2023. **Figure 3–6** shows the budget process provided by the district for fiscal year 2024.

As shown in **Figure 3–6**, the district’s budget timeline includes steps for the Business Office to meet with principals and department heads to discuss needs for the coming year. Staff reported that campus and department budgets are based on historical amounts and typically are the same from year to

year. During the annual budget development process, the CFO adjusts budgeted amounts if staff can justify the changes for the upcoming school year. This incremental budgeting model, in which the current fiscal year budget becomes the basis for increases or decreases the following year, enables the district to plan for immediate needs but does not connect budget decisions to district goals or long-term outcomes.

For example, staff reported that budget decisions are not tied directly to the priorities and needs of the district based on the campus improvement plans (CIP) and the district improvement plan (DIP). All campuses must develop CIPs annually, pursuant to the Texas Education Code, Section 11.253. The CIP is a one-year plan that sets the campus’s educational objectives and specifies how the campus will allocate resources during the school year to meet the determined objectives. The Texas Education Code, Section 11.251(a), requires each district to develop a board-approved DIP annually. Districts develop DIPs to improve school performance by developing annual goals, objectives, and strategies based on analyses of student achievement, graduation rates, retention rates, and other federal and state accountability indicators. The DIP and CIPs provide critical direction for the district through annual goals and priorities. Although Vernon ISD’s school year 2023–24 DIP identifies

funding resources for each strategy, staff made these designations after the board adopted the fiscal year 2024 budget. Within the current budget process, campuses and departments typically receive the same allocation as in the previous year, irrespective of student performance and progress toward district goals.

In addition, the district's budget process does not include mechanisms for budgeting based on a consensus of long-term needs. According to board members and district staff, the district does not have a comprehensive strategic plan. The district has developed some long-range plans, including five-year academic goals as part of Lone Star Governance and a five-year technology replacement plan. However, the district does not consider these plans during the annual budget process. Furthermore, the district lacks planning documents that address transportation, facilities management, food service, asset and risk management, and other areas of district operations.

In addition, the district's budget process does not include sufficient stakeholder input. According to the district's budget procedures, Vernon ISD "develops the annual budget with the assistance of all department directors and campus principals." However, this practice does not appear to be implemented consistently. During interviews, some staff described a collaborative budget process with the CFO, while others reported that they did not have the opportunity to provide input on their departments' needs. For example, operational department leaders reported that they are not involved in or aware of budget allocation decisions for the functions they oversee. Staff also reported that the district does not employ any strategies to solicit community input into the budget process.

Without a long-range budget planning process, the district reacts to administrative, operational, and academic challenges annually rather than addressing them systematically through a well-defined, multiyear planning process. In addition, without an established and comprehensive strategic planning process, a district cannot articulate its future direction based on consensus of long-term needs and use of resources. Passive or reactive budget planning can prove costly and often is ineffective in advancing the district's goals.

For example, TEA issues state academic accountability ratings ranging from letter grades of A to F for each district and campus. The ratings are derived from various indicators such as the State of Texas Assessments of Academic Readiness (STAAR) test scores; graduation rates; measures of college,

career, and military readiness; and college preparatory course completion. For school year 2021–22, districts and campuses that would have received a rating of D or F, including Vernon ISD, were designated Not Rated in accordance with Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021. The district's elementary schools were Not Rated: Senate Bill 1365, and the middle school and the high school each received C ratings. Failure to consider the DIP or CIPs when determining spending priorities could place the district at risk of not meeting its future academic goals, which in turn could result in sanctions or monitoring from TEA.

Strategic plans assist school districts to establish measurable and time-bound goals, allocate budget and human resources efficiently to achieve those goals, and effectively navigate unforeseen setbacks. For example, a decrease in a district's tax base due to economic factors could affect the district's fund balance without proper planning. Sound strategic plans encompass all aspects of district operations, including academic, operational, and financial goals. Each goal is tied to resource requirements, student achievement, implementation steps, timelines, action items, performance measures, and fund requirements. The strategic planning process involves gaining stakeholder support by engaging staff, parents, and the community in the planning process.

**Figure 3–7** shows a best practice model of a strategic planning process.

The Government Finance Officers Association (GFOA) represents public finance officials throughout the U.S. and Canada with a mission to advance excellence in public finance. In its publication, *Smarter School Spending*, GFOA recommends that school districts develop a strategic financial plan that provides guidance for implementing the district's instructional priorities across three years to five years. As part of this process, districts should develop a plan of action describing how the strategic financial plan will be translated into actionable steps.

According to GFOA, long-term financial planning includes the following benefits:

- establishing a long-term outlook into other planning processes, including budgeting, capital planning, and revenue forecasting;
- helping to diagnose potential risks and causes of fiscal distress;
- stimulating big-picture thinking;

**FIGURE 3–7  
STRATEGIC PLANNING BEST PRACTICE MODEL**

STEP	PURPOSE
1. Vision Setting	The board, superintendent, and key stakeholders engage in a vision-setting process to identify the characteristics the district should have if it were operating at the optimal level.
2. Mission and Goals	The board, superintendent, and key stakeholders identify a mission and associate goals that, if accomplished, will bring the district closer to fulfilling its vision.
3. Setting Priorities	The board prioritizes the district's most important goals to serve as the basis of the strategic plan.
4. Identifying Barriers	The board, superintendent, and leadership team use data to identify the key barriers to accomplishing the goals.
5. Identifying Resources	The administration links the budgeting process to the planning process to ensure that district goals and priorities are represented in budget allocation.
6. Strategy	The superintendent, administration, and key stakeholders—including parents, business leaders, civic organizations, and community groups—develop strategies to accomplish the goals by addressing the identified barriers, setting timelines for completion, assigning accountability, identifying performance measures, and allocating resources.
7. Consensus Building	The board, superintendent, and stakeholders build consensus, review the plan for viability, and approve the final document.
8. Implementation and Monitoring	Individuals or departments with assigned accountability implement the plan strategies and monitor progress against performance measures and use of allocated funds.
9. Evaluation	The district evaluates the success of the plan, which performance measures were met, which goals were fulfilled, and what obstacles prevented success. The superintendent presents findings to the board.

SOURCE: Legislative Budget Board School Performance Review Team, Strategic Planning Best Practice Model, 2017.

- providing a tool for evaluating long-term compliance with financial policies;
- enabling and encouraging preemptive action to mitigate forecasted financial distress;
- defining parameters for decision-making; and
- communicating a long-term financial position to residents and other stakeholders, including rating agencies and bond investors.

**Vernon ISD should develop a proactive budget-planning approach that aligns spending with identified needs and goals and includes mechanisms for budgeting based on a consensus of long-term needs and use of resources.**

The CFO and the superintendent should develop written procedures for a budget development process that achieves the following goals:

- aligns district expenditures with the advancement of the district’s goals, DIP, and CIPs; and
- initiates a three-year-to-five-year, comprehensive, strategic planning process with measurable objectives for all areas of district operations, which will serve as a decision-making framework for district budgeting.

The superintendent and the board should ensure that the strategic planning process addresses functional areas that are not included in the DIP, such as facilities, technology, risk management, and safety and security. The district’s strategic planning efforts should include input from staff, community representatives, and other stakeholders.

To implement this recommendation, the superintendent should perform the following actions:

- form a district team including the superintendent, leadership staff, board representative, and cabinet staff to develop a timeline for the strategic planning process and facilitate the logistics of the process;
- form a district steering committee representing all stakeholder groups, including district administration, teachers, principals, board of trustees, business community, parents, and students, to identify the overall direction, values, mission, vision, purpose, and goals for the plan;
- establish an action planning committee including one representative from each stakeholder group of senior staff, teachers, principals, board of trustees, business community, parents, and students to write objectives,

develop strategies, identify resources, and establish metrics to measure the outcomes;

- share the completed plan with the public and post it on the district’s website for public comment;
- incorporate components of the plan in the annual district and campus improvement plans; and
- develop key strategic plan highlights to share with the business community and other organizations.

In developing this plan, the district team should supplement the goals with specific, measurable long-term objectives for instructional and noninstructional areas. In addition, the action plan should identify the resources required to accomplish the goals, including funding sources. The district also should identify staff responsible for monitoring the goal and establish a timeline for each goal. The typical timeline for goals established in a long-term strategic plan ranges from three years to five years. The assigned staff should report periodically to the board on the progress of accomplishing each action plan.

Vernon ISD also should consider holding an annual strategic planning retreat with board members, the superintendent, and key stakeholders to discuss the progress of the strategic plan.

The district could implement this recommendation with existing resources.

#### **FUND BALANCE (REC. 6)**

Vernon ISD lacks a local, board-adopted fund balance policy to guide the district in short-term and long-term planning.

A school district uses its general fund for daily operational expenses. The general fund balance is the variance between the district’s overall assets and liabilities at the close of the fiscal year. Districts maintain general fund balances to address unforeseen financial events or delays in the receipt of state and local revenue sources. For example, districts receive most of their property tax collections from December to February. Some districts use fund balance reserves to cover expenditures at the start of the school year until tax revenue is received.

The Governmental Accounting Standards Board (GASB), an independent organization that standardizes state and local accounting and financial reporting, established the following five categories that designate how a school district can expend a fund balance:

- nonspendable – amounts that are not in spendable form, such as inventory, or amounts that are required to be maintained intact, such as a permanent fund;
- restricted – amounts that may be spent only for specific purposes in accordance with local, state, or federal laws, or funds from external resource providers, such as grantors or creditors;
- committed – amounts limited to specific purposes defined by the board;
- assigned – amounts the district intends to use for a specific purpose; and
- unassigned – amounts that are available for any purpose.

Statute does not govern the size of a school district’s fund balance. According to GFOA, the optimal size of a district’s fund balance can be influenced by factors such as cash flow requirements, planned costs, and susceptibility to natural disasters and economic recession. In its publication, *Fund Balance Guidelines for the General Fund*, GFOA recommends that governments “maintain unrestricted budgetary fund balance in their general fund of no less than two months of regular general fund operating revenues or regular general fund operating expenditures.” TEA’s School FIRST ratings also contain some guidance related to fund balance levels. For example, to achieve an A/Superior rating, School FIRST requires a district to have less than a 25.0 percent decrease in its combined assigned and unassigned fund balance during a three-year period, or to maintain 75 days’ operating expenditures in its combined assigned and unassigned fund balance. Vernon ISD’s fund balance has ranged from six months to nine months of operating expenditures during this period, consistently meeting both GFOA and TEA guidelines.

**Figure 3–8** shows Vernon ISD’s fund balances from fiscal years 2018 to 2022. The district’s ending fund balance for fiscal year 2022 was \$18,029,028, with an unassigned fund balance of \$12,518,955. The district’s total unassigned and assigned fund balance represents 76.1 percent of total operating expenditures, which equates to 9.1 months of operating expenditures for that year. The district’s total assigned and unassigned fund balance increased by 40.1 percent from fiscal years 2021 to 2022.

As shown in **Figure 3–8**, since fiscal year 2018, Vernon ISD maintained a fund balance that exceeds the target recommended by GFOA.

**FIGURE 3–8  
VERNON ISD GENERAL FUND BALANCES  
FISCAL YEARS 2018 TO 2022**

FUND BALANCES	2018	2019	2020	2021	2022
Nonspendable	\$0	\$0	\$393,184	\$0	\$10,073
Restricted	\$0	\$0	\$0	\$0	\$0
Committed	\$1,250,000	\$1,250,000	\$3,500,000	\$5,500,000	\$5,500,000
Assigned	\$1,500,000	\$1,500,000	\$0	\$0	\$0
Unassigned	\$7,048,268	\$8,592,653	\$7,787,615	\$8,934,779	\$12,518,955
<b>Total Assigned and Unassigned</b>	<b>\$8,548,268</b>	<b>\$10,092,653</b>	<b>\$7,787,615</b>	<b>\$8,934,779</b>	<b>\$12,518,955</b>
<b>Total fund balances</b>	<b>\$9,798,268</b>	<b>\$11,342,653</b>	<b>\$11,680,799</b>	<b>\$14,434,779</b>	<b>\$18,029,028</b>
Increase/(Decrease) from previous year (assigned and unassigned)	\$2,082,807	\$1,544,385	(\$2,305,038)	\$1,147,164	\$3,584,176
Percentage change from previous year (assigned and unassigned)	27.0%	15.8%	(20.3%)	9.8%	24.8%
Total operating expenditures	\$16,623,557	\$16,320,473	\$18,077,667	\$18,056,296	\$16,452,323
Fund balance (assigned and unassigned) as a percentage of total operating expenditures	51.4%	61.8%	43.1%	49.5%	76.1%
Fund balance (assigned and unassigned) as months of total operating expenditures	6.2	7.4	5.2	5.9	9.1

SOURCE: Legislative Budget Board School Performance Review Team; Vernon ISD Annual Financial Reports, fiscal years 2018 to 2022.

A review of peer district data shows that Vernon ISD’s peer districts also maintain fund balances exceeding two months of operating expenditures. **Figure 3–9** shows that, for fiscal year 2022, Vernon ISD had a higher fund balance than its peers, both as a percentage of operating expenditures and as months of operating expenditures.

During interviews, district staff stated that the board has not established goals or targets for the district’s fund balances. Staff reported that the district’s fund balances have accumulated steadily during recent years due to the board and administration’s historical hesitation to spend funding and a lack of strategic planning. Staff could not describe plans for the district’s fund balances, including the committed fund balance. According to interviews, the committed fund balance of \$5.5 million initially represented

the amount the board designated for construction, specifically for potential cost overruns related to the most recent bond project. Although the district designated funds for these purposes for the past five years, Vernon ISD completed the construction of the new elementary school and all other bond projects without using these funds. District staff said the district does not have specific plans for future construction projects using the designated fund balance. Although it is not improper to designate funds for an extended period, holding the funds in these categories when it is not required legally or contractually may distort the district’s true financial position.

Maintaining a robust fund balance is an important safety net to guard against unforeseen expenses and economic downturns. However, accumulating fund balances without

**FIGURE 3–9  
VERNON ISD FUND BALANCE COMPARED TO PEER DISTRICTS  
FISCAL YEAR 2022**

BALANCE	VERNON ISD	BOWIE ISD	CITY VIEW ISD	GRAHAM ISD	SWEETWATER ISD
Fund balance (assigned and unassigned) as a percentage of total operating expenditures	76.1%	43.0%	61.3%	61.5%	<b>34.1%</b>
Fund balance (assigned and unassigned) as months of total operating expenditures	9.1	5.2	7.4	7.4	<b>4.1</b>

SOURCES: Texas Education Agency, Public Education Information Management System Financial Data, fiscal year 2022.

plans for their use raises concerns that the district is not managing its resources effectively to best support student achievement or ensure efficient operations. Alongside opportunities to improve academic performance, the district has significant needs related to aging facilities, equipment, and vehicles. For example, 21 of the district's route buses do not have air conditioning, resulting in students being subjected to excessive heat for extended periods during the hottest times of the day. In addition, older campuses require significant ongoing repair and maintenance, including T.G. McCord Elementary School, Vernon Middle School, and Vernon High School.

GFOA recommends that "governments establish a formal policy on the level of unrestricted fund balance that should be maintained in the general fund for generally accepted accounting principles and budgetary purposes. Such a guideline should be set by the appropriate policy body and articulate a framework and process for how the government would increase or decrease the level of unrestricted fund balance over a specific time period."

In establishing a policy governing the level of unassigned fund balance in the general fund, GFOA references the following factors governments should consider when establishing a policy:

- revenue predictability and expenditure volatility;
- perceived exposure to significant onetime setbacks, such as disasters or state budget decreases; and
- the potential demand upon general fund resources from other funds and the availability of resources in other funds.

According to the Texas Association of School Business Officials, districts should address each of the following five fund balance categories in their formal fund balance policies:

- for committed balances, identify the body with the highest level of decision-making authority (e.g., the board), and the formal action required, such as a board resolution approved by vote;
- define the body or official authorized to assign amounts; and
- address the district's policy on minimum fund balance, often expressed as a multiple or a percentage of prior-year revenues.

**Vernon ISD should establish a board policy to identify the level of fund balance the district will maintain in the general fund and how the district will use it.**

The CFO, with the superintendent's assistance, should determine the necessary level of fund balance to meet the district's needs. The superintendent and CFO also should consider any district goals, including construction plans. They should develop a fund balance policy that addresses acceptable uses of any unassigned fund balance greater than the minimum included in the policy. The policy also should include a plan to restore the fund balance if it decreases below the identified level. The fund balance policy should be adaptable to consider a modest increase or decrease in any year.

The district could implement this recommendation with existing resources.

**ASSET MANAGEMENT (REC. 7)**

Vernon ISD lacks procedures for tagging, inventorying, and disposing of district assets.

Vernon ISD maintains two types of fixed assets – capital assets and nonspendable assets. GASB Statement No. 34: Basic Financial Statements—and Management's Discussion and Analysis—for State and Local Governments defines capital assets as having the following qualities:

- tangible or intangible;
- used in operations; and
- have a useful life of more than one year.

According to TEA's FASRG, a district's capital assets can include land, land improvements, land use rights, buildings and building improvements, construction work in progress, furniture and equipment, vehicles, machinery and equipment, works of art, historical treasures, monuments, infrastructure, computer software, and commercially available software.

FASRG defines nonspendable assets as "durable items such as instructional materials and physical education equipment that are not considered to be capital assets." These items can include goods such as office supplies, paper, computer supplies, maintenance supplies, and science lab supplies.

Vernon ISD Board Policy CFB (LOCAL) states that the capitalization threshold for purposes of classifying capital assets is \$5,000. **Figure 3–10** shows the district's

**FIGURE 3–10  
VERNON ISD CAPITAL ASSET ACTIVITY  
FISCAL YEARS 2021 TO 2022**

ASSET	2021	2022	INCREASE/(DECREASE)	PERCENTAGE CHANGE
Land	\$582,374	\$582,374	\$0	0.0%
Building and improvements	\$10,392,402	\$10,314,480	(\$77,922)	(0.7%)
Furniture and equipment	\$1,275,764	\$1,253,356	(\$22,408)	(1.8%)
Right-to-use leased furniture and equipment	\$0	\$235,936	\$235,936	N/A
Construction in progress	\$408,000	\$6,931,366	\$6,523,366	1,598.2%
<b>Total</b>	<b>\$12,658,540</b>	<b>\$19,317,512</b>	<b>\$6,658,972</b>	<b>52.6%</b>

SOURCE: Vernon ISD Annual Financial Report, fiscal year 2022.

capital asset activity for fiscal year 2022, which is the most recent data available from the district’s published annual financial reports. Vernon ISD has approximately \$19.0 million in net capital assets after depreciation, an increase of 53.0 percent from fiscal year 2021. This increase was due to the construction of Vernon Elementary School fiscal year 2022.

FASRG requires districts to inventory capital assets periodically to perform the following tasks:

- identify and resolve discrepancies between the capital asset inventory list and what is on hand;
- maintain a list of fully depreciated assets still in use; and
- list and write off missing items in accordance with established internal policy, using journal entries that comply with generally accepted accounting principles.

To maximize control of capital assets, FASRG states that districts must keep a detailed subsidiary ledger that includes the following information:

- the asset purchased;
- date of purchase, construction, or acquisition;
- price paid to acquire and put the asset in place;
- expected useful life and disposal date of the asset;
- location of the asset;
- inventory number or identification code for movable items; and
- fund from which the asset was purchased.

Staff reported that the district tags and tracks technology equipment. The technology director maintains an inventory of devices and software licenses. This practice aligns with guidance from FASRG, which states that “certain audiovisual or computer equipment may not be capitalized (i.e., recorded as a capital asset), but a listing of such assets and their location may be maintained for control and accountability purposes.” However, the district has not established processes for monitoring capitalized assets that are not technology equipment.

Vernon ISD’s Business Office procedures contain few guidelines for how to document or inventory assets. The district’s *State and Federal Grants Manual* describes procedures for tracking and inventorying assets purchased with grant funds. However, during interviews, staff did not identify a process to tag assets other than technology equipment. Additionally, the Business Office procedures do not address the management of assets that are not funded through grants.

A review of the district’s capital asset list shows that Vernon ISD does not document capital assets in accordance with FASRG requirements. **Figure 3–11** shows an excerpt from Vernon ISD’s capital asset list. The excerpt shows that this list contains a variety of transactions relating to assets but does not identify the disposal date for each asset, the location of each asset, an inventory number, or an identification code for all movable items.

The district’s capital asset list, as shown in **Figure 3–11**, lacks detailed subsidiary ledger information necessary to perform a physical inventory of the district’s capital assets. It also likely does not include all capital assets, as district staff reported that Vernon ISD does not tag all capital assets as it receives them. In addition, the Business Office does not inventory capital assets periodically as required by FASRG.

**FIGURE 3–11  
VERNON ISD CAPITAL ASSET LIST EXCERPT  
FISCAL YEAR 2023**

DATE ACQ	DESCRIPTION	METH/ LIFE	COST	SALVAGE VALUE	DEPR BASIS	BEG A/ DEPR	CURR DEPR	END A/ DEPR
<b>Asset A/C#: 1531 – Furniture and Equipment</b>								
08/09/07	Various Custodial Equipment	SLP / 10		\$0.00	\$50,032.00	\$50,032.00	\$0.00	\$50,032.00
10/22/07	Home Plate Pitching Machine	SLP / 10		\$0.00	\$7,043.00	\$7,043.00	\$0.00	\$7,043.00
09/05/08	Holbart C44 Dishwasher Machine	SLP / 10		\$0.00	\$18,516.00	\$18,516.00	\$0.00	\$18,516.00
12/02/08	Unit 604 - TT60A New Holland Tractor with...	SLP / 15		\$0.00	\$24,298.99	\$20,654.11	\$1,619.93	\$22,274.04
08/05/09	TruTime base terminals	SLP / 10		\$0.00	\$13,938.00	\$13,938.00	\$0.00	\$13,938.00
08/07/09	Coffing Electric Hoist with push Trolley	SLP / 10		\$0.00	\$17,376.25	\$17,376.25	\$0.00	\$17,376.25
10/22/09	Unit 607 - 6 x 16 Stocker Trailer	SLP / 10		\$0.00	\$9,587.30	\$9,587.30	\$0.00	\$9,587.30
02/10/10	Mimio Interactive System - Paid with...	SLP / 5		\$0.00	\$49,670.00	\$49,670.00	\$0.00	\$49,670.00
03/25/10	Unit 610 - Big Tex 12-6 Cargo Trailer	SLP / 10		\$0.00	\$3,903.00	\$3,903.00	\$0.00	\$3,903.00
05/05/10	Sawstop Tablesaw	SLP / 10		\$0.00	\$5,256.76	\$5,256.76	\$0.00	\$5,256.76

SOURCE: Vernon ISD, October 2023.

Vernon ISD also has not established processes for tracking and inventorying noncapitalized assets. Although not required by FASRG, tracking assets valued at less than the capitalization threshold is a best practice to decrease the risk of loss from theft or misuse. When staff purchase noncapitalized items, the requesting campus or department receives and uses them, and the Business Office does not require that the assets be tagged, tracked, or inventoried. Several campuses developed processes for annual classroom inventories; however, this data is not collected at the district level.

Vernon ISD also lacks procedures for asset disposal. Board Policy CI (LOCAL) requires that the superintendent disposes of surplus property for fair market value and that “property obtained with federal funds or as federal surplus shall be managed in accordance with federal law.” However, the district’s Business Office procedures do not contain any instructions for asset disposal.

Without annual inventories, the district cannot hold campuses, departments, or staff accountable for safeguarding district property. Staff, guests, or unauthorized visitors could remove property from Vernon ISD premises undetected, and district records would not capture or alert staff of missing or

stolen inventory. In the event of fire or other disaster, the district would be unable to present an accurate inventory for insurance claims. The lack of written procedures for asset disposal could result in the accumulation of stored surplus property, and the district may not have the information necessary to maintain a complete and accurate list of assets. Furthermore, Vernon ISD is at risk of violating state and federal guidelines for the disposal of assets purchased with grant funds. Identifying assets purchased with federal funding is a requirement of most grant awards that follow the federal Education Department General Administrative Regulations (EDGAR) guidelines, and TEA has developed specific requirements for the disposal of such assets. During interviews, staff said that the district does not have a process to identify which assets were purchased with federal funds, nor did staff report awareness of procedures for removing grant-funded assets from inventory.

According to staff at the time of the onsite visit, the district had expended most of its grant funds on staffing and, therefore, was not at high risk of regulatory noncompliance with respect to asset disposal. However, with the recent construction of a new elementary school and the closure of two facilities, the district has multiple furnishings and items of value to move,

sell, or retain. The district may have purchased some of the assets with federal or state grant funds and will need to identify which surplus items were grant-funded, complete the appropriate documentation, and obtain approval before disposal. In addition, the district recently entered into a lease-purchase agreement for vehicles. As Vernon ISD brings these new vehicles into service, the district likely will retire some of its aging fleet vehicles. Written disposal procedures would help direct staff to follow consistent methods when disposing of surplus property and vehicles in accordance with board policy and state and federal requirements.

A best practice for school districts is to use a formatted document that requires staff to itemize the asset, explain the reason for the disposal (e.g., obsolete, unrepairable, lost, stolen), and the method of disposal (e.g., sale, recycled, donated). Some school districts require prior approval before asset disposal and stipulate where to deposit the proceeds if items are sold. These procedures often require documentation of lost or stolen items.

Some disposal policies stipulate that all property purchased with district funds belongs to the district, and staff must follow district guidelines to dispose of district property. This statement serves as notice staff may not dispose of unused items by throwing them away, taking them for personal use, or giving them to anyone else without documenting the transaction. Although Vernon ISD has no evidence of this removal occurring, the lack of disposal policies places the district at risk for the misuse of assets.

To recoup some of the money invested in assets, many districts use online auctions, physical auctions, and other means to sell surplus assets. Others identify other school districts or nonprofit organizations that need the surplus items and are eligible to accept donations of school district property.

**Vernon ISD should develop and implement controls to manage district assets efficiently.**

The CFO should perform the following tasks:

- develop and document procedures for conducting annual inventories, reconciling them with the asset databases, and disposing of assets;
- establish a process for the receipt of assets, including the use of distinct tags for assets purchased with federal funding so that the need for EDGAR compliance for disposal is apparent;

- conduct the first inventory of assets at the end of the current school year, during which staff should capture the data needed to meet FASRG inventory requirements, tag all assets, and identify any assets that should be added to or removed from the lists;
- identify and tag all assets purchased with federal or state grant funds and mark those items that could become surplus;
- review the various disposal options and select those that best meet the district's needs; and
- establish a plan and schedule for the movement and temporary storage of surplus items pending the sale, auction, or disposal of those items.

The district could implement this recommendation with existing resources.

**PURCHASING PROCESSES (REC. 8)**

Vernon ISD does not use electronic purchasing systems effectively and lacks sufficient procedures for credit card usage.

Vernon ISD Board Policy CH (LOCAL) delegates purchasing authority to the superintendent, up to \$25,000. However, the board must approve purchases greater than \$25,000, regardless of the method of purchase. District staff reported that the CFO approves all payments and signs all checks to vendors. Checks that exceed \$25,000 must be signed by the CFO and a board member.

Before school year 2021–22, Vernon ISD operated using a decentralized purchasing system that lacked adequate internal safeguards against fraud, waste, and misuse. For example, individual campuses could issue checks, enter into contracts, and perform bank reconciliations without oversight from the Business Office. However, staff reported that, beginning in school year 2021–22, the district implemented substantial procedural modifications to improve consistency, accountability, and efficiency in purchasing districtwide. These efforts included centralizing contract management at the Business Office, standardizing and documenting purchasing protocols, and training district staff in the protocols.

During interviews, campus and district staff said that they appreciated the district's updated purchasing operations. Staff expressed feeling supported by the Business Office staff, noting their readiness to answer questions and assist at any time. These positive changes notwithstanding, the review

team observed opportunities to streamline processes further and strengthen internal controls.

The district uses a manual, paper-based purchasing process that includes the following steps:

- purchase originators submit a paper requisition request to the campus secretary or department staff (requestor) responsible for submitting requisitions;
- the requestor enters the information into the district's enterprise resource planning system, Skyward, and submits the requisition electronically to the principal or department head for approval;
- the accounts payable clerk prints out a purchase order and submits it to the CFO for approval, and a paper copy of the approved purchase order is provided to the requestor;
- the requestor may then order the items requested and, upon receipt, sign the paper purchase order and submit it and supporting documentation (e.g., invoice, packing slip) to the Business Office; and
- the accounts payable clerk checks that the invoice matches the purchase order and processes the payment to the vendor.

Requisition requests, purchase orders, receiving reports, and invoice documentation are performed almost entirely on paper, even though the Skyward system could execute these functions electronically. For example, staff could use the system to verify invoices, receive reports electronically before issuing payments, and maintain electronic copies of supporting documentation.

Skyward also could support the district's financial accounting and procurement operations, including its internal controls. For example, it can prevent expenditures from exceeding budgeted amounts and limit requisition requests to pre-approved items before issuing final purchase orders. However, Vernon ISD is not taking advantage of these features.

Manual documentation processes are time-consuming and prone to errors, and they require significant staff effort to generate, verify, and document purchases. Vernon ISD staff reported that obtaining an approved purchase order may require a week or longer. Staff also reported instances of lost paperwork that resulted in late payments to vendors.

The district also could improve its credit card purchasing procedures. The district has 31 active cards distributed

among campus and district leadership, coaches, and cafeteria managers. According to the Vernon ISD Purchasing Procedures manual, staff must secure an approved purchase order before using a district credit card and must submit receipts for all credit card purchases.

Although the manual describes important controls to prevent unauthorized transactions, it lacks guidance regarding transaction limits, unallowable purchases or vendors, protocols for emergency purchases, and consequences for violating procedures. The absence of these guidelines has resulted in unclear expectations for credit card use in the district. Interviews indicated that when the district makes purchases to address urgent needs, staff routinely make credit card purchases without first obtaining approved purchase orders. However, interpretations of what qualifies as an urgent purchase vary widely, ranging from acquiring holiday decorations to purchasing groceries required for same-day school lunch preparation. In addition, staff do not always remit receipts to support the credit card charges, and the district's procedures do not include mechanisms to recoup funds for unsupported purchases.

The FASRG states that credit card procedures "should be thorough and cover as many potential areas of use to provide sufficient guidance to the cardholder." The FASRG suggests that at minimum, procedures should include the following guidance:

- general program information and guidelines manual;
- what to do if a cardholder loses a district card or identifies fraudulent purchases;
- what types of items or services are considered an acceptable or unacceptable use of a district card;
- compliance violations and consequences for misuse of a district card;
- how to request a new or replacement district card; and
- a card transaction deadline calendar so the cardholder understands the sign-off requirements.

Dripping Springs ISD publishes a comprehensive credit card procedures manual on its website. **Figure 3–12** shows the best practice topics addressed in the district's manual.

Dripping Springs ISD's credit card procedures stipulate that district credit cards are not intended to avoid or bypass appropriate purchasing or payment procedures as

outlined in Board Policy CH (LOCAL), may be used only for official business, and the card must be returned to the appropriate location after use. The procedures include detailed steps for submitting a requisition in Skyward before using the card and submitting itemized receipts for all transactions. If a receipt is lost, the district requires staff to either furnish a duplicate receipt from the vendor or reimburse the district for the charges.

**Vernon ISD should develop and implement a process to streamline purchasing functions and strengthen controls over credit card use.**

The CFO should perform the following steps:

- develop a plan for the district to transition to a fully electronic purchasing process;
- identify training opportunities to support staff in the implementation of the Skyward purchasing module;
- strengthen the district’s credit card guidelines to include more detailed procedures that address the following areas:
  - responsibilities and expectations of cardholders;
  - criteria for individuals eligible to receive and use district credit cards;
  - transaction limits and spending thresholds for cardholders;
  - allowable and prohibited purchases;
  - guidelines for emergency purchases, including documentation;
  - restricted vendors;
  - procedures for reporting lost or stolen cards promptly; and
  - accountability measures for violation of district credit card policies.

The district could implement this recommendation with existing resources.

**ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district’s programs and services to students, staff, and the community. These observations are

**FIGURE 3-12  
DRIPPING SPRINGS ISD CREDIT CARD PROCEDURE  
MANUAL TOPICS  
JANUARY 2024**

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- Section 1 – Overview
  - 1.0 Purpose/Acceptable Uses
  - 2.0 Purchasing Payment Guidelines
  - 3.0 Purchasing and Documentation
  - 4.0 Audit/Review
  - 5.0 Signature Card Security
    - a. Controls
    - b. Limits
    - c. Merchant Category Codes
    - d. Eligibility
- Section 2 – Program Management – Individual Cards
- Section 3 – Program Management – Department Cards
- Section 4 – Program Management – Generic Cards
- Section 5 – Cancellation/Suspension Procedure
- Section 6 – Lost or Stolen Cards
- Section 7 – Changes in Employment Status
- Section 8 – Consequences for Failure to Comply with Program Guidelines
- Section 9 – Misuse of Card
- Section 10 – Discrepancies
- Section 11 – Disputed Items
- Section 12 – Lodging
  - 1.0 Hotel Payments
  - 2.0 Hotel Cancellations
  - 3.0 Federal Funds
- Section 13 – Transportation
  - 1.0 Air Fare
  - 2.0 Baggage Handling
- Section 14 – Meals
- Section 15 – Student Travel
  - 1.0 Lodging
  - 2.0 Meals
- Section 16 – Board of Trustees Travel
- Section 17 – Non-employee Travel
- Section 18 – Receipts

SOURCE: Dripping Springs ISD, Business Office Signature Card Procedures Manual, school year 2022–23.

presented for consideration as the district implements the report's other findings and recommendations.

### **PUBLIC EDUCATION INFORMATION MANAGEMENT SYSTEM PROCEDURES MANUAL**

The Public Education Information Management System (PEIMS) contains all data reported to TEA about public education, including student demographic and academic performance, personnel, financial, and organizational information.

Vernon ISD lacks a comprehensive standard operating procedures (SOP) manual for PEIMS operations. The district PEIMS coordinator has served in the role for five years and is responsible for PEIMS data submissions. The coordinator also unofficially oversees the four campus registrars. During interviews, staff reported that the district does not have manuals for the coordinator and registrar roles. The district has written procedures for PEIMS submissions; however, this manual does not provide steps to correct errors that may occur in the district's student information system, Skyward. When these errors occur, the PEIMS coordinator assists the registrars by emailing them screenshots of troubleshooting solutions.

The district also does not have a backup PEIMS coordinator, and staff noted that the district could struggle with PEIMS submissions if the current coordinator left. At the beginning of each school year, the PEIMS coordinator trains registrars on the student information system and inputting coding for new students; the coordinator also provides support throughout the year as needed. Each of the district's registrars has less than two years of experience in the roles, and two individuals are new to the roles for school year 2023–24. At some campuses, the attendance clerks and secretaries also are new to their roles. These staff are not familiar with the registrar's duties and may not be able to perform the role if a registrar is absent for an extended period.

Without an SOP manual, the district relies entirely on the PEIMS coordinator to support campus registrars. Regional Education Service Center IX staff could train and support a new PEIMS coordinator. However, the loss of the current PEIMS coordinator's institutional knowledge could hamper the district's ability to assist the registrars, correct system coding errors, and submit accurate PEIMS data efficiently. The CFO should consider requiring the PEIMS coordinator and the registrars to develop SOP manuals for their roles and develop procedures to update the manuals as needed. The CFO also should consider developing a succession plan for

the PEIMS coordinator and the campus registrars that ensures staff are trained adequately for their current and future roles.

### **DONATION PROCESS**

Vernon ISD lacks a formal process for accepting financial or material donations from community residents and organizations. During interviews, staff reported that parents or businesses occasionally donate money, books for the campus library, backpacks, and other school supplies for students.

Campus staff reported that they were not aware of nor had they received any training on the district's donation guidelines or processes. Staff said that the CFO or the business manager oversees all aspects of processing donations received by campuses. Additionally, when physical items such as backpacks or school supplies are donated, campus staff said that they establish independent processes to inventory and distribute the materials to students. They do not report the donated items to the Business Office.

The lack of formal procedures for processing donations and the absence of training on this process for campus staff could place the district at risk of fraud or inappropriate use of donations. Vernon ISD's Business Office should establish a formal written process for accepting and processing donations and distribute this information to campus administrators.

### **FISCAL IMPACT**

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and should be addressed promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and should be reviewed to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the findings in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

## 4. HUMAN RESOURCES MANAGEMENT

### FINDINGS

- ◆ Vernon ISD lacks a process to match staffing levels with student and campus educational needs.
- ◆ Vernon ISD lacks an effective records management process.
- ◆ Vernon ISD lacks an effective evaluation process for all staff.
- ◆ Vernon ISD lacks a process to maintain accurate and updated job descriptions for all staff.
- ◆ Vernon ISD lacks a process to evaluate the effectiveness and efficiency of its human resources activities.

### RECOMMENDATIONS

- ◆ **Recommendation 9: Assess district staffing levels and develop staffing allocation formulas based on best practices and student and campus needs.**
- ◆ **Recommendation 10: Develop and implement a written records management plan for personnel files.**
- ◆ **Recommendation 11: Develop written procedures outlining a formal, annual performance evaluation for all staff in accordance with board policy and the district of innovation plan.**
- ◆ **Recommendation 12: Develop and implement a process to review and update all job descriptions annually.**
- ◆ **Recommendation 13: Establish performance measures for annually evaluating the district's human resources functions.**

### BACKGROUND

Human resources (HR) management includes compensation, recruitment, hiring, retention, records management, staff relations, grievances, and performance evaluations. HR responsibilities can be classified as either compliance-based or strategic-based. Compliance-based responsibilities ensure that an organization follows federal, state, and local labor laws in areas such as benefits, timekeeping, records management, mandatory leave, discrimination, medical privacy, safety, termination, and eligibility to work. Strategic-based responsibilities include recruitment and retention, compensation and benefits, and staff relations.

Vernon Independent School District (ISD) does not have an HR Department or HR-dedicated positions. Instead, HR functions are assigned to various district staff. The Legislative Budget Board's School Performance Review Team conducted onsite observations and staff interviews at Vernon ISD in October 2023. At the time of the onsite visit, the payroll coordinator, the superintendent's assistant, and the business manager had primary responsibility for the district's HR activities. The superintendent, assistant superintendent of operations, chief financial officer (CFO), campus administrators, and the campus secretaries also perform some HR processes. **Figure 4–1** shows the HR activities assigned to Vernon ISD positions during school year 2023–24.

During school year 2022–23, Vernon ISD employed 300.5 full-time-equivalent (FTE) positions providing services to 1,792 students at six campuses. The number of district staff has increased by 6.6 percent since school year 2018–19. **Figure 4–2** shows the total FTE positions by staff category in Vernon ISD for school year 2022–23.

**FIGURE 4–1**  
**VERNON ISD'S HUMAN RESOURCES ACTIVITIES BY POSITION, SCHOOL YEAR 2023–24**

ACTIVITY	POSITION(S) RESPONSIBLE
Recruiting new staff	Superintendent Assistant superintendent of operations Regional Education Service Center IX (Region 9)
Maintaining posted vacancies and operating an application process and tracking system	Region 9 superintendent's administrative assistant
Interviewing and selecting new staff	Campus administrators Department heads Superintendent

**FIGURE 4–1 (CONTINUED)  
VERNON ISD’S HUMAN RESOURCES ACTIVITIES BY POSITION  
SCHOOL YEAR 2023–24**

ACTIVITY	POSITION(S) RESPONSIBLE
Establishing retention strategies	Superintendent Assistant superintendent of operations
Conducting orientations for new staff	Curriculum Department Payroll coordinator Department heads Campus administrators
Processing new staff information	Payroll coordinator Superintendent’s administrative assistant
Processing promotions and transfers	Superintendent’s administrative assistant Business manager Payroll coordinator
Directing exit activities and resignation	Campus administrators Department heads Payroll coordinator
Establishing and updating the district salary schedules for all staff	Superintendent Assistant superintendent of operations Chief financial officer (CFO) Business manager
Conducting compensation marketability research	Superintendent CFO Business manager Assistant superintendent of operations
Planning and forecasting staffing levels	Superintendent Assistant superintendent of operations CFO
Maintaining and securing staff records	Superintendent’s administrative assistant Payroll coordinator Campus administrators
Directing and monitoring the employee benefits program	Business manager CFO Payroll coordinator
Managing workers’ compensation claims	Business manager
Developing and maintaining job descriptions	Assistant superintendent of operations
Managing the staff evaluation and appraisal process	Campus administrators manage teacher evaluations. The superintendent manages principal evaluations. Other staff are not evaluated regularly.
Managing grievance processes	Assistant superintendent of operations
Revising and updating the staff handbook	Campus principals District Administrators
Ensuring compliance with personnel-related laws and regulations	Business manager Superintendent’s assistant Assistant superintendent of operations
Overseeing district staff professional development	The executive director of curriculum and instruction and campus administrators oversee professional development for teachers.  Professional development for noninstructional staff is conducted individually.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

**Figure 4–3** shows the distribution of Vernon ISD staff across each positional category compared to peer districts for school year 2022–23. Peer districts are districts similar in size and other characteristics to Vernon ISD that are used for comparison purposes. For this review, the four peer districts chosen are Bowie ISD, City View ISD, Graham ISD, and Sweetwater ISD.

As shown in **Figure 4–3**, Vernon ISD’s student-to-teacher ratio is higher than that of its peer districts. Conversely, Vernon ISD’s student-to-campus administrator, educational aide, and auxiliary staff ratios are lower than the average ratios of its peer districts.

**Figure 4–4** shows Vernon ISD’s HR staffing levels compared to its peer districts.

As shown in **Figure 4–4**, Vernon ISD’s HR staffing mirrors that of its peer districts. City View ISD and Graham ISD have an HR department staffed by 1.0 full-time position.

**FIGURE 4–2  
VERNON ISD FULL-TIME-EQUIVALENT POSITIONS  
SCHOOL YEAR 2022–23**

POSITION	TOTAL
Teaching staff	123.7
Professional support	14.7
Campus administrative staff	11.4
Central administrative staff	3.7
Educational aides	66.2
Auxiliary staff	80.7
<b>Total staff</b>	<b>300.5</b>

NOTE: Totals may not sum due to rounding.  
SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2022–23.

**Figure 4–5** shows the budgeted payroll expenditures of Vernon ISD and its peer districts during fiscal year 2023. In fiscal year 2023, Vernon ISD budgeted 78.3 percent of its

**FIGURE 4–3  
VERNON ISD STUDENT-TO-STAFF RATIOS COMPARED TO PEER DISTRICTS  
SCHOOL YEAR 2022–23**

CATEGORY	VERNON ISD	BOWIE ISD	CITY VIEW ISD	GRAHAM ISD	SWEETWATER ISD	PEER DISTRICT AVERAGE
<b>Staff-to-student ratios</b>						
Teaching staff	14.5	12.6	12.1	14.2	12.9	12.9
Professional support staff	121.9	149.5	106.9	96.2	69.9	105.6
Campus administrative staff	157.2	186.8	118.0	230.7	128.6	166.0
Central administrative staff	484.3	456.7	283.3	452.2	313.2	376.3
Educational aides	27.1	34.2	31.6	39.9	21.4	31.8
Auxiliary staff	22.2	25.5	40.2	27.6	20.1	28.4
<b>Student count</b>						
Total enrollment	1,792	1,644	1,133	2,261	1,942	1,745

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023; Texas Education Agency, Texas Academic Performance Report, school year 2022–23.

**FIGURE 4–4  
VERNON ISD HUMAN RESOURCES STAFFING COMPARED TO PEER DISTRICTS, SCHOOL YEAR 2022–23**

DISTRICT	HUMAN RESOURCES FULL-TIME-EQUIVALENT POSITIONS	STUDENT ENROLLMENT	TOTAL STAFF
Vernon ISD	0.5	1,792	300.5
Bowie ISD	0.5	1,644	266.8
City View ISD	1.0	1,133	181.9
Graham ISD	1.0	2,261	335.8
Sweetwater ISD	1.0	1,942	386.7

NOTE: FTE positions= full-time-equivalent positions.  
SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD; Bowie ISD; City View ISD; Graham ISD; Sweetwater ISD, October 2023; Texas Education Agency, Texas Academic Performance Report, school year 2022–23.

**FIGURE 4–5  
BUDGETED PAYROLL EXPENDITURES FOR VERNON ISD, PEER DISTRICTS, AND THE STATE  
FISCAL YEAR 2023**

CATEGORY	VERNON ISD	BOWIE ISD	CITY VIEW ISD	GRAHAM ISD	SWEETWATER ISD	STATE
Total operating expenditures	<b>\$20,115,074</b>	\$16,548,545	\$14,395,154	\$22,897,358	\$20,746,949	\$60,191,430,308
Payroll expenditures	<b>\$15,748,977</b>	\$12,940,642	\$10,673,614	\$17,834,736	\$15,750,277	\$47,768,779,606
Payroll as a percentage of total operating expenditures	<b>78.3%</b>	78.2%	74.2%	77.9%	75.9%	79.4%

NOTE: Budgeted expenditures represent all funds.  
SOURCE: Texas Education Agency, Public Education Information Management System, Budgeted Financial Data, fiscal year 2023.

operating expenditures for payroll. This amount represents the highest percentage of all its peers, although still less than the state’s 79.4 percent.

In school year 2022–23, Vernon ISD’s teacher turnover rate was 26.1 percent compared to the state’s rate of 21.4 percent. Vernon ISD’s turnover rate was also higher than that of many neighboring districts such as Wichita Falls ISD, Burkburnett ISD, and Holliday ISD.

During school year 2022-23, Vernon ISD’s teacher salary scale was lower than most of its surrounding districts. To improve teacher recruitment and retention, Vernon ISD updated its teacher salary schedule for school year 2023–24. The district raised its starting salary for teachers by 21.0 percent, from \$37,180 to \$45,000. This starting salary now slightly exceeds that of Burkburnett ISD, Holliday ISD, and the average salary for beginning teachers in Education Service Center Region IX (Region 9). However, it is less than the starting salary for teachers in Wichita Falls and the average salary for beginning teachers in Texas. Additionally, Vernon ISD’s teacher pay scale is limited to \$60,000 for teachers with a bachelor’s degree after 30 years of experience; teachers with an advanced degree receive an additional \$1,000. Vernon ISD’s pay scale limit and advanced degree compensation are the lowest among the neighboring districts.

**DETAILED FINDINGS**

**STAFFING (REC. 9)**

Vernon ISD lacks a process to match staffing levels with student and campus educational needs.

Staffing costs represent a significant portion of a school district budget, which means effective staffing is essential for operational efficiency and maximizing funding allocated to direct instruction. For example, during fiscal year 2023, staff salaries and benefits constituted 78.3 percent of Vernon ISD’s total annual budget.

Staffing decisions can profoundly affect student outcomes and the district’s academic success. During interviews, Vernon ISD staff reported that staffing decisions are made through joint discussions among the superintendent, the assistant superintendent of operations, and the CFO. Collaboratively, they consider historic campus and department staffing levels, trends in student enrollment, and personal observations to determine appropriate staffing. Staff also reported using a staffing software program to assess instructional staffing levels.

District leadership then discusses these staffing decisions with principals and department heads. If campuses and departments require additional staff, they submit requests to the superintendent or assistant superintendent of operations, who meet with the CFO to decide whether to approve the request.

The district is not bound by statutory class size limits because Vernon ISD adopted a local innovation plan in August 2022 pursuant to the Texas Education Code, Chapter 12A. Even so, the district uses statutory requirements and best practices as guidelines for staffing teachers and nurses. Texas does not specify minimum staffing requirements for school nurses. However, the National Association of School Nurses recommends different student-to-nurse ratios based on student needs. When a district decides how to staff nurses, it can consult this staffing formula for guidance. Staff reported that Vernon ISD does not use staffing formulas or guidelines to support decisions for staffing other positions.

The longest period any Vernon ISD administrators have served in their current positions is two years. Staff reported that the district had not conducted a staffing assessment during this period. A staffing assessment is an evaluation of each position within the district to determine accurate staffing levels for optimal productivity. The CFO reported that the district plans to conduct such an assessment of all departments and campuses in spring 2024.

When school districts staff schools through subjective processes rather than objective processes derived from best practice staffing models, they risk inadequate or inequitable school staffing, which can compromise operational efficiency and organizational performance.

For example, district administrators implemented a hiring freeze for educational aides during school year 2022–23 based on data and campus observation. The number of educational aides in the district increased by 21.0 percent from school years 2018–19 to 2022–23. In observing this data, district administrators felt that campuses did not need additional educational aides especially as the total number of students in the district decreased by 8.1 percent during this same period. However, a closer examination of the data reveals that while the total student enrollment decreased, the number of students receiving English as a second language services increased by 24.4 percent, and those receiving special education services increased by 33.2 percent. Educational aides often are assigned to address the specific needs of emergent bilingual and special education students. Vernon ISD does not use staffing formulas based on best practice standards to establish a baseline number of educational aides at each campus. Thus, using the district’s current staffing process, it is difficult for district administrators to determine if the number of educational aides at each campus is appropriate to meet the needs of these growing populations. The absence of established staffing formulas or a formal process to assess staffing levels has also led to frustration among some campus administrators who perceive shortages in educational aides but have been denied requests for additional staff.

Vernon ISD should assess district staffing levels and develop staffing allocation formulas based on best practices and student and campus needs.

The superintendent should develop and implement staffing formulas to determine staffing levels for campuses and departments that are equitable, efficient, and based on state and federal regulations, best practices, student and campus needs, and industry standards. The Texas Association of School Boards (TASB) has developed a set of staffing standards the district could use as a template. Additional organizations have developed best practice standards for various positions, such as counselors, librarians, custodians, and administrative staff.

After the superintendent establishes these staffing formulas, the CFO should conduct a staffing assessment for each

campus and department. The staffing formulas will provide the framework for this assessment. Additionally, the CFO should collaborate with principals and departments individually to discuss their needs and any unique situations affecting their campuses or departments. The CFO should consider all this information to develop a comprehensive written staffing assessment to present to the superintendent, principals, and department heads. Subsequently, the superintendent will present the assessment results to the Vernon ISD Board of Trustees (board).

The district should conduct this assessment at least every two years and use the assessment results when making staffing decisions.

The district could implement this recommendation with existing resources.

#### **RECORDS MANAGEMENT (REC. 10)**

Vernon ISD lacks an effective records management process.

Board policy CPC (LEGAL) and CPC (LOCAL) outline the statutory requirements and the board’s adopted policy for implementing a records management program, including records custody, maintenance, and disposition. The board policies require the superintendent to serve as the records management officer and to fulfill the duties prescribed by Local Government Code 203.023. These responsibilities include overseeing the school district’s records management program, administering the program, collaborating with individuals who create or maintain records to prepare retention schedules, preserving valuable records, ensuring compliance with regulations, disseminating relevant information, and establishing procedures to uphold legal duties and confidentiality standards for records. However, Vernon ISD lacks documented processes for retaining, managing, securing, archiving, or disposing of personnel files. As a result, staff files across the district are incomplete, over-retained, outdated, and vulnerable to inappropriate access.

Vernon ISD maintains two sets of personnel files. Files for current district staff are kept in an office in the administrative building. Files for former district staff are kept in a walk-in vault in the administrative building.

Current personnel files are maintained in a locked, fireproof, and waterproof filing cabinet in an office in the administration building. According to staff, the superintendent’s administrative assistant is the only individual with a key to the filing cabinet. The office that

contains the current staff files can be locked but staff reported that it typically remains unlocked.

Staff reported that new personnel files are initiated based on a checklist of required documents. After examining a sample of 40 current staff files, the review team determined that they consistently included the following such items:

- employment contracts;
- professional licensure;
- copies of driver licenses and Social Security cards;
- professional development records;
- college transcripts; and
- employee applications.

However, the reviewed files lacked disciplinary action files, verification of employment (I-9) forms, service records, and performance evaluations. Additionally, some files did not contain updated teaching certificates or employment contracts.

The lack of documented processes and training on records management contributes to inconsistencies in personnel files. The superintendent's administrative assistant maintains personnel files and relies on the campus staff to provide updated documents, such as assignment records, performance evaluations, and professional licensure. However, these record management processes are not effectively communicated to campus staff. During interviews, most campus administrators reported being unaware of these processes, stating that they maintained staff records at their campuses and provided them to the administrative office only when staff left the district.

Furthermore, the process for updating and transporting the official district records when staff leave the district's employment is ineffective. When staff leave the district, the superintendent's administrative assistant is notified and removes the staff's file from the current staff files. The file is moved to a box in the administrative assistant's office, and when that box is filled, the files are moved to the vault that houses the files of former staff. However, the reviewed sample of 40 current staff files included four files for individuals who are no longer employed by the district. Additionally, the door to the vault that contains all former staff files is often left unsecured, placing confidential documents at risk of being accessed inappropriately. Confidential staff records include teacher and administrator appraisals, criminal histories, certification examination results, and medical information.

Vernon ISD also lacks a record retention schedule and archival or disposition plan for staff files. Staff reported that the files are evaluated for disposition after 10 years. However, at the time of the review team's onsite visit, Vernon ISD maintained numerous staff records in the vault that aged from 10 years to 50 years. The district had no process to ensure that it met retention requirements or disposed of records that had satisfied those requirements.

By retaining documents that have satisfied retention requirements, Vernon ISD is unnecessarily compromising the integrity and efficiency of its records management process. Over-retention of staff data poses a security risk, increases a district's storage costs, inhibits organizational efficiency, and unnecessarily complicates record accessibility. For example, an inefficient records management system would delay the district's response to employment verification requests, public information requests, or employment litigation discoveries.

The Texas State Library and Archive Commission (TSLAC) has established a records retention schedule that indicates the minimum length of time records must be retained by state and local entities before destruction or archival preservation. The Local Schedule SD for Public School Districts and the Local Schedule GR for Local Governments include requirements for school districts' staff files. These requirements can be confusing, as they are extensive and include dozens of document types, each with varying retention periods.

Due to the complicated nature of record retention and disposition, many school districts manage their staff files electronically through an HR module in an education management software or an HR management system. This software can organize files by document type, improve record accessibility and security, and automatically purge records in accordance with the district's retention schedule. Staff reported that Vernon ISD recently purchased educational management software produced by Frontline Education and plans to use it to digitize staff records.

**Vernon ISD should develop and implement a written records management plan for personnel files.**

The superintendent should designate staff to develop and implement a file checklist to ensure that each file contains the required documents and any additional documentation specific to certain positions. For example, bus drivers must have a valid commercial driver's license (CDL). After the checklist is developed, the superintendent's administrative

assistant should use it as a guideline to update all staff files. The district should develop and implement the checklist beginning in school year 2024–25.

The superintendent also should designate staff to train campus administrators regarding which files can be kept at the campus level, which must be maintained in the administrative office, and how district leadership will address files stored at inappropriate locations. Additionally, the superintendent's administrative assistant should conduct an initial review of all current staff files during the summer to ensure that the information is updated and that all files of former staff have been removed. After this initial review is completed, the district can review the files every few years to ensure they are current.

The district should purchase a new waterproof and fireproof filing cabinet to store all former staff's information files and centralize all files in a single room that remains locked. Using TSLAC record retention schedules as a guide, the superintendent's assistant should conduct an audit of the staff files of former staff and purge or archive records that have met the retention threshold.

The superintendent should designate staff to develop records retention and disposition procedures. These should include a district-specific record retention schedule, an efficient annual audit and disposition system, and a process to train staff on these procedures. This staff should use TSLAC resources to assist in the development of this retention schedule and conduct regular audits of the personnel files to ensure that the district adheres to the retention and disposition procedures.

In addition, the superintendent and the CFO should conduct a cost-benefit analysis of transitioning to an electronic records system. The district has purchased HR software solutions from Frontline Education; therefore, the business manager should contact the district's Frontline account manager or other customer support to determine exactly which Human Capital Management solutions the district purchased and whether the application can store and dispose of digital personnel files. If it does, the business manager, payroll coordinator, and superintendent's assistant should utilize their Frontline account manager or other customer support and Frontline's Research and Learning Institute to learn all the capabilities and maximize the benefits of the software on the district's record retention and disposition processes.

The fiscal impact of the recommendation assumes a cost of \$1,900 for a new filing cabinet. The development and

implementation of all recommended records management procedures could be completed with existing resources.

### **PERFORMANCE EVALUATIONS (REC. 11)**

Vernon ISD lacks an effective evaluation process for all staff.

Vernon ISD Board Policy DN (LOCAL) requires that all district staff be evaluated based on the performance of their assigned duties and other job-related criteria. The policy also requires that staff are informed of the evaluation criteria, have an annual evaluative conference, and receive a copy of their written evaluation. Vernon ISD's district of innovation plan specifies that teachers are formally evaluated at least every three years, and principals annually, both using a locally developed evaluation tool. Noninstructional staff must also be evaluated annually, in accordance with local board policy. However, the review team found that, although the district adheres to these evaluation requirements for teachers, the district does not evaluate noninstructional staff formally and does not have strong evidence of consistent principal evaluations.

Staff reported that Vernon ISD evaluates teachers and principals using the Texas Education Agency's (TEA) Texas Teacher Evaluation and Support System (T-TESS) and Texas Principal Evaluation and Support System (T-PESS). The district has implemented T-TESS for all certified teachers at all campuses. However, the district lacks a formal process to evaluate noncertified instructional staff such as educational aides consistently. Some campus administrators reported they evaluate educational aides using teacher surveys, others use a form modeled after T-TESS, and still others reported not knowing how they should conduct these evaluations. Additionally, new principals expressed uncertainty regarding their own evaluations. Principals said that they are evaluated with T-PESS; however, staff reported that the district had not implemented all components of the evaluation system, including goal-setting meetings and self-assessments as of October 2023.

The review team also found no evidence that formal evaluations are performed for noninstructional staff, including counselors, assistant principals, administrative assistants, and instructional coaches. Additionally, the district does not perform evaluations for operational staff such as food service staff, transportation staff, maintenance staff, and security staff. District staff reported that they intend to develop a comprehensive appraisal process in alignment with the new superintendent's vision for the district; however, this process was not in place at the time of the onsite visit.

The absence of formal and consistent performance evaluations of noninstructional staff violates board policy. If principals are not evaluated during the 2023–24 school year, Vernon ISD would violate its district’s innovation plan strategies. A lack of evaluations also hinders HR management efficacy. Clear job expectations, performance goals, and progress tracking can improve productivity, retention, morale, and job satisfaction. Eagle Hill Consulting’s 2022 Performance Management and Feedback Survey of 1,000 U.S. employees found that nearly half reported feeling more pleased and motivated after discussing their performances with their manager. Performance evaluations also help organizations monitor pay equity, better determine staff’s training needs, and clarify job expectations.

Vernon ISD should develop written procedures outlining a formal, annual performance evaluation for all staff in accordance with board policy and the district of innovation plan.

The superintendent should begin by ensuring that all principals are familiar with the T-PESS timeline, expectations, and rubric. Principals who have not been through the T-PESS process should attend orientation training from Region 9. The superintendent then should assess compliance with the T-PESS timeline for each principal and identify a strategy to update principals on T-PESS activities, as necessary. Moving forward, the superintendent should establish and share the procedures with all principals to implement T-PESS consistently.

The superintendent also should collaborate with campus administrators to develop a formal evaluation tool for educational aides, modeled after the T-TESS process. The campus administrators should train educational aides on the tool, familiarize them with the evaluation timeline, and clarify performance expectations.

The superintendent should develop procedures for an annual evaluation process for noninstructional staff, including an evaluation form to serve as a template that can be individualized by supervisors for each position. The goal is to establish an evaluation process that is appropriate for all job types and for which expectations are clear and relevant.

The superintendent should establish processes to ensure all staff receive annual evaluations in accordance with board policy. An efficient way to integrate performance evaluations for all staff is to embed them into an established employment process, such as contract renewals. School districts that lack specialized HR staff often use this method because it can be

implemented within established processes without significant additional effort or resources.

The superintendent should designate staff to train supervisors who will be conducting the appraisals to promote uniformity in implementation. The district should require all supervisors to review the evaluation forms annually to keep the forms updated. Finally, the superintendent’s administrative assistant should file the annual evaluations in the personnel files, review the files each summer to confirm that all staff have been evaluated, and inform the superintendent of any staff whose evaluations are missing.

The district could implement this recommendation with existing resources.

### **JOB DESCRIPTIONS (REC. 12)**

Vernon ISD lacks a process to maintain accurate and updated job descriptions for all staff.

Vernon ISD’s Board Policy DC (LOCAL) states that the “superintendent shall define the qualifications, duties, and responsibilities of all positions and ensure that job descriptions are current and accessible to employees and supervisors.” The assistant superintendent is primarily responsible for maintaining job descriptions.

The district does not review and update all job descriptions regularly. During the review team’s onsite visit, staff reported that only teacher and educational aide job descriptions were updated. The district reviews job descriptions as positions become vacant and need to be posted to job recruitment websites. The district uses TASB’s model job descriptions for most positions, including teachers. For other open positions, the assistant superintendent of operations typically sends a TASB model job description for that position to the department heads and campus principals to review and update.

For current staff, Vernon ISD does not have a process to ensure that the recorded job description is aligned with the staff’s roles and responsibilities. Several staff expressed uncertainty regarding whether their positions have job descriptions and where they could access them. The district provided only the assistant superintendent’s job description to the review team. As a result, the review team was unable to determine whether all positions had an accurate, current, and accessible job description.

The district’s failure to maintain accurate job descriptions constitutes a violation of board policy, may foster

organizational confusion, and can increase legal exposure. Updated job descriptions provide applicants, staff, and supervisors with a clear understanding of essential responsibilities, informing accurate staffing decisions, guiding job performance, and mitigating confusion, inefficiency, and liability. For example, a terminated employee without a job description is in a stronger position to pursue wrongful termination litigation. Additionally, job postings based on accurate job descriptions and comprehensive skills help the district screen applicants thoroughly for positions.

In an industry that requires many staff to perform extra duties beyond their regular job functions, accurate and updated descriptions are particularly important to promote satisfactory performance, employment and pay equity, and organizational accountability. Maintaining accurate and updated job descriptions also is a best practice for compliance with several federal statutes, including the Fair Labor Standards Act (FLSA), Family and Medical Leave Act (FMLA), Americans with Disabilities Act (ADA), and discrimination laws at the federal and state levels. For example, job descriptions are used in accordance with FLSA regulations to determine employee exemption status and facilitate proper compensation. Similarly, complete and accurate job descriptions help employers identify whether an applicant will need accommodations pursuant to ADA regulations and can protect the employer against disability discrimination claims.

Vernon ISD should develop and implement a process to review and update all job descriptions annually.

The superintendent should implement this recommendation by following these steps:

- direct all Vernon ISD staff to identify all position-related tasks that they perform;
- require all supervisors to review these identified tasks, update or develop associated job descriptions, and submit these descriptions to the assistant superintendent of operations for review;
- replace outdated job descriptions with updated and approved descriptions;
- distribute updated job descriptions and salary verifications to all staff to review and sign; and
- require supervisors to annually review job descriptions of staff who report to them and make necessary revisions.

The assistant superintendent should establish written procedures for developing and updating job descriptions. These procedures should be communicated to all department heads and campus administrators to promote awareness and compliance.

The district could implement this recommendation with existing resources.

### **PERFORMANCE MEASURES (REC. 13)**

Vernon ISD lacks a process to evaluate the effectiveness and efficiency of its HR activities.

Effective HR operations are a key component of successful school district management. HR leaders are tasked with recruiting and retaining highly qualified and effective instructional and support staff, communicating the district's employment policies and procedures, identifying adequate and equitable compensation and classification plans, and overseeing employee relations and benefits.

During interviews, Vernon ISD leadership expressed that the district's HR functions were operating effectively. This determination is based on a lack of staff complaints about HR functions and the absence of HR issues being brought to their attention.

However, Vernon ISD has not established a process to evaluate its HR operations formally. During interviews, staff said that the district has not established HR goals or performance measures. Performance measures track progress toward achieving the organization's objectives by monitoring activities that are key to the success or failure of these efforts.

Vernon ISD's organizational structure disperses HR responsibilities across multiple positions. As shown in **Figure 4-4**, Vernon ISD's HR staffing is similar to that of its peers. However, the lack of an HR Department and dedicated full-time HR staff in Vernon ISD underscores the importance of establishing processes to determine the efficiency and effectiveness of HR operations. Performance measures enhance decision-making and problem-solving and contribute to continuous improvement in the district's HR functions.

During interviews, campus and department staff discussed issues they experienced with the district's HR operations. For example, staff reported that miscommunication in the hiring process has resulted in delays in which new staff began work before the district

conducted formal processing. As a result, those staff could not clock in for work shifts or access their district email when they began their roles. Other staff reported that they have been unable to receive information from administrative staff regarding questions about employment benefits. Additionally, several staff interviewed reported not knowing how to file a formal complaint or receive updates on past grievances. Without a process to evaluate HR functions, the district cannot determine whether these instances are outliers or evidence of systemic problems within Vernon ISD's HR operations.

The nonprofit organization American Enterprise Institute (AEI) for Public Policy Research emphasized in a 2010 report the importance of HR operations in school districts. The report states, "Dramatically improving the quality of teaching requires that a system be able to monitor personnel; gauge performance; and competently manage hiring, transfers, benefits, employee concerns, and termination." AEI recommends using measures for HR that provide the following information:

- the number of applicants for positions, how rapidly they are assessed, and how rapidly successful applicants are placed and prepared;
- staff satisfaction with the HR function's support and responsiveness to various concerns; and
- staff performance on various relevant metrics other than student achievement, such as soliciting performance rankings of teachers by their principals and of other employees by their managers.

In a 2018 report, Hanover Research states that common performance measures for human resources include the numbers and rates of teacher retention and separation, the percentage of teachers with satisfactory ratings, hiring timelines, vacancies, and employee satisfaction with the HR department. Additionally, the Council of the Great City Schools identifies HR performance measures, including the cost of employee health benefits, HR costs per district FTE position, and teacher retention rates.

**Vernon ISD should establish performance measures for annually evaluating the district's HR functions.**

The superintendent and assistant superintendent of operations should develop annual HR goals and performance measures informed by an annual survey of district staff to determine their satisfaction with

various HR services. The district should review the examples of performance measures identified by AEI, Hanover Research, and the Council of the Great City Schools. The district should review the following examples of HR performance measures:

- percentage of new teachers;
- retention rates of teachers by years of service;
- teacher vacancies unfilled on the first instructional day for students;
- noncertified teachers, including educational aides, as a percentage of total teachers;
- substitute placement rate;
- substitute costs per year, by campus, including dollar amount and percentage of salaries and wages;
- average days from recommendation by hiring manager to start date;
- staff separation rate by position (e.g., teachers, principals, auxiliary staff);
- health benefits cost per enrolled employee;
- benefits cost as a percentage of total salaries and wages;
- HR cost per district FTE position;
- rate of noninstructional staff receiving annual evaluations; and
- exit interview completion rate.

The district should select several of these performance measures and establish goals for each measure. The superintendent and the assistant superintendent of operations should meet quarterly to assess HR goals and performance measures. The superintendent also should provide the board with quarterly updates on HR goals.

The district could implement this recommendation with existing resources.

**ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

**GRIEVANCE PROCESS**

Board Policy DGBA (LOCAL) and Board Policy GF (LOCAL) outline processes for staff to file grievances. However, during the review team’s interviews, the only staff reporting familiarity with the grievance process were the superintendent and assistant superintendent of operations. Other staff reported that they had not been trained in the grievance process and that they directed any questions about the process to the administrative office. Additionally, the district supplies grievance forms in the administration building, but the forms are not available to staff electronically.

District staff have filed few grievances during the past several school years, with only one complaint presented to the board. The district should provide all staff with these policies and notify staff of these processes. In addition, the HR staff should be fully trained in the grievances policies because mishandling a grievance could leave the district vulnerable to legal action. The district should ensure an electronically accessible version of the staff grievance form is posted on the district staff resources webpage. The district also should consider producing a brief training video regarding the grievance process that also can be posted to the staff resources webpage.

**HUMAN RESOURCES MANAGEMENT**

As shown in **Figure 4–4**, it is not uncommon for districts of Vernon ISD’s size to lack an HR department or dedicated HR staff. Additionally, the district has experienced considerable turnover during the past few years, including the appointment of a new superintendent and new campus principals during school year 2022–23. At the time of the onsite visit, the longest-tenured district administrator was the CFO, who had served slightly more than two years in the position. District leaders acknowledged that they have not prioritized many daily HR functions because their focus is

on establishing staff in their new roles and improving the district’s academic accountability rating. Although prioritizing instructional services and student outcomes is understandable, the lack of staff time dedicated to HR functions has resulted in the district not meeting best practices and industry standards, as described in the findings in this chapter.

The district should consider hiring a full-time staff member to oversee the district’s HR operations. Hiring a designated HR specialist would enable the district staff who currently perform extra HR duties, such as the superintendent’s administrative assistant, to focus on their designated roles. Additionally, at the time of the onsite visit, no Vernon ISD staff had academic or working experience in HR management. Hiring staff with this experience would help the district remain compliant with employee-related laws and regulations. Based on Public Education Information Management System data for school year 2022–23, the average salary for an HR specialist position in Region 9 was \$51,283. Assuming a salary of \$50,000 and a benefits rate of 20.0 percent, the total would result in an estimated cost to the district of \$60,000 (\$50,000 salary + \$10,000 benefits) annually.

**FISCAL IMPACT**

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

The LBB’s School Performance Review Team identified a fiscal impact for Recommendation 10.

RECOMMENDATION	2024–25	2025–26	2026–27	2027–28	2028–29	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
<b>4. HUMAN RESOURCES MANAGEMENT</b>							
10. Develop and implement a written records management plan for personnel files.	\$0	\$0	\$0	\$0	\$0	\$0	(\$1,900)
<b>Total</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>(\$1,900)</b>



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## 5. FOOD SERVICE MANAGEMENT

### ACCOMPLISHMENTS

- ◆ The Vernon ISD Child Nutrition Department increased revenues by implementing best practices for administering the federal Community Eligibility Provision program.
- ◆ The Vernon ISD Child Nutrition Department implements best practices with its a la carte sales.

### FINDINGS

- ◆ The Vernon ISD Child Nutrition Department does not provide sufficient nutrition education or effective communication to students and stakeholders.
- ◆ Vernon ISD lacks processes to evaluate and manage staffing levels in the Child Nutrition Department.

### RECOMMENDATIONS

- ◆ **Recommendation 14: Develop a comprehensive nutrition education and communication plan that involves electronic and print communication methods.**
- ◆ **Recommendation 15: Evaluate the efficiency of Child Nutrition Department staffing.**

### BACKGROUND

An independent school district's food service operation provides meals to its students and staff. The district may provide meals through the U.S. Department of Agriculture (USDA) child nutrition programs, which include the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Summer Food Service Program, and the USDA Foods in Schools Program. These programs provide financial assistance to school districts through cash reimbursements and allocations of USDA Foods to support their meal services. In return, the districts must serve meals that meet federal nutritional requirements, and districts must offer free or reduced-price lunches to eligible students. School districts can be reimbursed for snacks served to students enrolled in after-school programs. A district's food service operation also may offer catering services to supplement its budget.

The two primary models of organizing school food service operations are self-management and contracted management.

In the self-management model, a district operates its food service department without external assistance. In contrast, the contracted management model involves a district entering an agreement with a food service management company to oversee all or a portion of its operations. In this arrangement, the management company may provide all or some staff for the district's food services operations.

Vernon Independent School District (ISD) uses the self-management model and participates in the SBP, the NSLP. The district also receives donated foods through the USDA Foods in Schools Program.

Vernon ISD offers free lunch and breakfast to all students. The district operates cafeterias at T.G. McCord Elementary School, Vernon Elementary School, Vernon Middle School, and Vernon High School. The Vernon ISD Opportunity Center and the disciplinary alternative education program (DAEP) receive meals from the middle school cafeteria. Each cafeteria receives and stores food onsite, with the exception of USDA Foods, which are stored separately. The frozen USDA Foods are stored in the middle school cafeteria, and the nonperishable items are stored in the transportation storage facility and distributed as needed.

The Child Nutrition Department's budget was \$1,286,343 for fiscal year 2024. Vernon ISD operates on a fiscal year beginning September 1 and ending August 31. District staff reported that food service operations typically record a profit at the end of the year. **Figure 5-1** shows the Vernon ISD Child Nutrition Department's revenue, expenditures, net fund change, and fund balance for fiscal years 2018 to 2022. In fiscal year 2022, Vernon ISD's food services revenue exceeded its expenditures by its highest margin, \$206,676, partly due to increased USDA reimbursement rates for school districts participating in the Seamless Summer Option (SSO) during the COVID-19 pandemic. The SSO enables districts to provide free meals to children during summer and vacation periods, and the USDA expanded and extended this program into school year 2021-22 to support schools and families during the pandemic.

**Figure 5-2** shows Vernon ISD's lunch and breakfast participation rates compared to peer districts, regional Education Service Center IX (Region 9), and the state. Peer districts are districts similar in size and other characteristics

**FIGURE 5–1  
VERNON ISD’S CHILD NUTRITION REVENUE, EXPENDITURES, NET FUND CHANGE, AND FUND BALANCE  
FISCAL YEARS 2018 TO 2022**

YEAR	TOTAL REVENUE	TOTAL EXPENDITURES	DIFFERENCE BETWEEN REVENUE AND EXPENDITURES	NET CHANGE IN FUND (1)	ENDING FUND BALANCE
2018	\$983,281	\$981,000	\$2,281	\$2,281	\$2,281
2019	\$1,021,277	\$988,183	\$33,094	\$36,579	\$38,860
2020 (1)	\$878,568	\$969,836	(\$91,268)	(\$636)	\$38,224
2021	\$965,277	\$940,505	\$24,772	\$24,772	\$62,996
2022	\$1,241,796	\$1,035,120	\$206,676	\$206,676	\$269,671

NOTE: (1) The district compensated losses to the National School Lunch Program fund using the general fund, in accordance with U.S. Department of Agriculture regulations.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023; Vernon ISD Annual Financial Reports, fiscal years 2018 to 2022.

to Vernon ISD that are used for comparison purposes. For this review, the peer districts chosen were Bowie ISD, City View ISD, Graham ISD, and Sweetwater ISD. Participation rates represent the ratio of the daily average number of students who participate in the meal program to the daily average number of students in attendance during the same period. During school year 2022–23, Vernon ISD’s lunch participation rate exceeded state and regional rates and was comparable to the peer district average. For breakfast participation, Vernon ISD’s rate surpassed the state’s rate but was lower than those of most peer districts and the region.

Vernon ISD’s Child Nutrition Department has 25 staff, including a child nutrition director, an administrative assistant, four cafeteria managers, and 19 cafeteria workers. **Figure 5–3** shows the department’s organization.

The child nutrition director oversees the food service operations and reports to the chief financial officer. The child nutrition director is responsible for personnel management, menu compliance, food ordering, claims, and direct certification oversight. The cafeteria managers oversee food preparation, order food, and supervise staff schedules, and cafeteria workers prepare and serve food. The child nutrition administrative assistant manages claims, generates the direct certification list, and processes requisitions and purchase orders.

The department uses software services, Skyward and PrimeroEdge, to streamline its operations. Skyward, the district’s enterprise resource planning system, is used for budget management, purchasing, edit checks, direct certification, and tracking participation. PrimeroEdge, the district’s nutrition management system, is used

**FIGURE 5–2  
MEAL PARTICIPATION RATES FOR VERNON ISD, PEER DISTRICTS, REGIONAL EDUCATION SERVICE CENTER IX (REGION 9), AND THE STATE  
SCHOOL YEAR 2022–23**

DISTRICT	LUNCH PARTICIPATION RATE	BREAKFAST PARTICIPATION RATE (1)
Vernon ISD	62.6%	38.0%
Bowie ISD	46.6%	39.8%
City View ISD	80.6%	73.9%
Graham ISD	52.0%	27.1%
Sweetwater ISD	75.7%	65.8%
Peer district average	63.7%	51.7%
Region 9	58.2%	42.8%
State	60.0%	35.4%

NOTES:

- (1) Breakfast rates represent the meal participation rates at severe needs sites, designated by the U.S. Department of Agriculture’s School Breakfast Program.
- (2) Monthly meal participation rates represent the average daily participation in the meal program as a percentage of the average daily student attendance for that month. The annual rates provided are calculated as the mean of these monthly rates for school year 2022–23, from August to May.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023; Texas Department of Agriculture, October 2023.

primarily for menu planning, production sheets, and inventory management.

Vernon High School maintains an open campus policy that authorizes students in grades 11 and 12 to eat lunch off campus. The district’s other students must remain on campus during mealtimes.

## DETAILED ACCOMPLISHMENTS

### COMMUNITY ELIGIBILITY PROVISION

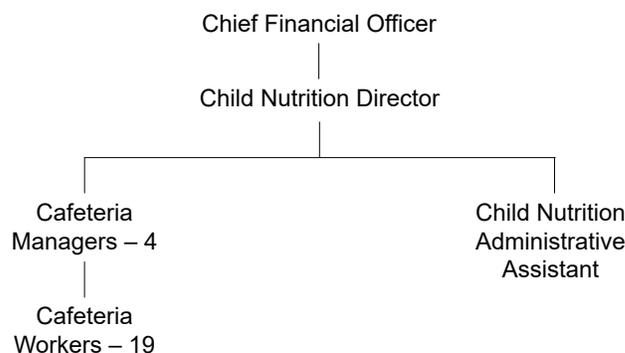
The Vernon ISD Child Nutrition Department increased revenues by implementing best practices for administering the federal Community Eligibility Provision (CEP) program.

The CEP program, introduced by the Healthy, Hunger-Free Kids Act of 2010, enables districts in high-poverty areas to provide no-cost meals to all students. Vernon ISD implemented CEP at its elementary and middle school campuses in school year 2022–23 and extended the program to include the high school and the Vernon ISD Opportunity Center in 2023–24. Following this expansion, breakfast and lunch participation rates increased at the high school cafeteria. **Figure 5–4** shows the breakfast and lunch participation rates in October 2022 and October 2023.

Vernon ISD transitioned from breakfast in the classroom to breakfast served in the cafeteria in school year 2023–24, resulting in lower breakfast participation data. However, district staff noted that meal participation data is more reliable with the cafeteria model. Therefore, the data may not represent changes in breakfast participation accurately. Additionally, district staff report that the meals provided in the cafeteria are more nutritious and higher in quality because they are prepared from scratch, unlike the prepackaged meals that were served through the classroom model.

Typically, school districts determine eligibility for free or reduced-price meals through household applications that assess family income levels and household size. Students who meet federal income thresholds receive meals at no cost or at a reduced price, while others pay standard prices. The USDA

**FIGURE 5–3**  
**VERNON ISD'S CHILD NUTRITION DEPARTMENT ORGANIZATION**  
**SCHOOL YEAR 2023–24**



SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

reimburses districts for free, reduced, and paid meals at specific rates for each category. In accordance with the CEP program, districts can provide meals at no cost to all students without collecting household applications. The USDA reimburses CEP districts based on Identified Student Percentages (ISP), which reflects the percentage of students who are categorically eligible for free meals based on their participation in qualifying programs, such as Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), certain types of Medicaid, Head Start, and state-funded prekindergarten. Students identified as migrant, homeless, or in the care of the Department of Family and Protective Services (DFPS) automatically are eligible to receive free meals. Districts use a process called direct certification to determine the ISPs. The Texas

**FIGURE 5–4**  
**VERNON ISD LUNCH AND BREAKFAST PARTICIPATION RATES BY CAMPUS**  
**OCTOBER 2022 AND OCTOBER 2023**

CAMPUS	BREAKFAST		LUNCH	
	2022	2023	2022	2023
T.G. McCord Elementary School	94.4%	53.7%	83.2%	91.9%
Vernon Elementary School (1)	57.2%	48.0%	77.4%	80.9%
Vernon Middle School (2)	26.7%	39.6%	80.1%	81.9%
Vernon High School	13.5%	23.1%	29.9%	43.4%
<b>Vernon ISD</b>	<b>43.6%</b>	<b>39.8%</b>	<b>64.6%</b>	<b>72.1%</b>

NOTES:

- (1) Data for Vernon Elementary School includes aggregated data from feeding sites at Shive and Central Elementary facilities, representing their consolidation into a single feeding site at Vernon Elementary School in school year 2023–24.
- (2) Data for Vernon Middle School includes participation data from Vernon ISD's disciplinary alternative education program (DAEP) because meals for the DAEP are prepared at the middle school's cafeteria.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

Department of Agriculture provides a data-matching system for districts to develop a direct certification list.

Although all students receive free meals through the CEP program, school districts receive varying reimbursement amounts based on the student populations served. The percentage of reimbursed meals is calculated by multiplying the ISP by a factor of 1.6 in accordance with federal regulations. Any remaining meals are reimbursed at the paid rate. Accordingly, if a school district’s ISP is 62.5 percent or higher, all meals will be reimbursed at the free rate. Although ISPs are guaranteed for four years, districts are encouraged to certify students for categorical programs annually, as school districts can reestablish ISPs in the second, third, or fourth year based on enrollment data from April of the previous year.

Vernon ISD’s Child Nutrition Department conducts direct certification monthly. Staff review this list for accuracy, updating records for any discrepancies or changes in student enrollment. Additionally, the department identifies students in special categories, such as those identified as homeless or in DFPS care, to ensure that all eligible students are included. Maintaining an updated certification list helps the district maximize its program reimbursement rate. **Figure 5–5** shows the ISPs submitted for each Vernon ISD campus in April 2022 and April 2023. In response to the increased ISPs at each campus, the district reestablished their ISPs for school year 2023–24 to use the highest ISPs for calculating district reimbursements.

A district can form ISP groups to optimize reimbursements by combining larger, high ISP schools with smaller, low ISP schools. This strategy can allow campuses to participate in the CEP program that would otherwise be ineligible. The ISP for a group is calculated by dividing the total identified students by the total enrolled students in all campuses in a group. Reimbursements for meals are based on the group’s combined ISP rather than the individual campus’s ISP.

During school year 2022–23, Vernon ISD grouped all CEP-eligible campuses, T.G. McCord Elementary School, Vernon Elementary School, and Vernon Middle School, together. This configuration resulted in a 57.6 percent ISP, which enabled 92.2 percent of meals on those campuses to be reimbursed at the free rate. For school year 2023–24, the district added Vernon High School and Vernon ISD Opportunity Center to the CEP program and reorganized its ISP groupings. The district paired Vernon High School and Vernon Middle School, which had lower campus ISPs, with

**FIGURE 5–5**  
**VERNON ISD IDENTIFIED STUDENT PERCENTAGES BY CAMPUS**  
**APRIL 2022 AND APRIL 2023**

CAMPUS	2022	2023
T.G. McCord Elementary School	65.6%	72.8%
Vernon Elementary School	58.2%	63.4%
Vernon Middle School	50.0%	56.6%
Vernon High School	43.2%	51.9%

NOTE: Data for Vernon Elementary School includes aggregated data from feeding sites at Shive Elementary School and Central Elementary School facilities, which were consolidated into a single feeding site at Vernon Elementary School in school year 2023–24.  
 SOURCES: Legislative Budget Board School Performance Review Team, October 2023; Texas Department of Agriculture, School Nutrition Programs Data, Program Years 2021–22 and 2022–23.

T.G. McCord Elementary and Vernon Elementary School, respectively, due to the higher rates of categorically eligible students at the elementary level. This strategic grouping aimed to optimize the ISPs districtwide. **Figure 5–6** shows Vernon ISD’s campus groupings for school year 2023–24, including each group’s ISP and the corresponding percentages of meals reimbursed at the free rates for campuses.

The CEP offers the following benefits:

- students have access to free nutritious meals without the stigma attached to income-based programs, which promotes a healthier school culture and helps to ensure that more children are fed;
- students spend less time in cashier lines and have more time to consume nutritious meals;
- parents are not required to complete household applications or negotiate meal accounts or meal debt;
- administrators have streamlined meal service operations, resulting in reduced paperwork, lower administrative costs, and improved program integrity; and
- districts earn increased revenue and improved claiming rates.

**A LA CARTE SALES**

The Vernon ISD Child Nutrition Department implements best practices with its a la carte sales.

Vernon Middle School and Vernon High School both have snack bars located on the campuses. According to staff, the Vernon High School snack bar is popular among students. The middle school snack bar is structured to complement,

**FIGURE 5–6  
VERNON ISD’S COMMUNITY ELIGIBILITY PROVISION GROUPINGS  
SCHOOL YEAR 2023–24**

CAMPUS	CATEGORICALLY ELIGIBLE STUDENTS	ENROLLED STUDENTS	PERCENTAGE OF IDENTIFIED STUDENT	PERCENTAGE OF MEALS REIMBURSED AT THE FREE RATE
<b>Group 1</b>	<b>516</b>	<b>859</b>	<b>60.1%</b>	<b>96.1%</b>
T.G. McCord Elementary School	244	335		
Vernon High School	272	524		
<b>Group 2</b>	<b>5</b>	<b>8</b>	<b>62.5%</b>	<b>100.0%</b>
Vernon ISD Opportunity Center	5	8		
<b>Group 3</b>	<b>549</b>	<b>905</b>	<b>60.7%</b>	<b>97.1%</b>
Vernon Elementary School	335	527		
Vernon Middle School	214	378		

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023; Texas Department of Agriculture, October 2023.

rather than compete with, the NSLP service by remaining closed at the start of the lunch period and opening after a designated period to offer a la carte options. By encouraging students to prioritize their regular school lunches, this approach maximizes sales of reimbursable meals, promotes the nutritional benefits of a full school lunch, and enhances profits by offering extra food purchases.

The snack bars provide a range of a la carte options that comply with Smart Snacks Standards, which are a federal requirement for all foods sold apart from the NSLP and SBP. The a la carte selection is customized to student and staff preferences based on their feedback, and it features items such as a Smart Snack-compliant pizza, among other popular choices.

**DETAILED FINDINGS**

**NUTRITION EDUCATION AND PROMOTION (REC. 14)**

The Vernon ISD Child Nutrition Department does not provide sufficient nutrition education or effective communication to students and stakeholders.

The federal Healthy, Hunger-Free Kids Act of 2010 mandates that every school district participating in NSLP or SBP establishes and implements a local wellness policy. This policy must address the following key areas:

- specific goals for nutrition promotion and education, physical activity, and other school-based activities;
- standards for all foods and beverages provided but not sold to students;

- standards for all foods and beverages sold to students;
- individuals responsible for the implementation and oversight of the wellness policy;
- provisions for stakeholder participation in the development, implementation, and periodic review of the wellness policy; and
- a plan for measuring the implementation of the wellness policy.

The Vernon ISD Board of Trustees approved a policy outlining federally required wellness goals. **Figure 5–7** shows Vernon ISD’s wellness goals, found in Board Policy FFA (LOCAL).

Board Policy FFA (LOCAL) requires the district’s school health advisory council (SHAC) to develop a wellness plan to implement the district’s nutrition guidelines and wellness goals. The plan must include the following components:

- strategies for engaging stakeholders in the wellness plan and policy;
- objectives, benchmarks, and activities for implementing the wellness goals;
- methods for measuring the implementation of the wellness goals;
- standards for foods and beverages provided but not sold to students; and
- methods for communicating important wellness policy and plan information.

**FIGURE 5–7  
BOARD POLICY FFA (LOCAL) – VERNON ISD WELLNESS GOALS  
SCHOOL YEAR 2023–24**

CATEGORY	GOALS
Nutrition Promotion	The district’s food service staff, teachers, and other district personnel shall consistently promote healthy nutrition messages in cafeterias, classrooms, and other appropriate settings.  The district shall share educational nutrition information with families and the general public to promote healthy nutrition choices and positively influence the health of students.
Nutrition Education	The district shall deliver nutrition education that fosters the adoption and maintenance of healthy eating behaviors.  The district shall make nutrition education a districtwide priority and shall integrate nutrition education into other areas of the curriculum, as appropriate.
Physical Activity	The district shall provide an environment that fosters safe, enjoyable, and developmentally appropriate fitness activities for all students, including those who are not participating in physical education classes or competitive sports.  The district shall make appropriate before-school and after-school physical activity programs available and shall encourage students to participate.  The district shall encourage students, parents, staff, and the community to use the district’s recreational facilities, such as tracks, playgrounds, and the like, that are available outside of the school day.
Other School-based Activities	The district shall allow sufficient time for students to eat meals in cafeteria facilities that are clean, safe, and comfortable.  The district shall promote wellness for students and their families at suitable district and campus activities.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD Board Policy Manual, FFA (LOCAL), Student Welfare: Wellness and Health Services, October 2023.

The Legislative Budget Board’s School Performance Review Team visited the district in October 2023. At that time, the SHAC had not developed a wellness plan, and the staff interviewed were unaware of the existence of such a plan or the requirement to develop one. Additionally, the district reported no evident progress toward the goals related to nutrition promotion and education.

Without a wellness plan to guide nutrition education efforts, the district’s Child Nutrition Department cannot communicate program information effectively. The department communicates to stakeholders through the district website and social media, but these sources offer limited details regarding food service. The website provides information regarding the CEP and monthly breakfast and lunch menus. However, it does not promote cafeteria meals or a la carte items adequately, nor does it include nutritional information for the monthly menu offerings. The district’s social media account, which highlights district events and achievements, offers minimal information about Child Nutrition Department programs. The platform features monthly menus and occasional mentions of child nutrition staff; however, it lacks nutritional education or promotional content for the food service program and displays inaccurate breakfast times.

Cafeteria menu availability is also inconsistent, and some campuses have not posted menus or do not post comprehensive menu information. At two campuses, menus are not available in the cafeteria, and at T.G. McCord Elementary School, menus are displayed too high on a cafeteria wall for young students to see. Moreover, dining rooms have unused wall space suitable for nutritional displays, but they lack educational content.

The School Nutrition Association’s (SNA) 2019 resource, *Keys to Excellence: Standards of Practice for Nutrition Integrity*, highlights best practices in successful school nutrition programs, including promoting and supporting nutrition education. **Figure 5–8** shows the review team’s analysis of how Vernon ISD’s Child Nutrition Department meets the SNA best practices. The review team found that Vernon ISD meets two of the seven indicators suggested by the SNA.

The absence of a thorough nutrition education program violates Healthy, Hunger-Free Kids Act guidelines and hinders students’ understanding of healthy habits. Furthermore, the lack of a detailed wellness plan impedes progress toward district wellness goals. Additionally, inadequate promotion of the food service program and ineffective communication may lead to diminished

**FIGURE 5–8  
ANALYSIS OF NUTRITION EDUCATION BEST PRACTICE INDICATORS IN VERNON ISD  
OCTOBER 2023**

INDICATOR DESCRIPTION	PRESENT IN VERNON ISD
Current, age-appropriate, science-based nutrition and nutrition education materials are recommended and promoted.	No
Nutrition education materials such as posters, displays, and bulletin boards appear on campus.	No
Meals and other foods and beverages served in the school cafeteria reinforce the Dietary Guidelines for Americans and other accurate nutrition messages.	Yes
Nutrition messages are shared with parents using available media resources such as printed menus and newsletters, social media, school websites, school television stations, parent meetings, and school board presentations.	No
School nutrition staff serve as a resource for nutrition activities through kitchen tours, food demonstrations, tasting parties, and participation in classroom nutrition education activities.	No
School nutrition staff prompt students to choose fruits and vegetables.	Yes
Nutrition education programs promoted by the school nutrition program are evaluated for effectiveness.	No
<p>SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023; School Nutrition Association, <i>Keys to Excellence: Standards of Practice for Nutrition Integrity</i>, 2019.</p>	

stakeholder engagement, lower meal participation rates, or adverse perceptions of food quality.

The USDA’s Team Nutrition initiative supports child nutrition programs by offering training and technical assistance in nutrition education to assist schools participating in the NSLP and SBP. Participating schools can access materials easily through an order form online. The Team Nutrition website provides the following resources intended to foster a healthier school environment:

- event plans;
- social media materials;
- cafeteria decorations;
- educational tools for children;
- guides for building balanced meals;
- support for implementing school wellness policies;
- training materials for nutrition professionals; and
- strategies for reducing added sugars and integrating whole grains into school meals.

Free nutrition education materials also are available through several school nutrition organizations and programs, including USDA’s My Plate, the Institute of Child Nutrition (ICN), SNA, and its regional group, the Texas Association for School Nutrition. These resources include downloadable graphics, lesson plans, and training materials for professionals in child nutrition. Leveraging these resources

could provide Vernon ISD with tools to broaden its outreach in nutrition education.

Bowie ISD, a peer district of Vernon ISD, effectively uses its food service webpage to promote nutrition and engage stakeholders. The site has interactive menus that showcase the variety of entrees available each day and include nutritional details for each menu item. The page highlights Bowie ISD’s achievements, such as winning the HealthierUS School Challenge award and promoting healthy living through the NFL Play 60 initiative at all campuses. Each cafeteria has a dedicated page containing staff details, and the site includes information about the Seamless Summer Option. The district’s social media highlight events, including a kickoff event with food provided by its Child Nutrition Department.

Social media is an effective tool for increasing public awareness and engagement in a food service program and facilitating consistent communication with diverse stakeholders and audiences. The program can use popular platforms to share updates and highlights with families, faculty, staff, administrators, and partners. Regular communication can improve trust, strengthen partnerships, and increase participation in the program.

**Vernon ISD should develop a comprehensive nutrition education and communication plan that involves electronic and print communication methods.**

Vernon ISD’s SHAC should follow the district’s guidelines to develop a wellness plan, including the following directions:

- define actionable steps, benchmarks, and activities to meet wellness goals;
- develop methodologies to track and measure wellness goal implementation, establishing evaluation criteria for effective progress monitoring;
- involve stakeholders through surveys, forums, and meetings to gather input;
- establish district standards that comply with nutritional requirements for food provided on campus but not sold as part of the food service program;
- develop a communication plan to disseminate wellness policy information via the district's website, social media, newsletters, and community programs; and
- develop a schedule for SHAC's regular wellness plan review and revision, including protocols to assess effectiveness and recommend policy adaptations in response to evolving needs and best practices.

The child nutrition director should ensure that the department incorporates nutrition education into its online and campus presence through the following measures:

- require all cafeterias to use materials available from USDA's Team Nutrition;
- improve the informational value and appearance of menus through the following features:
  - integrating nutritional data into online breakfast and lunch menus;
  - using visually engaging calendars to display nutritional information, complemented by vibrant graphics or student artwork;
  - highlighting local farmers by showcasing their produce in market-featured menu items;
- require all cafeterias to use wall space to display nutrition education, leveraging resources from SNA, USDA, and ICN; and
- use USDA, ICN, and SNA training opportunities to educate child nutrition and campus staff in providing nutrition education.

The Child Nutrition Department should collaborate with the district's Public Information Officer to improve website information and social media content, including nutrition-

focused materials and methods of promoting the Child Nutrition Department. Additions to the district's website and social media should support the following goals:

- promote Child Nutrition Department events and workshops, engage with cafeteria staff messages, and display lunchroom education activities;
- showcase visually appealing meals, recipes, local ingredients, and behind-the-scenes cafeteria efforts;
- offer engaging content about nutrition, including informative graphics, quizzes, and resources for healthy eating habits;
- develop a comprehensive nutrition program brochure or newsletter highlighting cafeteria events, new menu items, and seasonal ingredients; and
- collect and utilize positive testimonials from students, staff, and food professionals as marketing material and community engagement.

The district could implement this recommendation within existing resources.

#### **STAFFING (REC. 15)**

Vernon ISD lacks processes to evaluate and manage staffing levels in the Child Nutrition Department.

Student enrollment has decreased in Vernon ISD by 9.7 percent during the past five school years, from 1,985 students in school year 2017–18 to 1,792 students in school year 2022–23. Decreasing enrollment means the cafeterias serve fewer meals overall, which can affect staffing. In addition, the district closed two elementary facilities in school year 2023–24 and opened one combined facility. The district reassigned all food service staff from both cafeterias to the new cafeteria and did not perform an analysis to determine ideal staffing levels based on potential efficiency gains, centralized production, and role duplication resulting from the merger. Additionally, the implementation of CEP and changes to the breakfast service model have contributed to changes in meal participation rates. Changes in campuses' meal participation rates also may affect campus staffing requirements. Despite these changes, the district has not evaluated whether the current staffing level is ideal for successful program operations.

According to staff interviews, the child nutrition director allocates staff to each of the district's four kitchens based on historical staffing levels. Vernon Elementary School has a

**FIGURE 5–9  
VERNON ISD CAFETERIA STAFF ALLOCATION BY CAMPUS  
OCTOBER 2023**

CAMPUS	ENROLLMENT (2)	PERCENTAGE OF DISTRICT ENROLLMENT	PERCENTAGE OF TOTAL DISTRICT MEALS SERVED	PERCENTAGE OF TOTAL DISTRICT CAFETERIA WORKERS
T.G. McCord Elementary School	321	18.4%	20.9%	21.1%
Vernon Elementary School	536	30.7%	36.4%	47.4%
Vernon Middle School (1)	403	23.1%	25.7%	15.8%
Vernon High School	487	27.9%	17.1%	15.8%

NOTES:

- (1) Data for Vernon Middle School includes meals served and enrollment data from Vernon ISD Opportunity Center and the disciplinary alternative education program; these campuses' meals are prepared at the middle school.
- (2) Enrollment data are from Vernon ISD's October 2023 claims to the Texas Department of Agriculture and are distinct from enrollment data submitted to and published by the Texas Education Agency.
- (3) Percentages may not sum to 100.0 due to rounding.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

staff allocation that is disproportionately large in relation to its student population and share of meals served districtwide. In contrast, the middle school and high school are allocated relatively fewer staff. Despite serving the second-largest share of the district's meals, the middle school employs fewer staff than other cafeterias. **Figure 5–9** shows the student enrollment and the percentages of students, meals served, and cafeteria workers at each cafeteria in Vernon ISD.

A common productivity measurement for school cafeterias is meals per labor hour (MPLH). MPLH is calculated by dividing the total meal equivalents by the total number of paid labor hours for a period. One meal equivalent equates to one reimbursable lunch. All other food items sold have a component value, such as 0.5 meal equivalents. For example, non-reimbursable breakfasts, snacks, a la carte items, and catering sales have a conversion factor to calculate meal equivalents, but they are not simply the sum of items sold.

The SNA recommends that a campus MPLH should range from 14.0 to 18.0 meal equivalents. According to the 2018 SNA publication *Case Study: Benchmarking Meals per Labor Hour (MPLH)*, a district cafeteria with an MPLH rate of less than 14.0 should consider adjusting its labor hours.

Vernon ISD does not calculate MPLH for its kitchens and did not provide the review team with data to measure the productivity of the district's cafeterias. District staff reported that the only indicator used to evaluate staff is the amount of overtime worked. Monitoring overtime is important for controlling labor costs, and excessive overtime could indicate potential understaffing. However, relying on this metric

alone hinders the district's ability to determine whether cafeterias are overstaffed.

If Vernon ISD does not regularly evaluate Child Nutrition Department staffing based on industry standards, then it cannot ensure that it is using its resources efficiently. Industry standards dictate that staff productivity is fundamental to evaluating appropriate staffing levels.

In a 2019 publication, *How to Calculate and Establish Meals per Labor Hour*, SNA notes that calculating MPLH is important because it provides the following benefits:

- measures the financial success of the school nutrition program;
- monitors the labor efficiency of operations;
- determines appropriate staffing levels;
- guides the labor budget; and
- justifies operational changes.

**Vernon ISD should evaluate the efficiency of Child Nutrition Department staffing.**

The child nutrition director should determine a regular schedule for calculating MPLH at each campus and compare calculations to data from past months and years. After the district has established a process for regular accounting of MPLH, the child nutrition director should assess whether staffing levels should be adjusted. The director should set MPLH targets for each campus and align staffing hours to achieve those goals. This adjustment

could occur through attrition, enabling the director to adjust hours as vacancies occur.

As part of this process, the child nutrition director should coordinate with cafeteria managers to determine the hours that best support each cafeteria's needs. Effective districts often schedule cafeteria managers and lead cafeteria staff to work full-time, while remaining cafeteria staff are scheduled to work part-time, working the busiest hours. The child nutrition director should evaluate this option to support cafeteria staff appropriately.

A fiscal impact cannot be determined until the child nutrition director determines the appropriate staffing levels for the department. However, implementing regular MPLH assessments and best practices could result in annual savings for the Child Nutrition Department.

### **ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

#### **MEALTIMES**

Vernon ISD Board Policy FFA (LOCAL) establishes the goal of providing students with sufficient time to eat their meals in clean, safe, and comfortable cafeteria facilities. However, the review team observed that some students were not provided with enough time or seats during lunch.

Principals set mealtimes without standardized guidelines and do not regularly assess students' time or space for eating. The high school's seating capacity for each lunch period does not meet the requirements of the student body. The review team observed 210 seats, including outdoor seats, available for each of the campus' two lunch periods. Assuming full attendance, with a campus enrollment of 487 students at the time of the review, and favorable weather to accommodate outdoor seating, the cafeteria will have an average deficit of 33.5 seats per lunch period.

Additionally, the review team observed that some Vernon Elementary School students had inadequate time for lunch. During the observation, students spent up to seven minutes waiting in line. The review team observed that students frequently were directed to one of the two available lines, resulting in an uneven distribution of students and longer wait times. After accounting for

time spent in line and transitioning, some students have less than 20 minutes of seat time within the 27-minute lunch period. This elementary school showed lower meal participation during October 2023 than T.G. McCord Elementary School and Vernon Middle School. However, Vernon Elementary School recently opened, and service staff were adapting to the new cafeteria environment, possibly slowing down service.

The Centers for Disease Control and Prevention (CDC) advises a minimum of 20 minutes of seat time, defined as the time students spend seated and eating. It is important to differentiate this time from the total meal period, as various activities such as restroom use, handwashing, walking to and from the serving area, queueing, meal selection, recording meals for reimbursement, and socializing can decrease actual eating time. In a survey conducted by the review team, 50.0 percent of parents reported that they do not believe students have adequate time for meal service.

The CDC's 2011 report, *School Health Guidelines to Promote Healthy Eating and Physical Activity*, provides the following recommendations for providing adequate and safe spaces and facilities for healthy eating:

- students should have access to a clean cafeteria that has appropriate seating arrangements, which do not exceed 100.0 percent capacity;
- students can socialize and enjoy the meals without feeling rushed; and
- districts can ensure sufficient time for meals, with at least 10 minutes for breakfast and 20 minutes for lunch after being seated.

The Child Nutrition Department should develop written guidelines for mealtime planning and organization, collaborating with school administrators to enforce these standards across all campuses. Furthermore, the department should conduct regular assessments of mealtime duration and available space to ensure optimal student accommodation.

#### **OPEN CAMPUS**

Vernon High School permits students in grades 11 and 12 to eat lunch off campus through an open campus policy. This approach may decrease meal participation and raise safety concerns. During school year 2022–23, the high school cafeteria recorded the district's lowest lunch participation rate at 43.4 percent, significantly less than the districtwide participation rate of 82.3 percent.

In addition to decreasing revenues to the Child Nutrition Department, permitting students to eat off campus may deprive them of the nutritional benefits of meals provided through the NSLP that meet federal nutrition standards. A study by the International Journal of Behavior Nutrition and Physical Activity found that students at schools with open campus policies during lunchtime were significantly more likely to eat lunch at a fast-food restaurant than students at schools with closed campus policies.

Furthermore, permitting students to leave campus may pose risks to student safety. During interviews, district and campus staff reported concerns that students may be making poor, unsupervised choices while off-campus. The Vernon ISD Board of Trustees should consider establishing a closed-campus policy at the high school to maximize participation in the NSLP and promote student safety.

### **INVENTORY MANAGEMENT**

Vernon ISD has opportunities to strengthen controls over inventory management in campus kitchens. During previous school years, the district conducted districtwide physical inventories of food and supplies monthly and annually. During school year 2022–23, the district transitioned to the PrimeroEdge inventory module, to automate physical inventory processes. The district no longer requires monthly physical food and supply counts, although some cafeteria managers reported that they perform informal inventories periodically. The review team observed that campuses store food inventory in unlocked areas from which staff can access and remove stock. Cafeteria staff do not document which items are removed from inventory or by whom. Although using an automated system to track inventory electronically is a best practice, schools also should conduct regular physical inventory counts to reduce the risk of loss to spoilage or theft.

According to the *Inventory Management Reference Guide*, a 2012 publication by the ICN under its former name, the National Food Service Management Institute, food service department inventories often require a significant percentage of operational revenue. An important aspect of controlling food costs is to maintain inventory levels high enough to produce the optimal amount of menu items but low enough to avoid storing excess product. If the count of stock items does not match the servings prepared, it could indicate overproduction or shortages. Excess inventory increases the risk of waste due to spoilage or theft. When too many products are kept in inventory, more storage

space is required, and waste is more difficult to control. Conversely, insufficient inventory can affect production of menu items, leading to customer disappointment and potential violation of program regulations.

The SNA's 2019 resource *Keys to Excellence: Standards of Practice for Nutrition Integrity* identifies the following indicators for inventory management best practices:

- automated or manual inventory systems are in place;
- site inventory levels are monitored monthly, and corrective action is taken when needed;
- physical inventory is conducted on the last working day of each month at all sites;
- food in storage is labeled accurately and dated; and
- first-in, first-out inventory rotation is used.

Vernon ISD should consider developing and implementing written inventory control procedures in accordance with industry best practices.

### **FISCAL IMPACT**

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the findings in this chapter. Any savings or costs will depend on how the district chooses to address these findings.



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## 6. TRANSPORTATION MANAGEMENT

### FINDINGS

- ◆ Vernon ISD’s Transportation and Maintenance Department does not have formal, written procedures to promote safe and effective transportation service delivery.
- ◆ Vernon ISD does not have a process to monitor and evaluate routes.
- ◆ Vernon ISD lacks a comprehensive, board-adopted, bus-replacement policy.

### RECOMMENDATIONS

- ◆ **Recommendation 16: Develop written standard operating and safety procedures, including safety protocols, for transportation staff functions.**
- ◆ **Recommendation 17: Develop an efficient bus-routing process using transportation technology to optimize route planning.**
- ◆ **Recommendation 18: Develop and adopt a board policy to guide bus replacement and disposal based on the vehicle’s mileage and age.**

### BACKGROUND

An independent school district in Texas is required to transport students who receive transportation-related services through special education or Section 504 of the Federal Rehabilitation Act. However, most districts elect to transport as many students as possible to maximize student attendance, learning, and performance outcomes. A district’s transportation system determines which students are eligible for transportation, how those students can be safely and reliably transported, and what resources the district can allocate toward the vehicles and staff who transport the students.

Transportation decisions often are dictated by the school district’s transportation allotment, which is outlined in statute and the current biennium’s General Appropriations Act. A transportation allotment outlines funding parameters for the four categories of route service: regular, special, career and technical education, and private. Districts also must adhere to requirements outlined in the Texas Transportation

Code and the Texas Administrative Code that dictate vehicle, driver, route, and safety standards.

A school district may establish and operate an economical public school transportation system, contract with another school district, or contract with a mass transit authority, commercial transportation company, or a juvenile board to establish and operate a transportation system. Whether the district manages its operations or contracts with an entity, the district retains responsibility for ensuring compliance with all applicable laws and rules for providing transportation.

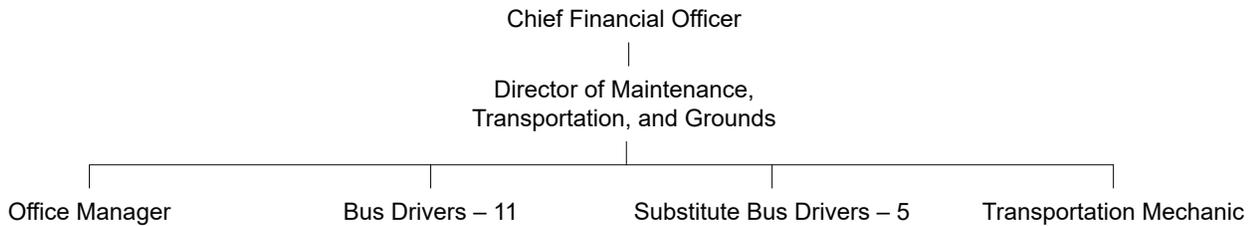
Vernon Independent School District (ISD) operates its own school transportation system. Vernon ISD’s Transportation and Maintenance Department develops and implements the bus routes that transport students to and from school each day. Additionally, it coordinates transportation for athletics and other extracurricular trips. The Transportation and Maintenance Department also makes recommendations to the chief financial officer (CFO) and superintendent regarding district purchases of school buses.

The district maintains a fleet of 25 school buses that serve 11 regular bus routes. These routes include nine regular education routes and two special-services routes. During school year 2022–23, the district transported an average of 319 students daily out of 1,792 enrolled, or 17.8 percent.

The director of maintenance, transportation, and grounds oversees Vernon ISD’s Transportation and Maintenance Department and reports to the CFO for transportation-related matters. The department employs 11 route drivers, five substitute drivers, a mechanic, and an office manager. **Figure 6–1** shows the organization of Vernon ISD’s transportation function within the Transportation and Maintenance Department.

The district’s bus storage and fleet maintenance facility is located in downtown Vernon. All transportation staff are officed at the fleet maintenance facility, which is located approximately 1.0 mile from the district administration building on a lot owned by the district. The Transportation and Maintenance Department employs a full-time mechanic who performs general maintenance on district-owned buses, including oil and tire changes, and more substantial

**FIGURE 6-1  
VERNON ISD'S TRANSPORTATION ORGANIZATION WITHIN THE TRANSPORTATION AND MAINTENANCE DEPARTMENT  
SCHOOL YEAR 2023-24**



NOTE: Figure shows the organization of the transportation functions within the Transportation and Maintenance Department.  
 SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

maintenance such as engine and transmission repairs. The mechanic also holds a commercial driver license and serves as a backup bus driver when needed. The fleet maintenance facility includes a fuel point that dispenses diesel fuel and unleaded gasoline. All district buses are equipped with a radio system that the office manager uses to communicate with bus drivers en route. The district’s white fleet, which includes vehicles used by maintenance staff and district administrators, is leased from a vehicle management company that performs all general maintenance and upkeep on these vehicles.

Figure 6-2 shows the district’s student ridership from school years 2020-21 to 2022-23. During this period, the average

daily ridership increased by 75 students, and total annual state funding increased by \$24,879.

A key indicator of a transportation operation’s efficiency is a comparison of the operation’s fleet and costs to those of similar-sized operations. Figure 6-3 shows the operations cost, number of buses, ridership, and cost per mile for both regular and special programs at Vernon ISD and its peer districts during school year 2022-23. Peer districts are districts similar in size and other characteristics to Vernon ISD that are used for comparison purposes. The peer districts for Vernon ISD are Bowie ISD, City View ISD, Graham ISD, and Sweetwater ISD. For school year 2022-23, Vernon ISD had higher operations costs than three peer districts and

**FIGURE 6-2  
VERNON ISD'S TRANSPORTATION ROUTING AND STATE FUNDING DATA  
SCHOOL YEARS 2020-21 TO 2022-23**

CATEGORY	2020-21	2021-22	2022-23
Average daily ridership – Regular program/Hazardous area service	208	213	271
Average daily ridership – Special program	36	54	48
<b>Average daily ridership – Total students</b>	<b>244</b>	<b>267</b>	<b>319</b>
<b>Total annual state transportation funding</b>	<b>\$100,006</b>	<b>\$150,258</b>	<b>\$124,885</b>

SOURCE: Texas Education Agency, Vernon ISD School Transportation Route Services Report, school years 2020-21 to 2022-23.

**FIGURE 6-3  
VERNON ISD AND PEER DISTRICTS' VEHICLE FLEET OPERATIONS COMPARISON  
SCHOOL YEAR 2022-23**

DISTRICT	OPERATIONS COST	BUSES	RIDERS	COST PER REGULAR PROGRAM MILE	COST PER SPECIAL PROGRAM MILE
<b>Vernon ISD</b>	<b>\$838,043</b>	<b>25</b>	<b>319</b>	<b>\$3.87</b>	<b>\$1.48</b>
Bowie ISD	\$825,091	23	510	\$3.36	\$3.32
City View ISD	\$141,891	11	518	\$1.32	\$1.79
Graham ISD	\$942,214	31	299	\$3.01	\$3.73
Sweetwater ISD	\$682,382	34	461	\$2.94	\$2.93

SOURCES: Texas Education Agency, Transportation Operations Report and Route Services Report, school year 2022-23.

higher regular program mile costs than all four peer districts. However, Vernon ISD had lower special program mile costs than all four peer districts.

## DETAILED FINDINGS

### STANDARD OPERATING PROCEDURES (REC. 16)

Vernon ISD's Transportation and Maintenance Department does not have formal, written procedures to promote safe and effective transportation service delivery.

The district lacks protocols to guide transportation staff in their daily activities or during emergencies. Transportation staff rely on informal processes such as institutional knowledge of other staff to complete job duties and learn procedures. According to the director of maintenance, transportation, and grounds, most of the district's bus drivers have been employed with the district for more than 10 years; because of their longevity, they are knowledgeable of the department's operating procedures.

Vernon ISD's Board of Trustees has legal and local policies regarding basic transportation responsibilities related to bus maintenance, bus driver credentials, and student safety. However, the district lacks documented guidelines, administrative regulations, or a comprehensive manual that contains procedures for executing these board policies.

Staff reported that bus drivers conduct a bus inspection before every route or trip in the vehicle. However, no documentation is included regarding how the process is monitored and by whom, or how preventive maintenance inspections are documented.

The efficiency and effectiveness of a transportation operation depend greatly on the knowledge of the staff. The development and adoption of safety-related procedures help to inform all transportation staff of the standards, rules, and regulations that are intended to promote students' safety. Without such procedures, department staff unknowingly may violate student transportation rules and regulations, and they could be unaware of important responsibilities they may have in certain situations.

A comprehensive manual that specifies a department's processes and procedures can provide staff with a detailed resource for addressing questions about responsibilities, safety, and administrative requirements.

Kingsville ISD's Transportation Department developed a comprehensive training manual for drivers and staff with

detailed guidance and safety procedures. The school year 2023–24 manual appears on the district's Maintenance and Transportation website.

The Kingsville ISD Transportation Department Driver Handbook aims to promote the "highest degree of professionalism, safety, and efficiency" in the department. The handbook provides detailed guidance on safety and emergency procedures, vehicle inspections, reporting requirements, driver and aide responsibilities, first aid, and other departmental processes. The handbook is distributed to Transportation Department staff at the beginning of every school year, and the transportation foreman reviews the manual with all department staff to promote a high level of operational efficiency and a culture of safety.

### **Vernon ISD should develop written standard operating and safety procedures, including safety protocols, for transportation staff functions.**

The director of maintenance, transportation, and grounds should collaborate with bus drivers and other staff as needed to develop a transportation manual that includes all standard operating procedures for the department, including the following information:

- the mission and organization of the Transportation and Maintenance Department;
- a detailed description of the daily responsibilities of transportation staff; and
- comprehensive departmental procedures to maintain staff and student safety that include the following areas:
  - student loading zones;
  - student behavioral management;
  - ride-time goals;
  - wheelchair lift operations;
  - pre-trip and post-trip school bus inspections;
  - railway crossing;
  - bus accident, injury, or incident;
  - professional development; and
  - monitoring and reporting performance to the Texas Education Agency.

Following approval by the assistant superintendent of operations, the director of maintenance, transportation, and grounds should print and distribute the manual to all transportation staff at the beginning of each school year. In addition, the department should provide the manual to every newly employed bus driver, substitute bus driver, and bus monitor.

The district could implement this recommendation with existing resources.

### **BUS ROUTE OPTIMIZATION (REC. 17)**

Vernon ISD does not have a process to monitor and evaluate routes.

Route planning and management are fundamental elements of an effective and efficient transportation operation. Vernon ISD does not have a process to conduct thorough route planning and evaluation periodically, which may result in less efficient service for students.

The district operates nine regular program bus routes and two special program bus routes per day. The district transports students to campuses from 7:15 AM to 7:45 AM. Students from all grade levels are transported on the same route for delivery to each of the schools at approximately the same time, with bell schedules staggered to enable the buses to travel among nearby campuses. The district does not have board policies or procedures that establish a maximum ride time for students.

The district's bus routes are long-established, and transportation route planners typically make minor adjustments to routes as needed. The district's annual route-planning process consists mainly of adding new students, changing students' addresses, and updating the records of students who no longer require transportation services.

However, the district has not configured its bus routes to optimize the efficient transportation of all students following the opening of a new elementary school during school year 2022–23. In the afternoon, the buses pick up students in the following order: first at T.G. McCord Elementary School, then at the new Vernon Elementary School, next at Vernon Middle School, and finally at Vernon High School. The Legislative Budget Board's School Performance Review Team visited the district in October 2023. The review team noted that high school students experienced wait times of approximately 30 minutes or longer after the final bell. This excessive wait time could result in unsafe conditions for high school students waiting for their buses to arrive.

By periodically representing all bus routes on a map to visualize their alignment with each other and existing roads, a district can identify opportunities for route improvements that support students' safe and effective transport. The lack of a regular review and optimization of routing and scheduling inhibits the district from evaluating its transportation services to students and optimizing its use of district funds. For example, staff reported that many younger students are subjected to excessive ride times as a result of the district's current routing system.

The *Idaho School Transportation Best Practices*, published by the Idaho State Department of Education and revised in January 2018, notes that "routing is probably the single most important factor in establishing an effective, cost-efficient, and safe district student transportation system." Effective districts routinely evaluate the efficiency of their routes and schedules and fully utilize the capacity of technology, such as routing software, to optimize routes.

Austwell-Tivoli ISD implemented an effective process for managing bus routes. The district evaluates and compares the mileage of each route annually, with a focus on removing stops that no longer are necessary. Trinity ISD also has developed an effective process by revising its routing scheme to combine its out-of-town and in-town routes, which reduced operating, maintenance, and capital costs by eliminating four bus routes.

Many districts use an electronic system to develop efficient bus routes, including common productivity programs for producing spreadsheets and documents. Some districts use online applications for mapping and improving run paths. Both systems improve efficiency compared to manual processes.

The *National School Transportation Specifications and Procedures*, adopted by the National Congress on School Transportation, is a resource for the route-planning process. Its recommendations include the following elements:

- determine planning policies or guidelines, including eligibility and walk distances;
- develop routing strategies to increase efficiency or improve service levels, including feeder or transfer routes; and
- conduct periodic evaluations of route data to ensure that each route is planned to meet the specific goals or parameters of the school district.

**Vernon ISD should develop an efficient bus-routing process using transportation technology to optimize route planning.**

The district should conduct a periodic route review to ensure that bus routes and student ride times are balanced across the system and that students’ information and stop data are current and accurate.

Additionally, the district should review the current routes and develop new routes, if necessary. The following steps are essential to this process:

- the superintendent should ensure that the Transportation and Maintenance Department receives an accurate list of student names and addresses;
- the department should review or establish stops for eligible students, including home stops and congregated stops, based on the location and the number of students within walking distance of the stop; and
- when the number of students and stops have been determined, the department should establish routes across the system to meet the following specific planning goals:
  - balancing the route time and individual student ride times among all routes in the system;
  - maximizing seat usage on each bus within time and distance constraints; and
  - minimizing bus usage by combining routes with low ridership.

After the district has evaluated the routes, the Transportation and Maintenance Department should enter the stop locations into a basic mapping application to verify route timing and to identify routes for consolidation. Transportation staff should enter the route data, including stop locations, students assigned, and mileage, into a spreadsheet for easy retrieval and analysis. The district should use these criteria to review the routes annually and determine if any changes are necessary.

This recommendation could be implemented with existing resources.

**BUS REPLACEMENT POLICY (REC. 18)**

Vernon ISD lacks a comprehensive, board-adopted, bus-replacement policy.

**FIGURE 6–4  
VERNON ISD BUS INVENTORY BY MODEL YEAR  
SCHOOL YEAR 2022–23**

MODEL YEAR	BUS AGE (IN YEARS)	QUANTITY
2023	1	1
2021	2	3
2020	3	2
2017	6	2
2016	7	1
2015	8	2
2014	9	2
2012	11	2
2011	12	4
2008	15	3
2007	16	1
2005	18	1
2001	22	1
<b>Total</b>		<b>25</b>

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

Through data provided by the district and onsite interviews with staff, the review team determined that the district’s fleet consists of 25 school buses, including 11 that are used daily in regular and special education routes.

During onsite interviews, staff reported that the mechanic assesses the district’s bus fleet throughout the year and makes recommendations to the CFO and the director of maintenance, transportation, and grounds about when to replace buses. However, without the guidance of a policy containing industry-specific replacement criteria, the district’s bus replacement process will continue to be reactionary.

Figure 6–4 shows the district’s bus inventory. Vernon ISD has six buses that are more than 15 years of age. The fleet has an average age of 9.5 years, ranging in age from one year to 22 years.

Regular investment in bus fleet replacement is important to promote the ongoing safety, reliability, and efficiency of transportation services. Older vehicles are less reliable, leading to an increase in breakdowns and service disruptions. They require the district to retain a higher proportion of spare vehicles in the fleet to cover more frequent and longer maintenance and repair activities. Older vehicles also may

lack effective safety features or emission control and fuel efficiency technology found in newer vehicles. An aging fleet with significant mileage typically requires a higher cost to operate, including fewer miles per gallon, more frequent repairs, and higher repair costs.

School buses are a large capital expense, and a long-term comprehensive plan is critical to a district's success in providing safe, reliable, and fiscally responsible transportation. Failure to plan for the regular acquisition of school buses to update the fleet can force districts to make large purchases of buses all at once, which affects the general or capital fund budgets during those years.

Bus replacement is one of the most important transportation decisions that school districts make to maintain a sound fleet and stable budgeting. Although 11 states set maximum ages for school buses, Texas law contains no school bus-replacement requirements for districts. The National Association of State Directors of Pupil Transportation Services, a membership organization of leaders in school bus transportation, published a white paper that promotes the timely replacement of school buses through a planned process. The association recommends a replacement cycle ranging from 12.0 years to 15.0 years, mitigated by local operational conditions and the extent of preventive maintenance necessary. The average age of Vernon ISD's buses is 9.5 years. However, 10 of the district's 25 buses are within the recommended age range for replacement.

**Vernon ISD should develop and adopt a board policy to guide bus replacement and disposal based on the vehicle's mileage and age.**

To establish a replacement plan, the district should perform the following steps:

- determine the number of buses used on daily routes, which may be informed by data derived from a review of current routing;
- determine the total useful life, years, and miles of a bus in the local operating environment; and
- establish the average number of miles per year each route bus is projected to accumulate, including mileage for extracurricular activities and field trips.

The Vernon ISD director of maintenance, transportation, and grounds should develop the policy in coordination with the CFO and assistant superintendent of operations. After the policy has been developed, the superintendent should

submit it to the board for consideration. The policy should be data-driven, based on objective criteria such as miles, age, and availability of parts used to maintain serviceability, or a combination of criteria. The replacement criteria will help the district minimize maintenance costs, streamline the process to maintain a cost-effective school bus fleet, and reduce the average age of the fleet.

No fiscal impact is assumed for this recommendation until the district develops its bus-replacement plan and performs an analysis of associated costs based on the life cycles of the vehicles in the fleet.

**ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

**TRAINING**

Vernon ISD's Transportation and Maintenance Department does not provide driver safety awareness or skill improvement training other than the state-mandated training.

The department does not provide its staff with any training with regard to safety awareness, defensive driving, skill improvement, or student behavioral management for transportation-related issues. As prescribed by the Texas Department of Public Safety (DPS), new bus drivers are required to complete a 20.0-hour initial certification class, and all bus drivers are required to complete a course update every three years. During the onsite visit, transportation staff reported being unsure of additional driver training requirements.

The lack of additional training for drivers means that a school bus driver may provide transportation service for three years without any discussion or reminders of student safety procedures. The National Association of State Directors of Pupil Transportation Services stated the following in the 2000 position paper *School Bus Drivers—Their Importance and Training*: "A modern, safe, well-maintained school bus operating on the best possible terrain with ideal loading zones cannot compensate for an ill-trained school bus driver."

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

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

Vernon ISD should consider supplementing mandated state driver training programs with periodic course updates to promote a culture of safety and a high level of driver skill.

The director of maintenance, transportation, and grounds and the assistant superintendent of operations should ensure that departmental training initiatives are supported and that all bus drivers are permitted to attend training programs. For example, it is common for the staff of smaller districts who perform multiple roles to have scheduling conflicts when training programs are offered; therefore, professional development programs should be scheduled in a manner that enables staff to attend transportation-related training programs periodically.

Additionally, the director of maintenance, transportation, and grounds should investigate the resources available to develop an effective training program. One resource is the *School Bus Driver In-Service Safety Series* produced by the National Highway Transportation Safety Administration (NHTSA), which is available at no charge to provide useful training and skills improvement information to drivers. This material, available at [www.nhtsa.gov](http://www.nhtsa.gov), includes an instructional guide, a presentation, and handouts regarding the following training topics:

- driver attitude;
- student management;
- highway–rail grade crossing safety;
- vehicle training;
- route knowledge;
- loading and unloading procedures;
- emergency evacuation;

- transporting students with special needs; and
- driving in adverse weather conditions.

In addition to the materials provided by NHTSA, the Transportation and Maintenance Department's periodic training topics should include safety-related concerns that are unique to Vernon ISD (e.g., truck traffic influenced by local industries and route paths that should be changed to improve student safety).

Additionally, the mandated three-year course updates and the periodic training programs should be well-documented and archived. These documents may fulfill school transportation record retention requirements and serve as proof of the district's diligence in providing drivers with safety-related and skills-improvement training if a district vehicle were involved in a traffic accident.

#### **BUS MONITORS**

According to staff, the number of bus-related discipline cases in the district has increased in recent years. Students at all grade levels ride the same buses, which poses a potential for safety issues to occur involving younger students. Staff reported the need for the district to assign monitors to each bus to decrease the number of behavioral issues on board and promote a safety mindset among students and staff. District bus monitors serve only the two special education routes. To promote safety on bus routes when transporting students, the district should consider placing bus monitors on all regular bus routes in addition to the special education routes.

Placing monitors on bus routes helps drivers to concentrate on operating the bus safely, without the distraction of maintaining order and addressing behavioral issues while driving.

#### **AIR CONDITIONING ON BUSES**

Staff reported that only four of the district's 25 buses have functional air conditioning installed. Two of the air-conditioned buses are used for the district's special education routes, and two are used for regular routes. Therefore, seven of the district's buses that run regular routes are not air-conditioned. Based on interviews with bus drivers, passengers and drivers on buses without air conditioning often endure excessive heat for extended periods during the hottest times of the day. Extended exposure to excessive heat causes a safety concern for students and staff.

When shopping for vehicles to replace the district's fleet, the district administration should consider the need

for all new buses to be equipped with functioning air-conditioning systems.

### **STUDENT MONITORING SYSTEM**

According to the office manager, the Transportation and Maintenance Department routinely receives calls from Vernon ISD parents inquiring about the location of students in transit before or after school. One solution the district has discussed is implementing a monitoring system that tracks when a student boards and exits a bus. This system could show transportation staff and parents the location and time of a student's daily transportation activity. Parents can log in to a web-based portal to track when students ride the bus and receive notifications when they arrive at their destination. Without a proper monitoring system, the district risks being unaware of a student's location in transit, which could lead to a safety issue. Vernon ISD should investigate suitable methods for monitoring when and where students enter and exit school buses to keep staff and parents informed.

### **FISCAL IMPACT**

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

# 7. FACILITIES MANAGEMENT

## ACCOMPLISHMENT

- ◆ Vernon ISD maintenance staff are skilled and knowledgeable tradespeople who have maintained the district’s facilities during multiple administrations with limited procedures or operational guidance.

## FINDINGS

- ◆ Vernon ISD lacks a facilities master plan and protocols to meet future facilities needs.
- ◆ Vernon ISD lacks documented procedures for the maintenance and custodial functions.
- ◆ Vernon ISD does not manage, measure, or monitor its energy use.

## RECOMMENDATIONS

- ◆ **Recommendation 19: Develop a comprehensive long-range facilities master plan that includes an annual facilities audit and ongoing preventive maintenance.**
- ◆ **Recommendation 20: Develop a detailed operating procedures manual for maintenance and custodial functions.**
- ◆ **Recommendation 21: Develop and implement an energy management plan to conserve energy and reduce annual energy costs.**

## BACKGROUND

An independent school district’s facilities program provides safe and clean learning environments. A school district’s facilities

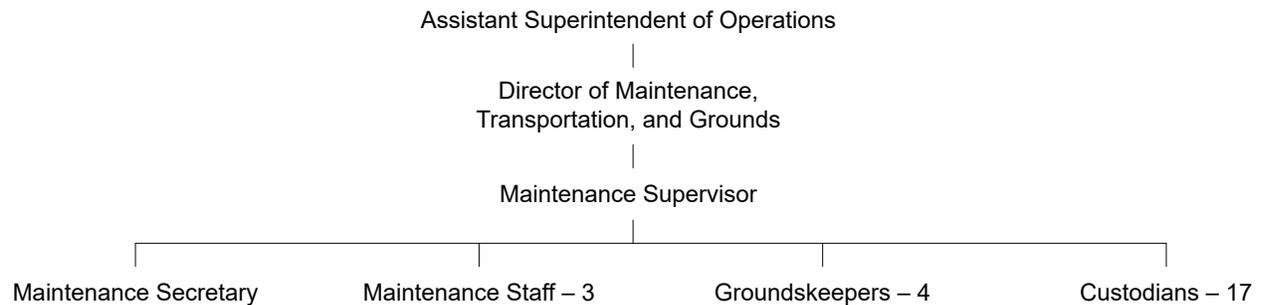
include campuses, buildings, grounds, gymnasiums, athletic fields, portable buildings, storage structures, and warehouses. Facilities management involves acquisition and construction, maintenance and operations, and general administration.

Acquisition and construction include the purchase, remodel, or extension of buildings. Maintenance and operations involve activities required to keep the facilities and grounds open, clean, comfortable, insured, and in effective working condition. General administration consists of planning and budgeting for facility functions.

Vernon Independent School District (ISD) operates a Transportation and Maintenance Department. This chapter discusses the maintenance and facilities functions of the department, and transportation-related matters are addressed in Chapter 6, Transportation Management.

Vernon ISD’s director of transportation, maintenance, and grounds oversees the district’s buildings, maintenance, custodial, and transportation functions of the district and reports to the assistant superintendent of operations. Vernon ISD manages its own custodial services and employs 17 full-time custodial staff. The maintenance supervisor oversees three maintenance staff who are responsible for plumbing, electrical systems, general maintenance, and carpentry. Four groundskeepers maintain the landscaping and grounds for the athletic fields and the campuses. **Figure 7–1** shows the reporting structure for the maintenance and custodial functions in the Transportation and Maintenance Department.

**FIGURE 7–1**  
**VERNON ISD’S MAINTENANCE ORGANIZATION WITHIN THE TRANSPORTATION AND MAINTENANCE DEPARTMENT**  
**SCHOOL YEAR 2023–24**



NOTE: Figure shows the organization of the maintenance, custodial, and groundskeeping functions within the Transportation and Maintenance Department.  
 SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

**Figure 7–2** shows Vernon ISD facilities, including their respective years of original construction and square footage. The district maintains 417,620 square feet of campus and administration facilities.

In addition to the facilities shown in **Figure 7–2**, Vernon ISD owns 110,483 square feet of building space used for a maintenance facility, a transportation facility, a middle school gymnasium, a high school gymnasium, and various ancillary buildings used for classrooms, athletics, or storage. The Legislative Budget Board’s School Performance Review Team visited the district in October 2023. At the time of the visit, the district’s disciplinary alternative education program and the Vernon ISD Opportunity Center were housed in two separate buildings across from Vernon Middle School. The total square footage for all buildings in the district is 528,103 square feet.

**Figure 7–3** shows the actual facilities maintenance and operations costs for Vernon ISD and its peer districts for school year 2021–22. Peer districts are districts similar in size and other characteristics to Vernon ISD that are used for comparison purposes. The peer districts for Vernon ISD are Bowie ISD, City View ISD, Graham ISD, and Sweetwater ISD. Vernon ISD spent \$2.3 million for facilities maintenance and operations, which was less than three of its peer districts and the peer district average. Vernon ISD’s facilities maintenance and operations expenditures represented 10.8 percent of its total expenditures and cost an average of \$1,261 per student. For school year 2023–24, Vernon ISD budgeted approximately \$2.8 million for facilities maintenance and operations.

**FIGURE 7–2  
VERNON ISD CAMPUS AND ADMINISTRATION FACILITIES  
OCTOBER 2023**

FACILITY	YEAR OF CONSTRUCTION	SQUARE FOOTAGE
T.G. McCord Elementary School	1982	59,554
Vernon Elementary School	2023	79,324
Vernon Middle School	1999	79,000
Vernon High School	1965	82,021
Central Elementary School (1)	1937	48,908
Shive Elementary School (1)	1947	54,397
District Administration Building	1980	14,416
<b>Total</b>		<b>417,620</b>

NOTE: (1) Central Elementary School and Shive Elementary School no longer serve students; they were replaced by Vernon Elementary School beginning in school year 2023–24.  
SOURCE: Vernon ISD Property Schedule, Texas Political Subdivisions Insurance Agency, 2023.

The department provides a work order system to manage facilities maintenance requests. Staff can enter a request into the work order system for repairs or maintenance, and the maintenance supervisor assigns each order to the appropriate staff. The maintenance supervisor reviews the open requests daily, records each completed item, and closes the work orders.

**DETAILED ACCOMPLISHMENT**

**FACILITIES MAINTENANCE**

Vernon ISD maintenance staff are skilled and knowledgeable tradespeople who have maintained the district’s facilities

**FIGURE 7–3  
VERNON ISD AND PEER DISTRICTS’ FACILITIES MAINTENANCE AND OPERATIONS COSTS  
FISCAL YEAR 2022**

DISTRICT	FACILITIES MAINTENANCE AND OPERATIONS EXPENDITURES	PERCENTAGE OF ALL FUNDS	ENROLLED MEMBERSHIP	COST PER STUDENT
<b>Vernon ISD</b>	<b>\$2,347,358</b>	<b>10.8%</b>	<b>1,862</b>	<b>\$1,261</b>
Bowie ISD	\$2,473,247	13.4%	1,685	\$1,468
City View ISD	\$1,657,315	10.3%	1,121	\$1,478
Graham ISD	\$2,784,815	11.5%	2,293	\$1,214
Sweetwater ISD	\$3,467,633	13.5%	2,052	\$1,690
Peer average	\$2,595,753	12.2%	1,788	\$1,463

NOTES:

- (1) Expenditures shown are from all funds.
- (2) Fiscal year 2022 data is used as it was the most recently available actual financial data in the Public Education Information Management System at the time of the onsite review.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023; Texas Education Agency, Public Education Information Management System, school year 2021–22.

during multiple administrations with limited procedures or operational guidance.

According to survey responses and staff interviews, the maintenance and custodial staff are familiar with each campus's needs and proactive in resolving facility-related issues. Staff said that the campuses and grounds typically are well-maintained and clean. For example, survey results from campus staff show that 72.3 percent of respondents agreed with the statement "Schools are clean, and buildings are properly maintained," and 88.1 percent of campus staff agreed with the statement "Emergency maintenance is handled properly."

Despite high turnover in district administration in recent years, the knowledge and dedication of the maintenance staff consistently have kept the district's facilities maintained to a high standard.

## DETAILED FINDINGS

### **FACILITIES MASTER PLAN (REC. 19)**

Vernon ISD lacks a facilities master plan and protocols to meet future facilities needs.

A long-range facilities master plan provides a roadmap for future construction and renovation programs. The development of a comprehensive school facilities master plan usually involves the following components:

- stakeholder engagement that may include students, teachers, administrators, and community representatives;
- data collection that addresses student demographics, enrollment projections, and facility conditions and capabilities;
- consideration of district initiatives and facility goals;
- identification of district project and renovation priorities;
- determination of project budgets and timelines; and
- development of a living document that is reviewed and updated regularly to guide school district budgeting, spending, and construction decisions.

Additionally, Vernon ISD's facilities planning process lacks important elements. For example, the district does not regularly develop facility condition reports, maintain a deferred or preventive maintenance list, or conduct an annual audit of district facilities.

Most repair needs are identified by campus principals and staff, maintenance staff, or during periodic campus visits by the director of transportation, maintenance, and grounds and the maintenance supervisor. Maintenance staff typically address maintenance tasks and consult specialists as needed for more extensive repairs or emergencies. This informal process enables the district to troubleshoot facility issues as they occur, but it does not enable the district to anticipate and budget for significant and ongoing repair or replacement costs.

Vernon ISD has implemented large-scale construction and renovation projects in recent years. In calendar year 2021, the district began construction on the new elementary school campus, which was completed in 2023 and was funded by a bond passed during the previous district administration. Additionally, the district recently added security vestibules to all campuses and completed the construction of a new media center at the high school. Without a facilities plan, the district is making major decisions and incurring large facility-related expenses without considering the long-term facility conditions, goals, or resources.

At the time of the onsite visit, the district had not finalized plans for Central Elementary School and Shive Elementary School, which were replaced by the newly constructed Vernon Elementary School. Since the onsite visit, the Board of Trustees has approved moving the disciplinary alternative education program and the Vernon ISD Opportunity Center to the building that previously housed the Central Elementary School.

In addition, a green hydrogen production facility is expected to begin commercial operations in Wilbarger County in calendar year 2027, which is expected to generate approximately \$500.0 million in revenue and offer more than 1,300 construction jobs, 115 permanent operations jobs, and 200 transportation and distribution jobs. This local development could affect the district significantly by increasing property tax revenues and student enrollment as families move into the area for jobs. Without a facilities master plan, Vernon ISD cannot spend new revenues strategically for cohesive upgrades to campus buildings and grounds.

In addition to plans for upgrades and new construction, a comprehensive facilities master plan includes measures for ongoing maintenance. Vernon ISD owns several older buildings with more extensive, ongoing repair and

**FIGURE 7–4  
FACILITIES MASTER PLAN COMPONENTS**

COMPONENT	DESCRIPTION
<b>Introduction</b>	
District Facility Goals	Identify district goals and vision for its facilities
Issues and Findings	List the issues the district is facing (e.g., enrollment decline, facility condition, bonding for contractors, excess space, overcrowded facilities)
Planning Process	Discuss the planning process (e.g., stakeholder engagement)
Executive Summary	Identify priority projects, costs, and funding
<b>Existing and Projected Conditions</b>	
Educational Structure	School district composition (i.e., number/type of schools and grade-level configurations), including anticipated changes
Site and Facilities Overview	School district boundaries and attendance zones; list of facilities, including physical addresses, dates of opening, square footage, etc.
Demographics and Enrollment	Include historical demographic information, possible influencing factors, and enrollment projections
<b>Capacity and Utilization</b>	
Functional Capacity Analysis	Identify maximum capacities at each site and factors that might affect capacity
Utilization Analysis	Identify utilization rates at each site and factors that affect current utilization
Space Needs	Discuss classroom and storage needs; identify vacant and underutilized spaces
<b>Capital Improvement Program</b>	
Available Funding	Provide an overview of district funding history; identify current and future financial resources available to meet capital, systems, security, maintenance, and technology needs
Planning Strategy and Implementation	Consider the following factors: Does the district need a new school? Which facilities need to be fully replaced, if any? Which facilities need major or minor renovation? Which facilities only need general maintenance? Which maintenance needs could result in capital needs if not addressed? Which facilities need to be closed, demolished, consolidated, or repurposed? Does the district have any early childhood facility needs?
Capital Plan Priorities	Identify priorities, anticipated sources of funding, and discuss the prioritization process including public engagement

SOURCE: New Mexico Public School Facilities Authority Facilities Master Plan Scope of Work Checklist, revised December 2022.

maintenance needs. For example, Vernon High School was constructed in 1965. Although it has received several updates and renovations, staff reported that the original structure likely will require significant and ongoing repairs and maintenance.

Without an established planning protocol to address facilities needs, critical maintenance needs may be deferred or overlooked, lack sufficient budgeting, or lack leadership support that otherwise could be secured through a facilities master planning process.

Periods of routine maintenance typically follow large-scale construction, renovation, and upgrading projects. A long-term facilities master plan helps the district to prioritize and complete building projects according to an efficient and logical process. As the board members and district leadership

change, a long-term facilities master plan adds stability and cohesion to the district’s construction, use, and management of facilities.

Effective districts often use a guide, such as the New Mexico Public School Facilities Authority Facilities Master Plan Scope of Work Checklist (2022). **Figure 7–4** shows recommended components of a facilities master plan for school districts.

A developed facilities master plan supports a highly effective educational system across many operational areas. A facilities master plan can provide the following benefits:

- provide baseline data for district decision making;
- support current and long-range educational programming needs;

- serve as a conduit for stakeholder engagement, including the community, parents, students, and staff;
- communicate district requirements and goals clearly; and
- assist district staff to develop bond proposals for educational facility improvements.

School districts can prevent deferred maintenance by implementing proper preventive maintenance procedures. Effective school districts' maintenance programs include the following elements:

- commitment to facility maintenance from the board, the superintendent, and managing staff;
- development of a comprehensive preventive maintenance program;
- adequate funding for both preventive maintenance and capital improvements;
- consideration of new ideas for the construction and maintenance of facilities;
- exploration of new and different ways to pay for maintenance and construction needs;
- review of district goals and policies to make sure facilities management receives appropriate levels of funding in the annual budget cycle; and
- connection of academic programs to facilities needs through a plan.

An annual facilities audit and regular preventive maintenance also are essential components of a facilities master plan. These components protect a school district's most costly assets and help the district meet its present and future educational program needs. Annual auditing and regular inspection of school facilities enable a clear understanding, documentation, and communication of the current condition and budgetary needs of district buildings, systems, and sites.

An annual audit provides the following benefits:

- increasing the likelihood of identifying failures or faults to a building's components or systems in time to perform repairs in lieu of a total replacement, which may reduce or control maintenance costs;
- helping to establish preventive maintenance protocols and schedules; and

- providing the basis for long-range planning.

**Vernon ISD should develop a comprehensive long-range facilities master plan that includes an annual facilities audit and ongoing preventive maintenance.**

The first step in developing a facilities master plan is to adopt a formal facilities planning process. This process is necessary to ensure that the district can maintain its facilities within available funding and to a level that supports an effective educational program. The district should begin the planning process by carrying out the following actions:

- assess whether district staff have the expertise to conduct a comprehensive facilities needs assessment to determine the status of buildings and systems and identify current and future needs; if the committee determines a consultant is needed, the district should initiate the process to solicit bids from a vendor;
- assess the capacity of each campus facility by setting standards that govern student-to-teacher ratios and the number of square feet required per student in a classroom; these standards should specify the minimum size of core facilities, such as classrooms, gymnasiums, cafeterias, and libraries, so that campuses do not overload these facilities or overuse portable classrooms;
- develop a facilities inventory that identifies the use and size of each room at each campus;
- analyze student enrollment to establish accurate enrollment projections for at least five years;
- review and analyze deferred maintenance work to determine its current necessity;
- identify current needs, including safety, accessibility, and energy improvements;
- determine the training necessary to prepare maintenance staff to support and implement planned improvements;
- solicit input from district staff, students, community representatives, and other stakeholders through methods that may include establishing a subcommittee, conducting periodic meetings for feedback, and enabling stakeholders to submit feedback through the district's website; and
- establish facilities and educational programming priorities.

After collecting these data, the assistant superintendent of operations, the director of transportation, maintenance, and grounds, and the maintenance supervisor should develop and implement a continuous facilities planning process for approval by the superintendent. This process should contain the following elements:

- identify a committee of stakeholders to participate in the planning process, including the superintendent, maintenance and custodial staff, campus staff, parents, community stakeholders, students, and board members;
- conduct an annual audit of all district facilities, including all critical repairs and maintenance and a prioritized list of all deferred maintenance needs;
- develop a five-year facilities master plan that includes the status of each facility, facility goals and objectives, recommendations for facility improvements, and projected costs for these improvements; and that accounts for expected changes to facility needs, including curriculum and technology, safety and security developments, and the incorporation of local, state, and federal requirements;
- develop and implement a detailed preventive maintenance plan, organized by building and equipment and focused on the ongoing maintenance and repair of identified facilities assets that require upkeep;
- identify funding sources for the work; and
- implement a deferred maintenance schedule that includes a detailed backlog of all district maintenance activities, prioritized by building and equipment, and establish a timeline for performing deferred maintenance activities.

The district should review and update the information annually as new data and information become available.

The district could implement this recommendation with existing resources.

### **FACILITIES PROCEDURES (REC. 20)**

Vernon ISD lacks documented procedures for the maintenance and custodial functions.

The district lacks written procedures for training new staff. Based on interviews with maintenance and custodial staff,

new staff learn most of their duties through on-the-job training provided by experienced staff, their knowledge of industry standards and best practices, or direct assignments from supervisors. The maintenance supervisor conducts an orientation regarding general duties for new staff, and then they are assigned to a campus. Experienced campus staff then provide campus-specific training.

Staff reported that the district has knowledgeable, veteran maintenance staff; however, custodial staff have turned over during the past three years. Additionally, many of the experienced staff have been employed with the district for several years, and some are eligible to retire soon.

The absence of documented procedures increases the risk that staff may perform functions inconsistently. Moreover, the lack of written procedures risks potential gaps in controls and misunderstanding of roles and responsibilities. Relying on institutional knowledge does not assure that the district will continue to operate effectively in the event of attrition or turnover among staff.

Effective districts establish standardized orientation, training, and operational procedures with clear guidelines. These procedures encourage self-management, limit arbitrary action, provide a basis for measuring performance, and provide a defense against potential human resources complaints.

The National Center for Education Statistics (NCES) is the primary federal entity responsible for collecting and analyzing data related to education. Its *Planning Guide for Maintaining School Facilities*, 2003, recommends that effective maintenance and operations procedures manuals at a minimum should contain a mission statement, staff policies, purchasing regulations, accountability measures, asbestos abatement procedures, repair standards, vehicle use guidelines, security standards, and work order procedures.

San Angelo ISD's website provides an example of comprehensive facilities maintenance procedures. The district's manual outlines the maintenance department's mission, operational rules, job responsibilities, and safety guidelines, covering topics from staff conduct and workplace protocols to specific duties for maintenance, custodial, and grounds staff.

**The Vernon ISD Transportation and Maintenance Department should develop a detailed operating procedures manual for maintenance and custodial functions.**

Using the NCES *Planning Guide for Maintaining School Facilities* and the San Angelo ISD facilities maintenance procedures manual as guides, the Vernon ISD director of transportation, maintenance, and grounds should seek stakeholder input to develop an operating procedures manual that addresses key responsibilities and functions related to maintenance and custodial operations. When the manual is complete, the director should meet with staff to discuss applicable contents and conduct training necessary to implement the procedures.

The district could implement this recommendation with existing resources.

### **ENERGY MANAGEMENT (REC. 21)**

Vernon ISD does not manage, measure, or monitor its energy use.

Texas school districts are required to develop energy management strategies to reduce their overall energy consumption. The Texas Education Code, Section 44.902, requires each school district to establish a long-range energy plan to reduce its annual electric consumption by 5.0 percent. In addition, the plan should include the following components:

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

An effective energy management plan includes strategies for using the minimum amount of energy while providing a desired level of comfort to building occupants. These strategies should include the education of building staff, enhancements to or automation of building controls, proper maintenance of existing equipment, and installation of energy-efficient equipment as systems are replaced.

Vernon ISD has not developed a comprehensive energy plan that includes these strategies or identifies actions to support the district's annual reduction in energy usage.

The district employs a heating, ventilation, and air conditioning (HVAC) technician and an electrician to provide maintenance of heating, cooling, and electrical systems at campuses and district buildings. According to

campus principals, most repair orders are initiated by the principals or campus staff and communicated to the Transportation and Maintenance Department. Based on interviews with principals, individual campuses have instructed staff on when to turn off lights for the day, and thermostats are managed based on when staff and students are in the buildings.

No staff are assigned to review the district's utility account statements monthly to identify errors or discrepancies or to maintain a spreadsheet of utility use rates so that sharp increases in service or deviations can be investigated. Additionally, the district does not have a procurement board policy requiring that new equipment is energy efficient. During school year 2022–23, the district hired an energy efficiency company to install LED lighting at campuses and district-owned facilities and installed automatically adjusting thermostats to conserve energy. However, although the district has made energy-efficiency improvements to certain buildings, it does not follow a districtwide energy-efficiency plan. Additionally, several of the district's buildings have been in service for decades and likely would realize long-term cost savings from upgrades that reduce energy consumption.

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

The Texas State Energy Conservation Office (SECO) offers free assessments of school district facilities to identify opportunities for savings, which may result from systems retrofits or the maintenance and operation of facilities. This service, known as a Preliminary Energy Assessment (PEA), is intended to identify and recommend cost-effective renovations, equipment upgrades, or changes to building operations that could reduce utility costs or consumption.

PEAs include the following elements:

- analysis of utility bills and other building information to determine energy and cost utilization indices for facilities;
- recommendations of maintenance procedures and capital energy retrofits that will decrease energy consumption through efficiency measures;

- recommendations for the development and monitoring of customized procedures to control the running times of energy-using systems;
- onsite training for building operators and maintenance staff;
- follow-up visits to assist with implementing the recommendations and to determine savings associated with the project;
- development of an overall energy management policy;
- assistance with developing guidelines for efficiency levels of future equipment purchases; and
- facility benchmarking using the Energy Star Portfolio Manager.

**Vernon ISD should develop and implement an energy management plan to conserve energy and reduce annual energy costs.**

To implement this recommendation, the director of maintenance, transportation, and grounds, CFO, and assistant superintendent of operations should develop an energy management plan that includes a mission statement and procedures to support specific energy conservation strategies. These procedures should communicate building management policies and enforcement methods. In addition, the energy management plan should include the following:

- establish guidelines for classroom temperature settings and schedules;
- review and monitor electricity usage monthly, as directed by the superintendent;
- evaluate installed controls to ensure that systems are functioning correctly, including independent motion detectors for controlling lights, HVAC systems, and set-back controls that reduce energy consumption during nights and weekends;
- conduct preventive maintenance tasks such as fixing leaks to optimize performance and efficiency;
- perform energy surveys to identify problems in systems or operational practices that are wasting energy;
- develop department procedures for closing windows and doors and for controlling exhaust fans to decrease the cost of heating and cooling;

- prepare a schedule for regular cleaning, maintenance, and filter changes of HVAC equipment to protect indoor air quality and extend equipment life;
- adopt standards for routine maintenance that require the use of energy-efficient equipment; for example, all relamping or fixture replacements should be based on high-efficiency fluorescent or LED technology; and
- draft an incremental plan to increase staff awareness of energy conservation; for example, district staff should be encouraged to place equipment with high-energy use, such as coffee pots and refrigerators, in common rooms instead of keeping personal equipment in classrooms and offices.

The district also should consider seeking assistance from SECO to obtain an energy assessment of its facilities.

This recommendation could be implemented with existing resources. Any savings or costs will depend on how the district implements an energy management initiative.

### **ADDITIONAL OBSERVATION**

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

#### **MIDDLE SCHOOL GYMNASIUM**

The middle school gymnasium does not have an HVAC system.

According to the director of maintenance, transportation, and grounds, the middle school gymnasium is a former military building in sound condition that was incorporated by the campus. According to the director, the district had received a bid within the past few years to retrofit the building with an HVAC system for approximately \$350,000. Vernon ISD should consider the long-term needs of the campus and district in evaluating whether it would be more cost-effective to retrofit the building with a functioning HVAC system or construct a new middle school gymnasium.

### **FISCAL IMPACT**

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other

recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation.

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.



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## 8. SAFETY AND SECURITY MANAGEMENT

### ACCOMPLISHMENTS

- ◆ Vernon ISD implements several safety and security procedures and programs.
- ◆ Vernon ISD implements effective positive behavior incentives.
- ◆ Vernon ISD has made significant improvements to campus safety throughout the district.
- ◆ Vernon ISD implements recommendations identified by safety audits.

### FINDING

- ◆ Vernon ISD lacks comprehensive safety and security procedures for all campuses and safety positions.

### RECOMMENDATION

- ◆ **Recommendation 22: Develop comprehensive, documented safety and security procedures for the district.**

### BACKGROUND

The goal of an independent school district's safety and security function is to ensure the physical and mental well-being of students and staff. To achieve this goal, a school district must collaborate with community and state organizations to prepare for and prevent emergencies and to identify and implement strategies to maintain an environment conducive to student learning.

School district safety and security involves securing facilities and assets, monitoring district property, and preparing for emergencies. Additionally, a school district must manage student behavior and develop procedures to promote mental health to ensure the emotional and physical safety of students and staff. School safety management often is supported by local law enforcement and first responders, mental health professionals, and community service organizations. The management of safety and security responsibilities depends on a district's size; larger districts often hire dedicated safety and security staff, while smaller districts may assign safety and security responsibilities to existing staff.

Vernon Independent School District (ISD) is responsible for the safety and security of five instructional and five

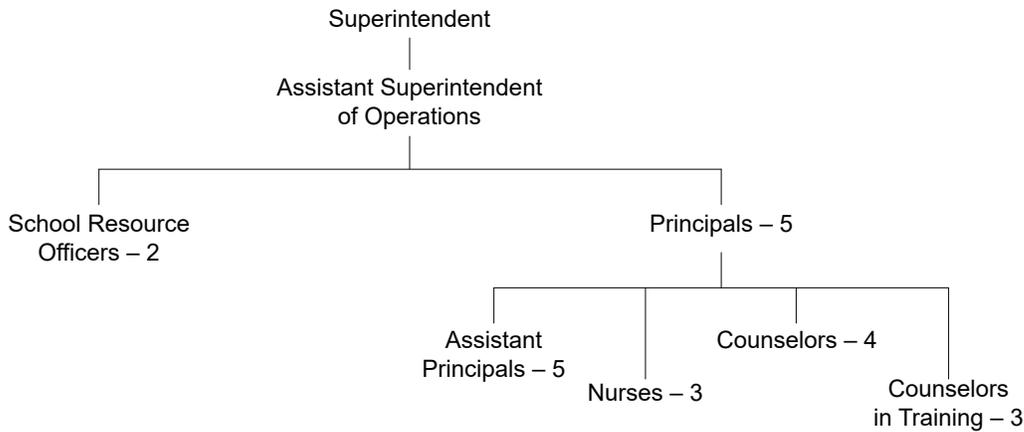
noninstructional facilities. The instructional facilities are T.G. McCord Elementary School, Vernon Elementary School, Vernon Middle School, Vernon High School, and the Vernon ISD Opportunity Center. The Vernon ISD Opportunity Center is a dropout recovery program that includes the district's disciplinary alternative education program (DAEP). The district's five noninstructional facilities include the district's administration building, a maintenance facility, a fleet maintenance facility, and two former instructional facilities, Central Elementary School and Shive Elementary School. The Legislative Budget Board's (LBB) School Performance Review Team visited the district in October 2023, when Central Elementary School and Shive Elementary School students had been moved into the newly constructed Vernon Elementary School. Central Elementary School currently houses the district's Curriculum Department, and Shive Elementary School is vacant.

The assistant superintendent of operations is responsible for overseeing districtwide safety initiatives, such as recommendations made in a safety and security audit or statutory changes for school district safety. Principals, working in coordination with their assistant principals, are responsible for the safety of their respective campuses. Campus-level safety initiatives must be approved by the assistant superintendent of operations.

To mediate student conflict and promote mental health, Vernon ISD employs three full-time counselors, one part-time counselor, and three counselors in training (CIT). Vernon ISD developed a counselor-in-training position to address its ongoing counselor shortage. Vernon ISD supports teachers who are pursuing school counselor certifications by assigning responsibilities to prepare them for when they are certified counselors. At the time of the review team's onsite visit, campuses reported the following counselor and CIT positions:

- T.G. McCord Elementary School has a counselor who also assists with campus administration;
- Vernon Elementary School has two CITs, and one also teaches fine arts;

**FIGURE 8-1**  
**VERNON ISD'S SAFETY AND SECURITY ORGANIZATION**  
**SCHOOL YEAR 2023-24**



SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

- Vernon Middle School has a part-time counselor, whose time is shared with the Vernon ISD Opportunity Center, and a CIT; and
- Vernon High School has two counselors.

In addition, beginning in school year 2023-24, the superintendent facilitated the district’s use of Care Solace, a team-based mental health service for students, their family members, and staff. Care Solace helps school districts coordinate referrals and helps families navigate the mental healthcare system.

To promote students’ physical and mental well-being, Vernon ISD employs three full-time nurses. All nurses serve on the school health advisory council (SHAC), which meets regularly. The purposes of SHAC are to promote school health programming; collaborate with the local community, district, and state agencies; and make recommendations to the Vernon ISD Board of Trustees. In addition to the district’s nurses, the SHAC includes the district social worker, the superintendent, counselors, food service employees, and several parents. Staff reported that the SHAC meets four times a year and at the last meeting, it discussed vaping prevention programs and mental health needs, including the district’s Care Solace service.

As of October 2023, the district employed two school resource officers (SRO) to provide dedicated campus security. The SRO stationed at Vernon High School is contracted through the City of Vernon Police Department, and the SRO stationed at Vernon Middle School is contracted

through the Wilbarger County Sheriff’s Department. The SROs communicate with each other infrequently, but they report weekly to the assistant superintendent of operations via email to summarize their activity from the week. Each SRO reports first to the principals of the campuses they serve and then to the assistant superintendent of operations at the district level. The SROs ultimately are responsible to their respective law enforcement agencies. Campus staff reported that both SROs are fulfilling their duties and have amicable relationships with the students they serve.

The Texas Education Code, Section 37.0814, states that a school district’s board must ensure that each campus in the district has at least one armed security officer present during regular school hours. This security officer must be a school district or commissioned peace officer or SRO. According to staff, Vernon ISD is unable to fund a security officer at each campus, so the district filed a good cause exemption with its board as allowed by the Texas Education Code, Section 37.0814(c). This exemption identifies the district’s defender program, also known as the guardian program, as its alternative standard to satisfy the statutory requirement of deploying armed security officers. The defender program authorizes trained staff to carry handguns on campus.

**Figure 8-1** shows the organization of the district’s safety and security functions, which includes the assistant superintendent of operations, the seven positions directly reporting to the assistant superintendent of operations, and staff responsible for health-related safety.

**FIGURE 8–2  
VERNON ISD DISCIPLINE DATA  
SCHOOL YEARS 2018–19 TO 2022–23**

GROUP	2018–19	2019–20	2020–21	2021–22	2022–23	PERCENTAGE CHANGE FROM 2018–19 TO 2022–23
Total Student Population	1,950	1,952	1,899	1,871	1,792	(8.1%)
Total Discipline Counts	1,027	717	567	594	493	(52.0%)
Percentage of Students Disciplined	18.3%	14.3%	13.1%	14.5%	12.0%	(34.4%)
Percentage of Students Suspended in School	16.6%	13.2%	11.2%	12.0%	9.2%	(44.6%)
Percentage of Students Suspended Out of School	7.1%	3.9%	3.5%	4.4%	3.6%	(49.3%)
Percentage of Students Removed to a Disciplinary Alternative Education Program	2.3%	2.2%	2.5%	3.5%	3.7%	60.9%

NOTE: In-school suspension and out-of-school suspension data do not include data for partial days.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System, Student Discipline Report, school years 2018–19 to 2022–23; Texas Education Agency, Texas Academic Performance Report, school years 2018–19 to 2022–23; Vernon ISD, October 2023.

A school district also is required to provide a disciplinary alternative education program (DAEP) that meets the educational and behavioral needs of students who have been removed from regular classes for disciplinary reasons. Vernon ISD’s DAEP is located near Vernon Middle School and the Vernon ISD Opportunity Center. At the time of the onsite visit, the district reported that the DAEP was staffed by one administrator, one part-time, certified teacher, and two paraprofessionals. The DAEP administrator also oversees the Vernon ISD Opportunity Center.

The Texas Education Agency maintains a database of school district discipline data. During school year 2022–23, Vernon ISD reported the following student discipline incidents most frequently:

- violation of the local student code of conduct;
- fighting/mutual combat; and
- controlled substances/drugs.

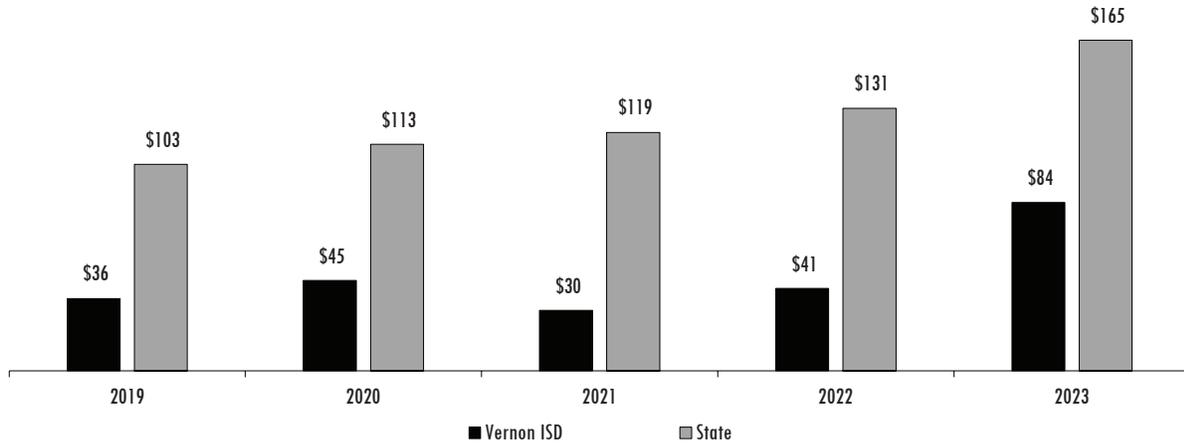
Figure 8–2 shows Vernon ISD’s discipline data from school years 2018–19 to 2022–23. During this period, Vernon ISD reported an overall decrease in discipline incidents. Although this period coincides with an 8.1 percent decrease in student enrollment, the discipline incidents decreased at a higher rate. The total number of students disciplined, including those suspended in-school and out-of-school, also decreased. The only discipline rate that increased during this period was DAEP removals. Staff did not have an explanation for this increase in DAEP removals.

Vernon ISD’s safety and security functions also are supported by the following equipment and procedures intended to protect students, staff, and facilities:

- automatically closing and locking exterior doors;
- single entry points;
- security vestibules with intruder-proof glass;
- audio-enabled cameras on the exterior of all buildings;
- door-buzzer entry systems with integrated audio and video capabilities for visitor management;
- panic alerts and streamlined digital emergency response technology available to all staff through a mobile phone application; and
- automated external defibrillators located at each campus.

From school years 2018–19 to 2022–23, Vernon ISD’s security and monitoring expenditures increased at a rate greater than total operating expenditures from all funds. During that period, total operating expenditures increased by 25.2 percent, and security and monitoring expenditures increased by 111.0 percent. Figure 8–3 shows the district’s spending on safety per student during this period compared to the statewide spending per student. Although Vernon ISD’s safety expenditures per student have doubled since school year 2018–19, they remain lower than statewide per-student safety expenditures.

**FIGURE 8-3**  
**SAFETY SPENDING PER STUDENT IN VERNON ISD AND ALL DISTRICTS STATEWIDE**  
**FISCAL YEARS 2019 TO 2023**



SOURCE: Texas Education Agency, Public Education Information Management System, Financial Data, fiscal years 2019 to 2023.

**DETAILED ACCOMPLISHMENTS**

**SECURITY PROCEDURES AND PROGRAMS**

Vernon ISD implements several safety and security procedures and programs.

The district has an active safety and security committee (SSC) that oversees the district’s emergency planning. SSC members include the assistant superintendent of operations, campus principals, teachers, parents, SROs, and county emergency services personnel in accordance with the Texas Education Code, Section 37.109(a-1). This committee coordinates safety efforts and assists with drills and exercises, school safety and security audits, policy development, and training. For example, the committee participates in the development and implementation of the district’s multihazard emergency operations plan (EOP). Staff reported that the SSC recommended adding security vestibules at every campus, which the district completed before the start of school year 2023–24.

Vernon ISD also participates in the defender program, as required by the Texas Education Code, Section 37.0814. This program authorizes district staff who have firearm licenses to complete extensive school safety and firearm training with a qualified handgun instructor. Staff also must complete federal firearm background checks, which include mental health screening. In addition, staff must be authorized by the board to carry firearms on campus. A limited group of district staff knows the program

participants’ identities, and participating staff must conceal their weapons to avoid unnecessary risks such as theft. The superintendent, the assistant superintendent of operations, and the city’s police department have a list of district staff who participate in the program.

Finally, the district partners with Crime Stoppers, an anonymous reporting service available to high school students. Crime Stoppers submit reports directly to the Vernon Police Department, which shares them with a school liaison selected by the principal.

**POSITIVE BEHAVIOR INCENTIVES**

Vernon ISD implements effective positive behavior incentives.

The district’s teachers and administrators implement several behavioral management strategies. All staff have received training in Capturing Kids Hearts, a professional development model that trains teachers and administrators to better connect and engage with their students, fostering more independent, accountable classrooms and improving academic performance. Staff reported that the district has employed this model for more than 15 years.

In addition, each campus has a program to reward its students for good behavior. Except for Vernon Middle School, each campus has implemented a program to reward students for good behavior with school-issued tokens, called Lion Bucks or Cub Cash. Students can use this

currency to purchase items such as treats and toys at the end of each week in the campus store, where prices are in Lion Buck or Cub Cash amounts. Staff stated that high school students have been motivated to earn and save Lion Bucks for prizes.

The Vernon Elementary School administration also presents classes with reward tokens called Paws Cards when a class demonstrates positive behavior, such as walking quietly in a line through the hallways. The class that earns the most Paws Cards during a given period is rewarded with a treat.

The high school and middle school campuses use positive behavior incentives, such as field trips for students with passing grades, perfect attendance, and no disciplinary actions every nine weeks. Past field trips included a movie theater trip and a picnic in the park. Occasionally, the high school and middle school randomly select students with good attendance and behavior for a treat, such as shaved ice.

Additionally, the district has made attendance a strategic priority. Campus leadership incentivizes attendance through competitions among grade levels wherein the grade with the highest attendance each week is recognized as the winner. At the end of the school year, the grade level with the most winning weeks earns a field trip to a theme park. These positive behavioral reward systems motivate students to attend school, which supports student learning and contributes to the district's attendance goals.

### **CAMPUS SAFETY**

Vernon ISD has made significant improvements to campus safety throughout the district.

During the past two school years, Vernon ISD has improved its physical security by restructuring entrances, installing new equipment, and hiring an additional SRO. Each campus now employs the following safety features in its front office:

- a single entry point;
- a camera with a two-way speaker system;
- a security vestibule inside the entrance; and
- intruder-proof glass.

Additionally, all exterior doors have been updated to close automatically and remain locked at all times. The district also purchased new visitor management software to screen and track all visitors.

The district installed new door access controls on all the campuses' frequently used exterior doors. All the doors in the district automatically close and lock, and security staff are responsible for conducting regular door checks to ensure they are functioning properly. Select doors at each campus also have magnetic locks that staff can operate using a mobile phone application.

The application also provides staff with additional safety and security programs. Vernon ISD recently integrated its emergency management software, which enables staff to perform the following functions:

- manage and track safety drills;
- initiate an evacuation or lockdown;
- connect with first responders; and
- account for students' and staff's location and status.

Vernon ISD has a policy requiring teachers to close and lock classroom doors. To support this effort, classroom doors are equipped with security locks that are mounted to the interior surface of the door and serve as an automatic locking mechanism. Vernon Elementary School, which opened one week before the review team's visit, has not finished installing these locks on all classroom doors.

Additional campus safety measures at Vernon ISD include the installation of interior and exterior cameras with audio capability at all instructional facilities. The district also increased the number of staff observing exterior doors during class changes as students walk between multiple buildings at the middle school and high school. In addition, the middle school hired an SRO during school year 2022–23.

A survey conducted by the review team of district staff, campus staff, and parents showed that campus and district staff are confident in students' safety at school. **Figure 8–4** shows survey results for three safety questions presented to the respondents. Staff reported higher agreement rates regarding student, classroom, and facility safety, and most parents who completed the survey agreed.

Staff attributed their sense of safety to the equipment and updates made across the district and the presence and response of security staff.

### **AUDIT RECOMMENDATIONS**

Vernon ISD implements recommendations identified by safety audits.

**FIGURE 8–4  
VERNON ISD STAFF AND PARENTS SAFETY AND SECURITY SURVEY RESULTS  
OCTOBER 2023**

RESPONDENTS	AGREE	DISAGREE	NO OPINION/DO NOT KNOW
<b>Students and staff feel safe and secure at school/ My child(ren) feel(s) safe and secure at school.</b>			
Campus Staff	93.1%	5.9%	1.0%
District Staff	91.7%	0.0%	8.3%
Parents	75.4%	19.7%	4.9%
<b>Classrooms are safe environments for students and teachers.</b>			
Campus Staff	94.1%	5.0%	1.0%
District Staff	95.8%	0.0%	4.2%
Parents	78.7%	14.8%	6.6%
<b>District facilities are properly secured and not easily accessible to visitors.</b>			
Campus Staff	92.2%	5.9%	2.0%
District Staff	95.9%	0.0%	4.2%
Parents	78.7%	11.5%	9.8%

NOTE: Percentages for each respondent type may not sum to 100.0 due to rounding.  
SOURCE: Legislative Budget Board School Performance Review Team Survey, October 2023.

The Texas Education Code, Section 37.108, requires school districts to conduct safety and security audits of their facilities at least once every three years and to report the results to the Texas School Safety Center (TxSSC). The assistant superintendent of operations is responsible for completing these audits. Staff stated that the district promptly implements feasible audit recommendations; other recommendations may require more time and planning. For example, the most recent audit recommended the removal of shrubbery from the front of the high school. The district removed those shrubs to enable a clear line of sight to the building. For recommendations that require significant resources, the district develops a timeline to make upgrades. An example of a long-term upgrade is facility renovations affecting multiple campuses.

**DETAILED FINDING**

**WRITTEN PROCEDURES (REC. 22)**

Vernon ISD lacks comprehensive safety and security procedures for all campuses and safety positions.

The district has a student handbook, student code of conduct, and employee handbook that provide basic safety guidelines. However, certain safety and security procedures are not captured in those documents, and some procedures are not comprehensive. For example, the EOP does not provide campus-specific guidance regarding the following areas:

- chain of command;
- staff roles and responsibilities;
- action steps for specific emergencies; and
- communication between staff and parents during emergencies.

During the past two years, Vernon ISD has opened a new campus, renovated the front offices of all other campuses, and installed new safety equipment across the district. However, the district has limited written procedures for safety and security products and processes that include these changes.

During onsite interviews, one campus produced documented campus safety procedures for the review team. These safety procedures were being updated, and most of the procedures still referenced the Shive Elementary School and Central Elementary School campuses, which no longer serve as instructional facilities.

The district also lacks comprehensive safety and security job descriptions. For example, SROs in the district are tasked with patrolling their assigned campuses, responding to calls, and completing required door checks. However, these responsibilities are not documented formally. In addition, the SRO’s contracts do not include weekly reports to the assistant superintendent of operations or participation in district safety meetings. Additionally,

SROs serve multiple campuses, which underscores the importance of documented, campus-level safety procedures. Without these safety procedures, SROs could lack important information about the campuses they serve, which could undermine their effectiveness and the safety of the campuses.

Proper documentation of safety policies and procedures is a best practice for effective school districts. Vernon ISD made certain documents available to the review team, such as evacuation maps, visitor management procedures, and elementary safety procedures. However, the district did not submit other necessary procedural documents. Without written safety procedures, staff are less likely to know or follow proper safety standards, placing the district at risk of regulatory consequences and jeopardizing the safety of students and staff.

TxSSC offers comprehensive EOP resources and school-based law enforcement training to aid districts in developing a comprehensive emergency management program. This framework provides standards for prevention and mitigation, preparedness, response, and recovery. Additionally, the Austin ISD Police Department published a comprehensive procedure manual for staff that outlines how officers are expected to respond to resistance, conduct a search and seizure, use technology, and other operations.

**Vernon ISD should develop comprehensive, documented safety and security procedures for the district.**

To implement this recommendation, the assistant superintendent of operations should collaborate with safety and security staff to develop comprehensive safety procedures. The district should identify its safety procedural deficiencies and develop those areas. In addition, the assistant superintendent of operations should collaborate with campus leadership to ensure that campus-level safety and security procedures are documented and updated.

The superintendent should present a draft of these procedures to the board, and the assistant superintendent of operations should make revisions based on the board's feedback. With superintendent approval, the procedures should be published and shared with staff through a districtwide training session. Procedures should be reviewed annually for alignment with current laws, rules, and district equipment and policies.

The district could implement this recommendation with existing resources.

**ADDITIONAL FINDING**

The Legislative Budget Board's School Performance Review Team identified an additional opportunity for the district to enhance its safety and security management functions. The review team presented this finding and the related recommendations directly to Vernon ISD leadership to preserve the confidentiality of the district's multihazard emergency operations plan.

**ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

**NURSING**

Vernon ISD should consider assessing its nurse staffing levels.

Vernon ISD employs full-time registered school nurses, who are responsible for checking immunizations, storing and distributing student medication, maintaining student medical records, and completing state-required screenings. During interviews, nurses described their work as "nonstop," "impossible," and "overwhelming." They also reported that they struggled to complete required duties without interfering with student learning.

Although state law does not require school districts to have nurses on staff, federal laws may apply as students who qualify for school health services pursuant to the federal Individuals with Disabilities Education Act or the federal Rehabilitation Act, Section 504, must have access to a qualified school nurse. The National Association of School Nurses (NASN) recommends that a registered nurse be available to all students during the full duration of the school day. NASN recommends determining school nurse staffing levels after considering the following factors:

- safety, medical acuity, and health needs of students;
- characteristics and considerations of students or populations, including individual social needs, and the infrastructure that results in inequities in social determinants of health;
- characteristics and considerations of the school nurse and other interprofessional team members; and
- context and culture of the school or school district that influences nursing services delivered.

Figure 8–5 shows the nurses assigned to Vernon ISD campuses for school year 2023–24 and their corresponding student totals. T.G. McCord Elementary School and Vernon Elementary School have nurses present for the full duration of the school day; however, Vernon Middle School, Vernon High School, and Vernon ISD Opportunity Center are served by one nurse. This staffing arrangement results in a student-to-nurse ratio for students at those campuses that is 2.7 times that of students at T.G. McCord Elementary School.

Vernon ISD should consider conducting a staffing assessment of nursing to determine whether present levels meet staff, student, and campus needs.

**SAFETY AND SECURITY COMMITTEE**

The Texas Education Code, Section 37.109(c), requires that a district’s SSC meets at least once each academic semester and once in the summer. The committee’s goal is to provide feedback and recommendations to the district regarding safety. Vernon ISD staff reported that the SSC met in July 2023, before the start of the school year, and plans to meet twice more before the end of the 2023–24 school year. The Texas Education Code, Section 37.109(d), also states that the SSC is subject to Texas Open Meetings Act (OMA) requirements and notice of a committee meeting must be posted in the same manner as notice of a board meetings. Additionally, the OMA requires the SSC to prepare and keep minutes of each open meeting and makes these minutes available for public viewing. However, due to the nature of the SSC, deliberations on the following topics may qualify as closed-meeting exceptions to OMA requirements:

- security personnel or devices, which might include deliberations about security audits;
- security infrastructure such as security assessments, resources, devices, or network security information;
- personnel, which applies to district staff and not to SROs who are contractors;
- student information, such as disciplinary actions or threat assessments; and
- consultation with an attorney.

Although the SSC has certain legally afforded confidentiality privileges, the committee should follow best practices to prepare and publish minutes of open meetings and certified agendas of closed sessions. The district should use the SSC guidelines available on the TxSSC website as a resource.

**FIGURE 8–5  
VERNON ISD NURSE ASSIGNMENTS  
SCHOOL YEAR 2023–24**

STAFF	ASSIGNED CAMPUS(ES)	STUDENT ENROLLMENT (1)
Nurse A	T.G. McCord Elementary School	337
Nurse B	Vernon Elementary School	525
Nurse C	Vernon Middle School	915
	Vernon High School	
	Vernon ISD Opportunity Center	

NOTE: At the time of the review, student enrollment data was not available for school year 2023–24; this data represents school year 2022–23.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System; Vernon ISD, October 2023.

Vernon ISD staff were not able to provide minutes or agendas of SSC meetings or written committee procedures for statutory responsibilities for review. Guidelines and procedures would facilitate compliance with district policy CK (LEGAL), which outlines the statutory responsibilities, membership, and meeting requirements of the SCC. The TxSSC and the Texas Association of School Boards (TASB) provide resources for school district SSCs, and TASB provides guidance specific to the OMA requirements.

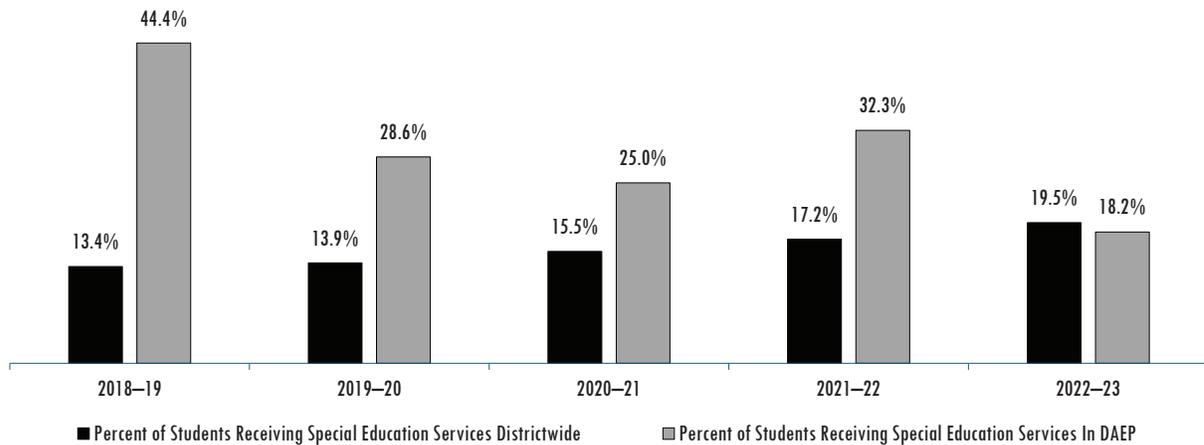
**THREAT ASSESSMENTS**

Vernon ISD has not established a threat assessment and safe and supportive school team to serve at each campus in accordance with the Texas Education Code, Section 37.115(c).

A threat assessment and safe and supportive school team conducts behavioral threat assessment, which is the process of identifying students who may present a threat to others or themselves, determining their level of risk, and making appropriate interventions. The goal of behavioral threat assessments is to intervene before the threat materializes and guide students to healthier solutions. Both Vernon Middle School and Vernon Elementary School staff report conducting behavioral threat assessments.

Vernon Middle School’s threat assessment team consists of the principal, the assistant principal, the counselor, the SRO, the nurse, a coach, and a teacher from each grade level (i.e., grades six to eight). The elementary school’s threat assessment team consists of the principal, both assistant principals, the counselor, the SRO, campus teachers and paraprofessionals,

**FIGURE 8–6**  
**VERNON ISD STUDENTS RECEIVING SPECIAL EDUCATION SERVICES DISTRICTWIDE AND IN THE DISCIPLINARY ALTERNATIVE EDUCATION PROGRAM (DAEP), SCHOOL YEARS 2018–19 TO 2022–23**



SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System District Discipline Reports, school years 2018–19 to 2022–23; Vernon ISD, October 2023.

the district’s social worker, and the assistant superintendent of operations.

Vernon High School reported that a threat assessment team has not been established. Without a threat assessment team, these assessments are not conducted, and behavioral threats may be unnoticed and unaddressed. Students who might have been deterred by such an intervention could put themselves, other students, staff, and the facilities at risk.

The assistant superintendent of operations should appoint staff to the threat assessment team at the high school. The assistant superintendent of operations also should ensure that all threat assessment teams comply with Board Policy FFB (LEGAL) and (LOCAL) regarding team duties, responsibilities, training, and reporting. Vernon ISD should use the model policies and procedures on school behavioral threat assessment developed by the TxSSC and available on their website as a resource.

**DISCIPLINARY ALTERNATIVE EDUCATION PROGRAM**

Vernon ISD’s DAEP has made progress in data collection practices. However, the district currently lacks a process to systemically evaluate the DAEP and its current data collection systems.

The purpose of a DAEP is to provide a temporary placement for students with behavioral management issues, often as an alternative to suspension or expulsion. The goal for students who receive a DAEP placement is to

succeed academically and behaviorally upon returning to their regularly assigned classrooms.

During interviews, staff reported that the DAEP began implementing new behavioral management structures and data reporting systems under its new leadership. For example, a monthly report identifies DAEP students, including grade level, race and ethnicity, and discipline data. However, the district does not use this report for planning, setting goals, identifying disproportionalities, or examining root causes.

Vernon ISD’s school year 2022–23 disciplinary outcomes indicate proportional representation of students with disabilities in the DAEP. However, during school year 2021–22, students receiving special education services appeared to be overrepresented in the DAEP population, as 32.3 percent of students removed to DAEP qualified for special education services, while they accounted for 17.2 percent of the total student population that school year. The district’s historical DAEP data also indicates special education students have been overrepresented in DAEP placements. **Figure 8–6** shows the percentage of students receiving special education services in the district and the percentage of those removed to the DAEP for school years 2018–19 to 2022–23. Districts are required to monitor and report discipline data annually, however, staff reported that they were unaware of any trends in overrepresentation.

An evaluation of the DAEP would help Vernon ISD leadership to identify referral trends to explore policies or

practices that unintentionally may reinforce any disproportionality in referrals so that they may address discrepancies. An evaluation also could reveal any policy or procedure changes that may have contributed to the district's more equitable DAEP representation in school year 2022–23.

Program evaluation provides actionable information regarding district programs, enables the district to monitor and adjust programs as they are implemented, and helps district and campus administrators make evidence-based decisions about which programs work for students and which do not. A 2009 report by the Intercultural Development Research Association titled *Disciplinary Alternative Education Programs in Texas* encourages districts to establish local procedures to monitor the DAEP to maintain equitable disciplinary practices and other improvements through annual performance evaluations. By regularly tracking data and evaluating their programs, districts can make decisions about the effectiveness of their programs and save vital resources by performing ongoing evaluations.

The superintendent should collaborate with the administrator of the DAEP to set long-term, data-driven goals for the DAEP and evaluate the program annually based on these goals. The administrator of the DAEP should continue to track student data in addition to any new data that may support the program's goal.

Several resources are available to help staff develop and track discipline goals. The Regional Education Laboratory Northwest developed a training guide in calendar year 2019 for using data to promote equity in school discipline to help schools find areas for improvement in their disciplinary data and track the progress of implemented interventions.

## **FISCAL IMPACT**

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

The Legislative Budget Board's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

## 9. INFORMATION TECHNOLOGY MANAGEMENT

### ACCOMPLISHMENT

- ◆ Vernon ISD provides effective instructional technology support for its teaching staff.

### FINDINGS

- ◆ Vernon ISD does not have an efficient long-range planning process for technology.
- ◆ Vernon ISD’s Technology Department does not have formal written procedures for technology staff.

### RECOMMENDATIONS

- ◆ **Recommendation 23: Develop a long-range technology plan and establish a process to review and update the plan annually.**
- ◆ **Recommendation 24: Develop a standard operating procedures manual for the Technology Department, including all technology staff positions.**

### BACKGROUND

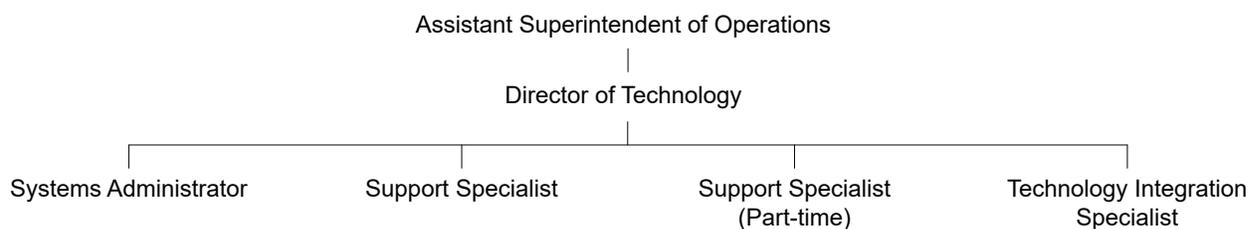
An independent school district’s technology management and planning functions provide an essential foundation for the digital learning opportunities of all students and educators. One of the stated objectives of public education in the Texas Education Code, Chapter 4, is for campuses to implement and use technology to increase the effectiveness of student learning, instructional management, staff development, and administration. Districts must strategically plan for and efficiently manage technology resources to keep pace with innovations in technology.

An independent school district’s technology department manages its hardware, software, and network systems. A district’s technology management often varies based on its size and structure. Larger districts often allocate staff to oversee specific hardware, software, or network functions, and smaller districts assign staff to manage a range of technology functions.

Vernon Independent School District’s (ISD) Technology Department is responsible for managing the district’s technology resources, including installing, maintaining, and tracking technology devices throughout the district. The district’s technology devices include staff and student laptop computers, printers, security cameras, keyless door access points, and wireless Internet equipment. Additionally, the department trains teachers to use supplemental technology devices and establishes student accounts on the district’s single-sign-on application, which connects to most of the district’s instructional software programs.

Figure 9–1 shows the organization of Vernon ISD’s Technology Department, which consists of four full-time staff: the director of technology, the systems administrator, the support specialist, and the technology integration specialist. The department also has a part-time support specialist. All Technology Department staff report to the director of technology, who reports to the assistant superintendent of operations. The technology integration specialist is also the district testing coordinator and reports directly to the assistant superintendent of operations for that role. Technology staff are officed at different campuses but assist at any campus as needed. Some technology staff do not have a designated campus and divide their work hours among campuses.

**FIGURE 9–1**  
**VERNON ISD’S TECHNOLOGY DEPARTMENT ORGANIZATION, SCHOOL YEAR 2023–24**



NOTE: The technology integration specialist is also the district testing coordinator.

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

**FIGURE 9–2**  
**VERNON ISD AND PEER DISTRICT TECHNOLOGY STAFF COMPARISON**  
**SCHOOL YEAR 2023–24**

DISTRICT	TECHNOLOGY STAFF	STUDENT ENROLLMENT (1)	STUDENTS-TO-TECHNOLOGY STAFF RATIO	TOTAL DISTRICT STAFF (1)	TOTAL STAFF-TO-TECHNOLOGY STAFF RATIO
Bowie ISD	3	1,644	548.0	266.8	88.9
City View ISD	4	1,133	283.3	181.9	45.5
Graham ISD	4 (2)	2,261	565.3	335.8	84.0
Sweetwater ISD	5	1,942	388.4	386.7	77.3
<b>Vernon ISD</b>	<b>4.5 (3)</b>	<b>1,792</b>	<b>398.2</b>	<b>300.5</b>	<b>66.8</b>

NOTES:  
 (1) Technology staff data is from school year 2023–24. However, the most recent student enrollment and total staff data available at the time of the review was from school year 2022–23.  
 (2) One of Graham ISD’s technology staff is also the district testing coordinator.  
 (3) One of Vernon ISD’s technology staff is also the district testing coordinator.  
 SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Texas Academic Performance Reports, school year 2022–23; Vernon ISD; Bowie ISD; City View ISD; Graham ISD; Sweetwater ISD, October 2023.

The Legislative Budget Board’s (LBB) School Performance Review Team visited the district in October 2023. During interviews, staff reported that the Technology Department has a low turnover rate. The most recent hire is the part-time support specialist who returned to work at the district in a new role after retiring from Vernon ISD at the end of school year 2022–23. The director of technology has been employed with the district for a year and a half and was hired after the former director of technology was promoted to assistant superintendent of operations. The three remaining technology staff have been employed with the district for periods ranging from six years to 24 years.

Vernon ISD’s Technology Department is of similar size to departments in its peer districts. Peer districts are districts similar in size and other characteristics to Vernon ISD that are used for comparison purposes. For this review, the peer districts include Bowie ISD, City View ISD, Graham ISD, and Sweetwater ISD. **Figure 9–2** shows staffing in Vernon ISD’s Technology Department compared to its peer districts. Vernon ISD’s ratio of students to technology staff is average among its peers; however, its ratio of district staff to technology staff is lower than three of its peers.

Vernon ISD is a one-to-one district, in which every student is assigned a laptop computer for daily use. High school students are allowed to take their devices home. District data identified 1,917 student devices, and the majority were purchased in July 2020. During school year 2022–23, Vernon ISD enrollment totaled 1,792 students. As a best practice, districts should keep 5.0 percent to 10.0 percent

more devices than will be used by students; Vernon ISD maintains about 7.0 percent more student devices.

During school year 2023–24, Vernon ISD’s technology inventory increased as it was the first year in which every teacher had interactive boards in their classrooms. Staff said that the number of devices the district has is sufficient to meet its needs. Additionally, when planning for future device purchases, the district evaluates device specifications to ensure purchased devices meet the district’s needs and are compatible with the existing infrastructure. Staff reported that the director of technology also verifies that the district has the required licenses and that requested purchases do not violate any contracts the district may have with other companies.

Staff report technology issues to the Technology Department through a Google form available on the district’s website. The form prompts staff to provide their name, date, location, contact information, description of their technology issue, and its priority level. Staff said that the data from the form synchronizes with a free work-management application the district uses to generate help-desk tickets. All technology staff have the application installed on their mobile phones and receive notifications when new tickets are submitted. Tickets are grouped by campus and assigned to the technology staff officed at that campus; however, individual tickets can be assigned to other staff depending on the issue and the staff’s expertise.

Technology staff enter progress notes in the work-management application if the ticket takes longer than

**FIGURE 9–3  
VERNON ISD HELP-DESK TICKET SUBMISSIONS  
SCHOOL YEARS 2020–21 TO 2022–23**

YEAR	ANNUAL TICKETS	AVERAGE MONTHLY TICKETS	AUGUST AND SEPTEMBER TICKETS	AUGUST AND SEPTEMBER TICKETS AS A PERCENTAGE OF ANNUAL TICKETS
2020–21	802	66.8	410	51.1%
2021–22	971	80.9	365	37.6%
2022–23	912	76.0	327	35.9%
<b>Total</b>	<b>2,685</b>	<b>74.6</b>	<b>1,102</b>	<b>41.0%</b>

SOURCES: Legislative Budget Board School Performance Review Team; Vernon ISD, October 2023.

expected, such as when a new part needs to be ordered. Staff reported that the time to complete the work for a ticket can range from a few hours to several days, depending on the issue. The work-management application does not enable technology staff to analyze data on closed tickets. However, staff reported that the district uses the submitted ticket data to identify devices with persistent issues. **Figure 9–3** shows the number of tickets submitted to the Technology Department from school years 2020–21 to 2022–23. Staff reported that more tickets are submitted at the beginning of the school year, which is supported by help-desk ticket request data. The most recent data provided by the district shows that the Technology Department received 288 help-desk tickets from August 1 to September 11, 2023.

During the review team’s interviews, several staff said that the technology staff are responsive to help-desk tickets. Additionally, the review team’s survey of staff shows that 90.9 percent of district staff and 88.0 percent of campus staff agreed with the statement, “Help desk tickets are resolved effectively and in a timely manner.”

The Technology Department spends its budget on staffing, network infrastructure, license renewals, devices, and repair parts. The department also contracts with a regional Education Service Center XII (Region 12) consultant who manages the district’s E-rate bidding process and communicates with vendors. Although campus devices are purchased primarily through the Technology Department’s budget, campuses can purchase additional technology devices as needed from their budgets. Principals evaluate additional purchase requests and submit them to the director of technology describing the devices needed and their purpose. The director of technology must approve the purchases.

## DETAILED ACCOMPLISHMENT

### INSTRUCTIONAL TECHNOLOGY

Vernon ISD provides effective instructional technology support for its teaching staff.

The district’s technology integration specialist trains teachers to use technology in their classrooms. During school year 2022–23, Vernon ISD employed 123.7 full-time-equivalent teachers. The technology integration specialist is officed at the high school campus, but staff reported that the specialist visits a different campus each day to support all teachers in the district.

The technology integration specialist provides several teacher professional development sessions throughout the school year and summer trainings for new programs or course updates on specific topics. Staff reported that the summer trainings count toward teachers’ professional development requirements and that teachers appreciate the convenience of being able to complete their required training in the district. Additionally, staff can request individual meetings as needed. After each training course, attendees are asked to provide feedback, which the technology integration specialist uses to improve the trainings and identify new topics for future trainings. The review team’s survey of staff shows that 90.9 percent of district staff and 91.0 percent of campus staff agreed with the statement, “Adequate training on technology devices and/or applications is available to me.”

The technology integration specialist also provides staff support by maintaining a webpage dedicated to answering common technology questions, including step-by-step videos to guide all staff in using the district’s administrative and educational applications. The technology integration specialist also sends staff a technology newsletter, *Tech Tuesday*, twice a month, with informative tips and upcoming professional development opportunities. During interviews, staff reported that the newsletter is valuable.

## DETAILED FINDINGS

### LONG-RANGE PLAN (REC. 23)

Vernon ISD does not have an efficient long-range planning process for technology.

Although staff reported that a long-range technology plan is in development, the district had not yet finalized the plan at the time of the onsite visit. Additionally, the district has a device-replacement plan in which student and staff devices are replaced every five years, and each year the district purchases new laptop computers for a different campus. Devices that serve the district's network are upgraded every seven years. However, it is unclear whether or how the Business Office has incorporated the replacement plan into the Technology Department's long-term budget-planning process.

At the beginning of school year 2023–24, Vernon ISD served students at five campuses. However, in October 2023, Vernon ISD consolidated two of its elementary school facilities, and students began attending the new Vernon Elementary School campus. Staff reported that the device-replacement plan will be updated to account for the consolidation of the elementary schools.

Vernon ISD's lack of long-range technology planning also is evident in the district's sole long-term goal of hiring additional technology staff, which staff reported to the review team without providing a timeline for meeting this goal. The assistant superintendent of operations is responsible for evaluating the Technology Department based on measures, according to staff, that include help-desk ticket response time and technology staff's ability to provide effective service. However, Vernon ISD has set no annual or multiyear goals for the Technology Department.

Vernon ISD also does not have a technology advisory committee, which gathers input from stakeholders and focuses on the district's technology needs. Committee members typically include district and campus leadership staff, teachers, parents, and community stakeholders. Although a committee is not required by law, a technology advisory committee enables stakeholders from different academic and professional backgrounds to support district technology goals.

A well-written and well-implemented technology plan provides a framework for effective decision making. An effective plan addresses the district's technology objectives for the upcoming years and outlines a coordinated strategy to

reach these goals. Without long-range technology planning, the district cannot evaluate the Technology Department effectively, track its progress in meeting departmental goals, or evaluate whether the district is meeting the technology needs of students and staff.

As a best practice, long-range technology plans should include the following components:

- mission and vision statements;
- needs assessment findings;
- goals and objectives;
- steps or strategies to meet goals and objectives;
- staff responsible for meeting goals and objectives;
- timeline;
- funding sources; and
- success measures.

The Texas Education Code, Section 32.001, requires the State Board of Education to develop technology goals that guide school districts in their long-range technology planning. These goals are outlined in the Texas Education Agency's Revised and Extended Long-Range Plan for Technology (LRPT), 2022, and include the following strategic goals for school district technology:

- a personalized, flexible, empowered learning environment, which supports data-driven instruction and virtual learning;
- equitable access to technology, such as one-to-one device initiatives and Internet connectivity for all students;
- digital citizenship, which includes Internet literacy and online safety;
- safety and security, which addresses cybersecurity and data management;
- collaborative leadership, which includes stakeholder engagement, planning, and budgeting; and
- reliable infrastructure, which includes technology systems, operations, maintenance, and support.

The LRPT provides districts with the guidance and informational resources to develop long-range technology plans that meet their unique needs. In addition to the six

strategic goals, the LRPT details 18 focus areas that represent trends and priorities in education.

In addition, the National Center for Education Statistics provides resources for performing a technology needs assessment that can help districts determine their technology goals and guide the development of the long-range technology plan.

Granbury ISD has a long-range technology plan that it updates annually based on progress measures and changes in its needs assessment. The plan includes the best practice components, and the district's technology director presents the plan for the upcoming school year to the Granbury ISD Board of Trustees at the December board meeting.

**Vernon ISD should develop a long-range technology plan and establish a process to review and update the plan annually.**

The director of technology should perform the following activities:

- collaborate with technology staff and the assistant superintendent of operations to develop an initial technology needs assessment for the district, with subsequent assessments conducted at least every two years thereafter;
- present the results of the needs assessment to the superintendent, the assistant superintendent of operations, and the chief financial officer, and collaborate with these staff and the technology integration specialist to develop measurable goals for the Technology Department, which should include annual goals and goals for three years to five years; and
- develop a long-range technology plan based on the identified goals.

The assistant superintendent of operations should review and approve the plan, and the superintendent should present the plan to the Vernon ISD Board of Trustees for approval.

The director of technology and the assistant superintendent of operations should meet annually to determine progress in meeting goals and adjust these goals based on district needs.

Furthermore, the superintendent should consider establishing a technology advisory committee consisting of Technology Department staff, administrative staff, teachers, parents, and community representatives. The committee could support

the development of the long-range technology plan by addressing and incorporating the ideas and concerns of staff and external stakeholders.

The district could implement this recommendation with existing resources.

**STANDARD OPERATING PROCEDURES MANUAL (REC. 24)**

Vernon ISD's Technology Department does not have formal written procedures for technology staff.

Technology Department staff reported that new staff receive on-the-job training by observing the work of current staff. The department relies on staff's knowledge and experience to troubleshoot technology problems in the district. Although the department has procedures for certain general technology tasks, it lacks comprehensive procedures for all tasks and for specific staff positions. Staff said that the Technology Department has a list of some tasks that occur throughout the school year, such as initiating new teacher accounts and installing classroom phones, but the department lacks a formalized list that includes all tasks performed by department staff.

Although the Technology Department has had low turnover in recent years, it is at risk of losing institutional knowledge if any staff were to leave the district. Staff said that technology staff are proficient in various aspects of the Technology Department's functions and needs, and that replacing experienced staff would be a challenge. Effective school districts maintain comprehensive, documented operating procedures, which help districts develop work standards, promote consistency, and implement overall operational efficiency. Additionally, detailed written procedures preserve institutional knowledge during staff absences or departures from the district. Documented procedures also serve as a reference for veteran staff, particularly for tasks performed seasonally or annually, such as shutting down the network or updating servers.

Standard operating procedures (SOP) are written documents containing step-by-step instructions for specific tasks. An SOP details who is responsible for a task and helps ensure that the organization's operations comply with industry best practices. SOPs help staff follow the correct methods for completing the organization's most essential tasks.

**Vernon ISD should develop an SOP manual for the Technology Department, including all technology staff positions.**

The director of technology should perform the following activities:

- collaborate with technology staff to identify the responsibilities for each position, using staffs' job descriptions as a guide, and determine annual and seasonal tasks that multiple staff perform;
- develop an SOP for annual and seasonal tasks;
- assign technology staff to develop an SOP for each position;
- develop a timeline for staff completion of their SOPs and review them for accuracy and alignment with job descriptions;
- combine the technology SOPs into one manual for all Technology Department functions;
- make the SOP manual readily accessible to all technology staff, either physically or electronically; and
- require technology staff to review and update their SOPs as tasks and job descriptions are updated.

The district could implement this recommendation with existing resources.

### **ADDITIONAL OBSERVATIONS**

During the onsite visit, the review team observed additional issues regarding the district's programs and services to students, staff, and the community. These observations are presented for consideration as the district implements the report's other findings and recommendations.

#### **TECHNOLOGY DEPARTMENT STAFFING**

Vernon ISD does not use an effective process to staff the Technology Department. During interviews, staff reported that the district does not use a staffing formula to determine the number of staff needed to support the district's technology needs. For example, in October 2023, the district rehired a retiree to fill a newly created part-time position. Although several staff said that the Technology Department is staffed adequately, data shows that the district has 2,767 computers, laptops, and tablets, which equates to about 615 devices per technology staff. This total does not include additional devices that the technology staff supports, such as printers, interactive boards, and equipment needed to maintain a reliable Internet connection. Staff reported concerns that the amount of technology in the district may exceed the

Technology Department's staffing level and its ability to address help-desk tickets.

Staff also reported that the Technology Department does not use help-desk ticket data as a metric to determine staffing needs. The district's work-management application does not provide data regarding the time required for the Technology Department to close out help-desk tickets and the number of tickets per campus. Additionally, two campuses have dedicated technology staff, which means that the other two campuses may have to wait longer for assistance if staff are not available.

Vernon ISD should consider developing a staffing formula for the Technology Department based on the number of devices the department services, the number of campuses the district has, and help-desk ticket data. The director of technology should evaluate whether to replace the district's current work-management application, which is free, with a dedicated help-desk system that could provide the department with additional data to develop an adequate staffing formula.

#### **DISTRICT WEBSITE**

Vernon ISD posts inconsistent and duplicate information on its website. The public information officer is responsible for developing webpages, updating the image galleries, posting news releases, and maintaining the directories. Although the public information officer checks the website quarterly for duplicate and outdated information, the review team found several instances of such postings, including the following examples:

- duplicate links for the district directory with different titles, such as "district directory" and "district staff directory";
- inconsistent job titles for some staff; for example, the "director of technology" is listed on the Technology Department webpage, but directories list the position as "district technology coordinator"; and
- resources found on the documents webpage are not consistent with the same resources linked in the menu bar.

To ensure that information is available and consistent throughout the website, Vernon ISD should consider asking a parent volunteer or support staff to navigate the website and identify any issues. The public information officer should review the issues and address them as needed.

**FISCAL IMPACT**

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The LBB's School Performance Review Team did not assume a fiscal impact for the recommendations in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

