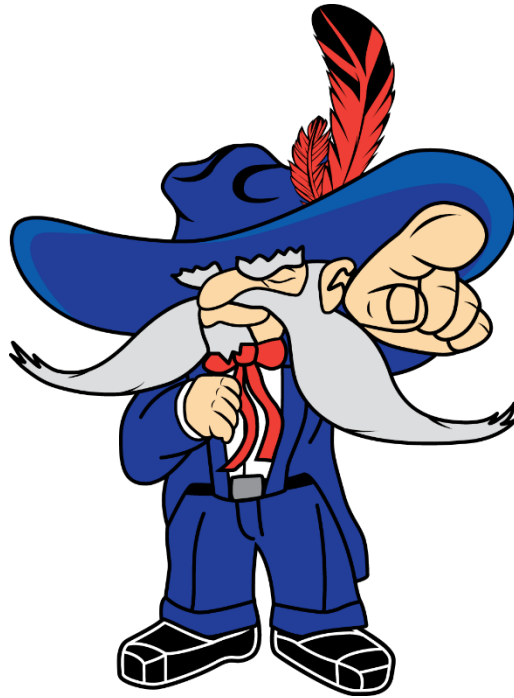


*Oklahoma*

**School Performance Review**

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Silo Public Schools

**Office of Educational Quality & Accountability**

May 2019





OFFICE OF EDUCATIONAL  
QUALITY & ACCOUNTABILITY

May, 2019

Fellow Oklahomans:

The Office of Educational Quality & Accountability is pleased to present the Silo Public Schools Performance Review upon the request of Silo Public Schools (SPS).

Silo Public Schools (SPS) has a number of commendable programs and enjoys support from district residents; however, it is faced with some challenges. The review contains recommendations to help SPS meet those challenges and improve the efficiency of their operations. The review also highlights a number of “Commendable Practices” in programs, operations, and services provided by the administration, teachers, and staff.

We are grateful for the cooperation of SPS board, administration, staff, parents, and students for their input into this review. The administration and staff are also to be commended for their dedication toward improving educational opportunities for all students.

We are pleased to announce that this review is available in hardcopy through the Office of Educational Quality & Accountability and on the office’s web site at [www.oeqa.ok.gov](http://www.oeqa.ok.gov)

Respectfully yours,

Dr. Daniel Craig  
Executive Director





# Oklahoma School Performance Review

## Silo Public Schools

May 2019



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Office of Educational Quality and Accountability

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The Office of Educational Quality and Accountability supports high level student performance by ensuring quality evidence based educator preparation, improving P20 school efficiency and effectiveness, and providing comprehensive statistical information for all stakeholders.



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## *Executive Summary*

The Oklahoma School Performance Review (OSPR) Program was authorized by the Oklahoma Legislature during the 2001 session, amended during the 2005 session, and amended again during the 2012 session. The responsibility to conduct school performance reviews was originally assigned to the Office of Accountability, which is now the Office of Educational Quality and Accountability. The purpose of a performance review is to develop findings, commendations, and recommendations regarding (1) containing costs; (2) improving management strategies; and (3) promoting better education for Oklahoma children.

The Office of Educational Quality and Accountability began the performance review of Silo Public Schools (SPS) in August 2018. The Office of Educational Quality and Accountability contracted with Prismatic Services to assist with the review. The Prismatic consulting team conducted individual and small group interviews with district personnel. The team also reviewed operations by touring facilities, observing cafeteria operations, and riding school bus routes. Administrators, teachers, support staff, parents, and high school students completed confidential surveys. The consulting team tabulated the surveys and used the results in this review. Survey results are contained in **Appendices A** through **D**.

For comparison purposes, the Office of Educational Quality and Accountability selected five Oklahoma school districts as peer districts based upon size, geography, and demographics. They are: Caney Valley, Newkirk, Wilburton, Tishomingo, and Hennessey. These districts are called peer districts throughout this report.

For further comparison, a Community Group average is also used throughout the report. SPS falls into community group F2, which includes districts with an Average Daily Membership (ADM) of between 500-999 students. The “2” indicates that the percentage of SPS students eligible to receive free or reduced price meals is above the state average.

During this review, 72 recommendations were developed; they were designed to improve operations and support increased academic performance. In some cases, these recommendations should result in a net savings to the district, in some cases a net cost, and in some cases they should have no fiscal impact but should improve district efficiency or effectiveness. A detailed list of costs and savings by recommendation appears in **Exhibit 5**.

### **ACKNOWLEDGMENTS**

The Office of Educational Quality and Accountability and Prismatic wish to express their appreciation to the Board of Education of; Silo Public Schools, its Superintendent, Ms. Kate McDonald, its principals, Ms. Katie Brister, Mr. Mike Lawless, and Mr. Jeremy Atwood, and the many district employees, students, parents, and community residents who supported and provided input for this review.

### **SILO PUBLIC SCHOOLS**

Located near Durant in south central Bryan County, Oklahoma, Silo covers 121 square miles. SPS operates one campus that serves approximately 900 students from Pre-K through 12<sup>th</sup> grade.

In 2016-17, the fall enrollment in SPS was 903, mostly Caucasian and Native American (**Exhibit 1**). Of all students enrolled at SPS, more than half were approved for free or reduced-price meals.

**Exhibit 1**  
**SPS Student Enrollment and Socioeconomic Characteristics, 2016-17**

School	Grade Span	Fall Enrollment	Caucasian	Black	Asian	Hispanic	Native American	Two or More Races	Eligible for Free or Reduced-Price Meals
Silo Elementary School	EC-5	489	59.1%	0.0%	0.4%	5.3%	28.0%	7.2%	75.7%
Silo Middle School	6-8	179	67.0%	0.6%	0.0%	1.7%	19.6%	11.2%	70.4%
Silo High School	9-12	235	55.7%	0.0%	0.9%	4.3%	27.2%	11.9%	68.1%

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2** shows demographic changes over the last five years in SPS. Over that time period, the average assessed property valuation per student increased by 16.5 percent and eligibility for free and reduced-price meals decreased by 5.2 percent.

**Exhibit 2**  
**SPS Change in Demographics from 2012-13 to 2016-17**

School Year	ADM	Ethnic Group					Average Assessed Property Valuation per Student	Eligible for Free or Reduced-Price Meals
		Caucasian	Black	Asian	Hispanic	Native American		
2012-13	843	60.0%	0.0%	0.0%	5.0%	34.0%	\$47,538	76.7%
2013-14	825	65.0%	0.0%	0.0%	5.0%	29.0%	\$52,659	76.3%
2014-15	863	66.0%	2.0%	0.0%	4.0%	28.0%	\$55,477	76.0%
2015-16	871	67.0%	1.0%	0.0%	4.0%	28.0%	\$57,168	72.0%
2016-17	898	59.8%	0.1%	0.4%	4.3%	26.1%	\$55,368	72.7%
<b>Change</b>	<b>6.5%▲</b>						<b>16.5%▲</b>	<b>(5.2%)▼</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 3** compares SPS' demographics with its peers, the community group, and the state for 2016-17. SPS had demographics similar to those of most of its peers, with the second highest Caucasian and third lowest Native American percentage. The assessed property valuation in SPS

was the highest of all of its peers, the community group, and the state. SPS' percentage of students eligible for free or reduced-price meals was in the middle of its peers.

**Exhibit 3**  
**Demographics of SPS, Peer Districts, and State, 2016-17**

Entity	ADM	Ethnic Group					Average Assessed Property Valuation per Student	Eligible for Free or Reduced-Price Meals
		Caucasian	Black	Asian	Hispanic	Native American		
<b>Silo</b>	<b>898</b>	<b>59.8%</b>	<b>0.1%</b>	<b>0.4%</b>	<b>4.3%</b>	<b>26.1%</b>	<b>\$55,368</b>	<b>72.7%</b>
Caney Valley	812	53.5%	0.5%	1.4%	4.6%	28.6%	\$40,491	62.8%
Newkirk	833	68.8%	1.0%	0.2%	3.2%	26.6%	\$47,709	66.1%
Wilburton	837	54.7%	1.8%	0.7%	5.7%	34.3%	\$31,684	68.2%
Tishomingo	942	52.7%	1.5%	0.7%	6.3%	24.9%	\$30,946	77.1%
Hennessey	905	53.9%	1.0%	0.0%	41.2%	3.2%	\$48,752	86.6%
<b>Community Group</b>	<b>697</b>	<b>50.2%</b>	<b>3.8%</b>	<b>0.5%</b>	<b>8.1%</b>	<b>30.4%</b>	<b>\$37,679</b>	<b>74.8%</b>
<b>State</b>	<b>1,267</b>	<b>49.4%</b>	<b>8.8%</b>	<b>2.3%</b>	<b>16.8%</b>	<b>13.9%</b>	<b>\$49,471</b>	<b>62.7%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

The data in **Exhibit 4** reflect ADM trends compared to the peers, community group and state. SPS had the second-highest ADM increase among its peers and has increased more than the state and community.

**Exhibit 4**  
**Silo, Peer Districts, and State Student ADM Trends, 2012-13 to 2016-17**

Entity	ADM					Percent Change
	2012-13	2013-14	2014-15	2015-16	2016-17	
<b>Silo</b>	<b>842.9</b>	<b>825.3</b>	<b>863.2</b>	<b>870.8</b>	<b>898.0</b>	<b>6.5%▲</b>
Caney Valley	768.3	756.6	770.3	789.5	812.0	5.7%▲
Newkirk	841.9	848.5	858.7	846.9	833.0	(1.1%)▼
Wilburton	897.3	893.4	910.7	891.4	837.0	(6.7%)▼
Tishomingo	969.8	969.4	981.2	947.4	942.0	(2.9%)▼
Hennessey	840.5	884.1	909.2	913.7	905.0	7.7%▲
<b>Community Group</b>	<b>704.5</b>	<b>708.8</b>	<b>720.5</b>	<b>708.5</b>	<b>697.0</b>	<b>(1.1%)▼</b>
<b>State</b>	<b>1,271.1</b>	<b>1,292.2</b>	<b>1,299.4</b>	<b>1,305.4</b>	<b>1,267.0</b>	<b>(0.3%)▼</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

## COMMENDATIONS

The Office of Educational Quality and Accountability identified “exemplary” or “best practices” in Silo Public Schools that led to 28 separate commendations. The Office of Educational Quality

and Accountability recommends that other school districts throughout Oklahoma examine these exemplary programs and services to see if they could be adapted to meet their local needs. The commendations are listed below and explained in detail in each chapter.

### **Chapter 1: MANAGEMENT, PERSONNEL, AND COMMUNICATIONS**

The superintendent and board of education are commended for the positive progress that is being realized by SPS and for establishing an atmosphere of trust and cohesiveness.

The school board and superintendent are commended for the efficient organization reflected in board of education meetings.

The school board is commended for establishing goals for the district by guiding the superintendent through a collaborative evaluation process.

The SPS board of education and superintendent are commended for effective policy review and publication practices.

The practices established by the SPS board of education and superintendent result in an effective board of education.

The superintendent is commended for being accessible to district staff and gaining the trust and confidence of staff and the community.

The principals are commended for maintaining a personal relationship approach to students, teachers, and staff despite the challenges of the role in a growing school district.

The board of education and superintendent are commended for having cost effective administrative services.

The district is commended for using the TLE model for providing teacher evaluations.

The school district is commended for using many opportunities and a variety of technologies to tell the district story and to inform the community.

### **Chapter 2: INSTRUCTIONAL DELIVERY SYSTEM**

The district is commended for adopting a consistent math series for Pre-K through 5th grade to support growth in student achievement.

The district is commended for offering a course taught by the Choctaw Tribe.

The district is commended for employing a full-time counselor.

### **Chapter 3: BUSINESS OPERATIONS**

SPS is commended for actively applying for competitive state and federal grants.



SPS is commended for using a time clock for hourly employees to clock in and out.

SPS is commended for having proper segregation of duties for collection of activity funds.

The superintendent and treasurer are commended for providing the school board a listing of all purchase orders for approval and a listing of checks for review monthly.

#### **Chapter 4: FACILITIES USE AND MANAGEMENT**

SPS is commended for developing a strong relationship with a responsive architectural firm.

SPS is commended for its efforts to increase safety and security in the district.

#### **Chapter 5: SUPPORT SERVICES**

SPS has participation rates in the breakfast program that are higher than industry best practices. Offering breakfast at no cost as well as serving it after the first period has contributed to the high rates.

The district has a thorough process to monitor the invoicing of its FSMC contract.

SPS enhances parent and community communication by using a variety of technology tools.

SPS is commended for providing a website that allows parents to remotely check grades and administration to communicate with staff, students, and parents.

SPS is commended for offering online course enrollment for students in grades K-12.

SPS is commended for using a consulting firm to assist with E-rate funding requests and documentation.

The transportation department is commended for supporting the safety of students riding the buses and adhering to the standard practices in discipline.

SPS is commended for allowing bus drivers to pre-drive each bus route for safety and accuracy.

SPS is commended for providing a facility for the transportation and maintenance department to provide upkeep for the districts buses, vehicles, and equipment.

#### **RECOMMENDATIONS AND PROJECTED COSTS AND SAVINGS**

A list of recommendations with their associated costs or savings is provided in **Exhibit 5**. In each chapter, implementation strategies and the estimates of fiscal impact follow each recommendation in this report. The implementation section associated with each recommendation highlights the actions necessary to achieve the proposed results. Many of the recommendations have no costs or savings associated with them, but are designed to formalize, improve, and streamline operations. In some cases, the consulting team has made

recommendations that will likely generate savings for the district, but in an effort to be conservative, no specific savings were estimated.

It must be understood that not all of the recommendations can be started at one time. The consulting team did not want to place priorities by indicating which recommendations should be implemented immediately and which ones implemented later. It will be up to the district to decide which ones to implement and the timelines for beginning implementation.

The Office of Educational Quality and Accountability recommends that the Silo Board of Education ask district administrators to review the recommendations, develop an implementation plan, and monitor its progress.

**Exhibit 5  
Summary of Costs and Savings by Recommendation**

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2019-20	2020-21	2021-22	2022-23	2023-24	
<b>Chapter 1</b>	<b>Management, Personnel, and Communications</b>						
1	Review teacher evaluation and student management loads at each school site and consider adding a full-time assistant principal for the opening of the new elementary classrooms.	(\$55,000)	(\$55,000)	(\$55,000)	(\$55,000)	(\$55,000)	(\$220,000)
2	Add an elementary counselor when the new elementary classrooms are opened.	(\$45,000)	(\$45,000)	(\$45,000)	(\$45,000)	(\$45,000)	(\$225,000)
3	Research and adopt an in-house student detention program for secondary schools that is more effective.						\$0
4	Develop an ongoing study group that meets periodically and reviews student disciplinary activities, discusses consequences levied, and generally coordinates the district's policy implementation.						\$
5	Use the results of this study to engage all stakeholders in a strategic planning process.	(\$5,000)	(\$5,000)	(\$5,000)	\$0	\$0	(\$15,000)
6	Contract for a detailed demographic analysis of student growth.	(\$6,000)	\$0	\$0	\$0	\$0	(\$6,000)
7	Used a sign-in sheet to track those having access to the personnel file.						\$0
8	Develop and implement an evaluation system for support staff.						\$0
9	Charge the professional development committee to develop a clearly articulated multi-year plan.						\$0
10	Develop strategies for improving the availability of substitute teachers.						\$0
11	Develop a strategy for increasing parent conference attendance or participation.						\$0
12	Study and develop a systematic volunteer program for SPS.						\$0
	<b>Subtotal</b>	<b>(\$111,000)</b>	<b>(\$105,000)</b>	<b>(\$105,000)</b>	<b>(\$100,000)</b>	<b>(\$100,000)</b>	<b>(\$521,000)</b>
<b>Chapter 2</b>	<b>Instructional Delivery System</b>						
13	Develop and implement a plan to annually evaluate instructional resources, software, enrichment, and remediation resources.	(\$10,000)	(\$10,000)	(\$10,000)	(\$10,000)	(\$10,000)	(\$50,000)

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2019-20	2020-21	2021-22	2022-23	2023-24	
14	Develop and implement district-wide processes and procedures for administering criterion-referenced benchmark assessments to monitor progress and ensure mastery of OAS.						\$0
15	Develop and implement district-wide processes and procedures to vertically align and pace the core curriculum from Pre-K through 12th grade.	(\$1,500)	(\$1,500)	\$0	\$0	\$0	(\$3,000)
16	Implement district-wide accountability procedures to ensure all OAS standards are taught, assessed, and paced with fidelity.	(\$8,000)	(\$8,000)	\$0	\$0	\$0	(\$16,000)
17	Implement an in-depth assessment to ensure all teachers have access to, and use, up-to-date teaching materials, digital resources, or textbooks that align with all aspects of the OAS.						\$0
18	Implement a district-wide process for analyzing student performance data throughout the school year and use the analysis results to adjust curriculum and instruction.	(\$3,000)	\$0	\$0	\$0	\$0	(\$3,000)
19	Enhance instruction through use of student engagement strategies and innovative practices.						\$0
20	Implement a tiered interventions model for remediation.						\$0
21	Implement a formalized, research-based, district-wide PLC process with regularly scheduled release time, standardized norms, and support structures for teachers to collaborate and focus on continuous school improvement.	(\$5,000)	\$0	\$0	\$0	\$0	(\$5,000)
22	Train all teachers in a clearly defined special education identification process.						\$0
23	Implement ongoing, regularly scheduled times for teachers to corporately plan curriculum and instruction based on student IEPs.						\$0
24	Explore options for offering supportive instructional resources, digital learning opportunities, and collaborative learning activities between the library and the regular classroom.						\$0
25	Continue to strengthen the gifted and talented program thorough enriched instruction in the regular classroom.						\$0
26	Explore additional offerings in areas such as STEM, to support student interests and college-and career-ready needs.						\$0
<b>Subtotal</b>		<b>(\$27,500)</b>	<b>(\$19,500)</b>	<b>(\$10,000)</b>	<b>(\$10,000)</b>	<b>(\$10,000)</b>	<b>(\$77,000)</b>

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2019-20	2020-21	2021-22	2022-23	2023-24	
<b>Chapter 3</b>	<b>Business Operations</b>						
27	Adopt a formal policy for the district’s general fund balance that establishes a fund balance target range, provides guidance on how to maintain the minimum balance, and requires reports for fund balance status to the school board.						\$0
28	Include a variety of stakeholders in the budgetary process.						\$0
29	Place special emphasis on the percentage of district funds being budgeted for instruction during budget development and in future budget years establish a target percentage for instruction.						\$0
30	Establish a district foundation or similarly organized stakeholder group to help support future bond issues and district needs.						\$0
31	Develop desk procedures for each business services employee and establish a formal process for cross-training.						\$0
32	Consider using purchasing cards in place of credit cards.						\$0
33	Develop and adopt fixed asset policies and procedures, such as capitalization thresholds, surplus procedures, and lost asset recovery; then, inventory fixed assets using a consolidated inventory listing.						\$0
34	Develop a standardized procedures handbook for all district activity funds to help ensure that funds are administered properly.						\$0
35	Update and post an electric copy or web link of the Estimate of Needs yearly on the district website directly so that the public can find information more easily.						\$0
	<b>Subtotal</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Chapter 4</b>	<b>Facilities Use and Management</b>						
36	Form a facilities planning committee for SPS.						\$0
37	Include a continuing collaborative effort between SPS and its long-term design professionals in the charter of the facilities planning committee.						\$0
38	Fill all vacant positions and hire an additional maintenance and repair technician.	\$0	(\$15,000)	(\$30,000)	(\$30,000)	(\$30,000)	(\$105,000)
39	Adopt an online maintenance work order system.	(\$7,735)	(\$3,320)	(\$3,320)	(\$3,320)	(\$3,320)	(\$21,015)
40	Schedule preventive maintenance.						\$0
41	Secure custodial closets at all times.						\$0

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2019-20	2020-21	2021-22	2022-23	2023-24	
42	Add an additional custodial position once the new elementary school is operational.						\$0
43	Include insulation improvements and other energy saving actions in future serial bond issue initiatives.						\$0
44	Seek to reduce unnecessary energy use and to reduce energy costs.	\$2,000	\$4,000	\$6,000	\$8,000	\$8,000	\$28,000
45	Schedule the replacement of the HVAC system.						\$0
46	Implement additional security measures by installing perimeter fencing and eliminating overlap between vehicular and pedestrian traffic.						\$0
47	Request a full, district-wide security assessment from the OSSI in 2019.						\$0
	<b>Subtotal</b>	<b>(\$5,735)</b>	<b>(\$27,320)</b>	<b>(\$53,320)</b>	<b>(\$53,320)</b>	<b>(\$53,320)</b>	<b>(\$189,015)</b>
<b>Chapter 5</b>	<b>Support Services</b>						
48	Staff kitchens using the SDE staffing standards based upon MPLH calculations.	\$19,738	\$19,738	\$19,738	\$19,738	\$19,738	\$98,690
49	Analyze all expenditure categories to determine potential areas for cost savings.						\$0
50	Improve the process used to determine which students are eligible for free meals through direct certification to ensure the maximum number of students are captured.						\$0
51	Improve high school lunch participation.						\$0
52	Provide nutrition education to students by displaying materials in the cafeterias using posters and menu boards.						\$0
53	Implement available components of the current software provider to automate the process of on-line meal applications.						\$0
54	Explore options for reconfiguring the kitchen and serving line for more efficient meal service.						\$0
55	Hire a full-time technology director.						\$0
56	Implement a cross-training program to ensure critical processes can be performed.	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)	(\$7,500)
57	Establish a district technology budget that is realistic and supportive of classroom needs.	(\$118,000)	(\$108,000)	(\$108,000)	(\$108,000)	(\$108,000)	(\$550,000)
58	Improve the technology planning process and develop a long-term strategic plan for technology with input from a variety of stakeholders.						\$0

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2019-20	2020-21	2021-22	2022-23	2023-24	
59	Complete and implement technology support procedures and a technology work order system that includes features such as logging, priority assignment, and completion.						\$0
60	Adopt a formal inventory process and procedure for computers and other technology equipment that includes assigning new equipment and maintaining a record of all technology devices.						\$0
61	Develop and test a disaster recovery plan that includes the district's critical data, systems, and programs.						\$0
62	Revisit and adjust the technology plan to achieve one-to-one capability district-wide.						\$0
63	Develop and implement an instructional technology plan in conjunction with a training program that focuses on increasing teachers' basic technology skills and integrating technology into the instructional program.						\$0
64	Complete and implement the wireless access system throughout the district.						\$0
65	Seek additional funding sources and grants to support long-range technology planning.						\$0
66	Develop a district policy and implement a school bus turn-around agreement form.						\$0
67	Develop a policy and procedure for transporting preschool students on district buses.	(\$1,000)	(\$1,000)	(\$1,000)	(\$1,000)	(\$1,000)	(\$1,000)
68	Develop a driver handbook outlining district policies and procedures regarding transportation of students.						\$0
69	Install a video surveillance system in school buses.	(\$4,500)	(\$4,500)	(\$4,500)	\$0	\$0	(\$13,500)
70	The district should provide before school in-service for the drivers to relay and reiterate policies and procedures by the district, SDE, ODPS, and federal guidelines.						\$0
71	Maintain a spreadsheet that documents all repairs and fuel for each vehicle.						\$0
72	Address the conditions of buses as needed.						\$0
	<b>Subtotal</b>	<b>(\$105,262)</b>	<b>(\$95,262)</b>	<b>(\$95,262)</b>	<b>(\$90,762)</b>	<b>(\$90,762)</b>	<b>(\$477,310)</b>
	<b>Total savings</b>	<b>\$21,738</b>	<b>\$23,738</b>	<b>\$25,738</b>	<b>\$27,738</b>	<b>\$27,738</b>	<b>\$126,690</b>
	<b>Total costs</b>	<b>(\$271,235)</b>	<b>(\$270,820)</b>	<b>(\$289,320)</b>	<b>(\$279,820)</b>	<b>(\$279,820)</b>	<b>(\$1,391,015)</b>
	<b>Total net savings and costs</b>	<b>(\$249,497)</b>	<b>(\$247,082)</b>	<b>(\$263,582)</b>	<b>(\$252,082)</b>	<b>(\$252,082)</b>	<b>(\$1,264,325)</b>

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School Performance Review reports are typically lengthy and densely packed with information. They can at first be overwhelming to district stakeholders. For that reason, the Office of Educational Quality and Accountability has identified the most likely “tipping point” recommendations for each area reviewed. These are recommendations that the Office of Educational Quality and Accountability believes are the most important to implement and most likely to have the greatest organizational impact.

Of the 72 recommendations made, the Office of Educational Quality and Accountability believes these seven recommendations to be the most critical:

- **Use the results of this study to engage all stakeholders in a strategic planning process.** Currently, only administrators are involved in the strategic planning process. This performance review may provide a basis for more long-term planning and an opportunity to broaden the range of people involved in planning. This can help ensure the continued positive district growth.
- **Implement a district-wide process for analyzing student performance data throughout the school year and use the analysis results to adjust curriculum and instruction.** SPS lacks a uniform process for analyzing OCCT/OSTP student performance data. The use of student performance data is essential to identify skill gaps in student learning. The superintendent, principals, and teachers should consider regularly graphing data. A visual depiction of the information often yields additional insights.
- **Develop desk procedures for each business services employee and establish a formal process for cross-training.** SPS lacks a complete set of desk procedures and has no formal process to cross-train staff in the completion of financial processes. For internal controls to operate effectively, all employees need a documented reference source detailing how they perform their assigned duties. Detailed desk procedures facilitate cross-training of employees and training of new employees since they provide the step-by-step instruction needed to perform tasks.
- **Seek to reduce unnecessary energy use and to reduce energy costs.** Currently, energy-conscious behavior is not being encouraged or managed actively at SPS. An active energy awareness program is a best practice for school districts to conserve energy and keep energy costs down. Over the summer months, the maintenance technician and head custodian should inspect each space within each building and generate a list of energy deficiencies. Also, the district should explore options for employing alternative sources of energy, including wind and solar.
- **Explore options for reconfiguring the kitchen and serving line for more efficient meal service.** SPS is not effectively managing meal services times and the sizes of the kitchen and serving areas are inadequate. The district should explore the possibility of expanding to provide more kitchen preparation space and a less congested serving area. District administrators should also reconfigure the current daily schedule for breakfast and lunch to one that staggers releasing middle and high school students in one meal period as opposed to the current practice of two separate meal periods.



- **Implement a technology cross-training program to ensure critical processes can be performed.** Historically, the district has relied on solely one person for everything related to technology. The implementation of a cross-training program for teacher technicians can assist with troubleshooting, password and system management, and equipment repair and servicing.
- **Address the conditions of buses as needed.** SPS bus drivers are not completing bus inspection sheets to report any mechanical malfunctions. The State of Oklahoma requires drivers to complete a daily record of the condition of the bus and report any defects. The SPS transportation director will need to ensure that all standards of performance on vehicle readiness and required documentation is complete before and after a vehicle is placed into service.



*Chapter 1:*

*Management, Personnel, and  
Communications*

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## *Chapter 1*

# ***Management, Personnel, and Communications***

This chapter addresses the management, personnel, and communications of Silo Public Schools (SPS) in the following sections:

- A. Governance
- B. Organization and Management
- C. Planning and Evaluation
- D. Personnel Management
- E. Community and Parent Involvement
- F. Communications/Public Relations

The organization and management of a school district involves cooperation between elected members of the board of education and staff of the district. The school board's role is to establish goals and objectives for the district in both instructional and operational areas, determine the policies by which the district will be governed, approve the plans to implement those policies, provide the funding sources necessary to carry out the plans, and evaluate the results of the plans.

Once the school board adopts goals and objectives for the district, it is the responsibility of the superintendent and staff to establish administrative policies and procedures to achieve the desired results. That achievement involves recommending the hiring and retention of employees, as well as ongoing communication with the community to ensure a clear understanding of the goals and the district's efforts to accomplish them.

### ***Background***

Located near Durant in south central Bryan County, Oklahoma, Silo covers 121 square miles. SPS operates one campus that serves approximately 900 students from Pre-K through 12<sup>th</sup> grade.

In 2016-17, the fall enrollment in SPS was 903, mostly Caucasian and Native American (**Exhibit 1-1**). Of all students enrolled at SPS, more than half were approved for free or reduced-price meals.

**Exhibit 1-1**  
**SPS Student Enrollment and Socioeconomic Characteristics, 2016-17**

School	Grade Span	Fall Enrollment	Caucasian	Black	Asian	Hispanic	Native American	Two or More Races	Eligible for Free or Reduced-Price Meals
Silo Elementary School	EC-5	489	59.1%	0.0%	0.4%	5.3%	28.0%	7.2%	75.7%
Silo Middle School	6-8	179	67.0%	0.6%	0.0%	1.7%	19.6%	11.2%	70.4%
Silo High School	9-12	235	55.7%	0.0%	0.9%	4.3%	27.2%	11.9%	68.1%

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 1-2** shows demographic changes over the last five years in SPS. Over that time period, the average assessed property valuation per student increased by 16.5 percent and eligibility for free and reduced-price meals decreased by 5.2 percent.

**Exhibit 1-2**  
**SPS Change in Demographics from 2012-13 to 2016-17**

School Year	ADM	Ethnic Group					Average Assessed Property Valuation per Student	Eligible for Free or Reduced-Price Meals
		Caucasian	Black	Asian	Hispanic	Native American		
2012-13	843	60.0%	0.0%	0.0%	5.0%	34.0%	\$47,538	76.7%
2013-14	825	65.0%	0.0%	0.0%	5.0%	29.0%	\$52,659	76.3%
2014-15	863	66.0%	2.0%	0.0%	4.0%	28.0%	\$55,477	76.0%
2015-16	871	67.0%	1.0%	0.0%	4.0%	28.0%	\$57,168	72.0%
2016-17	898	59.8%	0.1%	0.4%	4.3%	26.1%	\$55,368	72.7%
<b>Change</b>	<b>6.5%▲</b>						<b>16.5%▲</b>	<b>(5.2%)▼</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 1-3** compares SPS’ demographics with its peers, the community group, and the state for 2016-17. SPS had demographics similar to those of most of its peers, with the second highest Caucasian and third lowest Native American percentage. The assessed property valuation in SPS was the highest of all of its peers, the community group, and the state. SPS’ percentage of students eligible for free or reduced-price meals was in the middle of its peers.

**Exhibit 1-3  
Demographics of SPS, Peer Districts, and State, 2016-17**

Entity	ADM	Ethnic Group					Average Assessed Property Valuation per Student	Eligible for Free or Reduced-Price Meals
		Caucasian	Black	Asian	Hispanic	Native American		
<b>Silo</b>	<b>898</b>	<b>59.8%</b>	<b>0.1%</b>	<b>0.4%</b>	<b>4.3%</b>	<b>26.1%</b>	<b>\$55,368</b>	<b>72.7%</b>
Caney Valley	812	53.5%	0.5%	1.4%	4.6%	28.6%	\$40,491	62.8%
Newkirk	833	68.8%	1.0%	0.2%	3.2%	26.6%	\$47,709	66.1%
Wilburton	837	54.7%	1.8%	0.7%	5.7%	34.3%	\$31,684	68.2%
Tishomingo	942	52.7%	1.5%	0.7%	6.3%	24.9%	\$30,946	77.1%
Hennessey	905	53.9%	1.0%	0.0%	41.2%	3.2%	\$48,752	86.6%
<b>Community Group</b>	<b>697</b>	<b>50.2%</b>	<b>3.8%</b>	<b>0.5%</b>	<b>8.1%</b>	<b>30.4%</b>	<b>\$37,679</b>	<b>74.8%</b>
<b>State</b>	<b>1,267</b>	<b>49.4%</b>	<b>8.8%</b>	<b>2.3%</b>	<b>16.8%</b>	<b>13.9%</b>	<b>\$49,471</b>	<b>62.7%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

The data in **Exhibit 1-4** reflect ADM trends compared to the peers, community group and state. SPS had the second-highest ADM increase among its peers and has increased more than the state and community.

**Exhibit 1-4  
SPS, Peer Districts, and State Student ADM Trends, 2012-13 to 2016-17**

Entity	ADM					Percent Change
	2012-13	2013-14	2014-15	2015-16	2016-17	
<b>Silo</b>	<b>842.9</b>	<b>825.3</b>	<b>863.2</b>	<b>870.8</b>	<b>898.0</b>	<b>6.5% ▲</b>
Caney Valley	768.3	756.6	770.3	789.5	812.0	5.7% ▲
Newkirk	841.9	848.5	858.7	846.9	833.0	(1.1%) ▼
Wilburton	897.3	893.4	910.7	891.4	837.0	(6.7%) ▼
Tishomingo	969.8	969.4	981.2	947.4	942.0	(2.9%) ▼
Hennessey	840.5	884.1	909.2	913.7	905.0	7.7% ▲
<b>Community Group</b>	<b>704.5</b>	<b>708.8</b>	<b>720.5</b>	<b>708.5</b>	<b>697.0</b>	<b>(1.1%) ▼</b>
<b>State</b>	<b>1,271.1</b>	<b>1,292.2</b>	<b>1,299.4</b>	<b>1,305.4</b>	<b>1,267.0</b>	<b>(0.3%) ▼</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**A. GOVERNANCE**

Oklahoma state education laws, as codified in the Oklahoma State Department of Education (SDE) and district policies, establish the powers and responsibilities of the district board of education and the superintendent. The School Law Book contains 1,469 sections numbered consecutively and each section provides legal guidance for school district governance and

operations. The information provided in **Exhibit 1-5** reflects sections relevant to board of education organization and basic governance principles.

**Exhibit 1-5**  
**OSC: Board of Education Governance and Organization**

Topic	Section
School District – Definition	8
School System – Administered by State Department of Education, etc.	17
Positions in School System – Definitions	18
General Fund – Definition	22
Building Fund – Definition	23
State Board of Education – Powers and Duties	32
Governing Body of School District	123
Independent and Dependent School Districts – Board of Education – Members Election	125
Expansion of Board	126
Workshops for New Board Members – Expenses of Members Attending	127
Relation by Affinity or Consanguinity Prohibition	129
Employment of Relative of Member of Board of Education	130
Excluding Litigious Board Member from Proceedings	131
School District Treasurer – Assistant Local Treasurer	132
Local Treasurer – Surety Bond – Duties – Cash Investment Ledgers	133
Oath of Office	135
Requirements for Bonds for Employees and Officers	136
Powers and Duties	138
Meetings of Board – Executive Sessions – Compensation of Members of Boards of Districts with ADA Exceeding 15,000 or Population Exceeding 100,000	148
Officers of Board	149
President – Duties	150
Vice President – Duties	151
Clerk – Duties	152
Oklahoma Open Meeting Act	787
Executive Sessions	793

*Source: Oklahoma School Law Book, 2015*

Powers and duties of the board of education are contained in Section 32 of the School Law Book. These powers and duties cover all activities related to operating public school districts. Key powers and duties include:

- election of officers;



- establishing board policies;
- building and operating schools and related facilities; and
- Contracting for an annual audit of all district and school activity funds.

Section 126 addresses the size and election of school boards in Oklahoma, and Section 149 provides a description of the required officers for school boards. The board consists of five members, each of whom is elected to a five-year term. **Exhibit 1-6** reflects the year elected and the next election date for each board of education member.

**Exhibit 1-6**  
**Silo School Board Members**

<b>Board Member</b>	<b>Board Position</b>	<b>Year of Election or Appointment</b>	<b>Term Expires</b>
Sean Bradley	President	2015	2020
Keith Eppler	Vice President	2016	2021
Dennis Bowen	Clerk	2014	2019
Bradley Rowland	Deputy Clerk	2017	2022
Chris Cicio	Member	2018	2023

*Source: SPS, December 2018*

The district holds board elections each February. The board members swear in elected members and vote on officers at the next meeting. Sections 157, 158, and 159 list the duties of each officer of the board of education. The board must elect a clerk, who may or may not be a member of the board.

Section 127 outlines the training requirements for school board members. Within 15 months following election, new school board members are required to complete 12 hours of instruction on education issues in the areas of:

- school finance;
- legal issues (employment, due process, new laws, the *Oklahoma Open Records Act*, and the *Oklahoma Open Meeting Act*); and
- duties and responsibilities of district board of education members (including special education and ethics).

The 12 hours must include one hour of instruction in school finance, one hour of instruction in the *Oklahoma Open Records Act* and the *Oklahoma Open Meeting Act*, and one hour of instruction in ethics. The remaining hours may be satisfied by attending a two-day workshop to be held by the SDE or other workshops held by another organization or association approved by the Oklahoma State Board of Education.

Reelected board members are required to complete six hours of instruction within 15 months of

reelection. Included in these six hours is one hour of instruction in the following:

- school finance;
- the *Oklahoma Open Records Act* and the *Oklahoma Open Meeting Act*; and
- ethics.

The remaining hours may be satisfied by attending a workshop, class, or seminar addressing the education issues set forth above for new members.

### ***Board of Education Meetings***

The Silo Board of Education meets on the first Monday of the month at 6:00 pm in the school library. The meeting place and time may be changed by agreement of a majority of the board members. Special meetings are held as needed, and board members receive agendas and any supporting information in advance of the meeting.

The superintendent provides the board of education with a packet during the week before each meeting. The routine business items are located together on the consent agenda and acted upon before getting into any other topics. The agenda is posted online on the school website and on the front door of the SPS school building. Minutes of all previous board meetings are kept in a folder in the office of the superintendent. Minutes are also posted on the district's website and scanned for permanent storage. In the school handbook the following values statements and philosophy is included near the front page (**Exhibits 1-7 and 1-8**).

**Exhibit 1-7**  
**Values of Silo Public Schools**

Silo graduates will:

- Be able to function effectively as a member of a family or household.
- Be an effective communicator.
- Be an effective problem solver in all aspects of life as well as an effective decision maker to minimize those problems.
- Be a productive citizen within our society who can render responsible decisions in order to vote and be potential leaders of their community.
- Be able to function effectively as a team member in the work place.
- Seek life-long learning opportunities outside the structured educational environment.
- Have high self-esteem as well as positive approach to life itself.
- Respect the value of human life and the rights of others no matter what their race, gender, religion, or choice of lifestyle.

*Source: SPS Handbook, 2018*

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**Exhibit 1-8**  
**Philosophy of Silo Public Schools**

The philosophy of the Silo Public School System is based on the concept that the school should exist for individual students at all socioeconomic levels. It should concentrate on providing, through teaching and counseling, equal and adequate opportunities for all students to develop intellectually, physically, socially, and vocationally in order that they might make a contribution to society, that they might be capable of enjoying a cultural, moral and spiritual life, and that they might recognize and accept their responsibilities in preserving the democracy which has provided for these opportunities. It should be noted that these policies do not supersede any federal, state or local laws. If laws are changed, they will supersede board policy.

Furthermore, the philosophy of the Silo Public School System is based upon the following general rules:

- Silo citizens have rights and responsibilities, so also do classroom citizens have rights and responsibilities.
- The student does not divest himself of his constitutional rights on entering the school building.
- So long as a student does not disrupt the educational process, impose upon, endanger or deprive others of their rights, the student will enjoy his freedom of expression, orderly assemble, privacy of person and freedom from discrimination.
- Fair and reasonable procedure will be followed to assure the students' rights.
- The student, in turn, needs to recognize that to maintain an atmosphere conducive to learning, the reasonable exercise of authority by school officials is necessary.
- All persons connected with our school must demonstrate respect for the rights of the student, and students must accept their responsibility toward others and toward the school system.
- Rules of discipline are guidelines for behavior, so that all may know what is expected of them in the school community.

*Source: SPS Handbook, 2018*

**FINDING 1-1**

The school board is strongly supportive of the superintendent, the principals, and district staff. Its members recognize the efforts to improve district conditions and student achievement.

The school board hired the current superintendent approximately four years ago. The superintendent had been employed in the district as a dean of students for several years before being selected as superintendent. Last year, the school board supported a series bond measure to

update facilities. In interviews and focus groups, the superintendent was credited with the bond passage. The series bond is the first for the district in 20 years. The first expenditures of bond money are for the design and build of elementary classrooms.

The school board is focused on improving the school district and three of the five board members were available to the consulting team. It is clear that this school board is highly cooperative with one another, realistic about the current status of the school district, and focused on SPS becoming the best school district it can be. All of the board members interviewed expressed satisfaction with the performance of the superintendent, principals, and teachers. They were all confident in the current direction of the school system.

**Exhibit 1-9** reflects parent and staff survey results concerning the board of education. The results are strongly supportive of the board of education. Out of 246 staff and parent surveys returned only a small percentage are not supportive of the board. Also, 52 to 70 percent of the respondents had positive opinions of the board of education. Interview and focus group comments were also strongly supportive, particularly concerning the hiring of the current superintendent.

**Exhibit 1-9  
Parent and Staff Survey Results Regarding the School Board**

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Parent	School board members listen to the opinions and desires of parents and community members.	19%	33%	44%	2%	2%
Parent	School board members know and understand the educational needs of students in the district.	27%	36%	32%	4%	2%
Staff	School board members listen to the opinions of parents and community members.	22%	42%	33%	3%	0%
Staff	The school board understands the needs of the school district.	24%	46%	24%	7%	0%

*Source: Prismatic Survey Results, December 2018*

The mutual trust the superintendent and board of education have developed is having a positive impact on SPS. The development of mutual trust is a best practice and improves the leadership exhibited by both the board of education and the superintendent. Cohesiveness in beliefs and action is a best practice that starts with the board of education and can lead to more effective

decision-making in all areas of school district operations.

### **COMMENDATION**

**The superintendent and board of education are commended for the positive progress that is being realized by SPS and for establishing an atmosphere of trust and cohesiveness.**

### **FINDING 1-2**

The school board meetings are consistently organized and efficiently operated. The school board agendas are posted appropriately, and agenda items include reports on academics and activities. The school board minutes are posted online for the public. The superintendent provides a board packet of relevant material prior to the meeting and an oral report at the meeting. Occasionally, principals are also called upon to give an oral report to keep board members up to date on the district. The superintendent provides regular financial reporting to the board of education.

The superintendent often calls board members to determine if there are questions regarding items on the agenda for the upcoming meeting. Board minutes are scanned to a thumb drive for permanent storage. There is a process and a place in the agenda for comments from patrons.

### **COMMENDATION**

**The school board and superintendent are commended for the efficient organization reflected in board of education meetings.**

### **FINDING 1-3**

The school board has established goals and an evaluation plan for the superintendent. The board of education indicated during interviews that it has established goals for the superintendent and has an evaluation plan that also provides objectives for the superintendent. The superintendent stated that she had goals that she is working through and used the establishment of a cash management program as an example.

The hiring of the superintendent and the evaluation of the superintendent through collaboration and goal setting is the most important job of a school board. Based on interviews, focus groups, and surveys, the board of education has been successful in decision-making regarding the superintendent.

### **COMMENDATION**

**The school board is commended for establishing goals for the district by guiding the superintendent through a collaborative evaluation process.**

### **FINDING 1-4**

The superintendent brings policies to the board of education for updating as regulations change. There are several policies that have recently been updated, including the discipline policy. The board policy book was established in 2013 by a previous superintendent. SPS currently has a

contract with the state school board association to revamp the policy book. Interviews suggest that administrative staff and board of education members are knowledgeable and comfortable with the current practice. There is also evidence of policy implementation in school handbooks.

Policies provide a basis of continuity to district and school level decisions. Consistent policies serve to inform the public regarding how the district operates and convey a sense of stability and fairness. The policy book is available in printed form, in student handbooks, and on the district's website.

## COMMENDATION

**The SPS board of education and superintendent are commended for effective policy review and publication practices.**

## FINDING 1-5

The SPS school board meets standards set forth for effective boards of education. A study published by the Center for Public Education cites eight characteristics of effective school boards.<sup>1</sup> Paramount is the establishment of goals and collaboration with stakeholders. **Exhibit 1-10** shows the eight characteristics and the evidence-based assessment by the consulting team. The evidence reviewed by the consulting team included observation, interviews, survey data, focus groups and policy/handbook reviews. The chart represents the eight characteristics and the consulting team's assessment of how well the SPS Board of Education meets the criteria.

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<sup>1</sup> CPE. (2011, January 28). *Eight characteristics of effective school boards: At a glance*. Retrieved from <http://www.centerforpubliceducation.org/Main-Menu/Public-education/Eight-characteristics-of-effective-school-boards>

**Exhibit 1-10  
Eight Characteristics of Effective School Boards**

Characteristic		SPS
1	<p>Effective school boards commit to a vision of high expectation for student achievement and quality instruction and define clear goals toward that vision.</p> <ul style="list-style-type: none"> <li>a. Establishing “non-negotiable” goals (goals that all staff must act upon once set by the board) in at least two areas: student achievement and instruction goals.</li> <li>b. Having the board align with and support district goals.</li> <li>c. Monitoring goals for achievement and instruction.</li> <li>d. Using resources to support achievement and instruction goals.</li> </ul>	Partially Present
2	<p>Effective school boards have strong shared beliefs and values about possibilities for students and their ability to learn. Also shared beliefs in the school system and its ability to teach children at high levels.</p> <ul style="list-style-type: none"> <li>a. Board members consistently expressed their belief in the learning ability of all children and gave specific examples of ways that learning had improved as a result of district initiatives.</li> <li>b. Poverty, lack of parental involvement, and other factors were described as challenges to be overcome, not as excuses.</li> <li>c. Board members expected to see improvements in student achievement quickly as a result of initiatives.</li> <li>d. Comments made by board members were indicative of the differences in high achieving versus low achieving schools. In a high-achieving district, for example, comments might include: “This is a place for all kids to excel.” Another might be, “Sometimes people say the poor students have limits. I say all have limits. I believe we have not reached the limits of any of the kids in our system.”</li> </ul>	Partially Present
3	<p>Effective school boards are accountability driven, spending less time on operational issues and more time focused on policies to improve student achievement.</p>	Present
4	<p>Effective school boards have a collaborative relationship with staff and the community and establish a strong communication structure to inform and engage both internal and external stakeholders in setting and achieving district goals.</p>	Partially Present
5	<p>Effective boards are data savvy; they embrace and monitor data, even when the information is negative, and use it to drive continuous improvement.</p>	Present
6	<p>Effective school boards align and sustain resources, such as professional development, to meet district goals.</p>	Partially Present
7	<p>Effective school boards lead as a united team with the superintendent, each from their respective roles, with strong collaboration and mutual trust:</p> <ul style="list-style-type: none"> <li>a. a trusting and collaborative relationship between the board and superintendent;</li> <li>b. creation by the board of conditions and organizational structures that allow the superintendent to function as the chief executive officer and instructional leader of the district;</li> <li>c. evaluation of the superintendent according to mutually agreed-upon procedures; and</li> <li>d. effective communication between the board chair and superintendent, and among board members.</li> </ul>	Present
8	<p>Effective school boards take part in team development and training, sometimes with their superintendents, to build shared knowledge, values, and commitments for their improvement efforts.</p>	Present

*Source: Adapted by Prismatic, February 2013*

The processes of the SPS School Board meet four and partially meet four of the eight effectiveness standards. The evidence suggests that progress on the four partially present effectiveness indicators will result in greater positive gains for the school district. Board progress



on the four partially met areas should, also, enhance the amount of information on board of education activities.

**COMMENDATION**

**The practices established by the SPS Board of Education and superintendent result in an effective board of education.**

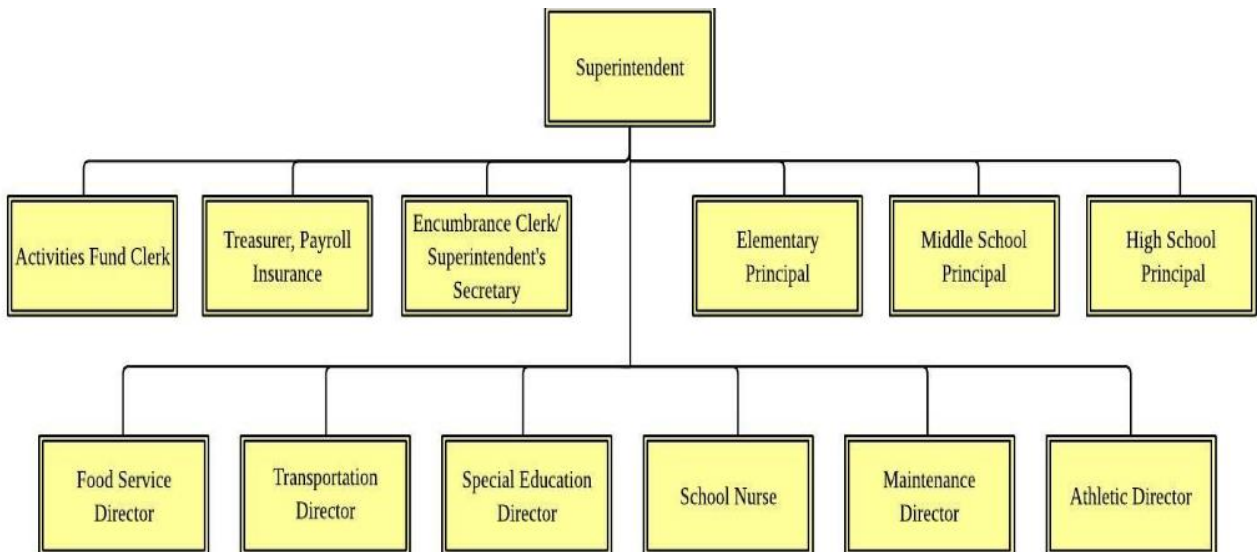
**B. ORGANIZATION AND MANAGEMENT**

The superintendent of a school district serves as the chief executive officer and is the administrative leader responsible for policy implementation and day-to-day operations. An effective central office organizational structure is essential to the efficient delivery of services throughout a school district. Efficient central office organizational structures have the appropriate spans of control for district leadership with clearly defined lines of authority that are reflected in the district’s organization charts. Effective central office structures encourage communication at all levels. The superintendent is in her fourth year as superintendent at SPS.

The middle and high school share two office support and the elementary school has just hired its second office support employee. There are individuals designated for leadership roles in support departments.

The administrative organization seems optimal at this point for the overall size of SPS and considering the budget issues faced by all Oklahoma school districts. **Exhibit 1-11** reflects the current organizational chart for SPS.

**Exhibit 1-11  
SPS Organizational Chart**



Source: Created by Prismatic, January 2019

**FINDING 1-6**

The superintendent’s leadership style has been described as open door, approachable, direct in communications with staff, and deliberate in problem solving, while being supportive and positive with all staff. In interviews with staff and focus groups, the superintendent is described as down to earth, smart, a good listener, motivational, and a problem solver who is not afraid to pitch in and do any work that is needed. School board members, principals, and teachers like the way she seeks the answers and responds promptly to concerns.

**Exhibit 1-12** shows that 97 percent of staff *agreed* or *strongly agreed* that the superintendent is accessible. 94 percent of the staff indicates that the superintendent communicates effectively with staff. Regarding the parents who responded to the survey, 75 percent feel the superintendent is a respected and effective leader. Positive comments regarding the superintendent were also made at the end of the parent surveys and in focus groups.

**Exhibit 1-12  
Staff and Parent Survey Results Regarding the Superintendent**

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	The superintendent is accessible to district staff.	65%	32%	3%	0%	0%
Staff	The superintendent effectively communicates with district staff.	52%	42%	3%	3%	0%
Parent	The superintendent is a respected and effective leader.	40%	35%	22%	2%	1%

*Source: Prismatic Survey Results, December 2018*

**COMMENDATION**

**The superintendent is commended for being accessible to district staff and gaining the trust and confidence of staff and the community.**

**FINDING 1-7**

Both the high school and middle school principals have been described as striving to develop positive relationships with students, teachers, and staff. The consulting team observed both principals frequently in the halls interacting with students. Additionally, the collaboration between the middle school principal and high school principal to provide coverage for one another seems outstanding. The middle school principal describes his discipline style as relationship based. He also coaches two hours per day and the high school principal teaches one to two hours per day. Both regularly fill in on teacher absences.

The elementary principal and the special education director have also formed a strong collaborative team to make sure everything is covered and handled well at the elementary school.

**COMMENDATION**

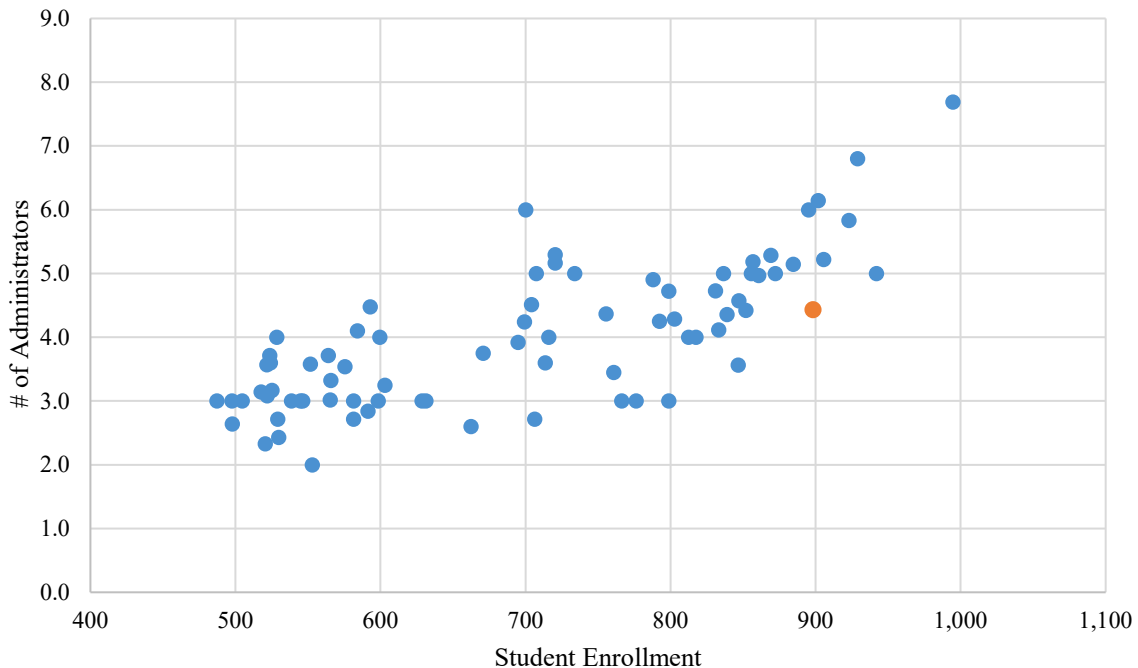
**The principals are commended for maintaining a personal relationship approach to students, teachers, and staff despite the challenges of the role in a growing school district.**

**FINDING 1-8**

The expense of administrative staff in small districts is under pretty much constant scrutiny by patrons and the media. Small district administrators must accomplish the same basic duties as those in large districts, but with less staff assisting and all doing many different jobs on top of their main job responsibilities. Nevertheless, small school district administrative levels should be roughly comparable while still providing some flexibility for differences in district needs.

Considering all districts in the F2 Community Group and the district’s current enrollment, having 4.4 administrative positions is comparable to similarly sized Oklahoma districts. **Exhibit 1-13** compares the number of administrative positions with student enrollment for all 78 of the F2 districts. The SPS data point is shown in orange. As shown, SPS’ 2016-17 administrative staffing is in line with many peers and below that of several.

**Exhibit 1-13  
Administrative Staffing as a Function of Enrollment  
All F2 Oklahoma School Districts, 2016-17**



*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 1-14** compares the SPS ratio of administrative staff to teaching staff with those of the peers. SPS has the second lowest ratio of teachers to administrators, tied with three peers. The SPS ratio was equal to the peer average at 11:1.

**Exhibit 1-14  
Comparison of Teacher and Administrator Staffing, 2016-17**

Entity	ADM	Number of Administrators (FTE)	Number of Classroom Teachers (FTE)	Ratio of Teachers to Administrators
<b>Silo</b>	<b>898</b>	<b>4.4</b>	<b>46</b>	<b>11:1</b>
Caney Valley	812	4.0	49	12:1
Newkirk	833	4.1	46	11:1
Wilburton	837	5.0	50	10:1
Tishomingo	942	5.0	56	11:1
Hennessey	905	5.2	61	11:1
<b>Peer Average</b>	<b>866</b>	<b>4.7</b>	<b>52</b>	<b>11:1</b>

*Source: Office of Educational Quality and Accountability, Profiles Database and Prismatic calculations*

**Exhibit 1-15** compares SPS’ per-student spending on administrator salaries with that of its peer districts. As shown, SPS’ spending was below the peer average of \$455 per student.

**Exhibit 1-15  
Administrative Expenditures Comparison, 2016-17**

Entity	ADM	Number of Administrators	Total Salary	Administrator Cost per Student
<b>Silo</b>	<b>898</b>	<b>4.4</b>	<b>\$378,836</b>	<b>\$422</b>
Caney Valley	812	4.0	\$330,456	\$407
Newkirk	833	4.1	\$338,184	\$406
Wilburton	837	5.0	\$415,500	\$496
Tishomingo	942	5.0	\$469,135	\$498
Hennessey	905	5.2	\$416,187	\$460
<b>Peer Average</b>	<b>866</b>	<b>4.7</b>	<b>\$393,893</b>	<b>\$455</b>

*Source: Office of Educational Quality and Accountability, Profiles*

SPS was below the peer group average of \$455 per student on administrative expenditures and higher than the peer group average on enrollment. It is right at the peer group average on teacher to administrator ratio. Combined, these factors point to cost effectiveness in administrative staffing.

**COMMENDATION**

**The board of education and superintendent are commended for having cost effective administrative services.**

**FINDING 1-9**

There are new elementary school classrooms being built and the district anticipates growth in student enrollment. Once the new building is in use, the management of the elementary school will become more complex.

The new school will serve students Pre-K through 2<sup>nd</sup> grade. The logistics of managing a school split across two buildings are more complicated than when all grades are under one roof. The school currently has two secretaries, 25 teachers, and more than 20 support staff. Currently, the special service director helps the principal at the elementary level.

The district lacks professionally developed enrollment projections, but can point to a number of new housing starts within the district that indicate likely growth in the near future. Once the district passes 1,000 students, it will move from the F2 to the E2 community group, which includes districts with enrollment from 1,000 to 1,999 students. In 2016-17, the average E2 district had 1,107 students and 5.0 administrators.

**RECOMMENDATION**

**Review teacher evaluation and student management loads at each school site and consider adding a full-time assistant principal for the opening of the new elementary classrooms.**

The superintendent should discuss with the principals the current teacher evaluation and student management loads at each school site. Regarding the elementary school, the superintendent and others should analyze the management logistics of having the two elementary buildings separated. An assistant principal would be the most cost-effective approach but an analysis on how long that position could remain an assistant, given the anticipated district growth, also seems necessary.

Discussions should also commence 2019-20 to predict when the middle school and high school will also need additional administrative help. The school board and superintendent should discuss where potential additional administrative expenses fit in with other classroom teacher and support staff needs.

**FISCAL IMPACT**

The consulting team estimates that an assistant principal position for the elementary school will require approximately \$55,000 in salary and benefits.

<b>Recommendation</b>	<b>2019-20</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>
Hire an Assistant Principal for the Elementary School.	(\$55,000)	(\$55,000)	(\$55,000)	(\$55,000)	(\$55,000)

**FINDING 1-10**

The elementary school lacks a designated staff member for counseling students. The current elementary principal filled that role previously.

Oklahoma high schools and middle schools are required to have one full-time counselor for every 450 students, a standard which SPS meets. At the elementary level, a counseling and guidance program is required, but does not have to be delivered by a certified counselor. For 2018-19, the elementary principal is listed as serving 0.25 FTE as a counselor. However, she indicated that she lacks the time to focus on counseling, given her other duties.

Survey results reflect the extent of identified student needs based on data from staff, parents, and high school students (**Exhibit 1-16**). As shown, sizeable percentages of each stakeholder group believe that bullying and drugs are problems in the district.

**Exhibit 1-16  
Parent, Student, and Staff Survey Results Regarding Student Needs**

Survey Group	Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Parent	Bullying is a problem in this district.	10%	17%	30%	33%	9%
Student		16%	15%	36%	22%	10%
Staff		3%	44%	0%	46%	8%
Parent	Drugs are a problem in this district.	9%	12%	39%	28%	13%
Student		14%	22%	36%	13%	14%
Staff		8%	50%	0%	36%	6%

*Source: Prismatic Survey Results, December 2018*

The American School Counselor Association recommends a staffing level of one counselor for every 250 students (regardless of level). The actual ratio in Oklahoma in 2015-16 was 430:1.<sup>2</sup> At a current enrollment of 903, SPS is well above the national recommendation and the Oklahoma average.

Effective school counseling programs collaborative efforts benefiting students, parents, teachers, administrators and the overall community. School counseling programs should be an integral part of students’ daily educational environment, and school counselors should be partners in student achievement. Counseling programs at the elementary level that emphasize character, good decision-making and resilience can have a positive impact on bullying behavior and drug abuse.

**RECOMMENDATION**

**Add an elementary counselor when the new elementary classrooms are opened.**

The superintendent and elementary principal should work together to find a counselor who is a good fit with the students and the community. Ideally, they will find someone who is equipped to handle the challenging social and developmental needs of elementary students while helping the administration manage the academic programs. Additionally, because the district has a high free and reduced lunch count and a relatively high Native American count the superintendent should research whether federal funds can be used for some of the cost in the next budget.

**FISCAL IMPACT**

The consulting team estimates that an elementary counselor position for the elementary school will require approximately \$45,000 in salary and benefits.

<sup>2</sup> <https://www.schoolcounselor.org/asca/media/asca/home/Ratios15-16.pdf>

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Hire an elementary counselor.	(\$45,000)	(\$45,000)	(\$45,000)	(\$45,000)	(\$45,000)

**FINDING 1-11**

Regarding discipline, the consulting team observed the in-house student detention room in operation and noted a lack of engagement in activities/study. Also, in interviews and focus groups, stakeholders indicated that the program has become more of a holding area for students who, as long as they do not disrupt, are free to listen to their music, sleep, and/or just sit. One commenter reflected that no school work is being performed by students while in the program.

SPS has recently been involved in a rewrite of its disciplinary procedures/policy. The number of suspensions and the repeat offenders seem to have prompted this rewrite. Results from interviews and focus groups suggests that a further, closer review of disciplinary practices is in order. **Exhibit 1-17** compares the district’s disciplinary statistics for 2016-17. As shown, the district’s rate for short-term suspensions was favorable in comparison to the community group and state; however, the district’s rate for long-term suspensions was not.

**Exhibit 1-17  
Discipline Statistics, 2016-17**

Statistic (Higher Number is Better)	Silo High School	District	Community Group	State
There was 1 suspension (of 10 days or less) for every ____ students.	33.6	43.0	20.1	15.4
There was 1 suspension (of 10 days or more) for every ____ students.	47.0	100.3	221.0	183.2

*Source: Office of Educational Quality and Accountability, Profiles*

**Exhibit 1-18** provides the high school’s disciplinary statistics for the past five years. As shown, there has been little consistency in short- or long-term suspension rates.

**Exhibit 1-18  
Trend in Silo High School Discipline Statistics**

Statistic (Higher Number is Better)	2012-13	2013-14	2014-15	2015-16	2016-17
There was 1 suspension (of 10 days or less) for every ____ students.	23.2	76.7	26.3	13.5	33.6
There was 1 suspension (of 10 days or more) for every ____ students.	232.0	38.3	118.5	114.5	47.0

*Source: Office of Educational Quality and Accountability, Profiles*

Successful disciplinary programs across the nation have both an academic component and a social/behavioral improvement component. A number of references are available that describe best practices in student discipline and effective in-school suspension:

- *Effective In-School Suspension Programs*;<sup>3</sup>
- *Turning Research into Practice: TRIP Report on In-School Suspension*;<sup>4</sup>
- *Best Practices for Award Winning Secondary Principals*;<sup>5</sup> and
- *In School Suspension Strategy Brief*.<sup>6</sup>

## RECOMMENDATION

**Research and adopt an in-house student detention program for secondary schools that is more effective.**

A study of other exemplary models for in-house detention/suspension rooms could inform and enhance effectiveness as both a deterrent and a learning opportunity for students. The district should establish a committee of teachers and administrators to review best practices and make recommendations for changes in the current program.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 1-12

The available data suggest a concern regarding student discipline among a portion of stakeholders. While overall survey results (**Exhibit 1-19**) concerning discipline were good, the following suggests that perceptions of the application of disciplinary consequences are an issue:

- 16 percent of the 60 teacher respondents were not positive towards the handling of discipline;
- 11 percent of the 193 parent respondents were not positive towards the handling of discipline; and
- 15 percent of the 97 student respondents believe discipline is handled unfairly.

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<sup>3</sup> <https://kycss.org/pdfs-docs/clearpdf/issuesbriefs/iss.pdf>

<sup>4</sup> [http://successfulethools.org/wp-content/uploads/trip\\_iss\\_edited.pdf?phpMyAdmin=168c4a6ce7f3t76b9b6da](http://successfulethools.org/wp-content/uploads/trip_iss_edited.pdf?phpMyAdmin=168c4a6ce7f3t76b9b6da)

<sup>5</sup> <https://us.sagepub.com/en-us/nam/best-practices-of-award-winning-secondary-school-principals/book226951>

<sup>6</sup> <https://k12engagement.unl.edu/strategy-briefs/In-School%20Suspension%2011-10-15%20.pdf>



**Exhibit 1-19**  
**Staff, Parent, and Student Survey Results Regarding Student Discipline**

Survey Group	Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	Student discipline is well maintained.	24%	61%	0%	16%	0%
Parent	Discipline is fairly and equitably administered at my child's school.	27%	44%	19%	8%	3%
Student	Discipline is fairly and equitably administered in this school.	16%	39%	29%	6%	9%

*Source: Prismatic Survey Results, December 2018*

Additionally, there were several survey comments by parents and students, and comments by teachers in focus groups and interviews that all have a similar theme regarding discipline – that there is preferential treatment of athletes when disciplinary consequences levied. Comments were made in teacher focus groups and interviews that attendance, truancy, and dress code policies are inconsistently applied. It is difficult for stakeholders to know all of the circumstances that lead to different disciplinary consequences for the same or similar school policy violations, but the consistency of perceived preferential treatment for student athletes is a concern. The district had little documentation available regarding the enforcement of rules and specific reasons for various punishments given, so the consulting team could not document whether there was a factual basis for stakeholders' perceptions.

The hallmark of any disciplinary plan is fairness, documentation, and consistent application of disciplinary consequences. The perception of uneven or even unfair application of consequences can often lead to litigation or civil rights investigations.

### **RECOMMENDATION**

**Develop an ongoing study group that meets periodically and reviews student disciplinary activities, discusses consequences levied, and generally coordinates the district's policy implementation.**

Implementing this discipline committee could be accomplished by establishing a small committee at the middle school and another at the high school. Alternately, a district-wide secondary committee might be established.

Teachers should be represented in discussions and the representative should be nominated and voted onto the committee by teachers. A feedback loop to other teachers should be established either by minutes kept of the meeting or a time set up for the teacher representative to share results with teachers as a group. Student privacy should be respected and specific students should not be identified when discussing discipline events and consequences. However, the committee should explicitly review infractions and punishments for student athletes (as a group) in comparison to all other students on a regular basis.

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**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**C. PLANNING AND EVALUATION**

Planning, evaluating, and correcting strengths and weaknesses through practice and re-teaching is common in the lexicon and repertoire of educators. However, planning and evaluation takes on a different meaning when it involves planning for change in a large entity like a school district. In that case, there is a need to strategically plan when and how to change the district for the improvement of the student learning experience.

To be effective, a strategic plan must lay out key milestones to measure progress, establish a priority ordering of the items to be accomplished, provide a timeline for which each item is to be accomplished, and assign accountability for each item to a specified position in the school district's organization. Finally, the organization must provide periodic reports on the status of the plan's implementation and any changes that must be made due to changes in circumstances or changes in assumptions.

According to Cook (2000), strategic planning requires total concentration of the organization's resources on mutually pre-determined measurable outcomes.<sup>7</sup> Strategic planning allows an organization to have a clear focus on what it is doing and what it intends to do based upon established and monitored goals. A strategic plan will include long-term goals, which typically can be achieved in five to ten years. Short-term goals, which typically can be achieved in a year, support the attainment of the long-term goals.

**FINDING 1-13**

Other than a tight grip on spending, general discussions on handling the current student population and bond issue planning, the district does not engage in longer-term strategic planning. The superintendent, principals, and school board have discussed the long-term health of the school district but planning and evaluating the district remains an informal process with only administrators involved.

In 2007, Reeves summarized his work, which analyzed hundreds of strategic plans across 20 dimensions, controlled for school demographics, and compared student achievement to a baseline year.<sup>8</sup> The study found that substantially higher achievement was realized if strategic plans included:

- monthly monitoring of student performance, teacher strategies, and leadership practices;
- continued self-evaluation by teachers and administrators regarding every program initiative and strategy; and

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<sup>7</sup> Cook, Jr., W. (2000). *Strategies: The art and science of holistic strategy*. Westport, Connecticut: Quorum Books.

<sup>8</sup> Reeves, D.B. (2007). Leading to change/making strategic planning work. *Educational Leadership*, 65(4).

- attribution by teachers and leaders that their work is the fundamental cause of student growth rather than demographics.

Reeves concludes that school leaders must decide whether the strategic planning process is focused on achievement and therefore adds value. All too often, organizations develop strategic plans that are broad statements with no ties to specific goals. For example, a school district may establish a goal of “improving student performance” without setting a target or identifying the strategies it plans to employ to achieve the desired outcome, or even fully defining “student performance.” A better goal would be “improving student achievement by 10 percent from last year to this year as measured by state standardized testing.” The district would then identify the means by which this goal would be achieved, such as through additional small group instruction with benchmark testing to monitor progress.

According to the Balanced Scorecard Institute:<sup>9</sup>

There are many different frameworks and methodologies for strategic planning and management. While there are no absolute rules regarding the right framework, most follow a similar pattern and have common attributes. Many frameworks cycle through some variation on some basic phases:

1. analysis or assessment, where an understanding of the current internal and external environments is developed;
2. strategy formulation, where high level strategy is developed, and a basic organization level strategic plan is documented;
3. strategy execution, where the high level plan is translated into more operational planning and action items; and
4. evaluation or sustainment/management phase, where ongoing refinement and evaluation of performance, culture, communications, data reporting, and other strategic management issues occur.

The graphic in **Exhibit 1-20** explains the logic of the balanced scorecard approach to strategic planning.

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<sup>9</sup> <http://balancedscorecard.org/Resources/Strategic-Planning-Basics>

**Exhibit 1-20  
Balanced Scorecard Approach**



Source: Balanced Scorecard Institute,<sup>10</sup> September 2008

More strategic planning in all areas of SPS operations can assist in efforts to improve student academic achievement, address facility needs, establish appropriate roles and responsibilities for staff members and clarify perceptions, and the goals of the board of education. Most importantly, communicating the goals and plans to all levels of the organization and the community will promote a positive perception that the board understands the needs of the district. A successful, forward-looking school district is the best method of attracting students and quality teachers.

**RECOMMENDATION**

**Use the results of this study to engage all stakeholders in a strategic planning process.**

This performance review may provide a basis for more long-term planning and an opportunity to broaden the range of people involved in planning. That can help ensure the continued positive district growth.

A strategic planning process can start with an annual superintendent’s report to the board on the state of the school district in all its many facets. The basic steps for a strategic planning effort are:

- The superintendent convenes an internal administrative staff planning group. Decide who will chair the main committee and/or serve as liaison to the group.

<sup>10</sup> <http://www.balancedscorecard.org/BSCResources/TheNineStepstoSuccess/tabid/58/Default.aspx>

- Establish a board of education approved strategic planning committee heavily weighted to include teachers and parents. As many as two of the board of education members can serve if so desired.
- Develop a committee meeting schedule and open the meetings to the public. Develop agendas and reports that provide detailed data regarding strengths and weaknesses of the district to the committee and public. Each operational and instructional area should be included.
- Provide the committee with demographic studies.
- Establish sub-committees to dig into data as necessary and have them report back to the main committee with findings.
- Develop a vision statement.
- Develop short- and long-range goals for the district. Convert these goals into action steps.
- Assign staff to implement action steps.
- Determine how to evaluate the progress.
- Develop follow-up and review procedures.

Once a strategic plan is established, a follow-up annual retreat, attended by the board, superintendent, and other key administrative staff, should be scheduled in order to review the district’s progress and adjust goals accordingly. Such a review may include creating more specific short-term goals that support established long-range goals. Short-term goals should be “SMART”: specific, measurable, achievable, relevant, and time-bound.

**FISCAL IMPACT**

The SPS Board of Education and superintendent can undertake the process of launching the strategic plan process. This approach to planning has no fiscal impact.

Alternatively, the district may want assistance in working through a strategic planning process. This approach will have a fiscal impact. The school board can issue a request for proposals and enter a contract for services. Based on SPS’ size and complexity, an estimated cost for facilitating this process would be around \$15,000. This is, of course, a negotiable fee which would include meetings with stakeholders, follow-up, and production of documents. Lastly, in the third year of strategic plan development, a communication strategy would be developed, including print ready public relations documents and a final print ready strategic plan document. This three-year phasing equally distributes the cost but could also be done quicker if desired.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Develop a strategic plan.	(\$5,000)	(\$5,000)	(\$5,000)	\$0	\$0

**FINDING 1-14**

The superintendent and board of education seem in agreement that the future of SPS is dependent on the successful handling of the growth that they believe is coming from surrounding new housing additions. However, the district lacks data on the potential number of students arriving in SPS on a student per house-built basis. The district also lacks specific data on both the number of outgoing transfers and their reasons for seeking transfers. The reasons for transfer requests would help the district determine if the rate of transfer requests is likely to lessen as programs and services are added.

Average daily membership in SPS has grown by 6.5 percent over the five-year period that ended in 2016-17. In the same period, the net assessed property value grew by 16 percent – an \$8,000 per student increase in property evaluation. These are positive signs of growth in the district. However, without professionally completed demographic projections, it is not possible to know if the trends are likely to continue at the same rate, increase sharply in the near future, or even increase but at a slower rate.

The nearby district of Durant ISD recently published the results of a demographic study it undertook with an outside consulting firm.<sup>11</sup> Over the next five years, that study projected student enrollment growth of 10.1 percent. Over the next nine years, that study projected growth of 17.6 percent. How closely the growth of SPS' enrollment will match that of Durant is unknown.

Effective facilities (and district) planning requires accurate enrollment projections at least five years into the future. Accurate projections require planners to examine district demographics and track any new construction activity in the district. Many school planners work in coordination with county and city planners to track growth patterns.

**RECOMMENDATION****Contract for a detailed demographic analysis of student growth.**

More recent data with projections out five to ten years will help SPS plan better. Planners should also take into account the length of time it takes to do bond issues and to actually launch and construct classrooms. The district should use the results to inform strategic planning, bond development, future classroom construction activities, transfer policies, and other aspects of operational decisions.

To implement the recommendation, SPS should find a contractor with experience in providing demographic studies for schools. This is typically accomplished through a request for proposals. Following board approval of a time-limited contract, a meeting should then be held with administrative staff and no more than two board of education advisers. This meeting should profile SPS expectations and what will be needed from SPS by the researchers and what they will go out and get on their own. At the conclusion of the study, researchers should provide a

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<sup>11</sup> [http://www.durantisd.org/web/district/DISD\\_growth2018.pdf](http://www.durantisd.org/web/district/DISD_growth2018.pdf)

complete written report, an explanatory meeting with administrative staff, and an oral report to the board of education in a public board meeting.

**FISCAL IMPACT**

The consulting team anticipates about 40 hours of work at approximately \$150 an hour will be required for a demographic analysis. This fee should include some onsite time to meet with local planners and builders.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Hire a firm or consultant to conduct a demographic analysis.	(\$6,000)	\$0	\$0	\$0	\$0

**D. PERSONNEL MANAGEMENT**

Personnel costs typically represent the largest expense in school districts. As a result, efficient and effective management of human resource functions is critical to the overall effectiveness of a district. In small districts, human resource functions are usually managed by the superintendent with clerical assistance. Typical tasks of a school district’s human resources department include the following:

- recruiting employees;
- overseeing the interviewing, selection, and processing of new employees;
- retaining employees;
- processing promotions, transfers, and resignations;
- determining and maintaining compensation schedules;
- managing insurance programs;
- managing employee benefits programs;
- planning and forecasting personnel needs;
- maintaining complete employee records, including records on training and certification;
- developing and maintaining job descriptions, which would include establishing required job credentials;
- managing the employee evaluation process;



- handling employee complaints and grievances, including grievance procedures;
- developing personnel policies; and
- ensuring that the employer follows all laws and regulations.

To support the mission of a school district, it is important that these human resource functions be efficient, effective, and aligned to federal and state law. Like most employers, public school districts must comply with federal laws governing human resource management. These laws include:

- *Fair Labor Standards Act*, which governs wages and hourly payments;
- *Americans with Disabilities Act*, which requires employers to provide reasonable accommodation to any employee or job applicant who has a disability; and
- *Equal Employment Opportunity Act*, which prevents employers from making hiring and firing decisions based upon age, race, religion, gender, or other factors not related to performance.

In addition, state laws govern school district human resource administration in areas such as grievances, due process, termination, and contract renewal. Personnel selection and retention are part of a continuous process necessary to ensure an experienced, quality teaching staff.

#### **FINDING 1-15**

Personnel files are secure. The file cabinets had locks and were kept behind a locked office door. The only area of concern in regard to personnel files is that the district does not maintain a sign-in sheet indicating who has had access to the file.

The contents included in the personnel files were consistent across the files reviewed and meet most standards for handling personnel records. Although file cabinets are not fire-rated, the district annually scans documents they wish to have permanently into memory sticks that are then kept in locked storage. Scanning of documents currently includes leave records, contracts, time sheets, board minutes, sign-in sheets for professional development, and other documents that the district wishes to keep permanently.

The district does not maintain a sign-in sheet indicating who has had access to the personnel files. Any staff person reviewing a file should sign in, including the superintendent, principals, contracted or state auditors, and state accountability staff.

According to the Society of Human Resource Management (SHRM) guidelines, personnel files and medical records are private documents and should be maintained in locked file cabinets in a secure location. Files should only be accessible to those people with a legitimate need to access the files. Special guidelines apply to securing and handling medical information obtained



through medical examinations and tests.<sup>12</sup> The *Americans with Disabilities Act (ADA)* also requires that medical records be secured and accessible only for safety and health purposes.

## **RECOMMENDATION**

### **Use a sign-in sheet to track those having access to the personnel file.**

The sign-in sheet should include printed name, date, purpose, and signature of the person accessing the personnel file. The sign-in sheet should be kept on a clipboard on top of file cabinets holding records. Staff near the sheets may need to give a verbal reminder to sign in. A posted sign reminding those getting access to use the sign-in sheet will also likely be helpful.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 1-16**

The district does not have a personnel evaluation system for support staff. As a result, employees do not receive consistent feedback to enhance their performance and have limited opportunity for formal supervision.

In interviews and document review, the consulting team did not see evidence of a consistent plan of evaluation for support staff, nor a format for the evaluation activity. In several interviews with support staff, it was alleged that at least one support staff member is regularly late or absent from work but has not faced any consequences. The consulting team was unable to confirm or deny this allegation with the data available but, if true, would serve to underscore the need for an evaluation system that would surface these types of problems and provide for consistent discipline.

**Exhibit 1-21** provides a sample evaluation document used in another Oklahoma district.

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<sup>12</sup> [www.shrm.org](http://www.shrm.org)

**Exhibit 1-21  
Evaluation Tool for Non-Teaching Staff**

Performance Criteria	Appropriate Level of Performance	Room for Growth	Unsatisfactory
Attendance			
Job Knowledge			
Quality of Work			
Attitude			
Dependability			
Conduct			
Teamwork			
Neatness			
Do you recommend remediation?	Yes / No		
I agree with the above evaluation	Check		
I disagree with the above evaluation	Check		
I request a job targets report for the Needs to Improve ratings checked above	Check		
Two week notice statement			
Signature lines			

*Source: Blair Public Schools, 2013*

**RECOMMENDATION**

**Develop and implement an evaluation system for support staff.**

Supervisors should provide support employees with a deliberate and thorough evaluation process. Support staff should provide input into the development of an evaluation form and schedule. The evaluation form does not necessarily need to be tailored to each position (paraprofessional, bus driver, etc.), but it should include clear descriptors of expectations. It should also include a place that the employee can add comments, if desired. Most importantly, it should include a signature line so that each employee performance is officially documented. Any disciplinary action against an employee without this measure would be fairly easy to contest.

Once the form and schedule have been determined, the district should designate who is responsible for evaluating each support staff member. The results of the evaluation process should be used to support improved and continued high performance of support staff.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### ***Professional Development***

While the development of a competent certified teachers and non-teaching staff is often considered a human resource function, the professional development of personnel is also a critical component of instructional delivery and school improvement. Professional development programs enhance the professional knowledge, skills, and attitudes of educators to improve student learning. The base of knowledge in education is growing so rapidly in every academic discipline that educators must stay current and develop new expertise. Effective school districts provide ongoing learning opportunities for all educators. The SDE standards specify that professional development should increase competencies in core curricular areas.

The organization Learning Forward, formerly the National Staff Development Council, has established standards for quality professional learning<sup>13</sup> that increase educator effectiveness and results for all students. These standards characterize quality professional learning as that which:

- occurs within learning communities committed to continuous improvement, collective responsibility, and goal alignment;
- requires prioritizing, monitoring, and coordinating resources for educator learning;
- integrates theories, research, and models of human learning to achieve its intended outcomes;
- aligns its outcomes with educator performance and student curriculum standards;
- requires skillful leaders who develop capacity, advocate, and create support systems for professional learning;
- uses a variety of sources and types of student, educator, and system data to plan, assess, and evaluate professional learning; and
- applies research on change and sustains support for implementation of professional learning for long-term change.

The *No Child Left Behind Act (NCLB)* quality professional development guidelines specify that professional development should be ongoing, targeted to student achievement, and distributed over time. Single presentation and one-time only activities are not considered quality professional development under *NCLB* guidelines. These guidelines apply to professional development activities that are funded with federal funds.

### **FINDING 1-17**

The district uses the Teacher Leader Effectiveness (TLE) model for teacher evaluations. Principals are sufficiently trained in implementing the evaluation process and identified their work in completing teacher evaluations as most important, despite the amount of time it requires.

The TLE model is designed to provide teachers and principals with data that can lead to self-

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<sup>13</sup> <http://learningforward.org>

improvement. **Exhibit 1-22** shows the evaluation rubric for teachers.

**Exhibit 1-22**  
**Tulsa TLE Observation and Evaluation Rubric for Teachers**

Domain	Relative Weight	Dimensions
Classroom Management	30%	1. Preparation 2. Discipline 3. Building-Wide Climate Responsibility 4. Lesson Plans 5. Assessment Practices 6. Student Relations
Instructional Effectiveness	50%	7. Literacy 8. Common Core State Standards 9. Involves All Learners 10. Explains Content 11. Explains Directions 12. Models 13. Monitors 14. Adjusts Based upon Monitoring 15. Establishes Closure 16. Student Achievement
Professional Growth and Continuous Improvement	10%	17. Uses Professional Growth as an Important Strategy 18. Exhibits Professional Behaviors and Efficiencies
Interpersonal Skills	5%	19. Effective Interactions/Communications with Stakeholders
Leadership	5%	20. Leadership Involvements

Source: <https://sde.ok.gov/sites/ok.gov.sde/files/TLE-TPSFramework12.pdf>

The model provides a link to improvement through professional development by utilizing an evaluation rubric that clearly profiles areas of needed improvement. The teacher is expected to assist the principal in evaluation activities and to select professional development that will enhance teacher performance and improve outcomes for students. The principal assists the teacher by removing barriers and helping the teacher acquire high quality professional development. The principal has the role of analyzing the results of TLE for the entire staff and noting trends and areas where larger groups of teachers could use training to increase effectiveness and then reporting that to professional development planners. The TLE model also includes evaluation models for non-teaching certified staff such as counselors.

The high school principal’s methodology for discussing evaluation results with teachers reflects a great deal of thought. In focus groups, teachers characterized the evaluation comments as helpful.

**COMMENDATION**

**The district is commended for using the TLE model for providing teacher evaluations.**

**FINDING 1-18**

The SPS professional development plan seems to be a beginning of the year workshop effort for the teaching staff and then simply asking teachers if they want to attend something during the year. There does not appear to be a district effort to tie training into TLE evaluation results or into any identifiable district curriculum initiatives.

The district does not have a multi-year plan or schematic that describes a professional development program for teachers, nor is there a plan that includes detailed objectives and multi-year strategies for accomplishing these. Without these, teachers may lack an understanding of the professional development focus and how initiatives connect over time. The absence of a multi-year plan can result in fragmented school improvement initiatives.

Principals have commented that they try and work with teachers on identified improvement areas and then assist with providing resources and finding opportunities where teachers can get the training needed. The documentation kept on teacher attendance at professional workshops does suggest that teachers are going to professional development and the district is providing opportunities for professional development. Teachers, however, must pay the costs for the training.

Interviews and focus group comments on professional development reflect that teachers are willing to participate in scheduled professional development on Fridays. There is also three days of in-service at the beginning of the year, including a county-wide meeting at Southeastern Oklahoma University. A comment received on the survey suggests that routine staff development be done online, such as Blood Borne pathogens training, to free time in the classroom to prepare for school starting.

**RECOMMENDATION**

**Charge the professional development committee to develop a clearly articulated multi-year plan.**

The committee should outline a professional development program for teachers rooted in instructional initiatives. For non-teaching staff, appropriate training can also be based on evaluation activities.

Professional development activities should directly tie to curriculum initiatives, technology implementations, personnel evaluations, and job responsibilities. This type of planning will reduce fragmentation and increase teacher understanding of the initiatives designed to improve student achievement. This approach should also lead to greater professionalism, greater buy-in to overall school improvement, and enhanced performance of teaching and non-teaching staff.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 1-19**

Substitutes are difficult to acquire in most school districts which leads to reliance on principals or teachers to cover classes. Most of the substitute time used is tied to the beginning of the year activities.

As shown in **Exhibit 1-23**, 40 percent of staff *agreed* or *strongly agreed* that substitutes are available, while 40 percent *disagreed* or *strongly disagreed*. Providing quality substitutes seems to be an issue, as it is in most small districts.

**Exhibit 1-23  
Staff Survey Results Regarding Substitute Availability**

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The district has a pool of quality substitutes to fill positions when necessary.	7%	33%	20%	32%	8%

*Source: Prismatic Survey Results, December 2018*

At the time of the onsite work, the district was using nine different substitutes. An analysis suggests that most of the substitute time was used to cover classes at the beginning of the year in baseball, softball, agriculture judging, and other participation activities.

The effects of not having enough available and qualified substitutes are manifold:

- Teachers cover absences during their planning periods or even double up classes. This affects instruction in two classes instead of one.
- There is a reduction of time for teachers to plan together, discuss students’ progress and/or curriculum improvements, and mentor new teachers.
- Classroom aides are pulled from their assignments, again affecting two classes instead of one.
- Poor instruction and, often, poor conduct, is the result of a poorly prepared substitute.

**RECOMMENDATION**

**Develop strategies for improving the availability of substitute teachers.**

The district should study the substitute availability and data on coverage by administrators and teachers on their planning hour, then develop a plan to gradually reduce the use of teachers and administrators as substitute teachers. The consulting team recommends that the district take the following steps:

- visit the local colleges and universities with teacher preparation programs to promote the valuable experience that substitute teaching can provide, and ensure that prospective substitutes know that SPS is a nearby option;
- offer certified substitutes and those in certification programs a performance evaluation. These would be completed by the teacher for whom the substitute was obtained. They would be printed on SPS letterhead and signed, so that teachers looking for permanent positions could use them in their application packages;
- ensure that SPS is paying slightly higher for substitutes than neighboring districts;
- implement a tiered salary schedule, offering an incremental increase in pay to substitutes after they have completed 30 and 60 days of substituting each year;
- provide for a greater substitute pay differential between certified and noncertified substitutes;
- consider reviewing anticipated job openings and employing the candidate for the opening as a full-time substitute teacher working in different classes as illnesses in staff occur, and until the opening actually happens;
- develop a volunteer or PTA program as a potential source and pool of trusted substitutes; and
- provide staff development training targeting special needs of the substitutes.

Many of the strategies outlined above can be implemented at minimal or no cost to the district.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### ***E. COMMUNITY AND PARENT INVOLVEMENT***

School districts are a vital part of communities, often associated with a community's identity, sense of pride, and quality of life. This is especially true in smaller communities. In order to strengthen this role, school districts should develop effective communications and community involvement programs that lead to a more informed and engaged staff and community. Research demonstrates that community outreach benefits both the community and the schools.

Effective community involvement programs should highlight the unique characteristics of the school district and the community. These programs can substantially affect citizen perceptions of and engage the community with the school system. Effective programs will rally public support and involvement. They can result in parent and community volunteers, public participation in the decision-making processes that affect the schools (i.e., bond and board elections), and productive business and community alliances.

**FINDING 1-20**

SPS has low parent conference attendance rates. This is a concern, as parent conferencing is a formal method of communicating with parents.

**Exhibit 1-24** shows a five-year comparison of parent conference attendance rates for SPS, its peers, and the state. The district had a participation rate at parent/teacher conferences that was below the state in all years except 2015-16. Overall, SPS tends to have average conference attendance rates of 67.3 percent, which is the third-lowest among its peers.

**Exhibit 1-24**  
**Trend in Parent Conference Attendance**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17
<b>Silo</b>	<b>57.3%</b>	<b>67.1%</b>	<b>68.0%</b>	<b>74.0%</b>	<b>70.0%</b>
Caney Valley	58.0%	61.8%	62.0%	62.0%	60.0%
Newkirk	84.7%	84.9%	78.0%	80.0%	66.0%
Wilburton	66.8%	67.0%	62.0%	64.0%	69.0%
Tishomingo	75.5%	69.4%	69.0%	64.0%	60.0%
Hennessey	65.5%	67.9%	60.0%	62.0%	62.0%
<b>State</b>	<b>74.0%</b>	<b>74.1%</b>	<b>74.0%</b>	<b>74.0%</b>	<b>73.0%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

Epstein (2001) at Johns Hopkins University<sup>14</sup> and others have documented research showing the positive effect that strong parental involvement has on schools and on student achievement. Their findings include:

- 50 to 85 percent of the variance in achievement scores, IQ, or verbal ability can be attributed to parent, family, and home environment variables.
- Parent education programs, especially those that train low income parents to work with their children, improve how well students use language skills, perform on tests, and behave in school.
- Many studies have found that when parents become involved in school activities, not only do their attitudes improve, but so do those of their children. Student achievement rises as well.

**RECOMMENDATION****Develop a strategy for increasing parent conference attendance or participation.**

The strategy can include analyzing existing efforts at achieving parent conferencing, determining which new strategies have the best chance of success, and implementing at least one new

<sup>14</sup> Epstein, J. L. (2001) *School, family and community partnerships: Preparing educators and improving schools*. Boulder, CO: Westview Press.



strategy and analyzing the results.

Strategies for increasing parent conference attendance can include the following:

- Schedule siblings back-to-back when possible.
- Offer early evening, early morning, and night conferences when necessary.
- Use prearranged phone call appointments.
- Offer drop-in babysitting during conference times.
- Provide a sandwich dinner for those coming straight from work.
- Make sure the teachers have training in conferencing and provide personalized worthwhile information about the students.
- Implement student-lead conferencing.<sup>15</sup>

SPS principals should analyze the efforts to achieve parent conference attendance with their teachers and determine what best fits their situation.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 1-21**

The district lacks a volunteer program. The use of parent and community volunteers can be an effective method of assisting staff that are stretched thin and fulfilling numerous responsibilities. Additionally, as volunteers become known to staff and comfortable in the school, they can provide a trusted pool for substituting in classrooms. SPS makes some use of volunteers but there is not a plan in place to actively encourage the use of school volunteers.

**Exhibit 1-25** reflects the parent and staff survey results concerning volunteers. More than two-fifths (48 percent) of the staff acknowledges that there is not enough staff available to carry out district operations. While most parents feel they are encouraged to volunteer (76 percent), the lack of sufficient actual volunteers could stem from the lack of a structured program. Volunteers could lighten the load of the staff while encouraging the positive relationships the district has built with parents.

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<sup>15</sup> <http://www.pta.org/3549.htm>

**Exhibit 1-25  
Staff and Parent Survey Results Regarding School Volunteers**

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	The district effectively uses volunteers to assist with meeting district goals.	13%	25%	43%	15%	3%
Staff	The district has adequate numbers of staff to carry out its operations.	12%	36%	9%	41%	2%
Parent	My child’s school encourages parents to volunteer, if they are able.	38%	38%	18%	4%	2%

*Source: Prismatic Survey Results, December 2018*

**Exhibit 1-26** is a comparison of SPS to peer districts. SPS is the second lowest in reported hours per student when compared to peer districts but all have little use of volunteers.

**Exhibit 1-26  
Volunteer Hours per Student, 2016-17**

District	District Hours per Student
<b>Silo</b>	<b>1.0</b>
Caney Valley	1.1
Newkirk	2.0
Wilburton	2.2
Tishomingo	0.6
Hennessey	1.7
<b>Peer Average</b>	<b>1.5</b>

*Source: Office of Educational Quality and Accountability, Profiles Database 2018*

Without district guidelines and emphasis, volunteering can quickly be lost in all the other pressures that schools face. The National Parent Teacher Association’s *Seven Steps to a Successful Volunteer Program*<sup>16</sup> provides useful information for creating and maintaining an active school volunteer program. The steps are:

- assessing the volunteer needs each school has;

<sup>16</sup> Ibid.

- working with and training principals, teachers, and school staff on using and supervising volunteers effectively;
- setting goals and objectives for volunteer assignments;
- recruiting volunteers;
- training and orienting volunteers;
- training and recognizing volunteers; and
- evaluating volunteer performance and program success.

## **RECOMMENDATION**

### **Study and develop a systematic volunteer program for SPS.**

The available information seems to support an expanded role for parent and community volunteers to go to work in the school. Action on enhancing the use of volunteers will not only benefit the school and staff, it will also help create a more informed and engaged community, which can lead to greater support for board of education and bond elections. Additionally, an enhanced effort to use volunteers can help create a pool of trusted substitutes and people that can be relied on for input and advice regarding the school district.

SPS should study and develop a volunteer program that promotes parent and community involvement in the district, with specific goals in leveraging volunteer efforts toward improved academic outcomes. The superintendent should gather and task a committee with researching successful small school volunteer programs and then develop a SPS volunteer program. It should include administrators, teachers, parents, and community members.

The program can include classroom, bus, and school grounds volunteers, formal development of parent/teacher organizations, and programs that are aimed at involving specific groups like grandparents. It should seek consistency in policies and practices throughout the district and should also be formally approved by the school board.

The committee should be flexible in thinking of opportunities for parents, grandparents, and guardians to be involved outside the traditional concept of classroom volunteering and should focus on ways they can help support academic outcomes. To allay fears regarding the quality of volunteers, the program should provide training to the volunteers so that expectations are understood. The parent input provided through the surveys should be used as a starting point to inform district leaders of parent priorities and concerns.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**F. COMMUNICATIONS/PUBLIC RELATIONS**

The primary role of communications in a school district is to convey a message and image consistent with the school board policies and implemented through procedures established by the superintendent and district staff. Critical components of communications include strategies for externally communicating with the community and internally communicating within the school district.

**FINDING 1-22**

The district successfully communicates with the community in a number of ways. It runs a number of programs that serve as ambassadors for the district's work. The district uses two forms of social media to communicate with stakeholders: a website and Facebook page. Finally, the district uses other technologies as well to communicate.

The district has several outstanding programs that are a part of the district's message. They include:

- The academic team is winning regional and conference championships.
- The 4H and FFA program involves nearly 200 students.
- The FCCLA is an active organization, as is the BETA academic club.
- The baseball and softball teams play two full seasons (fall and spring) and win championships nearly every school year.
- Basketball is played in both girls and boys teams starting in elementary school.
- There is a leadership class that does many activities in the community.

The SPS website and Facebook page are up to date and maintained as an important community link. The school district uses Wen-GAGE as its student information system. On the website, parents have access to the online grade book and there is an online parent resource with specific quick links.

Staff and parent survey results were almost entirely positive regarding the district website and the ability to use technology for updates. As shown in **Exhibit 1-27**, all staff and parents who responded found the website useful.

**Exhibit 1-27**  
**Staff and Parent Survey Results Regarding Website Communication**

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Parent	The district website is a useful tool for me and/or my child.	37%	42%	15%	4%	3%
Parent	I regularly use technology to keep up to date on my child's education (emailing teachers, online grade book, etc.).	34%	42%	13%	8%	3%
Staff	The district website is a useful tool for staff, parents and students.	38%	63%	0%	0%	0%

*Source: Prismatic Survey Results, December 2018*

The district communicates with teachers, parents and other patrons using email, texting, and group messaging. Other communication efforts mentioned in interviews and focus groups include personal phone calls, voicemail, the Remind application, and an online newsletter. Survey, interviews and focus group data support the notion that communication is a strength for SPS. Focus groups and interviews indicate that parents are invited to and attend many events.

### **COMMENDATION**

**The school district is commended for using many opportunities and a variety of technologies to tell the district story and to inform the community.**



*Chapter 2:*  
*Instructional Delivery*

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## Chapter 2

# *Instructional Delivery System*

This chapter addresses the instructional delivery of Silo Public Schools (SPS) in the following sections:

- A. Curriculum
- B. Instructional Delivery and Student Performance
- C. Special Programs
- D. Student Services

The primary purpose of any school system is educating children. Effective schools deliver quality instruction based upon a district's capacity to manage and implement a rigorous, relevant curriculum. The education process requires robust policies and procedures that direct the instructional process, provide well-designed programs to meet the needs of all students, and provide resources to support program implementation. The monitoring and evaluation of program effectiveness based upon student performance data are also essential.

### **A. CURRICULUM**

Oklahoma state education laws, as codified in the Oklahoma Administrative Code (*210 OS § 15*), manage the instructional process to ensure academic success for all students. It is the responsibility of the school district to meet the requirements of the law. A district's instructional program, along with its allocation of resources, is how a district attempts to meet the educational needs of all students. A well-designed and managed process for developing curriculum and directing instruction, collecting assessment data to evaluate and monitor programs, and providing the resources needed to support educational efforts is essential if a district is to meet the needs of its students.

Curriculum development and instructional delivery are critical components of student learning. The presentation of materials, concepts, skills, and new ideas greatly affect the acquisition of knowledge. Curriculum content and instructional strategies need proper alignment and regularly scheduled evaluations. This promotes improvement of student performance and ensures curricular relevance, rigor, and equity.

Oklahoma school boards and superintendents provide principals and teachers with necessary tools to deliver the state adopted standards. The Oklahoma Academic Standards (OAS) drive educational delivery. With OAS, educators are encouraged to shape their educational efforts by integrating the best practice of instructional shifts. The goal is that such efforts will provide the rigor and relevance students need to be college and career-ready.

The OAS provides a consistent, clear articulation of learning expectations, guides teacher instruction, and assists parents in knowing what they need to do to assist in the educational process. The academic standards are intended to mirror the robust, relevant, real world knowledge and skills that students need for success in college and careers. The OAS defines the content, knowledge, and skills students should gain during their K-12 educational careers. It

prepares high school graduates for success in college courses and in workforce environments. **Exhibit 2-1** further explains the OAS standards.

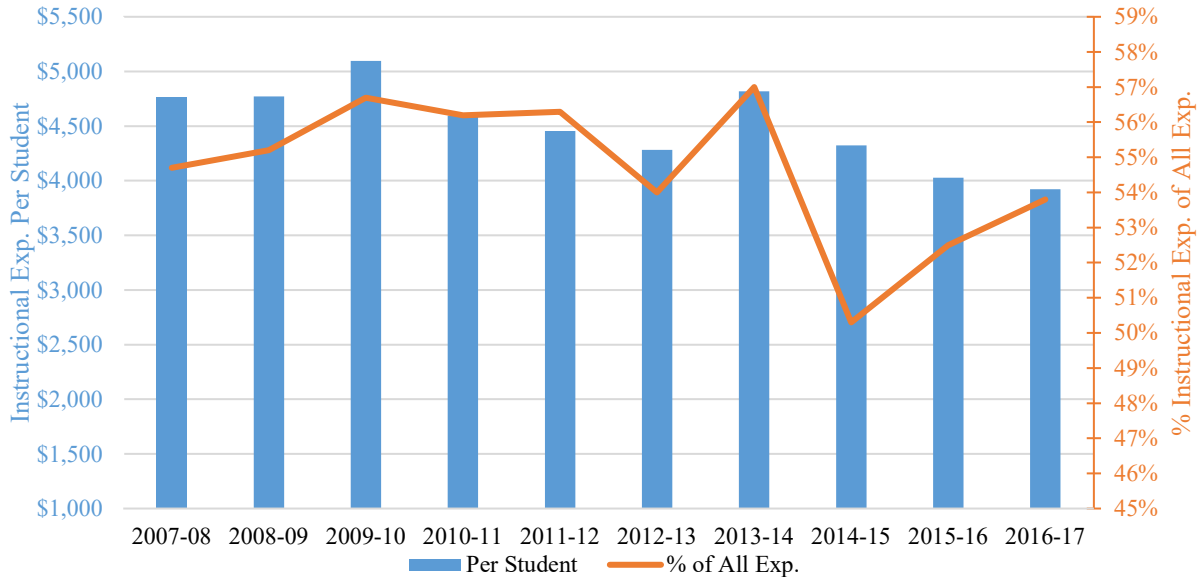
**Exhibit 2-1  
Oklahoma Academic Standards**

What the OAS Does	What the OAS Does Not Do
<ul style="list-style-type: none"> <li>• Focus on deep thinking, conceptual understanding, and real-world problem-solving skills</li> <li>• Set expectations for students to be college, career, and citizenship ready</li> <li>• Incorporate literacy in science, social studies, and technical subjects</li> <li>• Emphasize the use of citations and examples from texts when creating opinions and arguments</li> <li>• Increase rigor and grade level expectations</li> <li>• Determine the full range of support for English language learners and students with special needs</li> </ul>	<ul style="list-style-type: none"> <li>• Dictate how teachers should teach</li> <li>• Mandate a specific curriculum</li> <li>• Limit advanced work beyond the standards</li> <li>• Require the purchase or development of entirely new instructional materials</li> <li>• Prescribe all that can or should be taught</li> <li>• Limit efforts to prepare students for college, career, or citizenship readiness</li> <li>• Prescribe interventions for students below grade level</li> </ul>

*Source: The Oklahoma State Department of Education (SDE), 2018*

**Exhibit 2-2** provides a 10-year comparison of SPS instructional expenditures as a percent of total expenditures as well as the annual instructional expenditures per student. Over that period, instructional expenses have ranged from 50 percent to 57 percent of all expenditures. Instructional dollars per student have varied from \$5,095 in 2009-10 to \$3,923 in 2016-17.

**Exhibit 2-2  
Trend in Instructional Spending**



Source: Office of Educational Quality and Accountability, Profiles Database and Prismatic calculations

The total number of core curriculum units offered by SPS was the second-lowest and tied with the community group but lower than the state (**Exhibit 2-3**):

- The comparison shows SPS lower than all its peers, the community group, and the state in fine arts.
- SPS exceeded the community group and the state in science and languages.
- SPS exceeded the community group for language arts but was lower than the state.
- SPS was tied with Newkirk and Tishomingo in the number of math units but was lower than the community group and state.
- SPS was tied with Caney Valley in the number of social studies units but was lower than the community group and state.

**Exhibit 2-3**  
**Comparison of Core Curriculum Units by Subject, 2016-17**

Subjects	Silo	Caney Valley	Newkirk	Wilburton	Tishomingo	Hennessey	Community Group	State
Language Arts	5.0	6.0	6.0	6.0	5.0	5.0	4.7	5.2
Science	7.0	6.0	7.0	6.0	7.0	8.0	5.6	6.2
Math	5.0	4.0	5.0	6.0	5.0	7.0	5.5	5.7
Social Studies	6.0	6.0	5.0	4.0	5.0	7.0	6.1	6.8
Fine Arts	4.0	9.0	6.0	7.0	9.0	9.0	6.6	8.1
Languages	3.0	2.0	0.0	2.0	3.0	4.0	1.5	2.4
<b>Total</b>	<b>30.0</b>	<b>33.0</b>	<b>29.0</b>	<b>31.0</b>	<b>34.0</b>	<b>40.0</b>	<b>30.0</b>	<b>34.4</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

### FINDING 2-1

The district lacks processes and procedures to annually:

- evaluate instructional resources, software, enrichment, and remediation resources;
- review supplemental resources to determine alignment with OAS, student performance data, or relevant student need;
- evaluate programs to assess the selection, modification, and adjustment of all instructional resources;
- measure the overall effectiveness of curricular and instructional resources; and
- evaluate the impact of instructional resources on improved student achievement.

Across the district, there are no defined efforts to routinely collect data to determine the efficiency and effectiveness of instructional resources and the impact on student achievement.

The consulting team did not find evidence of an evaluation process to determine how supplemental and remedial interventions, instructional strategies, and enrichment activities are aligned with student need. Students in grades Pre-K through 3<sup>rd</sup> grade are in self-contained classes, while 4<sup>th</sup> through 12<sup>th</sup> grade is departmentalized by subject. In the middle school and high school, select teachers communicate regarding curricula and instructional resources. However, teachers primarily work in isolation and select their own supplemental resources. Many textbooks were found to be dated. Interviews and focus group conversation revealed the need for additional instructional resources to update and supplement the texts. There was no evaluation process to ensure current supplemental resources aligned with OAS.

Most federal and state instructional resource/programs require individual instructional resource/program evaluations. However, highly effective schools take the evaluation process to the next level and evaluate all locally implemented instructional resources/programs. This ensures instructional resources/programs work in concert and are effective for remediation or enrichment at each grade level and content area. An annual evaluation process ensures all instructional resources, programs, and software are not “busy work” but directly improve student learning. Likewise, an annual evaluation process determines if instructional resource materials are addressing student learning gaps or redundant and repetitive overlaps. All teachers need resources that are relevant, support curricula rigor, and most importantly, seamlessly align with state standards.

Without comprehensive instructional resource/program evaluations, schools risk getting into curricular and instructional traps. They continue doing what they have always done and serving students a number of instructional resources without focused intent and alignment to state standards and targeted student learning need. Systematically collecting and analyzing quantitative and qualitative information regarding instructional resources provides district administrators and teachers with valuable assessment information.

Evaluations should measure and answer questions such as:

- Is there a need to improve, modify, or abandon the supplemental instructional resources?
- Does the resource yield the intended effect on improved student learning?
- Are the resource goals still relevant to student need and aligned to state standards?
- Do the resources render unintended outcomes?
- Is there a need to change or refine the implementation strategies and procedures?
- Are all the individual resource components valuable and effective in improving student achievement?
- Does the instructional resource/program have positive impact on students, teachers, school climate, and culture?<sup>1</sup>

Districts can then use the evaluation to make data-driven, informed decisions. The evaluation should guide the district to keep or abandon instructional resources/programs. Based on data, modifications, additions, deletions, or revisions to instructional resources/programs can be determined. Such information is crucial for aligning district funds and resources with new purchases that are effective instructional resources/programs and best practices. Without implementing a regularly scheduled evaluation system, SPS positions itself to fund instructional resources/programs that are not meeting student needs or the intent behind their implementation.

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<sup>1</sup> [http://ies.ed.gov/ncee/edlabs/regions/pacific/pdf/REL\\_2014007.pdf](http://ies.ed.gov/ncee/edlabs/regions/pacific/pdf/REL_2014007.pdf)

Most of all, SPS needs assurance the district is not spending money and time on ineffective instructional resource/programs.

## RECOMMENDATION

### **Develop and implement a plan to annually evaluate instructional resources, software, enrichment, and remediation resources.**

High performing districts annually evaluate all instructional resource/programs, new initiatives, grants, and district processes. The combined data determines if there is need to eliminate components or discontinue the resource or instructional resource/program. The data should also provide evidence that the instructional resource/program positively:

- impacts improved student learning;
- contributes to the relevance and rigor of instruction and curriculum;
- meets the intended curricular and instructional purpose, and
- supports best instructional practices.

In the long term, instructional resource/program evaluations focus on improving student achievement. Evaluation is a guide to build upon successes and leads to ongoing improvement in practices and outcomes.

The SPS superintendent, principals, and all teachers should develop a list of all curricular and instructional resources they routinely implement to supplement, remediate, or enrich their instruction, and support the curriculum. The list should include a rank ordering of total dollars spent on each implemented resource. The superintendent should then direct evaluation efforts to those with the highest costs and the strongest correlation to student performance data in the bottom quartiles.

The superintendent and principals should work with teachers to identify and abandon resources and materials that are no longer robust and relevant to the knowledge base students need for the next level of study and college and career-readiness. This evaluation and abandonment process should be simple, easily implemented, and directly focused on supporting improved student performance.

All materials should undergo a formative and summative evaluation. A formative instructional resource/program evaluation can be used in purchasing new instructional resources/programs and during the implementation of the resource. Such evaluation promotes close examination of instructional resource/program implementation, as to whether there were changes, adjustments, or improvements, and that it is adapted with fidelity. **Exhibit 2-4** presents examples of formative evaluation questions to explore.

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**Exhibit 2-4**  
**Formative Instructional Resource/Program Evaluation**

While the instructional resource/program is ongoing, these questions should be asked several times:

- Is the instructional resource/program being implemented as it was designed?
- Do the students understand the instructional resource/program's concepts?
- What are the misconceptions about the instructional resource/program?
- Are all SPS instructional resource/program users implementing the instructional resource/program in the same way?
- Is the instructional resource/program being implemented on schedule?
- Is there enough time to implement all aspects of the instructional resource/program?
- What aspects of the instructional resource/program do not seem to be working as well as you intended?
- Do instructional resource/program implementers need additional training on the instructional resource/program?
- Are there any negative outcomes surfacing?

Source: [http://www.janetwall.net/attachments/File/9\\_Step\\_Evaluation\\_Model\\_Paper.pdf](http://www.janetwall.net/attachments/File/9_Step_Evaluation_Model_Paper.pdf)

Summative instructional resource/program evaluation takes place after the instructional resource/program has been implemented and is conducted at the end of each school year, or another logical time, such as the end of instructional resource/programmatic intervention.

**Exhibit 2-5** presents examples of summative evaluation questions to explore.

**Exhibit 2-5**  
**Summative Instructional Resource/Program Evaluation**

After an instructional resource/program has been implemented ask:

- What did the instructional resource/program accomplish?
- Did the instructional resource/program reach its goals and objectives?
- What impact did the instructional resource/program have on students?
- What were the outcomes?
- Who benefited from the instructional resource/program?
- How much was the benefit to improved student achievement?
- Was the benefit greater with this instructional resource/program when compared with another instructional resource/program?
- Did all types of students benefit from the instructional resource/program?
- What were the positive outcomes?
- What were the negative outcomes?
- What should be improved/changed in the instructional resource/program?
- Does the benefit of the instructional resource/program warrant the cost?

Source: [http://www.janetwall.net/attachments/File/9\\_Step\\_Evaluation\\_Model\\_Paper.pdf](http://www.janetwall.net/attachments/File/9_Step_Evaluation_Model_Paper.pdf)

In addition to asking these evaluation questions, it is important to make certain the instructional resources/programs align tightly with the OAS depth of knowledge (DOK) expectations, and Oklahoma's expected student performance levels. SPS demographics such as poverty, mobility, ethnicity, and bottom quartile student test scores should also be taken into consideration for abandonment or retention purposes. Teachers cannot afford to implement instructional resources/programs and materials that do not have high impact on closing the achievement gap and improving student performance. There are many free resources available to gather additional information, including:

- resources on designing and planning instructional resource/program evaluation;<sup>2</sup>
- a basic guide to instructional resource/program evaluation;<sup>3</sup> and

<sup>2</sup> <https://www.cde.state.co.us/fedprograms/designing-and-planning-your-program-evaluation>

<sup>3</sup> <https://managementhelp.org/evaluation/program-evaluation-guide.htm>



- an evaluation matrix and template.<sup>4</sup>

## FISCAL IMPACT

This recommendation can be implemented with existing resources. However, federal guidance notes that districts should expect to spend between five and seven percent of the total funding of an instructional resource/program on evaluation. In time, it would be preferable to contract with an outside evaluation firm with credibility and expertise in statistical analysis. Using federal monies, the consulting team recommends that a minimum of \$10,000 per year be allocated to evaluation efforts.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Evaluate all instructional efforts and initiatives.	(\$10,000)	(\$10,000)	(\$10,000)	(\$10,000)	(\$10,000)

## FINDING 2-2

The district recently adopted a new math textbook series for elementary grades. The primary rationale for adopting a new math series during the 2017-18 statewide mathematics textbook adoption year was to provide a consistent and systematic instructional resource for teachers in Pre-K through 5<sup>th</sup> grade to improve teaching and learning in mathematics. Interviews with elementary teachers indicated an overall appreciation of this initiative. Teachers reported that this was the first time they have ever had a math program with teacher editions to use as references and technology-based options to utilize in conjunction with each lesson.

SPS teachers also reported seeing an increased understanding of some of the key topics, such as number sense, as evidenced by observing student work and responding to student questions about each topic. One-on-one interviews with teachers revealed their comfort level with the mathematics topics has increased due to the access to a new program that provides multiple strategies and approaches for students to solve problems. For example, students learning multiplication are not only exposed to the traditional procedure for finding the products, but are also exposed to other methods, such as the area model, arrays, and related facts to support multiple approaches to understanding both the concept and the procedure.

International mathematics teaching and learning expert, Marilyn Burns, explains, “Too often mathematics instruction gives students the erroneous notion that learning math is all about learning procedures rather than making sense of ideas.”<sup>5</sup> Implementing a new math series, which includes multiple processes for helping student make sense of the mathematics, is a key step in moving away from simple teaching of procedures, to the teaching of mathematical thinking and reasoning using flexibility in strategies and approaches.

<sup>4</sup> <https://www2.ed.gov/about/offices/list/oese/sst/evaluationmatters.pdf>

<sup>5</sup> <http://portal.msresources.org/pdf/2015/Uncovering%20the%20Math%20Curriculum.pdf>

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## COMMENDATION

**The district is commended for adopting a consistent math series for Pre-K through 5<sup>th</sup> grade to support growth in student achievement.**

### FINDING 2-3

The district is not benchmark testing consistently across all core content areas. Criterion-referenced formative assessments are limited and sporadic. Teachers use insufficient benchmark measures to determine student mastery or the need for remediation or re-teaching. The benchmarks do not measure student performance against a fixed set of predetermined learning standards (i.e., OAS).

Periodic benchmark testing is randomly used by teachers to determine if students are progressing on grade level and mastering the state standards. During interviews and focus groups the consulting team found no uniform expectations for all teachers to administer benchmark assessments to monitor student progress.

Teachers also expressed limited knowledge regarding a defined process for benchmarking and how to implement formative assessments into their instructional practices. The teachers did not clearly understand the process for how benchmark data translate to instructional design and curricular adjustments. Interviews also found that teachers have marginal understanding of how benchmark data are used to identify small group learning arrangements and remediation strategies. SPS has no benchmark data to align curriculum and inform pacing and instructional design. Use of benchmark assessment results as feedback for both parents and students was minimal. STAR Reading and STAR Early Literacy are used in elementary grades to progress monitor overall reading skills. Overall, no comprehensive evidence was presented to indicate there are clear directions, district-wide expectations, and consistent accountability for teachers to administer criterion referenced benchmark assessments.

Criterion-referenced benchmark assessments yield formative data, testing student knowledge and performance against a fixed set of content or a state standard. Formative benchmarks are assessments administered regularly throughout the school year. Teachers have a measure of whether their students are on grade level and grasping the material. These data help teachers decide what they need to teach, re-teach, or remediate. It also gives teachers input as to whether the written, taught, and tested curriculum are aligned. By using benchmark results, teachers learn what needs reviewing with individual students, as well as which students have attained mastery and need to be challenged. Benchmarking also helps students keep track of their grade level success and their progress to mastering standards.<sup>6</sup>

Formative benchmark assessment is a proven research-based best practice. Benchmarks directly support high-quality instruction and effective assessment. The primary purpose for teachers to incorporate benchmarks is because it improves both their teaching and individual student learning. Formative assessment is a practice that informs teachers about “how” students learn and “what” they are not learning. It focuses on the day-to-day learning interactions between the

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<sup>6</sup> <https://www.edglossary.org/criterion-referenced-test/>

teacher and the students. Teachers routinely using periodic criterion-referenced benchmarks as a standard classroom practice have an immediate measure of what students know and how well they are learning standards and content. This enables teachers to promptly adapt instruction to meet students' needs. Formative benchmarks guide the teacher to make instructional adjustments that keep students on the path to mastery.<sup>7</sup>

Formative assessment is a “process.” Heritage (2007) describes it as “a systematic process to continuously gather evidence about learning.”<sup>8</sup> Boston (2002) explains that it is “the diagnostic use of assessment to provide feedback to teachers and students over the course of instruction (p. 2).” Whatever method a teacher uses – oral questions, a short test or quiz, a paragraph, or any other classroom activity – formative assessment uncovers the degree to which students understand and have mastered what is being taught on a day-to-day basis. It enables customized instruction based on what students know, not on what the textbook or program says to teach next. Formative assessments inform the next days or immediate instructional path and measures student progress toward the end of unit summative test.<sup>9</sup>

## RECOMMENDATION

### **Develop and implement district-wide processes and procedures for administering criterion-referenced benchmark assessments to monitor progress and ensure mastery of OAS.**

The superintendent and principals should set expectations for all teachers to administer formative criterion benchmark assessments. The district needs an accountability procedure to ensure benchmark tests are administered and used to design instruction. Staff meetings and Professional Learning Communities (PLC) meetings should be used to discuss how the assessment is aligned with OAS, DOK, and how the results guide teachers to change and target instruction. The principals should engage teachers in dialogue and discussions about how benchmark results give students a clear understanding of what they do not know or what they have mastered in the current unit of study. The results provide feedback to students, so they know exactly what they need to learn to improve their academic performance. Motivation to learn and be successful grows from knowing what learning gaps exist.

District leaders and teachers must embrace the mindset that benchmark assessments are a key part of the learning process. Criterion-referenced benchmark assessments are an ongoing check for student progress and mastery of content and standards. The assessment results guide teachers in decision-making about future instruction. The principals should use staff meetings, PLC meetings, and one-on-one dialogue to articulate expectations and raise awareness of the importance of administering benchmarks.

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<sup>7</sup> <https://www.ascd.org/publications/books/110017/chapters/Questions-and-Answers-About-Formative-Assessment.aspx>

<sup>8</sup> Heritage, M. (2007). Formative assessment: What do teachers need to know and do? *Phi Delta Kappan*, 140.

<sup>9</sup> Boston, C. (2002). The concept of formative assessment. *ERIC Digest*. Retrieved from: <http://files.eric.ed.gov/fulltext/ED470206.pdf>

The district could purchase software that generates benchmark tests assessing OAS. Teachers can also create their own benchmarks using SDE resources.<sup>10</sup> Several websites offer practical information and examples of formative assessment. This will help administrators refresh teacher awareness and understanding of the benefits for administering formative assessment.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources initially. If it is determined necessary, the district could contract with an external firm to provide assistance.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Hire a firm to help with implementing assessments, if needed.	(\$1,500)	(\$1,500)	\$0	\$0	\$0

**FINDING 2-4**

Although in previous years, SPS has initiated dialogue and some pacing and alignment efforts, the process has not been consistent. There are no current pacing guides or curriculum maps in place for all core curricular areas. Core curriculum at all grade levels and content areas is in differing stages of horizontal pacing and vertical alignment. There is no uniform grade level and content area, horizontal or vertical pacing, or curriculum alignment process. There are isolated efforts at aligning curriculum, yet the district has no full-scale curriculum alignment process among the schools.

SPS lacks intentional and targeted efforts to align the core curriculum and implement pacing calendars that are ongoing working documents. The district has not standardized horizontal and vertical curriculum alignment and pacing processes and procedures based on student performance results.

With no curriculum guides and pacing calendars, neither is there an instructional plan outlining foundational student-centered outcomes for critical thinking, technology skills, goal setting and organizational skills, and communication. The consulting team heard inconsistent and negligible descriptions telling how these components are woven into daily curriculum and instructional delivery. The district administrators expressed expectations to teach OAS, yet, monitoring and accountability are not uniform across the district. SPS teachers engage in random dialogue about curriculum, instruction, and assessment of standards. District-wide efforts to formalize this across all grade levels and content are primarily in the developmental stages. Systems for accountability and adjustments based on student performance also need development, refinement, and implementation.

Student test scores indicate there are still learning gaps. These scores are indicators of the need to address the curricular and instructional gaps that are obstacles to improved student performance.

<sup>10</sup> <https://www.edutopia.org/blog/dipsticks-to-check-for-understanding-todd-finley>; <http://www.ascd.org/publications/books/110017/chapters/Questions-and-Answers-About-Formative-Assessment.aspx>; <https://wvde.us/wp-content/uploads/2017/09/formative-assessment-plc.pdf>

Curriculum that is vertically mapped and aligned is a process for detailing what content and skills are required and taught at each grade level and course during a school year. Calendar pacing tells when the content is taught and revisited. The curriculum maps provide a year-long overview, rather than a daily classroom perspective, of what content and skills are required over the course of the school year (Jacobs, 1997). Curriculum mapping creates a document for teachers to follow and gives guidelines to monitor accountability and ensure the required curriculum is being followed (O'Malley, 1982).<sup>11</sup>

Curriculum pacing guides are created to help teachers stay on track, pace the frequency content, and ensure skills are taught and revisited for maintenance. These pacing guides serve a similar purpose to that of traditional scope-and-sequence documents, which lay out expectations of the material to be covered in each subject at each grade level. Pacing guides are different because they map out the skills and content which are expected to be on the annual state test. Teachers schedule these topics before the spring testing dates. Pacing guides are tied to benchmark assessments that take place quarterly or even more frequently, further delineating what teachers must teach and when they teach it. Some pacing guides specify the number of days, class periods, or even minutes that teachers should devote to each topic.<sup>12</sup>

Research and best practice recommend the identification and specific sequencing and scaffolding of content skills and learning objectives horizontally and vertically. Also, recommended is identifying learning gaps based on student performance. Teachers must know which skills and objectives have not been mastered and require remediation and re-teaching. Curriculum alignment or mapping involves a second-order change. Marzano, Waters, & McNulty (2005) state that second-order change:

...involves dramatic departures from the expected, both in defining a given problem and in finding a solution. Curriculum Mapping may be considered a second-order change for our district because it challenges the status quo of historical practices and therein may result in resistance. However, it has the potential of resulting in transformative learning.<sup>13</sup>

Jacobs (1997) states:

To make sense of our students' experiences over time, we need two lenses: a zoom lens into this year's curriculum for a particular grade and a wide-angle lens to see the K–12 perspective. The classroom (or micro) level is dependent on the site and district level (a macro view).

Though the micro and macro levels are connected throughout a district, there is a conspicuous lack of macro-level data for decision-making. Yet we need that big picture for each student's journey through his or her years of learning. With data from curriculum mapping, a school and its feeding and receiving sites can review and revise the curriculum within a larger, much-needed context. Data on the curriculum map can be

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<sup>11</sup> <http://www.ascd.org/publications/curriculum-handbook/421/chapters/Overview.aspx>

<sup>12</sup> <http://www.ascd.org/publications/educational-leadership/oct08/vol66/num02/Pacing-Guides.aspx>

<sup>13</sup> Marzano, R. J., Waters, T., & McNulty, B. A. (2005). *School leadership that works: From research to results*. (pp. 66). Alexandria, VA: The Association for Supervision and Curriculum Development.

examined both horizontally through the course of any one academic year and vertically over the student’s K-12 experience.<sup>14</sup>

The Curriculum Decisions website examines mapping research and provides pragmatic rationale. The site addresses the importance of the horizontal and vertical curriculum alignment and serves as a valuable foundational resource. It also provides descriptions of the mapping process and how the process is completed.<sup>15</sup>

The staff survey results in **Exhibit 2-6** indicate teachers and school administrators had knowledge of curriculum alignment and pacing issues. However, no digitalized evidence or documents were presented to support the survey results. In interviews and focus groups the consulting team heard only sporadic dialogue referring to the use of SDE resources, and teachers and administrators indicated that the previously used pacing guides were no longer in existence.

**Exhibit 2-6**  
**Staff Survey Results Regarding Curriculum**

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Teachers know what is to be taught and when because they have access to a district-adopted Pacing Calendar that reflects the current Oklahoma Academic Standards (OAS).	29%	39%	24%	7%	2%
The district’s curriculum is aligned from grade to grade and from class to class.	23%	43%	20%	13%	0%
Teachers have scope and sequence documents that determine what is taught and when.	22%	28%	37%	13%	0%

*Source: Prismatic Survey Results, December 2018*

## RECOMMENDATION

**Develop and implement district-wide processes and procedures to vertically align and pace the core curriculum from Pre-K through 12<sup>th</sup> grade.**

Electronic maps and pacing calendars at all grade levels and in core content areas should become the comprehensive “text” from which teachers deliver instruction. District administrators should assume greater responsibility for instructional leaders and deliberately schedule time and develop processes, procedures, and clearly defined expectations for horizontal and vertical curriculum alignment. It is the teachers’ responsibility to have a sound knowledge base of the standards and

<sup>14</sup> Jacobs, H. H. (1997). Chapter 1: The need for calendar-based curriculum mapping. *Mapping the big picture: Integrating curriculum & assessment K-12*. Alexandria, VA: The Association for Supervision and Curriculum Development.

<sup>15</sup> <http://www.curriculummapping101.com/curriculum-mapping-general>

content taught. Equally important is the teachers' obligation to translate the aligned and paced content, skills, and outcomes into their daily lesson plans.

To improve alignment of the SPS curriculum, the superintendent, principals, and teachers should take the lead in aligning Pre-K through 12<sup>th</sup> grade core curriculum and creating pacing calendars based on student performance data. Throughout the 2019-20 school year, the district should allot teachers release time to vertically align core curriculum and create pacing calendars.

Aligned curriculum maps identify the skills, content, and pacing period for all OAS skills and content. Each grade level and core content area need to be mapped and calendar paced. For each course and grade level the process indicates when skills are to be introduced, taught to mastery, and maintained or reinforced for long-term retention. The process should culminate in the creation of electronic documents that are user friendly and guide daily instruction for each course and/or grade level. The maps should also incorporate the student-centered outcomes and support DOK requirements, SDE blueprints, and OAS.

Properly developed and implemented curriculum maps and pacing guides, along with the use of frequent benchmark formative assessments, free teachers of the intense, last minute, "teaching to the test" reviews. Formative assessments provide cumulative documentation of student performance; the aligned core curriculum is mapped, paced, and adjusted to meet student need and testing requirements. This gives teachers a reliable roadmap for preparing students for success.

Each year the maps and pacing calendars should be updated and also shared with new teachers. All teachers must understand the content and the instructional expectations of their specific course and grade level. Placing maps on the district's website communicates the academic and instructional expectations to the community and parents. Teachers find creating their own curriculum maps most useful and pragmatic. This creates ownership and a deeper understanding for implementation. There are many free resources available for teachers to use as a guide, such as:

- yearlong draft maps available for both language arts and math;<sup>16</sup>
- information regarding curriculum mapping;<sup>17</sup>
- information on alignment;<sup>18</sup>
- sets of curricular resources to help educators translate the OAS into classroom practice;<sup>19</sup> and
- a collection of documents in which Oklahoma teachers shared their work to be used as sample/example curriculum guides in ELA.<sup>20</sup>

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<sup>16</sup> <https://www.engageny.org/resource/year-long-draft-curricular-maps-in-ela-and-mathematics>

<sup>17</sup> <http://www.ok.gov/sde/curriculum-mapping>

<sup>18</sup> <http://sde.ok.gov/sde/building-academic-vocabulary>

<sup>19</sup> <https://sde.ok.gov/oklahoma-curriculum-frameworks>

<sup>20</sup> <https://drive.google.com/drive/folders/0B34TUjFtH9SxSFk3c3ljYmoxbnM>



**FISCAL IMPACT**

The development of curriculum maps and pacing guides to improve the SPS curriculum will take time. Professional development days, before school, after school, and summer meetings could become work days. The consulting team estimates that \$8,000 should be budgeted for substitute pay (if teachers miss class time for the meetings); stipends (if teachers work outside the contract day); and materials (office supplies, laminating, etc.) for each of the next two school years.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Develop curriculum maps and pacing guides to improve the SPS curriculum.	(\$8,000)	(\$8,000)	\$0	\$0	\$0

**FINDING 2-5**

SPS teachers have no district-wide processes or procedures holding them accountable for teaching and testing the state standards. Each teacher is individually responsible for monitoring and documenting when they teach the OAS. As a result, the district lacks uniform monitoring to ensure all standards are taught with fidelity.

Teachers are expected to create lesson plans. There are multiple lesson planning formats in use in the district. No common lesson planning format is implemented to document how the curricula are paced and revisited for remediation or maintenance. Teachers indicated they create checklists to illustrate when each OAS objective is taught. There is no standardized accountability process to track or monitor the standards mastered by students. It was unclear how students are monitored to ensure they receive the needed remediation or reinforcement. Interviews and focus groups reported random efforts for how teachers incorporate the state’s blueprints, item specifications, curriculum frameworks, and released items as resources to support teaching and assessing OAS. Teachers indicated limited understanding and use of the revised blueprints and item specifications, and limited exposure to the statewide teacher-developed curriculum frameworks in ELA, Mathematics, and Science.

Oklahoma school districts can use the Teacher Leader Effectiveness evaluation process (TLE) to assist in the process of holding teachers accountable for implementing OAS appropriately. However, the consulting team received little information that SPS used TLE data to support accountability efforts. The TLE framework clearly states all learning objectives and state content standards are explicitly communicated to all students. TLE requires teachers to implement curriculum and deliver instruction in accord with OAS. The TLE framework also says the teacher “facilitates tracking of student progress using a formative approach to assessment and monitors the extent to which students understand their level of performance.” During focus group discussions and interviews, teachers indicated little familiarity with the use of formative assessment and how to adjust instructional goals based on the results.



## RECOMMENDATION

### **Implement district-wide accountability procedures to ensure all OAS standards are taught, assessed, and paced with fidelity.**

District leaders should reinforce expectations that all OAS standards are taught and monitored for student mastery with accuracy. The lesson planning process should be refined to meet accountability expectations. Currently, there are multiple lesson planning formats. Adopting one common lesson planning system and infusing accountability procedures could meet accountability expectations. If pacing calendars are put in place, they can also serve as an accountability measure for the taught, tested, and mastered curriculum. The principals should see if select teachers have a process that is working. If their test scores support the process used, perhaps their process could be adapted for district-wide implementation.

The accountability system should enable teachers to document OAS standards taught and ensure student progress toward mastery is closely monitored. The process is a support system to ensure students are appropriately prepared for success on state assessments and for college and careers. Previous student performance test data needs scrutiny. Standards with a strong pass rate need targeted review and teachers need to determine why students were successful. Probing curriculum pacing, frequency taught, instructional strategies, and methodologies implemented need analysis. Failed standards also need the same examination. These data provide teachers with information to adjust pacing, instructional strategies, and to increase the frequency for teaching OAS. The district should build upon existing electronic processes and examples found on multiple websites and programs.<sup>21</sup>

## FISCAL IMPACT

This recommendation can be implemented with existing funds.

## FINDING 2-6

The SPS curriculum is largely driven by textbooks and worksheets. Few teachers reported using only standards-based, student-centered curriculum as their primary teaching source. The district has not consistently purchased new textbooks, leaving many classrooms with older texts. Some teachers were not knowledgeable of how to crosswalk the current state standards with the older textbook content. Some indicated their older texts did not include needed content or the content was misaligned with OAS. Some teachers use textbook-published tests as the primary means for determining student mastery of concepts. No evidence was provided to ensure these tests assessed students with appropriate DOK questions nor do they fulfill the writing expectations required by state standards.

Teaching and learning resources significantly impact student achievement by supporting, enriching, and challenging student learning. They also add important structure to lesson planning and delivery of instruction. For example, if a language arts teacher is teaching new vocabulary

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<sup>21</sup> <https://www.stjohns.k12.fl.us/year-at-a-glance/>; <http://www.ascd.org/publications/educational-leadership/oct08/vol66/num02/Pacing-Guides.aspx>

words, playing a related game gives students practice and reinforces learning. Hands-on resources make learning fun. Resource materials also assist teachers in differentiating instruction. Differentiation of instruction tailors lessons to different learning styles and student capacities. Hands-on and interactive instructional resources enable teachers to present content in a variety of modalities.<sup>22</sup> Regardless of what kind of resources are implemented, they go beyond “answer the questions at the end of the chapter.”

The Internet offers almost infinite digital teaching materials, and many are free. These materials can improve student engagement. The OAS require students to synthesize and analyze literary and non-fiction texts across all content areas. Many resources for accessing non-fiction articles that connect to literary works are available free online. Sources for information text include:

- Common Lit<sup>23</sup> includes free reading passages and progress tracking tools for students in 3<sup>rd</sup> through 12<sup>th</sup> grade.
- Listenwise<sup>24</sup> is a listening skills platform. Their collection of podcasts and public radio keeps teaching connected to the real world and builds student listening skills at the same time.
- Tween Tribune<sup>25</sup> includes articles for Kindergarten through 12<sup>th</sup> grade. The service searches for relevant articles on the web and then modifies them for a variety of Lexile levels.
- Newsela<sup>26</sup> has articles on a number of topics (i.e., arts, culture, health, history, science, sports, opinion pieces, and others). Features include the ability to adjust the reading level, to highlight and annotate text, to complete vocabulary activities, and to take a quiz.
- ReadWorks<sup>27</sup> is a library of curated nonfiction and literary articles in the country, along with reading comprehension and vocabulary supports, formative assessments, teacher guidance, and more.
- Wonderopolis<sup>28</sup> is a resource to encourage students to explore and wonder, as students pose questions about the “why” behind many different ideas across a variety of content areas. The site features a “Wonder of the Day.” For example, one daily example is, “What is a Bandicoot?” Found in the SCIENCE – Life Science topic area of the website, the article includes the following guided questions to engage students in the content:

Have You Ever Wondered...

- What is a bandicoot?

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<sup>22</sup> <http://www.ck12.org>

<sup>23</sup> <https://www.commonlit.org/en>

<sup>24</sup> <https://listenwise.com/>

<sup>25</sup> <https://www.tweentribune.com/>

<sup>26</sup> <https://newsela.com/>

<sup>27</sup> <https://www.readworks.org/>

<sup>28</sup> <https://wonderopolis.org/>

- Where do bandicoots live?
- How big do bandicoots grow?

Students can listen to the passage being read aloud. They highlight key vocabulary words and included assessments for vocabulary and comprehension. There are extension activity/discussion ideas at the end of the passages.

- Storyline Online<sup>29</sup> is the SAG-AFTRA Foundation’s award-winning children’s literacy website that streams videos featuring celebrated actors reading children’s books alongside creatively produced illustrations. Readers include Viola Davis, Chris Pine, Lily Tomlin, Kevin Costner, Annette Bening, James Earl Jones, Betty White, and dozens more.

## RECOMMENDATION

**Implement an in-depth assessment to ensure all teachers have access to, and use, up-to-date teaching materials, digital resources, or textbooks that align with all aspects of the OAS.**

The superintendent and principals need to set the expectation that all teachers use effective supplemental instructional resources. It should be clear that hands-on resources are a valued component in the teaching and learning cycle. The goal is to move teachers toward “standards driven” curricula. Digital and hands-on resources need to supplement the outdated textbooks. Today’s classrooms should no longer consist of a teacher lecture followed by chapter reading and worksheet assignments. Today’s classroom should be student-centered and characterized by small interactive groups, multiple modes for learning, and digital media.

Professional development days and PLC meetings can be venues for teachers sharing resources. A portion of professional development days can provide teachers with time to make, search the Internet, and acquire resources that reinforce learning of OAS. Teachers should methodically pursue the content they teach and selectively determine areas lacking in resource materials. If there are content standards with a pattern of failure, or the content is difficult to teach, these are areas to add supplemental resources. It is important that aligning and pacing the curricula works in concert with selecting relevant, rigorous teaching materials that enhance learning and student engagement.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## ***B. INSTRUCTIONAL DELIVERY AND STUDENT PERFORMANCE***

High-achieving districts have curriculum maps that clearly define standards and learning objectives for each subject and grade level so that teachers know the content expectations and instructional timelines for student mastery of objectives. It takes strong instructional leadership to implement the curriculum. The principals and teachers, working collaboratively, are

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<sup>29</sup> <https://www.storylineonline.net/>

responsible for consistent implementation, quality instruction in the classroom, and student performance. The principals' instructional leadership is the catalyst for effective instructional delivery and high student performance.

The College of Education at Washington University, Center for Educational Leadership, has developed a framework for instructional leadership. According to their website, the framework is not the sum total of the work of instructional leaders; rather, it is a description of the most important aspects of instructional leadership. **Exhibit 2-7** describes the five core beliefs that drive the work in school leadership at the Center and **Exhibit 2-8** describes the four dimensions of instructional leadership.

**Exhibit 2-7**  
**Core Beliefs – Center for Educational Leadership**

<b>Beliefs</b>	
1	Instructional leadership is learning-focused, learning for both students and adults, and learning which is measured by improvement in instruction and in the quality of student learning.
2	Instructional leadership must reside with a team of leaders of which the principal serves as the “leader of leaders.”
3	A culture of public practice and reflective practice is essential for effective instructional leadership and the improvement of instructional practice.
4	Instructional leadership addresses the cultural, linguistic, socioeconomic, and learning diversity in the school community.
5	Instructional leadership focuses upon the effective management of resources and of people – recruiting, hiring, developing, evaluating – particularly in changing environments.

Source: <http://info.k-12leadership.org/4-dimensions-of-instructional-leadership>

**Exhibit 2-8**  
**Dimensions of Instructional Leadership**

<b>Dimensions</b>	
Vision, Mission, and Culture Building	School leaders, committed to collective leadership, create a reflective, equity-driven, achievement-based culture of learning focused upon academic success for every student.
Improvement of Instructional Practice	Based upon a shared vision of effective teaching and learning, school leaders establish a focus on learning; nurture a culture of continuous improvement, innovation, and public practice; and monitor, evaluate, and develop teacher performance to improve instruction.
Allocation of Resources	School leaders allocate resources strategically so that instructional practice and student learning continue to improve.
Management of People and Processes	School leaders engage in strategic personnel management and develop working environments in which teachers have full access to supports that help improve instruction.

Source: <http://info.k-12leadership.org/hs-fs/hub/381270/file-2563776150-pdf/documents/tools/UWCEL-4D-Smart-Card-V2.0.pdf?hsCtaTracking=93f13f05-1fed-4b67-ae6a-0a69bdb1e2c7%7Ccf854e41-63f2-4648-bd9c-da7d32a5b8ad>

Waters, Marzano, and McNulty (2003), from the Mid-Continent Regional Educational Laboratory (McREL), synthesized the body of research on the effects of leadership practices on student achievement. In their research, McREL identified 21 leadership responsibilities and 66 practices that are significantly associated with student achievement. These characteristics and responsibilities are now integrated into a Balanced Leadership Framework.<sup>30</sup> Much of the TLE evaluation process adopted for Oklahoma administrators uses this research.<sup>31</sup>

School administrators must have pragmatic knowledge, skills, strategies, and tools to positively affect student achievement. They must move their instructional leadership skill set past abstract and theoretical thinking to concrete, day-to-day practices to be effective leaders. Instructional leaders understand the need for multi-faceted strategies that enable them to know when, how, and why leadership action must be taken.

Superintendents and principals form the core of educational leadership in school districts. The school leader is no longer simply that of a building manager who makes sure that schedules are met, the school is maintained, and that discipline is properly enforced. Today, the educational leader is responsible for consistency of implementation of an aligned curriculum, the quality of instruction in the classroom, and student performance. Recent research contends that school leaders influence classroom teaching, and consequently student learning, by staffing schools with highly effective teachers and supporting those teachers with effective teaching and learning environments.<sup>32</sup>

<sup>30</sup> <https://eric.ed.gov/?q=balanced+leadership+framework&id=ED544245>

<sup>31</sup> <https://sde.ok.gov/tle-qualitative-components>

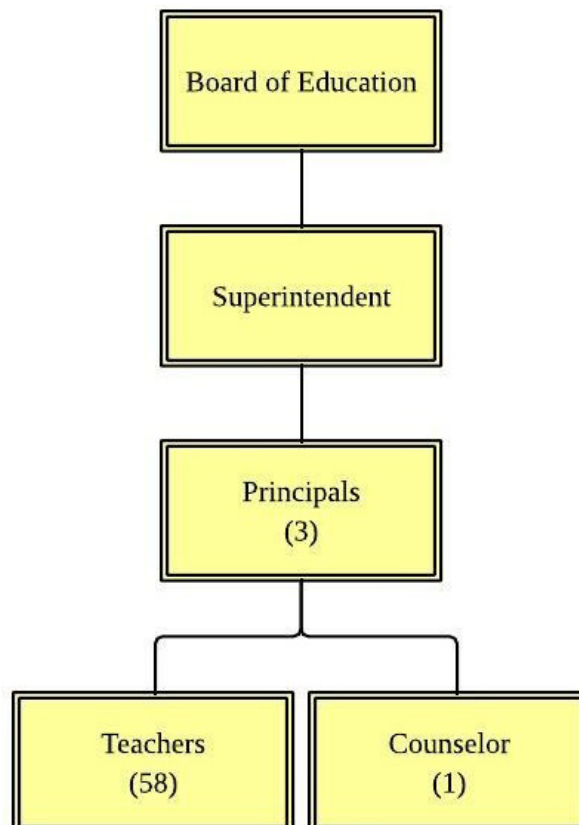
<sup>32</sup> <http://www.youblisher.com/p/110815-New-thinking-about-educational-leadership/>

Effective learning environments begin with strong educational and instructional leadership and include:

- Instructional Vision – instructional practices that are guided by a common, research-based instructional vision that articulates what students do to learn the subject effectively.
- Continuous Improvement of Instruction – resources (i.e., professional development, allocation of teacher time, budget decisions), policies, and procedures (i.e., school improvement plans, teacher evaluation) aligned toward continuous improvement of instructional practice guided by the instructional vision.
- High Expectations – for all students, academically, behaviorally, and in all aspects of student well-being.
- School Culture – a safe, collaborative, and supportive space that places high priority on ensuring that students are successful in school and life.

**Exhibit 2-9** provides the current organizational structure for instructional delivery at SPS.

**Exhibit 2-9**  
**SPS Instructional Delivery Organizational Structure**

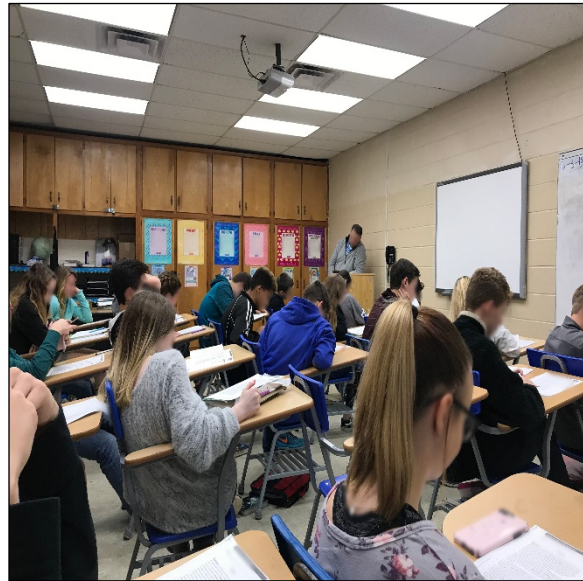
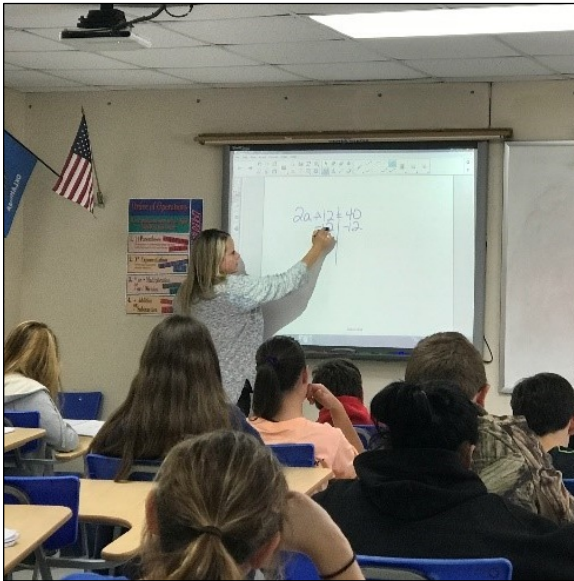


*Created by Prismatic, December 2018*

**Exhibit 2-10** provides illustrations of SPS classrooms.



## Exhibit 2-10 SPS Classrooms



Source: Prismatic, December 2018

### ***Oklahoma School Testing Program***

Student assessment is an integral part of measuring student performance. The Oklahoma School Testing Program (OSTP) continues implementation of the current standards-based tests that students must take during the school year. The Oklahoma Core Curriculum Tests (OCCT) consist of Criterion-Referenced Tests (CRTs) designed to measure student attainment of skills established for core subjects. The OCCT helps monitor student and school performance relative to the OAS. The OSTP program uses a phase-in process to increase tested grades and subjects. CRTs have previously been administered in 3<sup>rd</sup> through 8<sup>th</sup> grade. Exams were administered for selected grades and courses in this manner:

- third grade: Reading and Mathematics;
- fourth grade: Reading and Mathematics;
- fifth grade: Reading, Mathematics, Science, Social Studies, and Writing;
- sixth grade: Reading and Mathematics;
- seventh grade: Reading, Mathematics, and Geography; and
- eighth grade: Reading, Mathematics, Science, US History, and Writing.

Beginning with the 2018 testing cycle, students enrolled in eleventh grade were given the Oklahoma College and Career Ready Assessment (CCRA), which consisted of two parts. For part one, each district administers either the ACT or SAT, including the writing section. Part two

consists of Science Content Assessment which is aligned to the OAS for Science, and U.S. History Assessment which is aligned to the OAS for U.S. History. Historically, Oklahoma districts have administered either the ACT or SAT in eleventh grade, as well as tested tenth grade students in science and history.

Currently, state assessments are administered for selected grades and courses in this manner:

- third grade: English Language Arts and Mathematics;
- fourth grade: English Language Arts and Mathematics;
- fifth grade: English Language Arts (including a written response), Mathematics, and Science;
- sixth grade: English Language Arts and Mathematics;
- seventh grade English Language Arts, Mathematics;
- eighth grade: English Language Arts (including a written response), Mathematics, and Science; and
- eleventh grade: CCRA.

All students in the tested grades and subjects participate in the OSTP. The test results are for all students who attend a Full Academic Year (FAY). Current administrative rules define FAY as any student who has enrolled within the first 20 instructional days of the school year.

The SDE uses performance level descriptors (PLDs) advanced, proficient, basic and below basic in reporting student test scores. Also, test scores are reported in one of the following four categories:

- Advanced – Student demonstrates superior performance on challenging subject matter;
- Proficient (called Satisfactory prior to 2009) – Student demonstrates mastery of appropriate grade level subject matter and is ready for the next grade, course, or level of education, as applicable;
- Basic – Student demonstrates partial mastery of the essential knowledge and skills appropriate to his or her grade level, course, or level of education, as applicable; and
- Below Basic – Student does not perform at least at the limited knowledge level.

To assist teachers and districts in teaching the OAS and preparing students for the OSTP, the SDE provides a variety of resources on its website. These resources include the following:

- the OAS by subject and grade level;



- test blueprints for each grade level and subject area test that show what percentage of the test each skill will represent;
- test/item specifications highlight important points about the items' emphasis, stimulus attributes, format, content limits, distracter domain, and sample test items;
- released test questions;
- writing samples;
- curriculum frameworks in ELA, Mathematics, and Science; and
- DOK levels and percentage weights for all OSTP test questions in test specifications.

The OAS along with the blueprints, PLDs, item specifications, DOK, writing samples, and released items define the testing requirements for 2014 through 2017.<sup>33</sup>

**Exhibit 2-11** provides the results of the math OCCTs in 2016-17. SPS students were generally in the middle of the peer districts at each grade level. SPS scored higher than both the community group and state in the 3<sup>rd</sup> grade. SPS scored lower than the community group and the state in the 4<sup>th</sup> through 6<sup>th</sup> grades. SPS scored higher than the community group but lower than the state in the 7<sup>th</sup> and 8<sup>th</sup> grades.

**Exhibit 2-11**  
**Percentage of SPS and Peer District**  
**Full Academic Year Students Scoring Proficient or Above in Math**  
**2016-17**

Entity	3 <sup>rd</sup> Grade	4 <sup>th</sup> Grade	5 <sup>th</sup> Grade	6 <sup>th</sup> Grade	7 <sup>th</sup> Grade	8 <sup>th</sup> Grade
Silo	63%	23%	21%	29%	37%	25%
Caney Valley	55%	28%	26%	34%	21%	16%
Newkirk	57%	57%	15%	14%	23%	8%
Wilburton	51%	22%	15%	46%	53%	55%
Tishomingo	48%	36%	28%	28%	31%	41%
Hennessey	73%	87%	58%	64%	27%	38%
<b>Community Group</b>	<b>51%</b>	<b>43%</b>	<b>35%</b>	<b>36%</b>	<b>34%</b>	<b>22%</b>
<b>State</b>	<b>54%</b>	<b>49%</b>	<b>42%</b>	<b>42%</b>	<b>42%</b>	<b>29%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-12** provides the results of the reading OCCTs in 2016-17. SPS students in the 3<sup>rd</sup>, 5<sup>th</sup>, and 6<sup>th</sup> grades scored the second highest among the peer districts while students in the 4<sup>th</sup> grade scored in the middle. SPS students in the 7<sup>th</sup> and 8<sup>th</sup> grades scored the second lowest among the

<sup>33</sup> <http://sde.ok.gov/sde/assessment-administrator-resources-administrators>

peer districts. SPS students in the 3<sup>rd</sup> through 6<sup>th</sup> grades scored higher than the community group and state, while those in the 7<sup>th</sup> and 8<sup>th</sup> grades did not.

**Exhibit 2-12**  
**Percentage of SPS and Peer District**  
**Full Academic Year Students Scoring Proficient or Above in Reading**  
**2016-17**

Entity	3 <sup>rd</sup> Grade	4 <sup>th</sup> Grade	5 <sup>th</sup> Grade	6 <sup>th</sup> Grade	7 <sup>th</sup> Grade	8 <sup>th</sup> Grade
<b>Silo</b>	<b>54%</b>	<b>49%</b>	<b>54%</b>	<b>54%</b>	<b>26%</b>	<b>26%</b>
Caney Valley	37%	34%	40%	45%	24%	40%
Newkirk	37%	55%	20%	35%	30%	21%
Wilburton	63%	37%	36%	43%	45%	58%
Tishomingo	48%	34%	50%	41%	38%	49%
Hennessey	40%	67%	56%	55%	29%	54%
<b>Community Group</b>	<b>45%</b>	<b>41%</b>	<b>43%</b>	<b>45%</b>	<b>38%</b>	<b>39%</b>
<b>State</b>	<b>49%</b>	<b>46%</b>	<b>49%</b>	<b>48%</b>	<b>42%</b>	<b>43%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-13** shows the 2016-17 science scores. In both 5<sup>th</sup> and 8<sup>th</sup> grade, SPS students scored in the middle among peer districts. SPS 5<sup>th</sup> graders scored below the community group and state, while 8<sup>th</sup> graders scored at the same level as the community group, but below the state.

**Exhibit 2-13**  
**Percentage of SPS and Peer District**  
**Full Academic Year Students Scoring Proficient or Above in Science**  
**2016-17**

Entity	5 <sup>th</sup> Grade	8 <sup>th</sup> Grade
<b>Silo</b>	<b>47%</b>	<b>44%</b>
Caney Valley	74%	40%
Newkirk	28%	21%
Wilburton	44%	76%
Tishomingo	58%	45%
Hennessey	59%	67%
<b>Community Group</b>	<b>48%</b>	<b>44%</b>
<b>State</b>	<b>51%</b>	<b>50%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-14** shows math scores over a five-year period. The 2016-17 math scores reflect Oklahoma's higher performance standards adopted in 2017. The 3<sup>rd</sup> grade cohort from 2012-13 outperformed the state each year until 2015-16. The 4<sup>th</sup> grade cohort did the same until 2016-17, as did the 5<sup>th</sup> grade cohort with one exception in 2013-14.

**Exhibit 2-14**  
**Five-year Data Trend in Math**

Grade	2012-13		2013-14		2014-15		2015-16		2016-17	
	Silo	State	Silo	State	Silo	State	Silo	State	Silo	State
3 <sup>rd</sup>	89%	75%	91%	75%	74%	71%	76%	75%	58%	54%
4 <sup>th</sup>	92%	78%	96%	74%	72%	79%	60%	77%	68%	49%
5 <sup>th</sup>	85%	75%	80%	75%	82%	77%	79%	79%	65%	42%
6 <sup>th</sup>	74%	77%	70%	76%	78%	76%	66%	76%	50%	42%
7 <sup>th</sup>	68%	74%	85%	74%	91%	76%	82%	76%	50%	42%
8 <sup>th</sup>	56%	72%	50%	63%	37%	64%	73%	64%	13%	29%

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-15** shows reading scores over a five-year period. The 2016-17 reading scores reflect Oklahoma's higher performance standards adopted in 2017. The 3<sup>rd</sup> grade cohort from 2012-13 outperformed the state each year until 2015-16. The 4<sup>th</sup> grade cohort did the same until 2016-17. The 5<sup>th</sup> grader cohort did not outperform the state until 2015-16. In 2016-17, students in the 3<sup>rd</sup>, 4<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> grades outperformed the state.

**Exhibit 2-15**  
**Five-year Data Trend in Reading**

Grade	2012-13		2013-14		2014-15		2015-16		2016-17	
	Silo	State	Silo	State	Silo	State	State	State	State	State
3 <sup>rd</sup>	91%	78%	93%	80%	84%	81%	80%	82%	58%	49%
4 <sup>th</sup>	95%	74%	89%	76%	94%	80%	78%	78%	52%	46%
5 <sup>th</sup>	74%	75%	83%	76%	94%	77%	83%	82%	35%	49%
6 <sup>th</sup>	82%	72%	72%	75%	89%	74%	62%	74%	50%	48%
7 <sup>th</sup>	86%	77%	91%	81%	74%	82%	92%	82%	55%	42%
8 <sup>th</sup>	81%	82%	84%	82%	87%	86%	87%	86%	33%	43%

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-16** displays results for the 2016-17 10<sup>th</sup> grade test scores. In history and English, SPS had the second highest score among the peer districts. In science and math, SPS scored in the middle of the peer districts.

**Exhibit 2-16**  
**Percentage SPS and Peer District Grade 10 Regular Education,**  
**Full Academic Year Students Scoring Proficient or Above**  
**2016-17**

Entity	English	U.S. History	Science	Math
<b>Silo</b>	<b>41%</b>	<b>68%</b>	<b>16%</b>	<b>32%</b>
Caney Valley	27%	31%	13%	13%
Newkirk	29%	37%	26%	7%
Wilburton	30%	41%	20%	20%
Tishomingo	34%	75%	30%	34%
Hennessey	48%	39%	12%	45%
<b>Community Group</b>	<b>39%</b>	<b>51%</b>	<b>27%</b>	<b>26%</b>
<b>State</b>	<b>44%</b>	<b>58%</b>	<b>24%</b>	<b>32%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-17** shows that in two years out of the past five years SPS' number of high school graduates completing Regents' College-Bound Curriculum was 100 percent. Since 2013-14, SPS' rate has been higher than the rates for the community group and state.

**Exhibit 2-17**  
**Percentage of SPS and Peer District Graduates Completing**  
**Regents' College-Bound Curriculum, 2012-13 to 2016-17**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17
<b>Silo</b>	<b>67%</b>	<b>100%</b>	<b>96%</b>	<b>98%</b>	<b>100%</b>
Caney Valley	96%	93%	98%	91%	96%
Newkirk	63%	82%	13%	75%	83%
Wilburton	84%	89%	56%	67%	58%
Tishomingo	71%	67%	62%	90%	100%
Hennessey	93%	86%	88%	91%	11%
<b>Community Group</b>	<b>96%</b>	<b>78%</b>	<b>73%</b>	<b>82%</b>	<b>76%</b>
<b>State</b>	<b>85%</b>	<b>84%</b>	<b>81%</b>	<b>81%</b>	<b>80%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-18** compares the trends in the district's ACT composite scores over time. SPS' composite score averaged 19.7 in 2012-13 and slightly decreased to 19.6 in 2016-17. Both the community group and the state declined over the past five years.

**Exhibit 2-18**  
**Trend in ACT Composite Scores, 2012-13 to 2016-17**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17	Percentage Change
<b>Silo</b>	<b>19.7</b>	<b>20.0</b>	<b>21.0</b>	<b>19.0</b>	<b>19.6</b>	<b>(0.5%) ▼</b>
Caney Valley	21.1	19.8	20.1	18.2	18.8	(10.9%) ▼
Newkirk	19.1	18.9	16.4	18.6	17.4	(8.9%) ▼
Wilburton	20.5	21.3	20.5	20.3	18.6	(9.3%) ▼
Tishomingo	19.3	20.7	21.7	21.0	20.5	6.2% ▲
Hennessey	19.8	20.0	19.5	20.7	19.2	(3.0%) ▼
<b>Community Group</b>	<b>19.4</b>	<b>19.4</b>	<b>19.3</b>	<b>19.3</b>	<b>18.4</b>	<b>(5.2%) ▼</b>
<b>State</b>	<b>20.9</b>	<b>20.8</b>	<b>20.7</b>	<b>20.6</b>	<b>19.5</b>	<b>(6.7%) ▼</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

In 2016-17, SPS had the highest four-year dropout rate among the peers, at 14.1 percent. SPS also had the lowest senior graduation rate, at 91.7 percent. This was lower than the community group and state (**Exhibit 2-19**).

**Exhibit 2-19**  
**SPS and Peer District Four-Year Dropout and Senior Graduation Rates**  
**2016-17**

Entity	Four-Year Dropout Rate	Senior Graduation Rate
<b>Silo</b>	<b>14.1%</b>	<b>91.7%</b>
Caney Valley	3.5%	96.5%
Newkirk	3.6%	98.2%
Wilburton	1.4%	98.6%
Tishomingo	4.9%	100.0%
Hennessey	0.0%	100.0%
<b>Community Group</b>	<b>5.4%</b>	<b>97.4%</b>
<b>State</b>	<b>9.2%</b>	<b>96.8%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**FINDING 2-7**

The district has no uniform process for analyzing OCCT/OSTP student performance data. There is no process to assist teachers in breaking down the data and applying it to instructional pacing and adjusting curriculum and instruction. There is no process to use student performance data to vertically align and pace curriculum and make adjustments in re-teaching specific topics. There was isolated reporting of teachers using item analysis to find trends and patterns in student learning. Teachers may independently review the data but have limited knowledge and expectations for using those reviews to plan instruction and remediation.

There are no district-wide procedures or software to assist teachers in using OCCT data to inform targeted instruction and form flex groups for targeted remedial instruction. There are no standardized methodologies for disaggregation of data and looking for vertical learning gaps. Random evidence was presented to indicate how student performance data collected at the end of each grading period were used to plan re-teach, remediation, or maintaining mastery. There is no district-wide use of student performance data to close skill gaps or reoccurring curricula redundancies. Across the district, student performance data are not commonly used to plan, adjust, pace, and design instruction and close skill gaps throughout the school year.

One of the longest-standing bodies of research is the “effective schools” research. One of the original correlates of effective schools’ research is the “frequent monitoring of student progress.” As stated by the University of Oklahoma’s research in effective schools:

The effective school frequently measures academic student progress through a variety of assessment procedures. Assessment results are used to improve individual student performance and improve instructional delivery. Assessment results will show that alignment must exist between the intended, taught, and tested curriculum.<sup>34</sup>

More recently, effective schools research was conducted by the National Association of Elementary School Principals (NAESP). NAESP published best practices for schools and reported how the use of student achievement data must be included in instructional decision-making. In a white paper, NAESP provided five recommendations to help principals put student achievement data to the best possible use:

- make data part of the ongoing cycle of instructional improvement;
- teach students to examine their own data and set learning goals;
- establish a clear vision for school-wide data use;
- provide supports that foster a data-driven culture within the school; and
- develop and maintain a district-wide data system.<sup>35</sup>

## RECOMMENDATION

**Implement a district-wide process for analyzing student performance data throughout the school year and use the analysis results to adjust curriculum and instruction.**

The purpose of teachers analyzing classroom data is to determine what the students have learned, what they need help to learn, and how teachers plan instruction to ensure that they all do learn. The use of student performance data is essential to identify skill gaps in student learning. The learning and skill gaps must be addressed through re-teaching or remediation. The use of data also guides improvements in the rigor, pacing, and vertical articulation of curriculum and instruction. As teachers monitor performance data, patterns of teaching and individual student

<sup>34</sup> [http://www.ycschools.us/downloads/ycs\\_hs/sevencorrelates\\_20151104\\_223914\\_1.pdf](http://www.ycschools.us/downloads/ycs_hs/sevencorrelates_20151104_223914_1.pdf)

<sup>35</sup> [http://www.naesp.org/sites/default/files/Student%20Achievement\\_blue.pdf](http://www.naesp.org/sites/default/files/Student%20Achievement_blue.pdf)

learning successes and challenges become evident. It is essential for teachers to have ongoing formative data to measure learning at the end of each instructional segment. This allows teachers to make informed, collaborative decisions to address potential problems.

Working with the teachers, district administrators should develop a timeline that details which student assessment data are required throughout the school year. Using this timeline, the superintendent and principals should hold PLC meetings for analyzing data. Meetings should focus on determining the strengths and weaknesses of the students and how the results impact the district in pacing instruction. Reviewing formative benchmark test data throughout the school year allows timely feedback on student performance, the effectiveness of teaching strategies, and any needed adjustments and alignment to the curricula.

A helpful resource for administrators and teachers to use is found in an article published in *Educational Leadership*, “*Developing Data Mentors*.” The authors say that “gathering student-assessment data is not enough. Administrators and teachers must learn to analyze the data and apply this information in the classroom.”

The district process should examine classroom data and ask key questions:

- Which content standards is the teacher assessing?
- What percent of students demonstrated proficiency? What implications does that have for instruction?
- Which students have not demonstrated that they can master content standards?
- What diagnostic information did an examination of student work provide?
- Based on individual student performance, what do teachers need to do next to move the student to proficiency?
- Based on the class performance, what re-teaching needs to be done?
- After re-assessing, did students demonstrate proficiency?
- Are re-teaching or other interventions resulting in improved student performance?
- When comparing performance by subgroups, are any groups not performing as well as the whole group? If so, what’s being done about that?
- Are there students who are not attaining proficiency across standards?
- What diagnostic information do we have about them to inform instruction?
- What interventions have we tried? What interventions do we plan to try next?<sup>36</sup>

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<sup>36</sup> Nichols, B. W. & Singer K. P. (2000). Developing data mentors. *Educational Leadership*, 57(5).

The superintendent, principals, and teachers should consider regularly graphing data. A visual depiction of the information often yields additional insights.

Another way for teachers to get a quick visual picture of who needs additional support is to color code the data recorded in the grading process. For example, if three categories are used to define student performance in the grade book (i.e., basic - B, proficient - P, and advanced - A), each could be assigned a different color. This would allow teachers to quickly determine who was progressing and who needed additional support.<sup>37</sup>

Parents, as well as students, need consistent and clear communication regarding ongoing student performance data. Through use of one-on-one conversation or electronic communication, they can monitor daily assignments, homework, and student test data.

Additionally, the SDE has developed the Oklahoma Family Guides for English Language Arts, Mathematics, Science, and Social Studies for Pre-K through 2<sup>nd</sup> grade.<sup>38</sup> The SDE Family Guides are resources aligned with the OAS and developed specifically for Oklahoma families to complement classroom learning. They illustrate what is expected of students at each grade level in different content areas along with activities families can do at home to further support children’s learning experiences. As Family Guides are developed for 3<sup>rd</sup> grade and up, these can continue to be a valuable resource to share with parents.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources. However, if an external consultant is needed there are consultants available to guide teachers through the data analysis process. A short-term consulting engagement would cost approximately \$3,000.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Hire a consultant to help design a process for analyzing student performance data, if needed.	(\$3,000)	\$0	\$0	\$0	\$0

**FINDING 2-8**

Instructional delivery does not promote student engagement across all grades and content areas. Onsite observations by the consulting team revealed a common use of choral reading at many grade levels and across each content area. Students expressed a lack of interest in worksheets, read aloud, and dictionary handouts. In some cases, SMARTBoard’s were used to enhance instructional practices. Interactive activities were primarily observed in the lower elementary grades, while many of the secondary courses were worksheet driven.

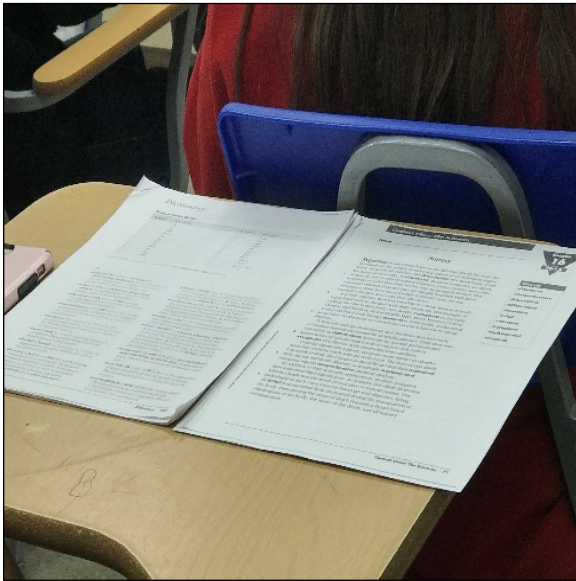
**Exhibit 2-20** provides illustrations of student working on worksheets.

<sup>37</sup> <http://mdk12.msde.maryland.gov/instruction/progress/using.html>

<sup>38</sup> <https://sde.ok.gov/oklahoma-family-guides>



## Exhibit 2-20 SPS Worksheets



Source: Prismatic, December 2018

Student engagement is key to ensuring that students develop a deep understanding of the content. Additionally, it is critical in fostering problem-solving, creativity, reasoning, and sense-making in students. Effective engagement demonstrates how content learned in school is purposeful and relevant in the world around students. Edutopia provides some relevant articles on maximizing student engagement.<sup>39</sup>

Formative assessment strategies can be effective in enhancing student engagement. Some strategies can lead to increasing student engagement in the lessons and content, as well as providing information to the teacher at the time of learning as to how well students are progressing in mastering the targeted standards. The examples include:

- Chain Notes. An effective way to formatively assess students by having them reflect on a question, compose some sentences/statements that answer the question. A paper is passed around the room on which students write their statements. When the paper comes to you, read the statements, and add something new.
- Muddiest Point. Typically used as an exit slip activity. Students are given a slip of paper, sticky note, or can use technology tools for this activity. They are asked to write the concept(s) that they are having the most difficulty understanding, or “Muddiest Point.” The teacher reads these and adjusts instruction to clear up these misconceptions and address the needs of the students.

<sup>39</sup> <https://www.edutopia.org/topic/student-engagement>

- Point of Most Significance (POMS). The opposite of Muddiest Point, this quick technique asks students to identify the most significant learning or idea they gained from a lesson.

## RECOMMENDATION

### Enhance instruction through use of student engagement strategies and innovative practices.

The superintendent and principals need to review the existing practices, strategies, and levels of teacher expertise in implementing innovative and engaging techniques in the classrooms. With select staff, they need to reflect on trends and patterns that have emerged over the last two to three years and utilize staff who exemplify effective student engagement practices to model strategies for other staff members and share the degree of effectiveness of the strategies in their PLC meetings.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 2-9

The district lacks a tiered intervention process for struggling learners. There are no structures in place to assist teachers in effectively monitoring the frequency and intensity of remedial interventions for students. There are no leveled or tiered interventions to guide teachers in selecting appropriate interventions to sustain student progress or help teachers determine if the interventions are closing learning gaps. There is no scheduled time in the daily schedule to provide targeted remediation for skill-based flex groups or one-on-one remediation. There is no clearly defined early intervention system for at-risk students. Teachers provide interventions, but there is no strategic plan for appropriate remediation strategies, how to differentiate instruction, and determining the level, frequency, and intensity of interventions.

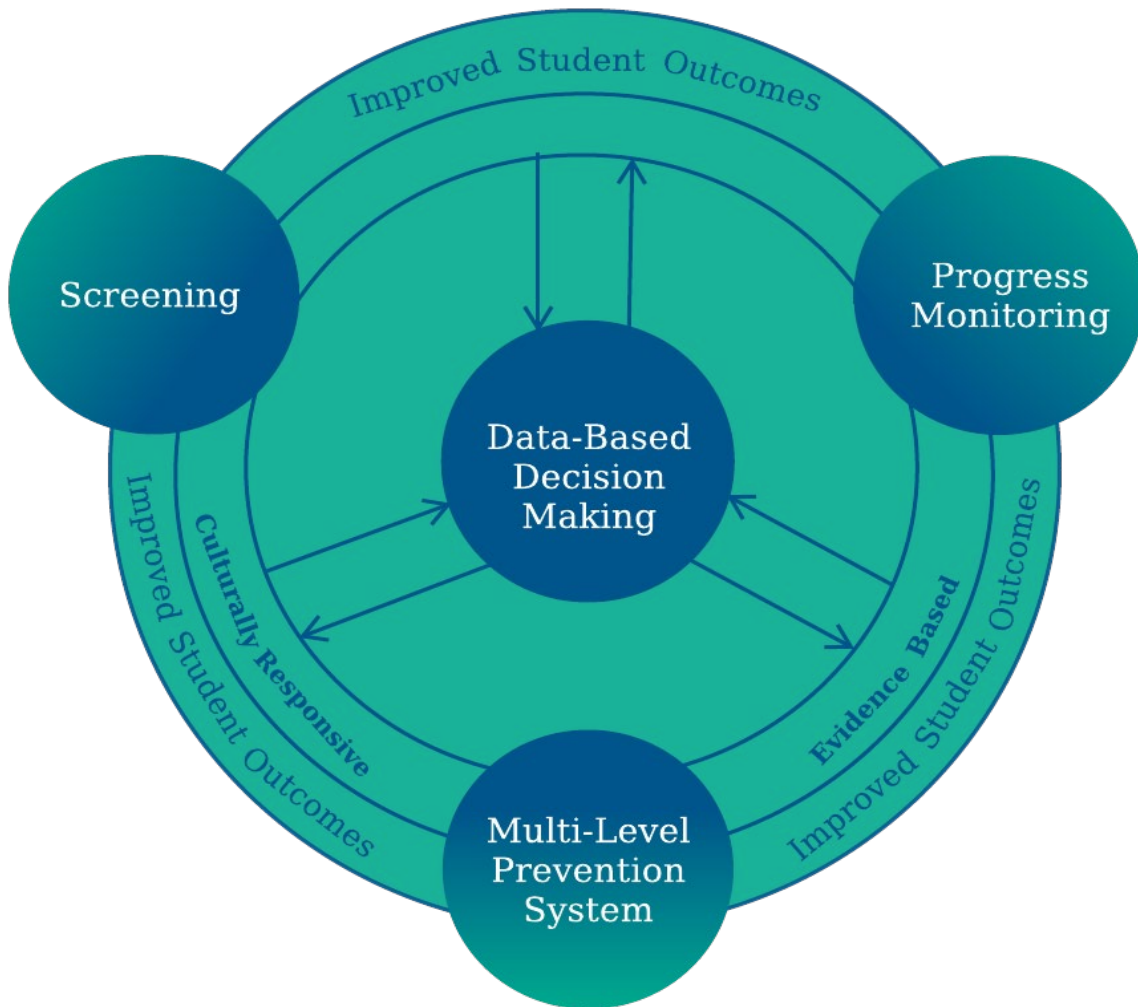
The consulting team noted in focus group and interviews there was no uniform understanding of the implementation of tiered interventions. District administrators and teachers expressed awareness of the need to address targeted interventions and define procedures to more effectively meet the needs of struggling learners.

The district is committed to meeting the needs of all students. However, no comprehensive continuum of prevention/intervention services are in place. At the elementary level, the consulting team learned there was some evidence of tiered intervention and flex grouping through use of STAR and STAR Early Literacy data. These data provided the basis for small group or individualized instruction with the reading specialist. Interviews and focus group discussions indicated that several teachers were attempting to provide data-driven interventions. Other teachers were vague and inconsistent in articulating how struggling learners are identified, how intervention strategies and support structures are selected, and how the interventions are evaluated as appropriate and helpful for meeting student needs and closing learning gaps. Several teachers articulated limited resources for differentiating learning experiences for students and a lack of professional development in how to implement content-specific interventions.

The district is not implementing the tiered academic and behavioral components of Response to Intervention (RtI) using the Oklahoma Tiered Intervention Support System (OTISS) model.

**Exhibit 2-21** illustrates the RtI process.

**Exhibit 2-21**  
**Essential RtI Components**



Source: <http://www.rti4success.org/essential-components-rti/data-based-decision-making>, re-created by Prismatic, March 2016

It is important for teaching and support staff to have a deep understanding of what RtI looks like when successfully implemented across all grade levels. The research behind RtI implementation with school-wide fidelity indicates that staff will see:

- a valid and reliable assessment system in place;
- curriculum that is evidence-based and includes grade level components across tiers;
- instructional practices are evidence-based and follow set parameters;

- staff following clear data-based decision-making rules;
- predetermined fidelity checks are applied routinely;
- integration and sustainability practices are followed, and
- staff regularly communicate using the same vocabulary.<sup>40</sup>

A district implementing RtI successfully has clearly defined procedures, techniques, feedback loops, and decision-making processes within each component. The district's plan will:

- detail responsibilities of specific persons (coaches, teachers, administration);
- create a data system for measuring operations, techniques, and components;
- link fidelity data to improved outcomes data;
- approach instructor observation in a positive manner, emphasizing problem-solving; and
- create accountability measures for noncompliance.<sup>41</sup>

RtI provides structure for lesson planning and instructional delivery. **Exhibit 2-22** summarizes the essential questions teacher teams need to address in lesson planning and planning for delivering instruction.

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<sup>40</sup> [http://www.rti4success.org/sites/default/files/FidelityImplementation\\_10-20-09\\_FINAL.pdf](http://www.rti4success.org/sites/default/files/FidelityImplementation_10-20-09_FINAL.pdf)

<sup>41</sup> Johnson, Mellard, Fuchs, & McKnight, 2006; Pierangelo & Giuliani, 2008

**Exhibit 2-22**  
**RtI Lesson Planning and Instruction**

<b>Adherence</b>	<ul style="list-style-type: none"> <li>• How well do you “stick to the plan?”</li> <li>• How well do you stay true to the intervention and not drift from the core elements?</li> <li>• Did you make sure all pieces of the intervention have been implemented as intended?</li> </ul>
<b>Duration/Exposure</b>	<ul style="list-style-type: none"> <li>• How often does a student receive an intervention?</li> <li>• How long does an intervention last?</li> <li>• In elementary schools: Providing 90 minutes of reading instruction five days a week? Progress monitoring a minimum of every two weeks.</li> </ul>
<b>Quality of Delivery</b>	<ul style="list-style-type: none"> <li>• How well was the intervention or instruction delivered?</li> <li>• Were good teaching practices used?</li> <li>• Is teacher enthusiasm evident?</li> <li>• Is there adequate time for student questions and exposure to differentiation? Student groups and transitions effectively managed?</li> </ul>
<b>Program Differentiation</b>	<ul style="list-style-type: none"> <li>• How well do you differentiate one intervention from another?</li> <li>• How well do you avoid inserting pieces from other interventions?</li> </ul>
<b>Student Responsiveness</b>	<ul style="list-style-type: none"> <li>• How engaged and involved are the students in this intervention or activity?</li> <li>• Amount of time students spend on task?</li> <li>• Levels of enthusiasm for activity?</li> <li>• Extent students feel they learned what was expected?</li> <li>• Number of students meditating with their eyes closed and heads on their desks?</li> </ul>

Source: [http://www.rti4success.org/sites/default/files/FidelityImplementation\\_10-20-09\\_FINAL.pdf](http://www.rti4success.org/sites/default/files/FidelityImplementation_10-20-09_FINAL.pdf), March 2016

## RECOMMENDATION

### Implement a tiered interventions model for remediation.

The superintendent, principals, and select teachers should review the RtI program and then determine how to adopt the RtI program or a hybrid approach to tiered intervention for struggling learners. The review process should focus on how to increase the effectiveness of tiered interventions. If needed, external consultants are available to assist in the process.

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The guide *Considering Tier 3 Within a Response-to-Intervention Model* can serve as a resource to understand the RtI process.<sup>42</sup> The *RtI Essential Components Integrity Rubric* and the *RtI Essential Components Integrity Worksheet* are useful appraisal tools.<sup>43</sup>

## FISCAL IMPACT

This recommendation can be implemented with existing Title I or Special Education resources.

## FINDING 2-10

Not all teachers are actively engaged in the PLC process. The district does not provide regularly scheduled release time for all teachers to participate in PLC meetings to collaborate on curricular and instructional concerns. Across the district, there is random and informal dialogue taking place, primarily on the teachers' own time outside of contract hours. There is as yet no comprehensive approach for addressing curricular and instructional issues.

The district has some processes in place to promote the implementation of PLCs. There are common planning times scheduled for select teachers to collaborate and engage in dialogue and discussion regarding curriculum and instruction. However, SPS has not implemented standardized PLCs. The few PLCs that have been informally established have created their own hybrid plans to randomly meet to discuss issues regarding curriculum and instruction and the use of the new math textbook series in the case of the elementary grades. Teachers reported that these meetings function at varying levels of effectiveness; most are informal, times vary, attendance is random, and there is minimal accountability for rigor and quality of work.

It is the intent of the district to implement PLC based on professional dialogue, best practices, and research. However, the teacher discussions do not have a common district vision, mission, and student-centered outcomes. There are no pre-determined core priorities and daily curricular and instructional practices. Interviews and focus group discussions reported minimal dialogue centering on the shift from a focus on teaching to a focus on student-centered learning. Teachers recognize there is expertise, innovative strategies, and valuable resources among the staff, but no consistent structured time or process to share their work.

The consulting team found that staff meetings are not maximized by consistently focusing on collaborative efforts and instructional needs. All meeting agendas do not routinely share effective interventions and daily remediation practices across grade levels and subject areas. No PLC meetings consistently focus on data analysis, using formative and summative data to design, adjust, and pace curricula and instruction.

There are differing and diverse mindsets about collaborative times. Teachers are functioning at varied proficiency levels, thus affecting the quality of collaborative work. Some recurring issues reported were the degree of teacher buy-in, accountability, monitoring, need for additional professional development, and the quality of work done during collaborative times.

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<sup>42</sup> <http://www.rtinetwork.org/essential/tieredinstruction/tier3/consideringtier3>

<sup>43</sup> <http://www.rti4success.org/resource/essential-components-rti-integrity-rubric-and-worksheet>



Research is clear that PLC teacher collaboration has profound implications for schools. As a school moves forward, every educator must engage with colleagues in the ongoing exploration of three crucial questions that drive the work of those within a PLC:

- What do we want each student to learn?
- How will we know when each student has learned it?
- How will we respond when a student experiences difficulty in learning?<sup>44</sup>

Generally, the literature on collaboration and PLCs identifies five organizational competencies:

- supportive and shared leadership;
- collective creativity;
- shared values and vision;
- supportive conditions; and
- shared personal practice.<sup>45</sup>

Establishing PLCs does not occur quickly or spontaneously. It requires dedicated and intentional effort on the part of the instructional leader and the professional staff. Moving to collaborative planning and learning creates organizational change. It takes teachers from teaching in isolation and moves them to corporate thinking and shared expertise. It takes seasoned teachers out of their comfort zone and into shared learning.

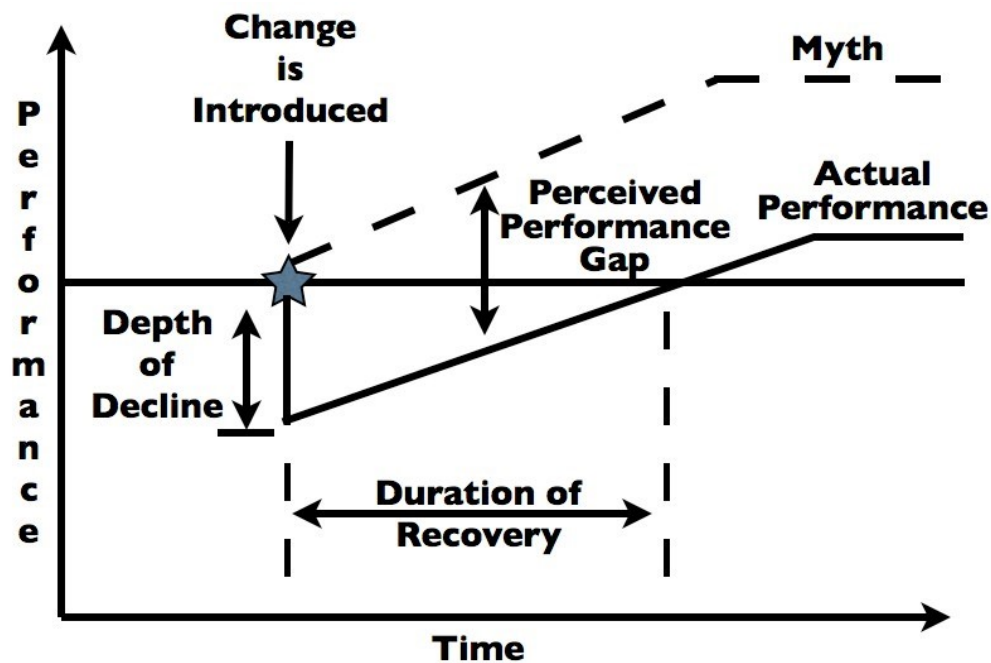
**Exhibit 2-23** articulates change insights from Fullan's *The Six Secrets of Change* (2008). The implementation dip is expected as change is introduced. However, after recovery, actual performance is better than before the change.

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<sup>44</sup> <http://www.ascd.org/publications/educational-leadership/may04/vol61/num08/What-Is-a-Professional-Learning-Community%C2%A2.aspx>

<sup>45</sup> <http://www.secl.org/change/issues/issues61.html>

Exhibit 2-23  
Change Implementation



Source: <http://michaelfullan.ca/wp-content/uploads/2016/06/2008SixSecretsofChangeKeynoteA4.pdf>

A district seeking to improve must be mindful that capacity building is more important than accountability because the former is the route to the latter. Clearly, one needs both. Finding the right combination and integration of the two is the trick.<sup>46</sup> Being the change agent in successful schools means that growing and learning are ongoing phenomena.<sup>47</sup> Exhibit 2-24 summarizes Fullan's insights regarding change.

<sup>46</sup> Fullan, M. (2008). *The six secrets of change*. San Francisco, CA: Jossey-Bass.

<sup>47</sup> <http://www.secl.org/change/issues/issues61.html>



**Exhibit 2-24**  
**Insights on Change for Continuous Improvement**

<b>Change Insights</b>	<ul style="list-style-type: none"> <li>• The implementation dip is normal</li> <li>• Behaviors change before beliefs</li> <li>• The size and prettiness of the planning document is inversely related to the quantity of action and student learning (Reeves, 2002)</li> <li>• Shared vision or ownership is more of an outcome of a quality process than it is a precondition</li> <li>• Feelings are more influential than thoughts (Kotter, 2008)</li> </ul>
<b>Change Savvy Leadership</b>	<p>Change savvy leadership involves:</p> <ul style="list-style-type: none"> <li>• Careful entry into the new setting</li> <li>• Listening to and learning from those who have been there longer</li> <li>• Engaging in fact finding and joint problem solving</li> <li>• Carefully (rather than rashly) diagnosing the situation</li> <li>• Forthrightly addressing people’s concerns</li> <li>• Being enthusiastic, genuine, and sincere about the change circumstances</li> <li>• Obtaining buy-in for what needs fixing</li> <li>• Developing a credible plan for making that fix</li> </ul>

Source: <http://michaelfullan.ca/wp-content/uploads/2016/06/2008SixSecretsofChangeKeynoteA4.pdf>

*Learning by Doing: A Handbook for Professional Learning Communities at Work*<sup>48</sup> provides a road map to narrow the “knowing-doing gap” regarding PLC. This book outlines the importance of common vocabulary and common understandings of PLC concepts and characteristics. It provides the rationale for implementing PLC that benefit students. DuFour, et al., lays out purposeful steps to guide leaders in assessing perceptual reality in their school. It is a helpful guide to foundational information and the improved capacity for staff to function as a PLC.

McLaughlin and Talbert (1993)<sup>49</sup> suggested that when teachers had opportunities for collaborative inquiry and the learning related to it, they were able to develop and share a body of wisdom gleaned from their experience. Darling-Hammond (1996)<sup>50</sup> cited shared decision-making as a factor in curriculum reform and the transformation of teaching roles in some schools. In such schools, structured time is provided for teachers to work together in planning

<sup>48</sup> DuFour, R., DuFour, R., Eaker, R., Many, T., & Mattos, M. (2006). *Learning by doing: A handbook for professional learning communities at work*. Bloomington, IN: Solution Tree.

<sup>49</sup> McLaughlin, M. W. & Talbert, J. E. (1993). *Contexts that matter for teaching and learning*. Stanford, CA: Center for Research on the Context of Secondary School Teaching, Stanford University.

<sup>50</sup> Darling-Hammond, L. (1996). The quiet revolution: Rethinking teacher development. *Educational Leadership*, 53(6), 4-10.

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instruction, observing each other's classrooms, and sharing feedback. These and other attributes characterize PLC.

For teachers to build the kind of trust needed to not only talk candidly but also to observe one another teach is a first step. This takes instructional leadership and teacher empowerment. Expecting teachers to have conversations is an instructional practice that takes instructional leadership. With the evolving trends and patterns of increased rigor for instruction, collaboration between and among teachers, and district leadership becomes vital. Teaching OAS with fidelity can take place more effectively with formalized PLC opportunities for discussion and collaborative planning. Without supportive time structures, teachers continue to work in isolation. Successful implementation of continuous school improvement requires cross-curricular dialogue. Continuous improvement evolves successfully through PLC collaboration, corporate thinking, and shared decision-making. Implementation of new initiatives, such as the student-centered outcomes, along with the day-to-day decisions in schools, is more robust and maximized when districts provide teachers with PLC opportunities.

## RECOMMENDATION

**Implement a formalized, research-based, district-wide PLC process with regularly scheduled release time, standardized norms, and support structures for teachers to collaborate and focus on continuous school improvement.**

SPS administrative staff should understand the need for finding the balance between capacity building and accountability. There is also need for freedom and self-direction that lead to district changes and improvement. Yet teachers need support, direction, and parameters that develop expertise and grow the practice of professional dialogue with fellow teachers. Teachers need to move past blaming the parent or socioeconomic status for deficiencies. All staff should take ownership for reaching the child through effective instruction. Teachers should talk about and develop curriculum together based on the state standards and skills students must learn. Teachers should no longer be tethered to textbook curriculum or outdated instructional materials. Teachers have a wealth of expertise and options for professional learning next door and across the hall and need time for collaboration.

The superintendent and principals should review the existing structures, schedules, and levels of teacher expertise in implementing collaborative processes. With select staff, they should reflect on trends and patterns that have emerged over the last two to three years. They need to assess where the staff is functioning during the initial implementation of PLC. The district should develop a profile of their journey to develop, deepen, and sustain the collaborative process. The review process needs input from all instructional staff.

The National College for School Leadership has developed a rubric that SPS principals should use to assess their PLC. A copy is available in **Appendix D**.

The superintendent and principals should determine the process for PLC implementation. Together with teaching staff, they should move to a "systematic process in which we work together, interdependently, to analyze and impact professional practice in order to improve our

individual and collective results.”<sup>51</sup> **Exhibit 2-25** is a resource for exploring scheduling options for teacher collaboration.

**Exhibit 2-25**  
**Examples for Providing Collaboration Time**

<p><b>Common Prep Time</b> – build a master schedule to provide daily common prep time for teachers of the same course or department.</p> <p><b>Parallel Scheduling</b> – schedule common prep time by assigning elective and special teachers to provide lessons to students across an entire grade level at the same time each day.</p> <p><b>Adjust Start and End Times</b> – gain collaborative time by starting the workday early or extending the workday one day each week to gain time.</p> <p><b>Shared Classes</b> – combine students across two different grade levels or courses into one class for instruction.</p> <p><b>Group Activities, Events, and Testing</b> – teams of teachers and non-teaching staff coordinate activities that require supervision of students rather than instructional expertise.</p> <p><b>Banking Time</b> – over a period of days, extend the instructional minutes beyond the school day.</p> <p><b>In-Service and Faculty Meeting Time</b> – schedule extended time for teams to work together on staff development days and during faculty meeting times.</p>
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*Source: Dufour, R. (2006). Learning by doing: A handbook for professional learning communities at work. Bloomington, IN: Solution Tree.*

**FISCAL IMPACT**

The consulting team was unable to accurately assess the fiscal impact for this recommendation. There was no clear indicator to measure the current level of implementation and determine if the process could be strengthened or if starting over is the better option.

If an outsourced vendor is needed to provide training to instructional staff in PLC, the consulting team estimates \$5,000 for the 2019-20 school year.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Hire a firm to help with PLC training if needed.	(\$5,000)	\$0	\$0	\$0	\$0

<sup>51</sup> Eaker, R., DuFour, R., & DuFour, R. (2002). *Getting started: Reculturing schools to become professional learning communities*. Bloomington, IN: Solution Tree Press.

**FINDING 2-11**

The district offers a course offered through distance learning by the Choctaw Tribe using technology resources. Interviews with students indicated that they enjoy the course, in which they learn about Choctaw language and culture. Additionally, they report that the course includes interactive and relevant learning experiences that can be applied to their own lives. **Exhibit 2-26** provides illustrations of SPS classrooms used for course taught by Choctaw Tribe using technology resources.

**Exhibit 2-26**  
**SPS Classrooms Used for the Choctaw Tribe Course**



*Source: Prismatic, December 2018*

Students mentioned preferences for learning with hands-on opportunities and expressed the desire for more courses to be offered in a similar method of content and teaching to that of the course offered by the Choctaw Tribe. The counselor, who serves as the facilitator of the course, indicated a high level of student engagement during the course on a daily basis.

**COMMENDATION**

**The district is commended for offering a course taught by the Choctaw Tribe.**

**C. SPECIAL PROGRAMS**

School districts offer educational services to students through a variety of programs, including regular education programs and special programs. Special programs are designed to provide quality services for student populations such as those in special education and Gifted and Talented education programs.

### ***Special Education***

The *Individuals with Disabilities Education Act (IDEA), Part B* is the federal law that supports special education and related service programming for children and youth with disabilities, ages three through 21. The major purposes of *IDEA* are:

- to ensure that all children with disabilities have available to them a free, appropriate, public education that emphasizes special education and related services designed to meet their unique needs and prepare them for employment and independent living;
- to ensure that the rights of children and youth with disabilities and their parents are protected; and
- to assess and ensure the effectiveness of efforts to educate children with disabilities.

Oklahoma statutes require that each school district provide special education and related services for all children with disabilities who reside in that district in accordance with *IDEA*. This duty may be satisfied by:

- directly providing special education for such children;
- joining in a cooperative program with another district or districts to provide special education for such children;
- joining in a written agreement with a private or public institution, licensed residential child care and treatment facility, or day treatment facility within such district to provide special education for children who are deaf or hard-of-hearing, children who are blind or partially blind, or other eligible children with disabilities; or
- transferring eligible children and youth with disabilities to other school districts pursuant to the provisions of the *Education Open Transfer Act*.

Districts must develop an Individualized Education Plan (IEP) for each child receiving special education services under *IDEA*. The IEP must include input from the parent and regular education teachers and be aligned with education plans for children in regular education classrooms. *IDEA* requires districts to provide educational services in the “least restrictive environment” and to include students with disabilities in state and district assessment programs. Instructional arrangements for students may include:

- all instruction and related services in a regular classroom in a mainstreamed setting;
- a resource room where the student is removed from the regular classroom less than 50 percent of the day;
- a self-contained classroom where the student is removed from the regular classroom more than 50 percent of the day; or

- a separate “self-contained” classroom for those whose disability is so severe that a satisfactory education cannot take place for any part of the day in a regular classroom.

Under *IDEA*, a school district can only place a student in a more restrictive setting such as a day treatment program or residential treatment placement if the student’s needs and educational program cannot be satisfactorily provided in the regular classroom with supplementary aids and services.

The reauthorization of *IDEA* in 2004, which went into effect in 2005, includes provisions significantly changing the way learning-disabled students are identified. One change in the law addresses early intervention services and creating opportunities to determine a student’s RtI. This approach was adopted in 2010 by SDE. With RtI, schools identify students at risk for poor learning outcomes; monitor student progress; provide evidence-based interventions; and adjust the intensity and nature of those interventions depending on a student’s responsiveness. Based upon the results of these interventions, the district may need a referral for additional testing to determine if there is a specific learning disability.

*IDEA* now allows a school district to use up to 15 percent of its *IDEA* allocation to support services to students who have not been identified as needing special education services, but who need additional academic and behavioral support to succeed in a general education environment. Funds may be used for professional development in scientific research-based interventions, literacy instruction, and the use of adaptive or instructional technology. It also permits use of funds for educational and behavioral assessments.

An effective special education program is defined by *IDEA* as having the following elements:

- pre-referral or tiered intervention in regular education;
- referral to special education for evaluation;
- comprehensive nondiscriminatory evaluation;
- initial placement through an IEP meeting;
- provision of educational services and supports according to a written IEP;
- annual program review;
- three-year re-evaluation; and
- dismissal from the special education program.

**Exhibit 2-27** shows comparison data on the percentage of special education students and the number of full-time equivalent (FTE) teachers in special education for 2016-17. SPS had the highest rate of student identification and the highest number of special education teachers/FTEs among peer districts and the community group. The district had a special education student-to-teacher ratio that was the second-lowest of the peer districts, but higher than the state.



**Exhibit 2-27**  
**Students and Teachers in Special Education Programs, 2016-17**

Entity	ADM	Special Education Percentage of All Students	Special Education Teachers FTEs	# of Special Education Students per FTE
<b>Silo</b>	<b>898</b>	<b>21.2%</b>	<b>5.9</b>	<b>32.3</b>
Caney Valley	812	16.5%	2.9	46.2
Newkirk	833	16.4%	4.7	29.1
Wilburton	837	20.3%	5.0	34.0
Tishomingo	942	20.0%	4.1	46.0
Hennessey	905	19.6%	4.2	42.2
<b>Community Group</b>	<b>697</b>	<b>18.8%</b>	<b>3.8</b>	<b>34.5</b>
<b>State</b>	<b>1,267</b>	<b>15.8%</b>	<b>8.2</b>	<b>24.4</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 2-28** compares district special education revenues expenditures for 2016-17. At 114.0 percent, SPS’ special education revenues exceed expenditures. SPS had the third highest revenue-expenditure ratio among its peer districts.

**Exhibit 2-28**  
**Comparison of Special Education Revenues and Expenditures, 2016-17**

Entity	Total Revenues for Special Education	Total Expenditures for Special Education	Revenues as Percent of Expenditures
<b>Silo</b>	<b>\$855,534</b>	<b>\$750,378</b>	<b>114.0%</b>
Caney Valley	\$512,159	\$452,022	113.3%
Newkirk	\$540,469	\$510,021	106.0%
Wilburton	\$494,394	\$809,134	61.1%
Tishomingo	\$754,120	\$588,470	128.1%
Hennessey	\$626,564	\$383,278	163.5%
<b>Peer Average</b>	<b>\$585,541</b>	<b>\$548,585</b>	<b>106.7%</b>

*Source: OCAS Impact Aid Letters and Prismatic Calculations 2018*

**FINDING 2-12**

Not all SPS teachers clearly understand the special education student identification process. This results in premature requests for identification and services before implementing appropriate interventions. Staff reported unclear and inconsistent understandings regarding the order of steps to follow with the current identification process.

The district’s referral process follows the state and federal guidelines. However, there are differing understandings of which personnel are involved in the process, what data to use, and timeframes for interventions. Across the district, there is no clearly defined and understood pre-

referral process. Interviews with the director of special education and teachers revealed that the district is lacking a policies and procedures manual to guide staff through the referral, identification, and IEP services process.

Oklahoma moved to a new special education data and eligibility/IEP process system beginning July 1, 2015. Entitled OK EdPlan™, the online system provides templates and guidance through the identification and referral process. The program continues to assist special education staff and administration through the latest changes to the eligibility and IEP process.<sup>52</sup>

## RECOMMENDATION

### **Train all teachers in a clearly defined special education identification process.**

The superintendent, principals, director of special education, and select special education and general education staff need to clearly outline the pre-referral and referral process. The training should define each step in identifying students and the qualifications for special education services. The director of special education and staff should hold annual briefings with the principals and all teachers to review the referral process. This is particularly important with the elementary principal and staff. These communications should include *IDEA* changes and time for questions from current and new staff members.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 2-13

Special education teachers lack sufficient time to communicate and plan with general education teachers. Districtwide, general education teachers lack a deep understanding of modifying and adapting curriculum and instruction for students with disabilities. There is no scheduled time for special education teachers and classroom teachers to plan and deliver instruction in concert.

There is no dedicated time for teachers to review the adaptations and modifications students require. There is still a prevailing mindset for pull out and resource room services over mainstreaming and inclusionary practices. Some general education teachers are apprehensive about how to provide students with least restrictive environment (LRE) in the classrooms.

District leaders recognize the importance in having special education teachers meet with general education teachers and plan for instructional and curricular modifications. However, focus group and interview discussion also indicated it is difficult for all SPS teachers to view IEP students as “our” students, and references were made to services received outside of the general education classrooms. There is no process in place that gives teachers time to plan, make shared instructional decisions, curriculum modifications, and determine how to assess student learning.

Collaboration between special education and general education teachers calls for commitment by the teachers who will be working together. They must have support from building administrators

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<sup>52</sup> <http://ok.gov/sde/sites/ok.gov.sde/files/EdPlan%20Q%26A.pdf>



and central office staff. This involves allocating time, procuring resources, monitoring, and, above all, persistence. The biggest issue is time. Time for planning, time for curriculum and instructional development, and time for evaluating.<sup>53</sup> Collaborative planning is a responsibility at the district, building, and classroom level.

Walther-Thomas and her colleagues (1996) found that five planning themes were identified by co-teachers who considered themselves to be effective co-planners:

- confidence in partner's skills;
- design of learning environments for both the educators and students that require active involvement;
- creation of learning and teaching environments in which each person's contributions are valued;
- development of effective routines to facilitate in-depth planning; and
- increased productivity, creativity, and collaboration over time.

Participants in collaborative programs agreed that the time required for planning does not decrease during the year, but the quality of instruction continues to improve.<sup>54</sup>

## **RECOMMENDATION**

### **Implement ongoing, regularly scheduled times for teachers to corporately plan curriculum and instruction based on student IEPs.**

The superintendent, principals, and director of special education should schedule release time for special education and general education teachers to work collaboratively. The administration must establish guidelines and expectations for the planning sessions so they are viewed as a priority for both teachers. The teachers should determine or select the students who will be part of the collaborative planning process. At all grade levels, the administrators and counselors should work with teachers to keep balanced proportions of regular students, at-risk students, and IEP students.

Planning for secondary students is more difficult as required courses may dictate which class students must attend. Ideally, weekly planning times work best. However, bi-weekly and monthly can also serve the collaborative planning process. The purpose of the teacher collaborative planning is to combine expertise and meet student needs with IEPs.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

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<sup>53</sup> Ibid.

<sup>54</sup> Ibid.

**FINDING 2-14**

The SPS library (**Exhibit 2-29**) is traditional in function and service. There is little collaboration among classroom teachers and library staff.

**Exhibit 2-29**  
**SPS Library Media Center**



*Source: Prismatic, December 2018*

The library is staffed with a certified librarian and library aide and the library meets statutory requirements. Students come to the library to take the Accelerated Reading tests. Elementary students frequent the library individually and as a class. From time to time, library staff provide instructional services for elementary students.

Staff and students expressed satisfaction with the library services. However, the library needs improvement in collaborating with teachers and integrating new technologies. SPS students have few digital learning options facilitated via the library.

As noted by SDE, an effective school library:

- offers a wide variety of materials – reference, fiction, and nonfiction – in a broad range of reading levels;
- provides access to current information by integrating new technologies into the curriculum;
- is cost-effective, allowing many readers access to one book; and
- allows the school librarians to team with teachers to create and present lessons.<sup>55</sup>

<sup>55</sup> <http://sde.ok.gov/sde/library-media>

School libraries launch students into a world of new knowledge by providing instant access to exciting books, online resources, and emerging technologies. They provide equal opportunities to all students for learning. Certified school librarians are an essential part of a school's faculty, partnering with educators to connect 21<sup>st</sup> Century learners with resources. They empower students to be critical thinkers, enthusiastic readers, and ethical users of information and digital technology.

21<sup>st</sup> Century librarians no longer spend most of their time monitoring the stacks and checking out books to students. Now their role as school librarians includes teaching students how to navigate and consume information online and helping teachers embed those skills into their curriculum. Librarians are becoming instructional partners, innovation leaders, and digital-literacy scholars. They are included in collaborative processes and contribute to innovative instructional strategies. The American Association of School Librarians (AASL) has taken the position that through providing professional development and co-teaching, school librarians today should be "leading the way in digital learning and literacies." Research has shown that when school librarians are involved in instruction, student learning improves.<sup>56</sup>

## RECOMMENDATION

**Explore options for offering supportive instructional resources, digital learning opportunities, and collaborative learning activities between the library and the regular classroom.**

The principals and library staff should seek ways to intentionally connect the library with classroom curricula. The library staff should be included in staff meetings and make teachers aware of digital and hard copy library resources that can be linked to classroom content and OAS. The library staff can use the AASL Framework as an initial resource to look for innovative learning opportunities to share with classroom teachers.<sup>57</sup> A number of websites describe how school libraries interface digital literacy services with classroom content.<sup>58</sup>

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

### *Gifted and Talented Education*

Chapter 8 Article VII, Section 904 of the School Law Book defines Gifted and Talented children as "those children identified at the preschool, elementary, or secondary level as having demonstrated potential abilities of high-performance capabilities and needing differentiated or accelerated educational services." The definition includes students who scored in the top three percent on any national standardized test of intellectual ability or who excel in the areas of

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<sup>56</sup> Will, M. (2016). As information landscape changes, school librarians take on new roles. *The Changing Face of Literacy*, 36(12), pp. 25-28.

<sup>57</sup> <http://sde.ok.gov/sde/sites/ok.gov.sde/files/webform/180205-AASL-frameworks-spreads-libraries.pdf>

<sup>58</sup> <http://geiendorsed.com/blog/beyond-the-classroom/school-libraries-of-the-future-5-trends-to-watch/>;  
<https://www.ebsco.com/blog/article/promoting-school-library-resources-and-services-with-todays-digital-tools>;  
<https://www.edutopia.org/blog/21st-century-libraries-learning-commons-beth-holland>

creative thinking ability, leadership ability, visual performing arts ability, and specific academic ability.

School Law Book Section 910 requires each school district to provide Gifted and Talented educational programs and to serve those identified students who reside within the school district boundaries. The local school board is required to submit a plan for Gifted and Talented to the State Board of Education and to provide annual program reports to the SDE.

The required components for Gifted and Talented education programs includes:

- a written policy statement which specifies a consistent process for assessment and selection of children for placement in Gifted and Talented programs in grades one through 12;
- a description of curriculum for the Gifted and Talented educational program, demonstrating that the curriculum is differentiated from the normal curriculum in pace and/or depth, and that it has scope and sequence;
- criteria for evaluation of the gifted child educational program;
- evidence of participation by the local advisory committee on education for Gifted and Talented children in planning, child identification, and program evaluation;
- required competencies and duties of Gifted and Talented educational program staff; and
- a budget for the district's Gifted and Talented educational programs.

**Exhibit 2-30** shows that SPS had a gifted and talented identification rate that was the second highest from 2012-13 to 2013-14 among its peers. From 2014-15 to 2016-17, SPS was comparable among its peers, but lower than the community group and state. No federal agency collects data on the number of gifted and talented students identified; however, the National Association for Gifted Children notes that between five and seven percent of students should be identified. In 2016-17, SPS was almost double this standard.

**Exhibit 2-30**  
**Trend in Percentage of Gifted and Talented Education Students**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17
<b>Silo</b>	<b>20.2%</b>	<b>15.0%</b>	<b>12.2%</b>	<b>11.6%</b>	<b>12.4%</b>
Caney Valley	14.7%	14.9%	12.7%	13.1%	12.6%
Newkirk	13.4%	11.5%	9.3%	10.4%	9.5%
Wilburton	26.5%	23.3%	21.6%	22.9%	23.7%
Tishomingo	3.5%	2.8%	7.2%	4.9%	4.2%
Hennessey	13.8%	10.9%	11.3%	8.3%	9.2%
<b>Community Group</b>	<b>12.2%</b>	<b>12.6%</b>	<b>12.6%</b>	<b>12.9%</b>	<b>13.4%</b>
<b>State</b>	<b>14.8%</b>	<b>14.2%</b>	<b>14.2%</b>	<b>14.2%</b>	<b>14.5%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**FINDING 2-15**

The consulting team found that gifted students are primarily served in the regular classrooms, and there is little evidence of differentiation to meet the needs of gifted students across all grades. It was observed that regular classroom teachers lacked the need to be intentional when meeting the needs of their gifted students. There was little evidence to indicate SPS classroom teachers are routinely enriching and challenging gifted students.

Often, acceleration and enrichment are confused. Gifted students may be asked to read more, answer more questions, and complete longer assignments; these are not enrichment. **Exhibit 2-31** illustrates the differences.

**Exhibit 2-31**  
**Differentiating Between Acceleration and Enrichment**

Acceleration	Enrichment
<ul style="list-style-type: none"> <li>• Acceleration is about the destination and moving through curriculum.</li> <li>• Pacing of content and instruction is sped up to match learner needs.</li> <li>• The goal is to accelerate content mastery.</li> <li>• When acceleration is the goal, students are moving faster through content or skill development.</li> </ul>	<ul style="list-style-type: none"> <li>• Enrichment is about the journey and extending the experience with depth and complexity.</li> <li>• Effort is made to allow students to explore topics of interest.</li> <li>• The goal is to enhance and investigate.</li> <li>• When enrichment is the goal, connections are made to units of study with integration of real world applications.</li> </ul>

Source: <https://hwlearninglinks.wordpress.com/2015/08/03/enrichment-for-gifted-learners-in-a-general-education-classroom/>

**RECOMMENDATION**

**Continue to strengthen the gifted and talented program through enriched instruction in the regular classroom.**

The superintendent, principals, and counselor should periodically share websites and resources with the regular classroom teachers.<sup>59</sup> The SDE also has resources to assist in teaching gifted students. Staff and PLC meetings can also be used to focus on effectively serving and modifying instruction for gifted students.

The SDE provides options for classroom curricular modifications. The modifications must be challenging and enriching to the student. The district should consider how it might incorporate one or more of these options (**Exhibit 2-32**).

<sup>59</sup> [https://docs.google.com/presentation/d/1IKiJPSr9d8FAjSN2sVC8dZbTwMXXhs9bDz\\_b6vib1Ps/edit#slide=id.p](https://docs.google.com/presentation/d/1IKiJPSr9d8FAjSN2sVC8dZbTwMXXhs9bDz_b6vib1Ps/edit#slide=id.p)

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### Exhibit 2-32 Enrichment Options

- **Enrichment in the Regular Classroom:** Experiences provided in regular classrooms that are supplemental to the established curriculum and which are purposefully planned with the needs, interests, and capabilities of students in mind. Appropriate enrichment experiences are NOT a repetition of material.
- **Seminars/Convocations:** Special short-term sessions where students focus on one area of study.
- **Mentorships:** A program which pairs individual students with someone who has advanced skills and experiences in a discipline and can serve as a guide, advisor, counselor, and role model.
- **Summer Enrichment Programs:** Enrichment classes or courses offered during the summer months.
- **Saturday Enrichment Programs:** Enrichment classes or courses offered on Saturday.
- **Creative/Academic Competitions:** Organized opportunities for students to enter local, regional, state, or national contests in a variety of areas.
- **Differentiated Curriculum:** Curriculum designed to meet the needs of high ability students and differentiated according to content, process, and product.
- **Learning Centers:** A designated area or portable center designed to enrich and/or accelerate students' interests in a given content area.
- **“Great Books” and “Junior Great Books”:** Discussions of great literature led by an adult discussion leader using a prepared question guide.

Source: <http://ok.gov/sde/gifted-and-talented-education-programming-options>

There are multiple resources with insights for teachers to use to support learning to identify gifted students.<sup>60</sup>

#### FISCAL IMPACT

This recommendation can be implemented using existing resources.

#### FINDING 2-16

The elective course offerings for students are limited. The superintendent, principals, counselor, and teachers all expressed interest in offering additional courses for students to select depending

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<sup>60</sup> <https://rossieronline.usc.edu/blog/teaching-gifted-students-in-full-inclusion-classrooms/>;  
<http://www.hoagiesgifted.org/>

upon areas of interests. Interviews with staff and students indicated a desire for more computer-based courses and the integration of STEM content.

There are resources across the state and nation to support implementation of STEM projects and courses at minimal to no cost to the district. The Oklahoma Center for the Advancement of Science and Technology (OCAST) was established in 1987 by the Oklahoma legislature for the purpose of growing and diversifying the state's economy through technology development, technology transfer, and technology commercialization. OCAST also is an active supporter of STEM education across Oklahoma's common education system and provides funding to support internships between local industries and higher education. In addition to offering grants and services, this organization can provide ideas and guidance in effective ways to expose students at all levels to STEM subjects.

## **RECOMMENDATION**

### **Explore additional offerings in areas such as STEM, to support student interests and college-and career-ready needs.**

The superintendent, principals, and counselor should explore courses offered by other schools around the state, as well as programs in which colleges and universities can support curricular needs. One example is offered free of charge through the University of Oklahoma. The School of Computer Science at the University of Oklahoma, in collaboration with NextThought, an Oklahoma learning company, is offering a free Computer Science Program, known as Code Sooner, to K-12 students in the State of Oklahoma. Code Sooner was initiated with a vision to ensure all secondary students in the State of Oklahoma have access to Computer Science education.<sup>61</sup>

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## ***D. STUDENT SERVICES***

Student services are comprised of counseling, health services, and social services in most Oklahoma districts. Services provided include:

- college and career counseling;
- health education and services;
- substance abuse and psychological counseling;
- social services; and

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<sup>61</sup> <https://codesooner.ou.edu/index.html>



- graduate follow-up.

Student services are evolving into a more powerful tool to assist students. They are becoming increasingly more valuable in providing needed support and guidance for students' college questions, career options, and individual needs.

### ***Guidance and Counseling***

Oklahoma State Board of Education Accreditation Standards for guidance and counseling are:

- The counseling staff, parents, administrators, and others shall provide guidance and counseling program direction through involvement in assessment and identification of student needs.
- The school shall develop a written description of a guidance and counseling program with special provisions for at-risk students. The program shall address assessed needs of all students, including those who are identified as at-risk and shall establish program goals, objectives, and evaluation.
- Each school shall provide an organized program of guidance and counseling services that include: counseling services available to students; a planned sequential program of guidance activities that enhance students' development; appropriate referrals to other specialized persons, clinics, or agencies in the community; and coordinated services.
- Each counselor shall follow a planned calendar of activities based upon established program goals and provide direct and indirect services to students, teachers, and/or parents.

The SDE publishes *The School Counselor's Guide: Developing a Comprehensive School Counseling Program Using Accreditation Standard VI*. This publication is designed to assist school districts in strengthening existing programs or developing new ones. The major components of the defined guidance curriculum include Guidance Curriculum Domains (Academic Development, Career Development, and Personal/Social Development); Student Competencies; and Guidance Curriculum Delivery.

The American School Counselor Association (ASCA) states: "School counseling programs are collaborative efforts benefiting students, parents, teachers, administrators, and the overall community. School counseling programs should be an integral part of students' daily educational environment and school counselors should be partners in student achievement."<sup>62</sup>

ASCA recommends that school counselors divide time between four components:

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<sup>62</sup> <http://www.ascanationalmodel.org/>



- Guidance Curriculum – The guidance curriculum is structured with developmental lessons designed to assist students. The guidance curriculum is infused throughout the school’s overall curriculum and presented systematically through K-12 classrooms.
- Individual Student Planning – School counselors coordinate ongoing activities designed to assist students individually in planning.
- Responsive Services – Responsive services are activities meeting individual students’ immediate needs that may require counseling.
- Systems Support – School counseling programs require administration and management.

Time allocated for each program component should depend on the developmental and special needs of the students served. While each district determines time allotments, ASCA recommends that school counselors spend 80 percent of their time in direct contact with students. Oklahoma high schools and middle schools are required to have one full-time counselor for every 450 students. At the elementary level a counseling and guidance program is required, but does not have to be delivered by a certified counselor.

**Exhibit 2-33** provides the trend in counselor staffing over time. SPS’ counselor staffing has been the lowest or tied for the lowest of all comparison entities for the past five years, despite a 100 percent increase.

**Exhibit 2-33  
Trend in Counselor Staffing Over Time**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17	Percent Change
<b>Silo</b>	<b>0.5</b>	<b>1.0</b>	<b>1.0</b>	<b>1.0</b>	<b>1.0</b>	<b>100.0%▲</b>
Caney Valley	1.0	1.0	1.0	1.8	2.0	100.0%▲
Newkirk	2.7	2.7	2.8	2.8	2.8	3.7%▲
Wilburton	3.0	3.0	3.0	3.0	3.0	0.0%●
Tishomingo	3.0	3.0	3.0	3.0	3.0	0.0%●
Hennessey	2.0	1.9	2.0	2.0	2.0	0.0%●
<b>Community Group</b>	<b>1.6</b>	<b>1.5</b>	<b>1.6</b>	<b>1.6</b>	<b>1.5</b>	<b>(6.3%)▼</b>
<b>State</b>	<b>3.0</b>	<b>3.1</b>	<b>3.1</b>	<b>3.1</b>	<b>2.9</b>	<b>(3.3%)▼</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**FINDING 2-17**

The district employs a full-time, certified counselor. The counselor provides individual counseling services to students, as well as group counseling services as needed. The counselor keeps middle school, freshman, and sophomore students informed of the Oklahoma Promise program and assists students with the needed paperwork to apply for the program. The counselor serves as a facilitator for the Choctaw Tribe course offered through distance learning technology. Additionally, the counselor provides information to students on concurrent enrollment and programs through the Career and Technology Center, as well as scholarship opportunities.

Effective school counseling programs are a collaborative effort between the school counselor, teaching staff, families, and community stakeholders. Counselors work with other educators to create an environment resulting in a positive impact on student achievement. School counselors value and respond to the diversity and individual differences in their student population and community. They are culturally sensitive and responsive to student needs. Comprehensive school counseling programs become an integral part of the school setting. Counselors ensure equitable access to opportunities and rigorous curriculum for all students to participate fully in the educational process.<sup>63</sup>

## **COMMENDATION**

**The district is commended for employing a full-time counselor.**

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<sup>63</sup> [https://www.schoolcounselor.org/asca/media/asca/PositionStatements/PS\\_ComprehensivePrograms.pdf](https://www.schoolcounselor.org/asca/media/asca/PositionStatements/PS_ComprehensivePrograms.pdf)

*Chapter 3:*  
*Business Operations*

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## Chapter 3

# *Business Operations*

This chapter addresses the business operations of Silo Public Schools (SPS) and is divided into the following sections:

- A. Planning and Budgeting
- B. Financial Processes
- C. Asset and Risk Management
- D. Activity Funds
- E. Auditing and Internal Controls

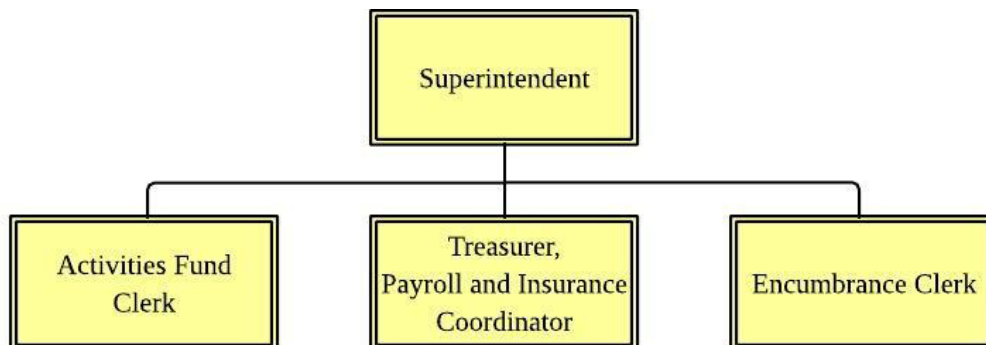
Financial, asset, and risk management in school districts require thoughtful planning and decision-making. Public school districts must meet or exceed increasingly rigorous academic standards without exceeding their budgetary resources. The superintendent and board of education must ensure that the district receives all available revenue from local, state, and federal sources and expends those funds in accordance with all applicable laws, rules, regulations, and policies so that the district can best meet or exceed the established academic standards.

### ***Background***

Oklahoma law entrusts a school district's board of education with specific responsibilities, including the oversight of investments and funds. The school board is allowed to contract with the county treasurer for the management of its accounts, or it may choose to appoint a treasurer.

The SPS superintendent oversees business services and is assisted by three employees who perform various business service functions. The treasurer, in addition to performing all treasurer duties, processes the district's payroll and handles all insurance. The encumbrance clerk processes encumbrances, purchasing documents, and payments to vendors. The activity clerk is responsible for all financial transactions pertaining to student activity funds. **Exhibit 3-1** shows the organization of SPS' business operations.

**Exhibit 3-1**  
**SPS Business Operations Organizational Structure**



Source: Created by Prismatic, December 2018

### **Financial Statements**

Financial statements for SPS are prepared based upon Generally Accepted Accounting Principles (GAAP) that require funds to be combined by fund type, and for the financial statements to be prepared based on these combined funds. The accounts of the district are organized based on funds, each of which is a separate entity. The operations of each fund are accounted for by providing a separate set of self-balancing accounts that comprise its assets, liabilities, fund balances, revenues, and expenditures.

The district's financial statements are prepared on a prescribed procedure of accounting that demonstrates compliance with the cash basis and budget laws of the State of Oklahoma. Revenues are recorded as received in cash, except for revenues susceptible to accrual and material revenues that are not received at the standard time of receipt. Expenditures are recorded in the accounting period in which the fund liability is incurred and encumbered. SPS prepares financial statements that include the fund types illustrated in **Exhibit 3-2**.

**Exhibit 3-2**  
**Funds Contained in the 2017 SPS Annual Financial Report**

Type	Purpose
General Fund	To account for all revenue and expenditures applicable to the general operations of the district.
Special Revenue Funds	To account for the financial activity of the building and child nutrition funds.
Debt Service Fund	To account for the revenue received from ad valorem taxes dedicated to the repayment of bonds and the subsequent payment of debt service.
Bond or Capital Projects Fund	To account for monies received from the sale of bonds for specific capital projects that span several years.
Agency Fund	To account for the activities of various student groups.

*Source: SPS Annual Financial Report, June 30, 2017*

### **Oklahoma Cost Accounting System**

Oklahoma Statutes, *Title 70, Section 5-135.2*, require school districts to report financial transactions for all funds using the Oklahoma Cost Accounting System (OCAS). Policies and procedures set forth in OCAS describe the basis of funding of Oklahoma public schools, the duties and procedures for the financial operations of the district, and the role of the Oklahoma State Department of Education (SDE) and the district in receiving, dispensing, reporting, and accounting for school funds.

School boards, superintendents, business managers, encumbrance clerks, treasurers, independent auditors, and other parties with responsibilities for school budgets and the administration of school district funds must be familiar with OCAS policies and procedures. A district's annual audited financial statements must include all necessary financial information and related disclosures as prescribed by OCAS.

### **Revenue Sources**

General fund revenues from state sources for current operations are governed primarily by the State Aid Formula under the provisions of *Title 70, Article XVIII. B. Section 200* of the School Law Book. The Oklahoma State Board of Education administers the allocation of state funding to school districts based upon state aid factors, the weighted average district membership, and several categories of prior year revenues.

Intermediate revenue sources primarily represent a four mill levy assessed on a countywide basis and distributed to the county school districts based upon average daily membership for the preceding school year. Local sources of funding are derived from ad valorem (property) taxes assessed each year by the district pursuant to *Article X, Section 9* of the Oklahoma Constitution. These taxes consist of the following components:

- no less than five mills of a total of 15 mills levied for county, municipal, and school district purposes;
- 15 mills levied specifically for school district purposes;
- an emergency levy of five mills; and
- ten mills levied for local support.

A mill is the equivalent of \$1 per \$1,000 or (1/10 of a penny) of net asset valuation.

Assessment ratios for real and personal property are determined locally by each individual county assessor within guidelines established by the State Board of Equalization and the Oklahoma Tax Commission. Property within SPS district boundary had a net valuation of \$49,720,464 in 2017 and \$49,781,894 in 2016. The mileage rate levied was 73.64 in 2017 and 73.64 in 2016.

State funds and ad valorem taxes are accounted for in the general fund of the district, which is authorized pursuant to *Title 70, Section 1-117*, Oklahoma Statutes 2001, as amended pursuant to *Article X, Section 9*, of the Oklahoma Constitution. The purpose of the general fund is to pay for operations. School districts are not authorized to use these revenues for capital expenditures as defined in the statutes.

Ad valorem taxes for bond issues are required by statute to be collected by the county treasurer and remitted to the school district for deposit into the sinking fund. The total debt service requirements may be reduced by any surplus from the prior fiscal year or any direct contributions made into the sinking fund.

Ad valorem tax rates for sinking fund purposes are determined by ascertaining the actual dollars of revenues required for payment of principal and interest on indebtedness, fees, and judicial judgments. A reserve for delinquent taxes, in an amount of not less than five percent and not more than 20 percent of the net required tax collections, is added to the required debt service collections.

The revenue requirements for both debt service and general fund are then divided by the total assessed valuation of all taxable property within the district. Multiplying the resulting quotient by 100 results in the tax rate expressed as a percent; multiplying the resulting quotient by 1,000 results in the tax rate expressed in mills.

Between 2012-13 and 2016-17, the average assessed property value per student for SPS has increased by 16.5 percent (**Exhibit 3-3**). This was the third highest increase among the comparison groups. All comparison groups but Wilburton also saw increases in average assessed property value per student.

**Exhibit 3-3**  
**Trend in Assessed Property Value per Student**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17	Percent Change
<b>Silo</b>	<b>\$47,538</b>	<b>\$52,659</b>	<b>\$55,477</b>	<b>\$57,168</b>	<b>\$55,368</b>	<b>16.5%▲</b>
Caney Valley	\$39,589	\$41,525	\$42,600	\$41,488	\$40,491	2.3%▲
Newkirk	\$29,691	\$27,684	\$29,201	\$46,938	\$47,709	60.7%▲
Wilburton	\$33,070	\$29,642	\$29,423	\$29,783	\$31,684	(4.2%)▼
Tishomingo	\$23,280	\$26,099	\$27,521	\$30,707	\$30,946	32.9%▲
Hennessey	\$44,865	\$46,126	\$46,817	\$48,148	\$48,752	8.7%▲
<b>State</b>	<b>\$43,631</b>	<b>\$45,248</b>	<b>\$47,329</b>	<b>\$49,623</b>	<b>\$49,471</b>	<b>13.4%▲</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 3-4** shows the percentages of local and county, state, and federal revenues for SPS and its peers. The district's revenue percentage from district sources was in the middle of its peers, higher than the community group, and lower than the state. The district revenue percentage from federal sources was the highest among all comparison groups.

**Exhibit 3-4**  
**Breakdown of Revenues by Source, All Funds, 2016-17**

Entity	District Revenue	County Revenue	State Dedicated	State Appropriated	Federal Revenue
<b>Silo</b>	<b>33.6%</b>	<b>2.4%</b>	<b>7.7%</b>	<b>38.8%</b>	<b>17.5%</b>
Caney Valley	37.6%	2.3%	8.5%	36.1%	15.5%
Newkirk	40.1%	3.1%	8.7%	35.9%	12.2%
Wilburton	31.9%	1.9%	11.0%	44.4%	10.8%
Tishomingo	27.1%	2.6%	8.7%	44.6%	17.0%
Hennessey	33.3%	3.3%	18.7%	31.0%	13.7%
<b>Community Group</b>	<b>31.0%</b>	<b>2.2%</b>	<b>9.2%</b>	<b>42.5%</b>	<b>15.1%</b>
<b>State</b>	<b>40.5%</b>	<b>2.7%</b>	<b>7.3%</b>	<b>38.2%</b>	<b>11.3%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 3-5** shows the trend in revenue sources for SPS, the community group, and state. The district's district and county revenue percentage was consistently higher than the community group and lower than the state every year. The percentage of SPS revenue from state sources was



lower than both the community group and higher than the state. The percentage of federal funding was higher than both the community group and state each year.

**Exhibit 3-5**  
**Sources of Revenue as a Percentage of Total Revenue, All Funds**  
**Silo, Community Group, and State**

Source of Revenue	Entity	2012-13	2013-14	2014-15	2015-16	2016-17
District and County	<b>Silo</b>	<b>32.2%</b>	<b>30.8%</b>	<b>33.2%</b>	<b>34.5%</b>	<b>36.0%</b>
	Community Group	28.3%	28.8%	30.0%	31.4%	33.2%
	State	39.6%	40.3%	40.8%	42.1%	43.2%
State Dedicated and Appropriated	<b>Silo</b>	<b>46.9%</b>	<b>52.0%</b>	<b>48.3%</b>	<b>46.5%</b>	<b>46.5%</b>
	Community Group	55.4%	55.7%	54.5%	52.9%	51.7%
	State	48.0%	48.0%	47.7%	46.3%	45.5%
Federal	<b>Silo</b>	<b>20.9%</b>	<b>17.2%</b>	<b>18.4%</b>	<b>19.0%</b>	<b>17.5%</b>
	Community Group	16.3%	15.5%	15.5%	15.7%	15.1%
	State	12.5%	11.7%	11.6%	11.6%	11.3%

*Source: Office of Educational Quality and Accountability, Profiles Database*

### ***Expenditures***

**Exhibit 3-6** compares 2016-17 expenditures as a percentage of total expenditures for SPS and the peers. As shown:

- SPS was the lowest of all peer districts in instructional expenditures.
- The percentage that SPS spent for student support was the second lowest among all comparison groups.
- The percentage that SPS spent for instructional support was the second lowest among all comparison groups.
- The percentage that SPS spent for district administration was in the middle of the peer districts.
- SPS was tied with Wilburton, Tishomingo, and the community group for the percentage spent on school administration.
- The percentage that SPS spent for district support was the highest of all comparison groups except the state.

**Exhibit 3-6**  
**Percentage Breakdown of 2016-17 Expenditures by Type, All Funds**

Entity	Instruction <sup>1</sup>	Student Support <sup>2</sup>	Instruction Support <sup>3</sup>	District Admin. <sup>4</sup>	School Admin. <sup>5</sup>	District Support <sup>6</sup>	Other
<b>Silo</b>	<b>53.8%</b>	<b>5.7%</b>	<b>1.7%</b>	<b>3.8%</b>	<b>5.7%</b>	<b>17.3%</b>	<b>12.0%</b>
Caney Valley	54.8%	6.5%	3.4%	5.2%	6.0%	15.4%	8.8%
Newkirk	57.3%	6.8%	0.9%	2.6%	6.7%	15.5%	10.1%
Wilburton	55.5%	10.9%	2.4%	3.7%	5.7%	14.0%	7.8%
Tishomingo	56.7%	8.2%	2.6%	4.3%	5.7%	13.2%	9.3%
Hennessey	56.8%	3.6%	3.4%	3.4%	4.8%	15.4%	12.6%
<b>Community Group</b>	<b>54.4%</b>	<b>6.4%</b>	<b>2.7%</b>	<b>4.2%</b>	<b>5.7%</b>	<b>16.8%</b>	<b>9.8%</b>
<b>State</b>	<b>53.6%</b>	<b>7.0%</b>	<b>3.7%</b>	<b>3.0%</b>	<b>5.8%</b>	<b>17.6%</b>	<b>9.3%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**Exhibit 3-7** shows the trend in SPS expenditures per student and overall for the past ten years. Both the total district expenditures and the expenditures per student have on average remained the same over that period. The highest total district expenditures occurred in 2014-15, when the district spent slightly more than \$7.4 million. The highest expenditure per student occurred in 2009-10, when the district spent \$8,981 per student.

<sup>1</sup> Instruction – Activities dealing directly with the interaction between teachers and students

<sup>2</sup> Student Support – Activities designed to assess and improve the well-being of students and to supplement the teaching process

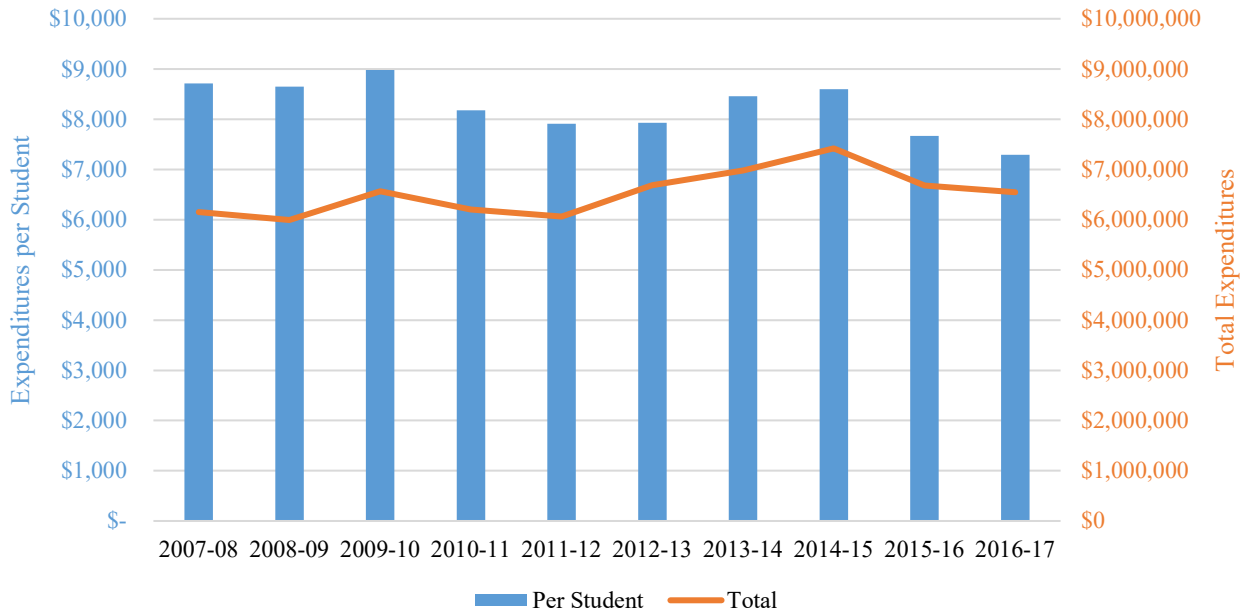
<sup>3</sup> Instruction Support – Activities associated with assisting the instructional staff with the content and process of providing learning experiences of students

<sup>4</sup> District Administration – Activities involving the establishment and administration policy in connection with operating the entire school district

<sup>5</sup> School Administration – Activities concerned with overall administrative responsibility for a single school or a group of schools

<sup>6</sup> District Support – Consists of central services (activities that support other administrative and instructional functions, fiscal services, human resources, planning, and administrative information technology), operation and maintenance of plant services (activities concerned with keeping the physical plant open, comfortable, and safe for use, and keeping the grounds, buildings, and equipment in an effective working condition and state of repair), and student transportation services (activities concerned with the conveyance of student to and from school as provided by state law)

**Exhibit 3-7**  
**Trend in SPS Expenditures per Student, All Funds**



Source: Office of Educational Quality and Accountability, Profiles Database, and Prismatic calculations

**Fund Balance**

The fund balance, often referred to as “carryover,” is defined as the excess of assets over liabilities and is used in future years to offset any revenue shortfalls or negative midyear adjustments that may occur. Fund balance is the amount of cash that is not obligated by purchase orders, contracts, outstanding warrants, or other commitments. A healthy fund balance can be beneficial to a school district by permitting longer investment terms and bridging periods of low cash flow during the year. Perhaps more importantly, it helps the district maintain cash flow to get through the first part of the new school year until state aid distribution can catch up with the district’s obligations.

A school district’s fund balance policy can provide guidance for the development and implementation of an annual budget. Oklahoma public school laws provide guidance regarding the allowable year-end balances. *Title 70, Section 18* of Oklahoma Statutes provides the maximum amount, as a percentage of total general fund collections, that a school district can maintain as a fund balance. **Exhibit 3-8** shows the table of maximum allowable balances expressed as a percentage of their general fund collections.

**Exhibit 3-8**  
**Maximum Allowable Balances at Year End**

General Fund Collections	Maximum Allowable Balances
less than \$1,000,000	40%
\$1,000,000 - \$2,999,999	35%
\$3,000,000 - \$3,999,999	30%
\$4,000,000 - \$4,999,999	25%
\$5,000,000 - \$5,999,999	20%
\$6,000,000 - \$7,999,999	18%
\$8,000,000 - \$9,999,999	16%
\$10,000,000 or more	14%

*Source: SDE Technical Assistant Document, July 2009*

Based upon general fund collections of \$6,150,502 for 2016-17, SPS would be able to reserve up to 18 percent as a fund balance. *Title 70, Section 18* of Oklahoma Statutes allows a school district to exceed the allowable percentage of carryover for two consecutive years before a general fund balance penalty is assessed. *Title 70, Section 18* also allows districts to exclude federal revenues received in a year from the total fund balance when calculating if a general fund balance penalty is assessed. **Exhibit 3-9** provides the SPS fund balances for the last three years. From 2014-15 to 2016-17, the fund balance has increased by 163.1 percent.

**Exhibit 3-9**  
**Trend in SPS General Fund Balances**

	2014-15 Actual	2015-16 Actual	2016-17 Actual
General Fund Collections	\$6,193,904	\$6,226,476	\$6,150,502
Fund Balance	\$592,444	\$1,053,115	\$1,558,738
Percentage of General Fund Collections	9.6%	16.9%	25.3%
<b>Fund Balance Year-Over-Year Change</b>		<b>77.8% ▲</b>	<b>48.0% ▲</b>
<b>Fund Balance Three-Year Change</b>			<b>163.1% ▲</b>

*Source: SPS Annual Audit Reports, 2014-15 through 2016-17, and Prismatic calculations*

**Bonds**

*Article X, Section 26* of the Oklahoma Constitution prohibits school districts from issuing debt without approval of “60 percent plus one” of the district’s voters. A district’s outstanding debt is limited to ten percent of its assessed valuation. The issued debt may be used for acquiring or improving school sites, constructing, repairing, remodeling, equipping buildings, or acquiring school furniture, fixtures, or equipment. **Exhibit 3-10** compares the district’s average daily membership (ADM), assessed property value, and bonding capacity for the last five years. ADM, property value, and bonding capacity have all increased.

**Exhibit 3-10**  
**SPS Trends in ADM, Assessed Values, and Bonding Capacity**

School Year	ADM	Assessed Property Value	Bonding Capacity
2012-13	842.9	\$40,069,780	\$4,006,978
2013-14	825.3	\$43,459,473	\$4,345,947
2014-15	898.0	\$49,818,346	\$4,981,834
2015-16	870.8	\$49,781,894	\$4,978,189
2016-17	898.0	\$49,720,464	\$4,972,064
<b>Percent Change</b>	<b>6.5% ▲</b>		<b>24.1% ▲</b>

Source: Office of Educational Quality and Accountability, Profiles Database, and Prismatic calculations

The debt service expenditures per student are based upon the amount of outstanding debt and number of students a district has during a given school year. Districts must balance facility and equipment needs with the amount of tax money requested of district taxpayers. In 2016-17, SPS had no debt service (no outstanding bonds), making it the only district among the peers to be debt free (**Exhibit 3-11**). The average among the peer districts was \$856.

**Exhibit 3-11**  
**Debt Service Expenditures per Student**  
**2016-17**

Entity	Debt Service per Student
<b>Silo</b>	<b>\$0</b>
Caney Valley	\$750
Newkirk	\$895
Wilburton	\$1,203
Tishomingo	\$593
Hennessey	\$841
<b>Community Group</b>	<b>\$517</b>
<b>State</b>	<b>\$947</b>

Source: Office of Educational Quality and Accountability, Profiles Database

**A. PLANNING AND BUDGETING**

An organization's budget development and management establishes the foundation for all other financial operations. The budget process should be strategic in nature and consist of activities that encompass the development, implementation, and evaluation of a comprehensive plan for student success.

The National Advisory Council on State and Local Budgeting (NACSLB) has identified four essential principles of effective budgeting. The specific principles include the following tasks:

1. Set broad goals to guide decisions.
2. Develop strategies and financial policies.
3. Design a budget supportive of strategies and goals.
4. Focus on the necessity of continually evaluating goal achievement.

### FINDING 3-1

SPS has no formal general fund balance policy. With a formal policy, the school board could provide additional guidance to district management pertaining specifically to what the district's fund balance goal should be and what steps should be taken to reach and maintain that goal within the statutory maximum limits.

The district's fund balance was 25 percent of total General Fund revenues at the end of 2016-17. Pursuant to Oklahoma statute *70 O.S. 18-200.1* school districts with general fund revenue between \$6,000,000 and \$7,999,999 cannot have fund balance greater than 18 percent.

The district is monitoring the budget on a regular basis to increase fund balance. The treasurer is analyzing the budget to make sure payroll expenditures stay around 85 percent of total expenditures for the district and monitoring monthly expenditures for consumables. To help accomplish meeting this percentage, the district has hired retirees or part-time employees to avoid paying retirement and health insurance benefits.

Based upon discussions with the superintendent and encumbrance clerk the district is making efforts to buy items in bulk, which allows the district to take advantage of discounts offered on larger purchases. The district is also using federal budget when the grant allows and making sure all purchases have a purchase order before processing. These changes in business practices, while minor, is allowing the district to save money and increase the fund balance.

**Exhibit 3-12** shows the results of staff surveys that indicate some concerns the district does not have adequate staff to carry out its operations. Some 43 percent either *disagreed* or *strongly disagreed* with the staff situation. Less than a majority (48 percent) feel staffing is adequate.

### Exhibit 3-12 Staff Survey Results Regarding the District

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The district has an adequate number of staff to carry out its operations.	12%	36%	9%	41%	2%

*Source: Prismatic Survey Results, December 2018*

As shown in previous exhibits, SPS was the lowest of all its peer districts in the percentage of funds spend on instruction and second to lowest for expenditures on student support and instructional support. While it is good practice to keep expenditures low and avoid waste,

discussion with the superintendent and high school principal indicated that the district would like to add additional instructional staff to meet district needs.

A district's general fund balance policy should outline what the board considers to be an adequate balance to maintain efficient cash flow, cover emergency expenditures, adjust for revenue shortfalls, and avoid excess balance penalties or paying interest on non-payable warrants. The fund balance is a measure of the financial stability of a district and is an integral part of the budgeting process. Fund balance policies are also needed to provide guidance as to how to achieve and maintain a minimum fund balance. Districts that are fortunate enough to achieve a substantial fund balance should also include policy guidance as to what priority needs should be funded.

For example, Guthrie Public Schools has a general fund balance policy that states:

An adequate level of general fund balance is required in order to maintain efficient cash flow, cover emergency expenditures, adjust for revenue shortfalls and avoid paying interest on non-payable warrants. In order to maximize the efficient use of this fund, the board of education establishes the fiscal management priority objective of achieving and maintaining a general fund balance of twelve percent (12%). Should the general fund balance drop below a minimum level of eight percent (8%), the administration shall give first priority to restoring this minimum level with any additional funding received and with the development and implementation of an appropriate expenditure strategy.

Each year beginning in January or February, the assistant superintendent in Guthrie Public Schools prepares an informative monthly document titled Fund Balance Projection. **Exhibit 3-13** shows a sample of the data included in that report.

**Exhibit 3-13**  
**Example Fund Balance Projection Report**

<b>Expenditure Classification</b>	<b>2014-15 Activity</b>	<b>2015-16 Activity YTD Activity</b>	<b>2015-16 Projected Activity</b>	<b>2015-16 Total Activity</b>	<b>Increase/ (Decrease)</b>
<b>BEGINNING FUND BALANCE</b>					
Current year	\$2,745,439	\$2,776,000	\$0	\$2,776,000	\$30,561
Lapsed From Prior Year	\$0	\$23,560	\$0	\$23,560	\$23,560
<b>REVENUES</b>					
Local Sources	\$4,758,920	\$3,894,754	\$938,950	\$4,833,704	\$74,784
Intermediate Sources	\$849,719	\$617,776	\$227,224	\$845,000	(\$4,719)
State Sources	\$15,047,772	\$7,707,310	\$5,737,251	\$13,444,562	(\$1,603,210)
Federal Sources	\$1,541,225	\$1,023,399	\$516,958	\$1,540,357	(\$868)
Non-Revenue Receipts	\$223,533	\$48,579	\$161,421	\$210,000	(\$13,533)
Total Revenues	\$22,421,169	\$13,291,818	\$7,581,805	\$20,873,623	(\$1,547,546)
<b>EXPENDITURES</b>					
Total Expenditures	\$22,390,608	\$21,329,397	\$540,382	\$21,869,778	(\$520,830)
<b>ENDING FUND BALANCE</b>	<b>\$2,776,000</b>	<b>(\$5,238,018)</b>	<b>\$7,041,424</b>	<b>\$1,803,405</b>	<b>(\$972,595)</b>

*Source: Guthrie Public Schools, February 2016*

Keeping all board members informed on the status of the general fund is extremely important in order to manage the finances of a district. Reports that not only show the financial activity that has occurred but also includes projections to the end of the year based upon actual year-to-date data prepared by an informed district official are effective in providing board members with an understanding of the status of the general fund balance.

The Government Finance Officers Association (GFOA) has developed standards for fund balance and recommends that:

- Governmental agencies establish a fund balance policy setting forth unreserved balances.
- The level of these recommended unreserved balances are based on unique characteristics and needs.
- Unreserved balances are no less and five percent of general operating revenues or no less than one or two months of regular general fund operating expenditures.
- Accountability measures consider long-term forecasting.



## RECOMMENDATION

**Adopt a formal policy for the district's general fund balance that establishes a fund balance target range, provides guidance on how to maintain the minimum balance, and requires reports for fund balance status to the school board.**

The district is seven percent or \$450,000 over the allowable fund balance maximum. The district has current needs (increase in teachers, increase in custodial staff, and facility upgrades) that could be addressed with the use of some of the fund balance.

The school board should provide guidance through the fund balance policy that establishes a fund balance target range, how to maintain the balance, and the use of the district's fund balance that exceeds the target amount. This should help ensure that the funds are only used for critical priority items and the district is not assessed an excess balance penalty. Reports to the school board will help the members to monitor the fund balance and have an understanding of the impact of actions that effect the balance.

The consulting team suggests that SPS aim to meet a standard of maintaining at least two months of regular general fund operating expenditures as recommended by the GFOA. In 2016-17, general fund expenditures totaled \$6,150,509, so the district should aim to maintain a balance of at least \$1,025,085, which is approximately two months (or one-sixth) of the total expenditures.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 3-2

The district is experiencing growth in student population and needs are increasing for access to technology, additional classroom resources, and staffing. The superintendent and principals are actively applying for competitive state and federal grants. This allows the district to acquire funding and resources that would otherwise not be available. **Exhibit 3-14** shows the grant types and totals received by SPS since 2008.

**Exhibit 3-14  
Percentage of Funds Spent on Instruction and Instruction Support**

Fiscal Year	Grant	Award Total
FY 08	Carol White Grant	\$157,778
FY 09	Carol White Grant	\$65,644
FY 10	Carol White Grant	\$62,024
	OPAT Grant	\$12,434
	Character Ed Grant	\$1,499
	Career Tech Equip Grant	\$10,000
FY 11	OETT Grant	\$40,000
	OPAT Grant	\$13,500
FY 13	DG Literacy Grant	\$2,000
FY 18	STEM Grant	\$3,182
FY 19	Safety Grant	\$345

*Source: SPS, December 2018*

**Exhibit 3-15** shows the results of staff surveys that indicate the district actively applies for competitive state and federal grants. 100 percent either *agreed* or *strongly agreed* with zero percent having *disagreed*.

**Exhibit 3-15  
Staff Survey Results Regarding the District**

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The district actively applies for competitive state and federal grants.	29%	71%	0%	0%	0%

*Source: Prismatic Survey Results, December 2018*

Actively applying for competitive state and federal grants allows SPS to receive funding to do things they currently do not have the capacity to do. It also encourages partners that can come in with resources and collaboration among employees who are involved in the grant writing.

**COMMENDATION**

**SPS is commended for actively applying for competitive state and federal grants.**

**FINDING 3-3**

There is limited public and staff involvement in the budget development process. The public is not provided any means to be involved in the budget development process and meetings are not held to obtain internal stakeholder involvement. A budget calendar is not produced for the budget development process.

The SPS budget is developed by the superintendent, treasurer, and principals. These staff members use the previous year’s revenues and expenditures and the Estimate of Needs to

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determine the budget for the current school year. The budget is based on staffing, curriculum, child nutrition, facility, and transportation needs, as well as other projected expenditures.

Although districts are not required to follow the *School District Budget Act* (Title 70 O.S. § 5-155) the district does, “make available to the public and investors sufficient information as to the financial conditions, requirements, and expectations of the school district.” *OAC 210:35-3-166(a)* states:

The principal shall be responsible for planning and administering the school site budget as approved by the local board of education. The principal shall involve the staff in the preliminary development of the budget, in establishing expenditure allocations, and setting priorities within the budget.

The GFOA recommends that a school district budget be developed using a results and outcomes approach. Using this approach, the budget should be developed to address the highest priorities of the district that could be achieved with the available resources. For example, if the district identified a need for additional staff members, the budget would be developed to incorporate this need, and, subsequently, be communicated clearly to all stakeholders.

Many districts have a budget committee comprised of community members, business leaders, and district employees who provide input to the board of education and superintendent on the priorities that should be addressed. Some Oklahoma public school districts use a budget committee that provides regular input to the superintendent and treasurer during the budget process. Other districts publish their budget materials and related information on their websites to ensure that all stakeholders are informed of budget processes and decisions that are being made.

At the time it was reviewed under the Oklahoma School Performance Review process, Clinton Public Schools had a transparent budget development process with a commendable level of public input. The process for budget development in Clinton involved these steps:

1. **Preliminary Budget:** Prior to the end of the current fiscal year, the superintendent and other key administrators prioritized items for the following fiscal year. Many contributions for this process came from school employees and the public.
2. **Preparation of Proposed Budget:** After the school board approved the estimate of needs, proposed budgets were devised within the approved revenues and expenditures for the budget year.
3. **Receipt of Public Comments:** The school board conducted a public hearing to take all comments on financial matters, both past and future, in the district.
4. **Adoption of a Final Budget:** This included any revisions due to public comments and potential program allocations received prior to this date.

5. Amending of Final Budget: Changes were made throughout the year to ensure that all expenditures had an appropriate amount of budgeted funds available and to adapt the current budget to reflect midterm allocation changes.

## **RECOMMENDATION**

### **Include a variety of stakeholders in the budgetary process.**

As a best practice, districts should include a variety of stakeholders in the budgetary process. These stakeholders should include the principals, facilities/transportation director, and cafeteria manager. A teacher and parent representative could also be included in the process. The goal should have more transparency, communication, and input regarding the process.

The superintendent and school board should adopt and publish an annual budget calendar and create a budget advisory committee. The budgetary process and timeline should be communicated throughout the district in order to foster transparency. Budget discussions for the upcoming school year should begin early in the spring semester at the latest. Budget discussions should include opportunities for input from district and community stakeholders.

Posting the budgetary process, timeline, and documents in public places and online will facilitate better communication, understanding, and support of the adopted budget. A sample budget calendar is provided in **Exhibit 3-16**. Each year, the district adjusts these dates by one or two days to match the new work calendar, but the process typically follows this schedule.

**Exhibit 3-16**  
**Sample Budget Calendar**

Date	Budget Activity
October 3	Introduction of budget process to principals and administrative staff
October 16	Submission of budget calendar to school board (regular meeting)
	Establishment of December date for public hearing on budget
October 20	Preliminary administrative staff budget committee meeting #1
	Review of budget process assignments and calendar
October 30	Administrative budget committee meeting #2
	Establish preliminary overall budget priorities
October 31	Submission of budget requests by principals and administrative staff
November 20	Public reminder concerning December date for public hearing on budget
November 27	Administrative budget committee meeting #3
	Analysis of budget requests and review of preliminary priorities
	Preliminary report on market analysis of cohort school districts
November 29	Advertise for December public hearing
December 4	Advertise for December public hearing
December 4	Annual school board legislative work session
December 8	Administrative budget committee meeting #4
	Refinement and alignment of projected expenditures
December 11	Public hearing on proposed budget (regular meeting)
	Report to school board on preliminary budget priorities (regular meeting)
	Invitation for school board member input on preliminary budget priorities
December 18	Administrative budget committee meeting #5
January 8	Analysis of preliminary budget priorities
	Review of projected state revenues based on the state proposed budget
January 11	Administrative budget committee meeting #6
	Refinement of budget priorities based on school board work session
January 22	Presentation of projected state revenues based on state proposed budget
	Invitation for further school board member input on budget
January 25	Administrative budget committee meeting #7
	Refinement of budget priorities based on public hearing and board member input
February 5	Presentation of first formal draft of budget
February 7	Administrative budget committee meeting #8
	Refinement of budget priorities
February 19	Presentation of second formal draft of budget (regular meeting)
	Update on projected state revenues
March 8	Administrative budget committee meeting #9
March 19	Target date for school board approval of budget (regular meeting)
May TBD	Called meeting for school board certification of final budget April 25-May 4
May 7	Target date for issuance of professional personnel contracts
May 21	Target date for issuance of classified personnel contracts

*Source: Created by Prismatic, based on records from an Oklahoma school district, November 2015*

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 3-4

Currently, the percentage of funds expended on instruction and instructional support is low. The district does not have specific goals or plans to increase the percentage of funds expended on instruction or instructional support (**Exhibit 3-17**). The district is the lowest in instructional expenditures among its peer districts and second lowest in instructional support among the comparison groups.

**Exhibit 3-17**  
**Percentage of Funds Spent on Instruction and Instruction Support**

Entity	Instruction <sup>7</sup>	Instruction Support <sup>8</sup>
<b>Silo</b>	<b>53.8%</b>	<b>1.7%</b>
Caney Valley	54.8%	3.4%
Newkirk	57.3%	0.9%
Wilburton	55.5%	2.4%
Tishomingo	56.7%	2.6%
Hennessey	56.8%	3.4%
<b>Community Group</b>	<b>54.4%</b>	<b>2.7%</b>
<b>State</b>	<b>53.6%</b>	<b>3.7%</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

By not receiving additional revenues from bonding and an increase in student population over the last couple years, SPS has had no other choice but to support a much broader array of expenditures from its general fund than would normally be expected. As a result, money has had to be directed away from the district's primary mission of instruction.

**Exhibit 3-18** shows SPS expenditures for the past three fiscal years, disaggregated by function code. The function code is a dimension used to describe the service or commodity obtained as a result of the expenditure. As the exhibit shows, total expenditures decreased by 15.2 percent over the three years. Spending on each classification has decreased. Moreover, the total expended on instruction per student has decreased each year over the last three years, a 9.2 percent decrease from 2014-15 through 2016-17. Instructional support expenditures per student has decreased by 45.5 percent over the last three years.

<sup>7</sup> Instruction – Activities dealing directly with the interaction between teachers and students

<sup>8</sup> Instruction Support – Activities associated with assisting the instructional staff with the content and process of providing learning experiences of students

**Exhibit 3-18**  
**Trend in SPS Expenditures per Student, All Funds**  
**2014-15 through 2016-17**

Expenditure Classification	2014-15	2015-16	2016-17	Percent Change
Instruction	\$4,322	\$4,028	\$3,923	(9.2%) ▼
Student Support	\$480	\$508	\$415	(13.5%) ▼
Instructional Support	\$220	\$139	\$120	(45.5%) ▼
District Administration	\$450	\$256	\$278	(38.2%) ▼
School Administration	\$545	\$419	\$419	(23.1%) ▼
District Support	\$1,494	\$1,607	\$1,263	(15.5%) ▼
Other	\$1,084	\$710	\$873	(19.5%) ▼
<b>Total</b>	<b>\$8,595</b>	<b>\$7,667</b>	<b>\$7,291</b>	<b>(15.2%) ▼</b>

*Source: Office of Educational Quality and Accountability, Profiles Database, and Prismatic calculations*

Pro-active school districts review historical expenditures when developing the budget and identify any trends that should be closely monitored or reversed. In reviewing the actual expenditure trends, any incorrect classifications or changes in how the district classifies expenses can also be identified and corrected.

Districts review historical expenditures, not only the dollar amount of the expenditures, but also the dollar amount as a percentage of the total. If one category is out of line, such as other support services, districts should make an adjustment. The priority should always be on classroom instructional and the students.

### RECOMMENDATION

**Place special emphasis on the percentage of district funds being budgeted for instruction during budget development and in future budget years establish a target percentage for instruction.**

Although activities other than classroom instruction certainly are necessary to support the education of students, they must be kept in perspective. The primary focus of SPS must be on providing the highest quality, most cost-effective public education available to its students.

The superintendent should analyze historical expenditures and establish recommended budget targets for board approval in order to increase funding percentages for classroom instruction. The district should also establish a budget target for each category of expenditures. The target should involve two components: the percentage of the total budget that should be allocated to each function and the percentage change over time in the allocation to each function. If the district closely monitors these indicators, it can manage its expenditures and ensure that the dollar allocation shifts closer to the board-adopted targets.

### FISCAL IMPACT

This recommendation can be implemented with existing resources.

**FINDING 3-5**

The district lacks an established group of community stakeholders to provide guidance to the district by setting financial-related goals and responsibilities relative to potential bond issues and other district needs. Community support for such debt financing and other needs would require significant community information and involvement that a stakeholder group could provide. This could also benefit the relationship with local Native American nations.

In an effort to ensure the transparency of their operations, many governmental agencies are establishing standing stakeholder groups, sometime in the form of foundations, sometime in the form of committees. If the district was considering the issuance of bonded debt for facilities or fundraising for a special need, it would be important that a stakeholder foundation/committee be established and become active and visible to the district and community. Community support for any debt financing or fundraising activity would require significant community information and involvement, which a functioning stakeholder support group could provide.

**RECOMMENDATION**

**Establish a district foundation or similarly organized stakeholder group to help support future bond issues and district needs.**

Establishing a stakeholder support group or foundation would help make the district's bond and financial operations more transparent and help build community support for long-term debt projects and district needs. The group should meet on a regular schedule in order to formalize its activities. Suggested duties of the group include:

- reviewing the existing financial status of the district's debt and needs through periodic financial and investment reports;
- reviewing district needs and reviewing any approved bid awards;
- monitoring the progress of voter-approved capital projects through staff presentations and reports;
- evaluating any potential issuances of debt to ensure reasonableness and capacity to repay the debt; and
- serving as a communications tool for the district.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**B. FINANCIAL PROCESSES**

Day-to-day financial processes should be efficient and effective. They should also be documented, transparent, and rational. Accounting and payroll are among the most important



business functions performed by a school district. Although regulations such as the OCAS and other accounting standards exist, actual practices can vary widely among Oklahoma school districts.

A sound accounting and payroll system can provide numerous benefits including:

- providing internal controls and safeguards;
- providing timely reporting on the status of funds; and
- allowing systematic disbursements to maximize available funds.

### **FINDING 3-6**

The district uses a time clock for hourly employees to clock in and out during the day. Using a time clock reduces the risk of timesheet fraud and helps ensure the district is only paying for time worked. The time clock also helps track comp time.

Having a time clock benefits both the organization and its employees. A school district benefits because it helps automate the payroll process for hourly employees and accurately records their time. Employees benefit because they are not having to manually keep up with time and can keep track of their time on a daily and weekly basis.

### **COMMENDATION**

**SPS is commended for using a time clock for hourly employees to clock in and out.**

### **FINDING 3-7**

In the business office, few support staff members are cross-trained. There is no formal plan or process to cross-train staff in all critical processes. In addition, there are few written procedures to guide staff in the completion of financial processes.

Staff members in business services do not have a complete set of desk procedures. Few staff members are cross-trained and there is no formal or comprehensive plan in place to get staff cross-trained in all critical procedures. With two business service employees having 26 years of service, cross-training is important. Although other employees have assisted in several critical processes, they would have difficulty if they were immediately called upon to perform all duties of another employee.

Without written procedures, employees complete their duties based upon verbal directions that may vary or become stale. Once time has passed after verbal directions are provided, employees often begin to perform their duties differently than instructed, and employees also improvise and develop their own ways to do certain procedures. Processing transactions in an unapproved manner often leads to errors. A desk procedures manual covers each activity's steps in sufficient detail that an individual using it for the first time can perform the steps with little, if any, additional instruction. It also lists specific forms to be used, computer screens accessed, fields on

the screen in which to enter information, as well as identifying other positions that supply information for the procedure, or to which it sends information.

Relying on a single individual to complete a critical process places a great amount of stress on that employee and often requires the employee to work overtime in critical situations. It is also an internal control weakness. When only one individual is fully trained and knowledgeable in critical processes, the district is vulnerable if that individual is unavailable.

For internal controls to operate effectively, all employees need a documented reference source detailing how they perform their assigned duties. An employee desk manual has much more detail than a procedures manual and is basically a step-by-step written document approved by management that describes how employees are expected to complete their individual assignments. Detailed desk procedures facilitate cross-training of employees and training of new employees since they provide the step-by-step instruction needed to perform tasks. This increases internal control by helping to ensure processes are performed correctly.

Some business offices have developed excellent detailed desk procedures to use when employees are completing their assigned duties. The payroll department in Chesterfield Public Schools in Virginia developed detailed desk procedures that are placed on the office's server with individual folders containing instructions for each staff member, but all employees of the office have access to them. Detailed explanations on a step-by-step basis for how to fulfill the numerous duties that must be completed accurately and timely are included. An example of a desk procedure that is for a payroll process called "COBRA changes" has detailed steps that include:

1. Receive from benefits, yellow form with the box next to COBRA marked and the change reflected.
2. Pull file. (It will either be in the file cabinet or COBRA basket.)
3. Ask XXX if individual on COBRA has paid anything.
4. Make a copy of the payment sheet or check.
5. Run calculator tape of what individual has paid.
6. Go to Excel, Payroll Server, open health insurance folder, health calculation 2003, COBRA, and COBRA-newchgehealthcal03. (Enable macros.)
7. Complete spreadsheet. (Referring to yellow form and individuals file.)
8. Next to number of payments, enter number of months going to have coverage. (Will be based on effective date until the end of the year.)
9. Note: If individual is an employee, next to employee, enter yes. If not, enter no and next to employee, in the next cell, enter employee's name.
10. Note: Next to coverage for, the start date would be based on the effective date. The end date remains the end of the year.

11. Enter the amount the individual paid next to less amount paid.
12. New monthly payment date will always be the first of the month. (The individual pays monthly.) Also, adjust the number of pays.
13. Next to total payment due by, give the individual 5 to 10 days.
14. The bottom of the spreadsheet may not need to be hid depending on if they owe us any money.
15. Print two copies of the calculation sheet. One copy will go to XXX, one copy is put in individual's COBRA file, and the original is mailed.
16. If the individual owes us money, a letter needs to be sent.
17. Go to Word, Payroll Server, health insurance, and health letters.
18. Use the information from the calculation sheet to complete the letter.
19. Make two copies of letter. One copy goes to XXX, one copy goes in individual's file, and the original is mailed.

## **RECOMMENDATION**

### **Develop desk procedures for each business services employee and establish a formal process for cross-training.**

A standard format to use when creating desk manuals with instructions should be developed by the superintendent with the assistance of the treasurer and clerks. The superintendent should review the key duties of business services staff and develop a list of critical processes. Business service staff should develop desk procedures for the list of critical processes.

Once desk procedures have been completed, the superintendent should determine which staff should be cross-trained on which processes. The assignments should be discussed with staff and their progress monitored to help ensure the cross-training is progressing in a timely manner. An effective cross-training program for business services staff should ensure that all essential job responsibilities are properly carried out in the absence of an employee who is assigned the primary responsibilities.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 3-8**

The district currently has multiple credit cards that are either signed in/out or provided to a few key employees. No formal credit card procedures are in place to ensure purchases are in compliance or credit cards are returned in a timely manner.

During the onsite visit, the consulting team found that a couple credit cards had been signed out for a while and not returned the next day after being used. Not having a procedure to ensure credit cards are returned after each use exposes the district to potential misuse of the credit card or fraud may go undetected if the credit card is not returned with receipts. Having multiple credit cards also requires the encumbrance clerk to complete additional work when it comes to reconciliation of purchases to the monthly credit card statement.

An alternative to credit cards for government agencies are purchasing cards. Purchasing cards provide more efficient, cost-effective method of purchasing and paying for small-dollar as well as high-volume purchases. GFOA notes numerous benefits to a purchasing card program. Benefits to the cardholder include:

- convenience of purchasing without a purchase order;
- expedited delivery of goods;
- better pricing on goods;
- expanded list of merchants from whom purchases can be made; and
- reduced paperwork.

Benefits to the school district can include:

- simplified purchasing and payment process;
- lower overall transaction processing costs per purchase;
- increased management information on purchasing histories,
- reduced paperwork;
- the ability to set and control purchasing dollar limits;
- the ability to control purchases to specific merchant categories and vendors; and
- receipt of rebates from the bank based upon dollar volume of total purchases.

## **RECOMMENDATION**

### **Consider using purchasing cards in place of credit cards.**

Purchasing cards may be issued in a designated individual's name or the district's name. The district should explore the use of purchasing cards to improve efficiency of the purchasing procedures. GFOA recommends a competitive process be used to select a purchasing card provider. Consideration should be given to vendors who can provide:

- automated approval and reconciliation software;

- a program that is simple and easy to use;
- comprehensive control restricts for single transactions;
- provisions for handling questioned items and chargebacks;
- a broad selection of reports or ad hoc reporting ability;
- training materials;
- customer support; and
- program rebates.

Developing appropriate controls, policies, and procedures will ensure the purchasing card programs are a success. Thomasville City Schools in North Carolina has a webpage dedicated to controls, policies, and procedures that is a great resource for setting up the purchasing card program.<sup>9</sup>

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### ***C. ASSET AND RISK MANAGEMENT***

Asset management involves managing the district's cash resources and physical assets in a cost effective and efficient manner. Effective cash and investment management involves forecasting cash requirements timely and accurately so that funds are made available when needed. Effective asset management involves the safeguarding of property from loss, damage, theft, and obsolescence. Proper safeguarding of district assets requires an effective system of accountability and a culture of adherence to established policies and procedures.

### **FINDING 3-9**

The district does not have a listing of fixed assets and does not complete a comprehensive physical inventory to determine if fixed assets are still in the custody of the district. SPS does not have any formal policies or guidelines to direct management of its investment in fixed assets.

During the onsite visit, the consulting team was not provided with a fixed asset listing when requested. Based upon review of the 2016-17 and 2015-16 audited financial statements of SPS, it was noted that the district received a "Qualified Opinion" because the amount of the general fixed asset account group was not known.

Fixed asset transactions are not identified and tracked during the year. SPS does not have a complete listing of its fixed assets where additions and deletions are made as they occur, or a

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<sup>9</sup> [https://www.tcs.k12.nc.us/apps/pages/index.jsp?uREC\\_ID=342361&type=d&pREC\\_ID=1164787](https://www.tcs.k12.nc.us/apps/pages/index.jsp?uREC_ID=342361&type=d&pREC_ID=1164787)

policy on assets to be capitalized. Without a comprehensive listing and physical inventories, the district has no way to know if items are stolen or lost. This leaves the district without recourse if an employee loses costly equipment or if a theft occurs.

Policies normally address many issues pertaining to an entity's investment in fixed assets. Policies cover all fixed assets and regularly address the following:

- responsibility for accounting for the district's investment in fixed assets and the system that is used for that accounting;
- responsibility for accountability for the property and equipment owned;
- a requirement for annual physical inventories;
- capitalization thresholds for property, equipment, land and infrastructure;
- depreciation methods, salvage value, and a schedule of estimated useful lives;
- capitalized improvements versus maintenance expenses;
- reporting junked, stolen or missing property, and what approvals are required to delete these items from inventory;
- receiving donated property; and
- transferring assets between department.

To protect its investment in fixed assets, school districts track their assets and have policies that provide direction on how the assets are to be managed. As items are acquired, they are immediately added to the listing. When the district disposes of an item through normal processes it is taken off the listing. When an item cannot be found, the situation is reviewed, and appropriate action is taken. Normally, the school board is required to approve all deletions.

### **RECOMMENDATION**

**Develop and adopt fixed asset policies and procedures, such as capitalization thresholds, surplus procedures, and lost asset recovery; then, inventory fixed assets using a consolidated inventory listing.**

The district should use Google spreadsheets for inventory listing and create a fixed asset inventory policy of only inventorying items worth \$5,000 or more. The OCAS procedures manual establishes a capitalization threshold at \$5,000. Therefore, the district should consider adopting a threshold of \$5,000 to remain in compliance with the OCAS requirements. Once the school board approves the policy, the superintendent should communicate the new policy to staff and begin implementation. This will reduce the total inventory listing and may allow for one staff member to complete the inventory count on a yearly basis.

Fixed assets policies and procedures along with a system to track fixed assets should help ensure that the district's investments are being managed as desired by the school board. The system should protect investments by documenting asset possession and hold staff accountable for the proper care and protection of district assets.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **D. ACTIVITY FUNDS**

Activity funds are defined as funds that consist of resources received and held by the school as trustee to be expended or invested in accordance with conditions of the trust. Specifically, they are funds accumulated by district-affiliated organizations from various fundraising activities, membership fees, commissions, interest income, and donations. These funds are to be used to promote the general welfare of the school and the educational development and morale of students.

Oklahoma Statute *Title 70 O.S. § 5-129* outlines the procedures to be used to account for activity funds. Specifically, the statute requires that the board of education of each school district exercise control over all funds and revenues on hand, received or collected from revenue-generating sources such as student organizations or extracurricular activities that are conducted on school campuses. The statute further defines that deposits are to be made daily or when the cash on hand exceeds \$100. Under the law, the school board is required to approve all school activity sub-accounts, all fundraising activities, and all purposes for which monies collected in each subaccount may be expended.

### **FINDING 3-10**

There is a lack of regular training for teachers and staff who handle activity funds. There is no yearly meeting to review policies and procedures or to emphasize the importance of receipting money in a timely manner. In addition, the district lacks an official activity fund handbook. One board policy exists related to activity funds, but this is insufficient to provide procedural guidance for those who handle activity funds.

Ideally, written procedures are provided to all activity fund sponsors in the form of a handbook. A typical handbook would include some or all the following sections:

- general information;
- responsibilities of the principal;
- responsibilities of sponsors;
- responsibilities of the activity fund custodian;
- procedures for fund raisers;

- procedures for purchasing;
- sponsor procedures for receipting money;
- activity fund custodian procedures for receipting money;
- important points to remember, sponsor;
- important points to remember, activity fund custodian; and
- activity fund project codes.

For example, Guthrie Public Schools publishes a comprehensive manual that provides guidance for managing school activity funds. The manual provides instructions and guidelines that cover over 30 topics along with forms, board policies, and examples. Topics in the manual include:

- procedures for purchasing;
- receiving and depositing cash;
- accounts payable;
- administrator responsibilities;
- receipts and deposits; and
- expenditures.

The handbook also includes Oklahoma state laws and State Department of Education regulations pertaining to activity funds. The manual is reviewed annually and updated as needed. It provides a valuable resource to principals and sponsors, as they manage activity funds and prepare various documents related to activity funds.

## **RECOMMENDATION**

**Develop a standardized procedures handbook for all district activity funds to help ensure that funds are administered properly.**

The procedures should clearly state how all activity funds are to be administered, and thus will assist principals, teachers, and sponsors in fulfilling their responsibilities. The handbook also will provide a good reference for new principals, teachers, and sponsors.

The activity fund clerk should require every sponsor to read the handbook and sign an “activity account sponsor’s affidavit of responsibility” stating that they have read the handbook and understand it. This form should also be signed by the principal and the activity account name or number for which the sponsor is responsible. The sponsor could be issued a receipt book only upon approval of this affidavit.



**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 3-11**

The district provides for proper segregation of duties for collection of activity funds. This helps reduce the risk of fraud.

In collecting activity funds, SPS follows this process:

- The teacher or club sponsor collects money and prepares the deposit slip, then provides them to the activity funds clerk.
- The activity funds clerk verifies the count and prepares the deposit.
- The encumbrance clerk enters the cash receipt into the financial system.
- The treasurer takes the money to the bank for deposit.

The consulting team observed the process for collection, verifying, and depositing activity funds during the onsite visit for proper segregation of duties. The process ensures the person collecting and verifying funds is not the same person entering the transactions or depositing, thus reducing the risk for fraud.

**COMMENDATION**

**SPS is commended for having proper segregation of duties for collection of activity funds.**

***E. AUDITING AND INTERNAL CONTROLS***

Internal and external audits provide a review of the district's compliance with established standards and practices. External audits are required of all Oklahoma school districts and are performed by state-approved public accounting firms. The external audit provides:

- an annual financial and compliance report;
- an examination of the expenditure of federal funds (as applicable); and
- a report to management on internal accounting controls (as applicable).

The internal audit function supplements the work of the external auditor. The internal audit function examines specific areas to determine:

- the adequacy of internal controls;

- compliance with adopted policies and procedures and adherence to applicable law and regulation; and
- efficiency and effectiveness of operations.

**FINDING 3-12**

The SPS treasurer prepares the listings of all purchase orders and checks for the month. The Silo School Board uses the listing of all purchase orders and list of checks each month to review and approve.

Prior to the board reviewing the listings, the encumbrance clerk encumbers all purchase requisitions completed by the superintendent or the principals. To complete the purchase request, the board approves a listing of purchase orders based upon review of board meeting minutes. The check listing is completed after an invoice is received and matched against a purchase order. The check listing is provided for information purposes and does not require approval.

Having the board approve all purchase orders adds another layer of security for district assets, since the district accounting staff is so small. The listing of checks helps the board to look for unusual payments or unrecognized vendors who are being paid, thus reducing the chances for fraud.

**COMMENDATION**

**The superintendent and treasurer are commended for providing the school board a listing of all purchase orders for approval and a listing of checks for review monthly.**

**FINDING 3-13**

The SPS website shows Estimate of Needs reports for 2010-11, 2011-12, and 2012-13. No updated Estimate of Needs is listed on the website.

Including an electronic copy of the current year Estimate of Needs in an easy-to-read format, such as an Adobe PDF or web link, would provide greater transparency into district finances for all stakeholders. Posting such information demonstrates the district's willingness to share all financial data and generates trust with stakeholders. It also provides an opportunity for the public to become more informed regarding the overall district financial situation.

**RECOMMENDATION**

**Update and post an electric copy or web link of the Estimate of Needs yearly on the district website directly so that the public can find information more easily.**

The district should post a copy of the current Estimate of Needs on its website annually. The superintendent should also include a memo highlighting the overall financial health of the district and any major changes noted in the Estimate of Needs.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.



***Chapter 4:***  
***Facilities Use and Management***

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## Chapter 4

# *Facilities Use and Management*

This chapter addresses the facilities use and management of Silo Public Schools (SPS) in the following sections:

- A. Facilities Planning and Construction
- B. Maintenance and Custodial Operations
- C. Energy Management
- D. Safety and Security

Facilities use and management includes the planning, construction, and maintenance of buildings, the safety of students and staff using those buildings, and the security of facilities before, during, and after school hours. More specifically, this area includes the following:

- planning and designing facilities to meet educational standards and to provide a physical framework that enhances learning conditions;
- properly maintaining and cleaning facilities so that teaching and learning can take place in a healthy and clean environment;
- ensuring that the facilities are safe when students and teachers are present;
- creating proper safeguards to ensure the security of the facilities during and after school hours; and
- having safety plans in the event of a crisis or natural disaster so that students and staff members are protected.

### ***Background***

Silo is a town in Bryan County, Oklahoma (**Exhibit 4-1**), approximately eight miles from Durant, the seat of Bryan County. In the 1900 census, Silo's population was 246. By the 1980 census, the population had declined to 43. The current SPS was established in 1970. SPS has been widely credited as instrumental in the revitalization of the town to its current population count of over 350.<sup>1</sup>

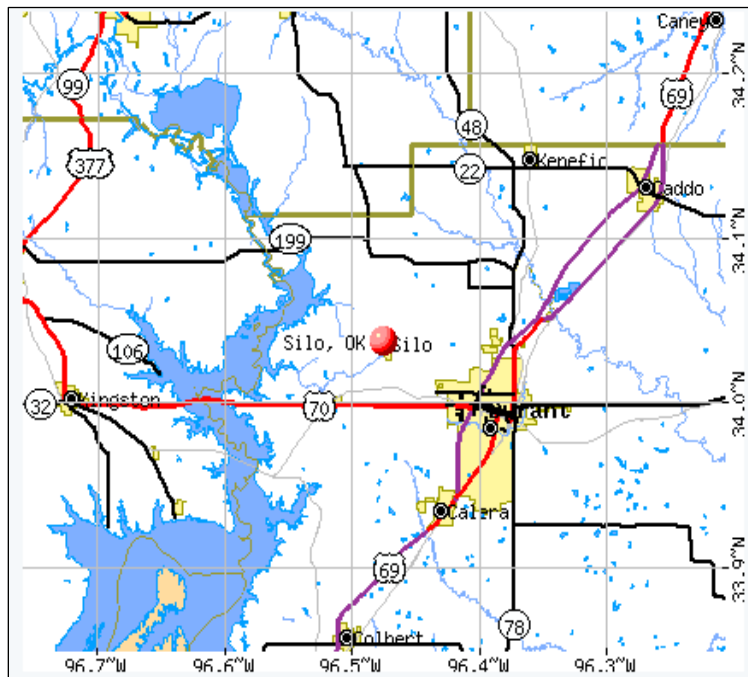
An article from *The Bryan County Patriot*, notes that SPS student enrollment is just below 1,000 at the present time, while superintendent McDonald claims that the original design capacity of SPS was for 600. SPS recently passed a bond for \$11 million to be used for the construction and outfitting of a new elementary school. The new building will house 22 classrooms and a safe room and serve students in grades Pre-K-2. Separate from the bond funds, SPS has been saving for a new agriculture building.<sup>2</sup>

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<sup>1</sup> <https://www.okhistory.org/publications/enc/entry.php?entry=SI003>

<sup>2</sup> <http://bryancountypatriot.com/silos-mcdonald-says-the-school-has-outgrown-current-facilities/>

**Exhibit 4-1**  
**Silo's Location in Bryan County**



Source: <http://www.city-data.com/city/Silo-Oklahoma.html>, December 2018

SPS consists of a campus of major structures housing elementary, middle, and high schools. One kitchen, cafeteria, and library serve all students. Two gymnasiums – the larger for high school and middle school, and the smaller for elementary and as needed for middle school – are major practice facilities. The high school gym is also used for competitive events. Safe rooms, agriculture, and shop programs round out the major facilities. Music education is housed in one of the safe rooms. A new building to supplement the existing elementary school is under construction, funded by the newly authorized bond funds. **Exhibit 4-2** shows an aerial view of this current configuration; the new elementary school is not yet pictured. Not counting the building currently under construction, these facilities encompass a total estimated floor area of about 136,870 square feet. The new building will add another 31,000 square feet, according to the district's contracted architect.



**Exhibit 4-2**  
**Aerial View of Silo and SPS**



*Source: Google Earth, December 2018*

**Exhibit 4-3** provides an inventory of SPS facilities, the floor area, and the insured or current replacement values (CRV). **Exhibit 4-4** provides a rendering of an early SPS building while **Exhibit 4-5** shows SPS' construction memorial plaques.

**Exhibit 4-3  
SPS Facilities Inventory**

<b>Facility</b>	<b>Sq. Ft.</b>	<b>Insured Value</b>
Bus Garage and Shop	4,080	(in intermediate classrooms)
Cafeteria and Library	15,424	\$2,145,171
Elementary School	26,040	\$3,991,270
Administration/Superintendent	3,100	\$404,230
Intermediate Classrooms	5,000	\$669,423
Middle and High School Classrooms/Gym	45,926	\$6,873,044
Kindergarten	4,064	\$1,923,220
Portable Classrooms	4,352	\$1,395,821 <sup>3</sup>
Safe Room	3,865	\$645,291
Vocational/Agricultural	12,620	(in Kindergarten)
Weight Room	2,800	(under portable classrooms)
New Bus Shop	9,000	(not clear if included in CRV schedule)
Press Box	600	(under portable classrooms)
New ES (under construction)	30,960	(in intermediate classrooms)
<b>Total (Existing Buildings)</b>	<b>136,870</b>	<b>\$18,047,470</b>
<b>Total (All Buildings)</b>	<b>167,829</b>	<b>Not yet known</b>

*Source: SPS insurance carrier's certificate of coverage dated 12/05/2018*

**Exhibit 4-4  
Rendering of Early SPS Building**

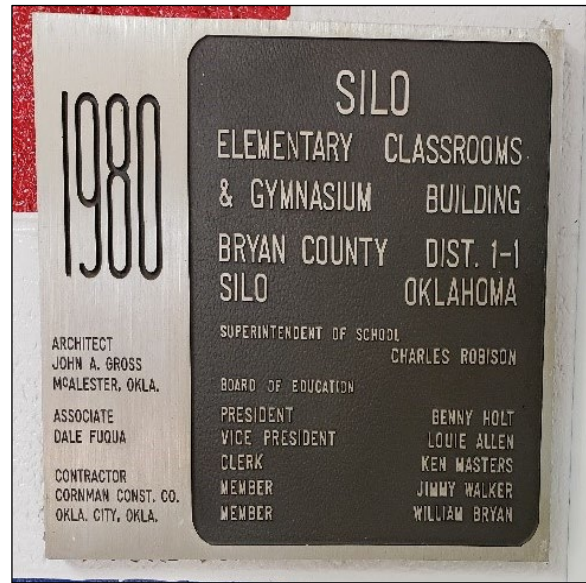


*Source: SPS, 1970*

<sup>3</sup> \$345,000 was added to this figure to make the total agree with the \$18,047,420 quoted by Jordan Insurance Group as the total replacement value for all existing facilities. This discrepancy may be due to no replacement value figure having been quoted by Jordan for the new bus shop.



**Exhibit 4-5  
Construction Date Memorial Plaques**



*Source: Prismatic, December 2018*

Between 2012-13 and 2016-17, the average assessed property value per student for SPS increased by 16.5 percent (**Exhibit 4-6**). This was the third highest increase among the comparison entities.

**Exhibit 4-6  
Trend in Assessed Property Value per Student  
2012-13 through 2016-17**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17	Percent Change
<b>Silo</b>	<b>\$47,538</b>	<b>\$52,659</b>	<b>\$55,477</b>	<b>\$57,168</b>	<b>\$55,368</b>	<b>16.5%▲</b>
Caney Valley	\$39,589	\$41,525	\$42,600	\$41,488	\$40,491	2.3%▲
Newkirk	\$29,691	\$27,684	\$29,201	\$46,938	\$47,709	60.7%▲
Wilburton	\$33,070	\$29,642	\$29,423	\$29,783	\$31,684	(4.2%)▼
Tishomingo	\$23,280	\$26,099	\$27,521	\$30,707	\$30,946	32.9%▲
Hennessey	\$44,865	\$46,126	\$46,817	\$48,148	\$48,752	8.7%▲
<b>State</b>	<b>\$43,631</b>	<b>\$45,248</b>	<b>\$47,329</b>	<b>\$49,623</b>	<b>\$49,471</b>	<b>13.4%▲</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

The debt service expenditures per student (**Exhibit 4-7**) are based upon the amount of outstanding debt and number of students a district has during a given school year. Districts must balance facility and equipment needs with the amount of tax money requested of district taxpayers. In 2016-17, the district had the lowest debt service expenditure of all comparison entities.

**Exhibit 4-7  
Debt Service Expenditures per Student  
2016-17**

Entity	Debt Service per Student
<b>Silo</b>	<b>\$0</b>
Caney Valley	\$750
Newkirk	\$895
Wilburton	\$1,203
Tishomingo	\$593
Hennessey	\$841
<b>Community Group</b>	<b>\$517</b>
<b>State</b>	<b>\$947</b>

*Source: Office of Educational Quality and Accountability, Profiles Database*

**A. FACILITIES PLANNING AND CONSTRUCTION**

Well-planned facilities are based upon the educational program and accurate student enrollment projections. The design process should have input from stakeholders including administrators, principals, teachers, security specialists, parents, students, and the maintenance and operations staff. The selection of building materials, interior finishes, hardware, mechanical, electrical, and plumbing systems, and other major building components should be made by applying life cycle cost analyses for an optimum total cost of construction, operations, and maintenance.

This, coupled with the functional need of providing the best physical learning space possible for students, should lead a district to recognize the necessity of developing, presenting, and implementing a long-range facilities master plan. Failure to implement a long-range facilities master plan will eventually lead to dissatisfaction and facility concerns.

Having a long-range facilities master plan will ensure that building projects are prioritized, begun, and completed following a studied, developed, and logical process. As administrators, faculty, staff, and school board members change, having a long-range facilities master plan will add stability and cohesiveness to the district's construction, use, and management of facilities.

A school district's long-range facilities master plan is a compilation of district policies and statistical data that provide a basis for educational facilities to meet the changing needs of a community. A valuable resource in developing a quality long-range facilities master plan can be obtained from the Association for Learning Environments (A4LE), formerly CEFPI.<sup>4</sup> Effective long-range school facilities master planning incorporates the following elements:

- **Facility Capacity:** Districts establish the capacity of each school facility by setting standards that govern student/teacher ratios and the amount of square feet required per student in a classroom. These standards deal with the minimum size of core facilities, such as classrooms, gyms, cafeterias, and libraries, so that schools do not overload these facilities or overuse portable classrooms.

In 2008, the Oklahoma State Department of Education (SDE) published the second edition of *Planning for Education: Space Guidelines for Planning Educational Facilities*.<sup>5</sup> The guidelines were developed to assist local school boards, school administrators, architects, engineers, and planners in planning and designing educational facilities. The guidelines arrange space information by the major activities of instructional spaces, auxiliary spaces, and service and structure spaces for the various grade ranges. They also provide suggested methods of calculating preliminary net and gross square footage for school buildings by grade and major activity. Another resource for facility construction is *An Administrator's Guide to School Construction Projects*, also published by SDE.<sup>6</sup>

- **Facility Inventory:** An accurate facility inventory is an essential tool in managing the use of school facilities. The inventory identifies the use and size of each room, which enables planners to accurately set the capacity of each school. Modifications to schools are noted in the inventory so it can be kept up to date.<sup>7</sup>
- **Enrollment Projections:** Effective planning requires accurate enrollment projections at least five years into the future.<sup>8</sup> Accurate projections require planners to examine district

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<sup>4</sup> Council of Educational Facility Planners International. (2004). *Creating connections: The CEFPI guide for educational facility planning*. Can be purchased at <http://creatingconnections.a4le.org/>

<sup>5</sup> <http://digitalprairie.ok.gov/cdm/singleitem/collection/stgovpub/id/9456/rec/4>

<sup>6</sup> <http://sde.ok.gov/sde/sites/ok.gov.sde/files/CI-AdministratorsGuide.pdf>

<sup>7</sup> Floor area figures were not available directly from SPS; they were estimated by Prismatic from floor plans.

<sup>8</sup> No official enrollment projections are available from any sources for SPS.

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demographics and track any new construction activity in the district. Many school planners work in coordination with county and city planners to track growth patterns.

- **Capital improvement program:** Effective planning requires the district to anticipate its future needs and balance these against expected resources. A capital improvement program charts future improvement to school facilities and identifies funding sources for them. An effective planning process involves the community at large, identifies district goals and objectives, and prioritizes projects based upon those goals and objectives.<sup>9</sup>
- **Facilities Maintenance Plan:** School facility planning necessitates identifying links between facilities maintenance and facilities construction and renovation. Capital outlay for school construction is generally a more palatable proposition for taxpayers and public officials when a school system demonstrates that existing facilities receive appropriate care and maintenance. Good plans include short- and long-term objectives, budgets, and timelines – all of which demonstrate organizational commitment to facilities maintenance.<sup>10</sup>

#### FINDING 4-1

As a relatively small district, procurement of facility planning, design, and construction services is via outsourcing. In such cases, the client is typically represented by a school official with limited knowledge and understanding of what best practices in this arena should be.

SPS has formed a relationship with an architectural firm from nearby Durant with the aim of a long-term relationship. That firm has similar relationships with other Oklahoma school districts.

The firm has prepared conceptual drawings and construction documents for the district's new buildings that are currently being constructed under the \$11 million bond issue. The firm is expected to prepare conceptual designs for improvements to the existing SPS facilities to account for safety, energy, and growth and change issues. These concepts will serve as planning priorities and capital projects to be funded by extensions of the recently approved serial bond issue.

#### COMMENDATION

**SPS is commended for developing a strong relationship with a responsive architectural firm.**

#### FINDING 4-2

Now that the long-awaited approval of the bond issue has been obtained, and its initial capital programs are being implemented, there appears to be no effort made to prepare a district-wide facilities master plan. Without a master plan, the district runs the risk of overbuilding, underbuilding, or otherwise spending on facilities that do not meet district needs.

Key questions and items for the future should include, but are not limited to:

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<sup>9</sup> A series bond issue represents a capital improvement plan for SPS.

<sup>10</sup> No official facilities maintenance plan is available from SPS.



- In addition to the new teaching positions already in the budget, what additional staff are needed to service the new elementary building and the new agriculture facility paid from existing (non-bond) funds?
- When should SPS schedule its first building condition assessment and its five-year annual updates?
- What is the schedule for retirement of deferred maintenance?
- How will the district manage subsequent bond issues?

## RECOMMENDATION

### Form a facilities planning committee for SPS.

A thorough and detailed facilities master plan is essential to the district's progress. A committee developed by the board of education should be assembled. Recommended membership include two board members, the superintendent, as well as an architect and/or another consultant. The committee could also include other board-invited guests and a public member. Input from the public should be sought regularly.

## FISCAL IMPACT

The recommendation can be implemented initially with existing resources. Additional resources may be needed as the architect is asked to develop concepts.

## FINDING 4-3

Historically, the district has had limited internal knowledge of facilities planning and construction. The district has had to rely on the expertise of external experts. This has resulted in both good and less desirable outcomes.

Among the good outcomes:

- The standing seam metal roof is durable and its red color serves as a unifying design element among the various individual structures of the campus.
- The remaining exterior and interior finishes are comparatively durable.

Among the less desirable outcomes:

- The current buildings dating from the 1970s are mostly free-standing. Some are connected by covered breezeways, others by open walkways. This requires frequent opening of exterior doors during hot and cold periods.
- Each building has its own, separate heating and cooling units rather than a larger central HVAC system.

- 
- Exterior walls and doors are energy-inefficient when compared to more compact designs.
  - Vehicular traffic and pedestrian walks are often in conflict and it is sometimes unclear where vehicles are permitted and restricted.
  - With 27 exterior doors, security of entry is a special challenge.

## RECOMMENDATION

### **Include a continuing collaborative effort between SPS and its long-term design professionals in the charter of the facilities planning committee.**

The remaining bond issue funding will be made available in relatively small amounts. These funds will be focused on improvements to the existing facilities, especially the elementary, middle, and high school instructional spaces. Every effort should be made to improve instructional spaces, inside and out.

The architect should review the current space use and design to enhance the positive attributes and ameliorate the unfavorable outcomes. The consulting team recommends that SPS make these changes:

- specify additional features for complete perimeter security including fencing and secured entrances elsewhere;
- review and potentially incorporate the concepts of learning communities, cooperative project spaces, individual study and practice areas, and links between distance learning and onsite learning;
- create enclosed links between the individual campus buildings;
- explore state-of-the-art spatial configurations;
- create interior partitions to allow relatively rapid, inexpensive and waste-free reconfigurations of space;
- renovate the existing kitchen/cafeteria space to better accommodate the current and anticipated district enrollment:
  - remove the existing wall between the serving area and the dining space, then move the main serving line forward into the dining space footprint, allowing for an expanded kitchen space;
  - remove the low wall along one side of the room that was likely intended to help queue the line;
  - incorporate a variety of seating styles (booths, varying table shapes, and standup counters) to both increase the available seating and improve aesthetics;



- store the floor buffing machines in a nearby storage room rather than next to dining tables;
- incorporate simple design and color upgrades to improve the overall aesthetic;

Fairly simple renovations of the existing cafeteria (**Exhibit 4-8**) would improve both kitchen and dining capacity, providing room for growth. **Exhibit 4-9** provides examples of renovated cafeterias that include the suggested renovations. The first three photos are from districts of similar size to SPS; and

#### **Exhibit 4-8 Current SPS Cafeteria**



*Source: Prismatic, December 2018*

**Exhibit 4-9**  
**Sample Cafeteria Remodels in Other Districts**



*Source: Prismatic Archives, December 2018*

- consider including the interior courtyards and exterior HVAC units. The interior courtyards of SPS have a characteristic lack of windows (**Exhibit 4-10**) and, in some instances, an aesthetically displeasing presentation of exterior HVAC installations. The courtyards could be updated by volunteering parents, students and teachers, based on landscape designers' ideas.

**Exhibit 4-10**  
**Interior SPS Courtyards**



*Source: Prismatic, December 2018*

**FISCAL IMPACT**

The consulting team recommends that the district implement as much as possible with bond funds.



**B. MAINTENANCE AND CUSTODIAL OPERATIONS**

The objective in maintaining and cleaning school facilities is to provide safe and cost-effective buildings, a sound educational environment, increased longevity of buildings and equipment, and the protection of school property. The maintenance and cleaning of the facilities must be accomplished in an efficient and effective manner in order to provide a safe and secure environment that supports the educational program and reflects proper stewardship for district resources.

Efficiencies and economies of maintenance and cleaning are critical to ensure that resources for direct instruction are maximized. However, extreme actions to reduce the cost of maintenance and cleaning can result in higher than acceptable costs of repair and replacement in the years to come. Consequently, a balance must be achieved between reasonable economies and unreasonable cost-cutting.

***Maintenance***

The proper maintenance of facilities is critical to ensuring support for an effective instructional program. Research has shown that appropriate heating and cooling levels, building and room appearances, the condition of restrooms and other facilities, as well as occupant safety, all impact how students and staff members carry out their respective responsibilities.

Ineffective or inadequate maintenance provisions have proven to lead to increased costs of facility operations by shortening the useful life span of equipment and buildings. Many school districts have adopted rigorous preventive maintenance programs. They maintain a record of the performance of equipment and the costs of regular maintenance to measure the effectiveness of these programs.

**Exhibit 4-11** provides survey results regarding student, staff, and parents perceptions of SPS' facilities. As shown, a majority of each group feel the facilities are attractive and well-maintained.

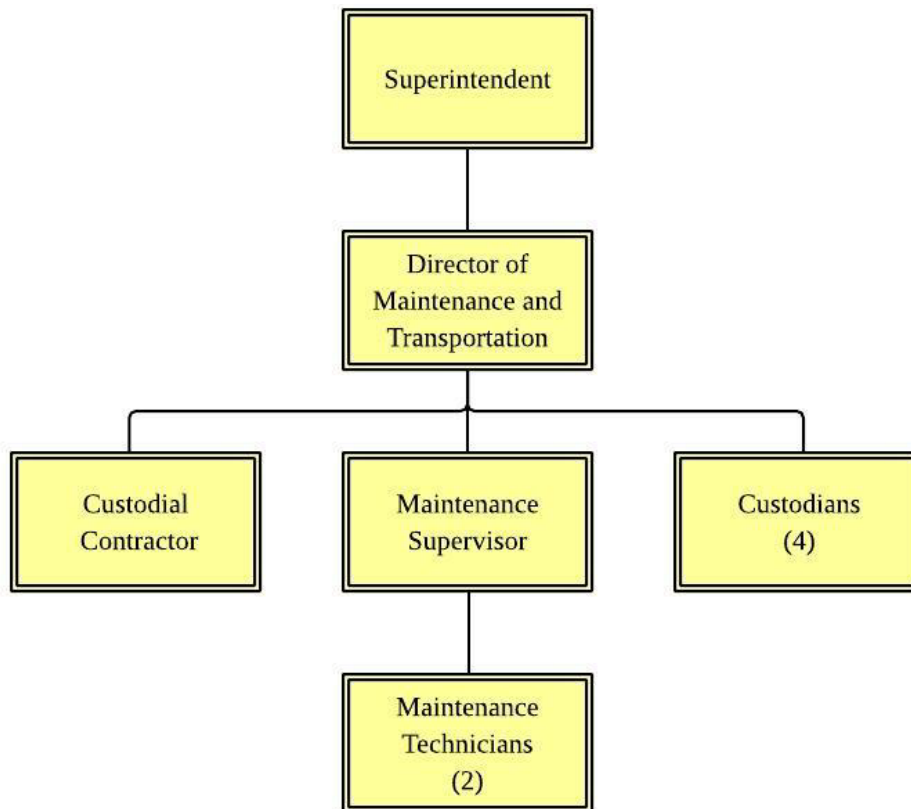
**Exhibit 4-11**  
**Student, Parent, and Staff Survey Results Regarding Maintenance**

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Student	My school is attractive and welcoming.	26%	36%	30%	4%	4%
Parent	My child’s school is attractive and welcoming.	37%	49%	8%	5%	1%
Student	My school building is well-maintained.	23%	46%	22%	6%	3%
Staff	The district’s facilities are well-maintained.	20%	56%	0%	20%	4%
Parent	My child’s school is well-maintained.	37%	46%	7%	8%	2%

*Source: Prismatic Survey Results, December 2018*

The SPS maintenance organization is shown in **Exhibit 4-12**. The director of maintenance and transportation is also an athletic coach.

**Exhibit 4-12**  
**SPS Maintenance Organizational Structure**



*Source: Created by Prismatic, December 2018*

The district's operations and maintenance expenditures over the past five years as compared to the peer districts are shown in **Exhibit 4-13**. The decrease in SPS expenditures from 2012-13 through 2016-17 was 8.5 percent, which was the second largest decrease among the peers.

**Exhibit 4-13**  
**Trend in Maintenance and Operations Expenditures**

Entity	2012-13	2013-14	2014-15	2015-16	2016-17	Percent Change
Silo	\$605,071	\$591,483	\$694,441	\$723,792	\$553,425	(8.5%) ▼
Caney Valley	\$577,061	\$674,569	\$580,487	\$564,108	\$650,309	12.7% ▲
Newkirk	\$635,934	\$863,739	\$709,941	\$563,295	\$615,808	(3.2%) ▼
Wilburton	\$592,211	\$556,720	\$528,043	\$536,059	\$529,051	(10.7%) ▼
Tishomingo	\$695,544	\$679,866	\$752,520	\$636,904	\$658,170	(5.4%) ▼
Hennessey	\$740,753	\$793,407	\$770,212	\$875,685	\$737,632	(0.4%) ▼
<b>Peer Average</b>	<b>\$648,301</b>	<b>\$713,660</b>	<b>\$668,241</b>	<b>\$635,210</b>	<b>\$638,194</b>	<b>(1.6%) ▼</b>

*Source: SDE, School District Expenditure Reports 2012-2017, and Prismatic calculations*

Resources from the U.S. Government's Building Research Board<sup>11</sup> offer a best practice guideline that two to four percent of a building inventory's CRV should be spent annually by a building owner on maintenance and repairs. To quote from the Building Research Board guidelines:

Underfunding is a widespread and persistent problem that undermines maintenance and repair (M&R) of public buildings. To overcome this problem, M&R budgets should be structured to identify explicitly the expenditures associated with routine M&R and activities to reduce the backlog of deferred deficiencies. An appropriate budget allocation for routine M&R for a substantial inventory of facilities will typically be in the range of 2 to 4 percent of the aggregate current replacement value of those facilities (excluding land and major associated infrastructure). In the absence of specific information upon which to base the M&R budget, this funding level should be used as an absolute minimum value.

The range of expenditure for two to four percent of CRV at SPS would therefore be \$360,949 to \$721,899. SPS' maintenance expenditures have been within that range for each of the past five years. Once the new elementary school is placed into use, an additional \$120,000 to \$280,000 in annual maintenance expenditures will be warranted, based on the additional \$6 to \$7 million in CRV.

**FINDING 4-4**

A number of maintenance positions were vacant at the time of the onsite review. Although the district has two maintenance technician positions allocated, they have remained vacant for a substantial time. Moreover, the current staffing for maintenance and repairs will be insufficient once the new elementary school is opened.

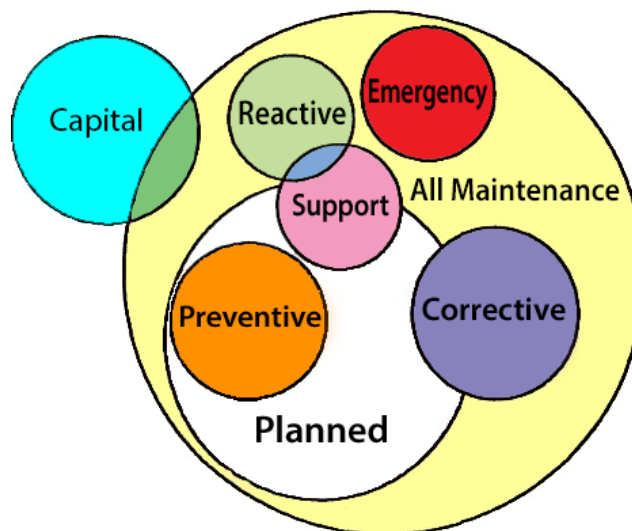
<sup>11</sup> Building Research Board. (1991). *Committing to the cost of ownership: Maintenance and repair of public buildings*. Washington, D.C.: American Public Works Association.

At the time of the onsite review, only one of three allocated maintenance technician positions was filled, that of the maintenance supervisor. According to SPS officials, one has been vacant for over a year, while the other has been vacant for less than a year, when the incumbent retired. District officials report that these positions have been traditionally hard to fill, and incumbents have tended to leave for better paid positions elsewhere. According to the director of maintenance, he oversees the maintenance positions, but does no maintenance work himself. The former technology director (deceased in December 2018) also provided support for the district's HVAC system, providing some maintenance services as needed.

The APPA standard for maintenance is one FTE for approximately 45,000 square feet of facilities. With slightly more than 130,000 square feet of facilities to maintain, the district should have three FTE maintenance staff. This does not yet include the added floor area of the new buildings now under construction.

Maintenance in a school is not merely replacing equipment when it quits working. There are various types of maintenance that should be performed to ensure the continued safe and efficient operation of equipment and systems, as well as reducing replacement costs. Becker (2011) wrote that maintenance can be depicted using a Venn diagram (**Exhibit 4-14**).

**Exhibit 4-14**  
**Overlap and Interrelationships in Types of Maintenance**



*Source: APPA Operational Guidelines for Educational Facilities: Maintenance, February 2011*

As Becker stated:

The large circle represents all maintenance activities that the operations and maintenance staff may perform in a year. The next smaller circle, entirely within maintenance, is planned work. These include preventive or predictive maintenance and some corrective work – those tasks that customers request that have some time requirements associated

with them and are not fully within the facilities operation’s control to schedule. Finally, hanging off to the side and trying to be part of maintenance, is capital work.<sup>12</sup>

The older a building, the more corrective maintenance it will require and all buildings, regardless of age, require regular preventive maintenance.

**RECOMMENDATION**

**Fill all vacant positions and hire an additional maintenance and repair technician.**

The consulting team assumes that the two vacancies present at the time of the onsite review will have been filled in a timely manner. If not, the district should place a priority on filling those positions immediately.

Once the new elementary school is opened, the district should hire an additional maintenance technician to help ensure that preventive and corrective maintenance tasks are completed in a timely fashion. Ideally, the district would hire technicians who collectively have expertise in HVAC, electrical, and plumbing maintenance. All three technician positions should be assigned to report to the current, “senior” maintenance person. In turn, that position should continue to report to the director of maintenance.

**FISCAL IMPACT**

The salaries and benefits for the two positions already allocated are already included in the district’s budget. The average salary for a maintenance technician is \$15.13 per hour in Oklahoma.<sup>13</sup> The consulting team estimates an annual salary with benefits of approximately \$30,000 will be required for the new position to be created and filled once the elementary school opens.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Hire one additional maintenance technician.	\$0	(\$15,000)	(\$30,000)	(\$30,000)	(\$30,000)

**FINDING 4-5**

The district lacks a functional maintenance work order system. Overall, such a work order system is needed to keep track of when maintenance tasks were performed, how much they cost, if they were preventive, reactive, predictive, scheduled, or of another nature.

The importance of using a computerized maintenance management system (CMMS) in a school district cannot be overemphasized. A fully implemented CMMS allows for standardization of all information and assessments of equipment reliability and performance using measures such as:

<sup>12</sup> Becker, T. J., (2011) What constitutes maintenance? *Operational Guidelines for Educational Facilities: Maintenance*, second edition (July/August), pp.14-15.

<sup>13</sup> <https://www.indeed.com/salaries/Maintenance-Technician-Salaries,-Oklahoma>



- Down Time (DT);
- Mean Time Between Failures (MTBF);
- Mean Time to Repair (MTTR); and
- Life Cycle Cost (LCC).

A CMMS can be used to identify training needs based upon failures due to user error, and track maintenance staff performance. A CMMS minimizes equipment downtime because it improves maintenance practices and aids maintenance staff in responding faster.

## RECOMMENDATION

### Adopt an online maintenance work order system.

A well-documented, thorough, and archived work order system is needed to keep track of all maintenance and repair activities and costs, performed by maintenance staff, custodians, and specialized technicians (i.e., computer hardware maintenance and repair). The district should decide whether to procure an off-the-shelf CMMS or develop a program in-house. Given SPS' size and internal resources, it is logical that the district would look to an off-the-shelf CMMS for a maintenance management and preventive maintenance system.

Once the CMMS has been procured, staff should receive training and proceed to input data into the system such as equipment type, manufacturer and location, preventive maintenance requirements and frequencies, and other details required by the system. Staff should also account for life safety equipment, with location of device and required tests and maintenance as stipulated by the state fire marshal and local authority having jurisdiction.

## FISCAL IMPACT

The consulting team has worked with one CMMS vendor, SchoolDude, for pricing in several Oklahoma school districts. Based upon a quotation from SchoolDude for school districts of the size of SPS, after the first-year setup cost of \$4,415, continuation of the maintenance management and preventive maintenance modules would cost approximately \$3,320 per year.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
SchoolDude Maintenance Essential Pro. <sup>14</sup>	(\$3,320)	(\$3,320)	(\$3,320)	(\$3,320)	(\$3,320)
Quick Start Cost.	(\$1,915)	\$0	\$0	\$0	\$0
PM Scheduling/ Tasking.	(\$2,500)	\$0	\$0	\$0	\$0
<b>Total</b>	<b>(\$7,735)</b>	<b>(\$3,320)</b>	<b>(\$3,320)</b>	<b>(\$3,320)</b>	<b>(\$3,320)</b>

<sup>14</sup> Includes maintenance management and preventive maintenance modules.

**FINDING 4-6**

The district performs little to no preventive maintenance (PM). The lion's share of maintenance and repair work is reactive, i.e., in response to unexpected malfunctions, breakdowns, and other equipment failures. Only one maintenance employee is presently employed at SPS, two more are needed now, and one additional in 2019. With or without the support of competent outsourcing, this is not enough.

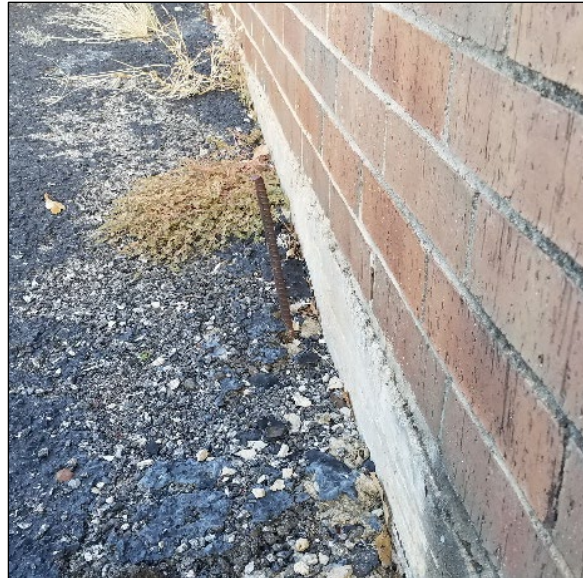
Filter replacements and fire safety equipment inspections appear to be the only scheduled PM activities at SPS. **Exhibits 4-15** provides multiple instances of maintenance deficiencies observed by the consulting team. These deficiencies include deteriorating and stained ceilings, clutter, potential building code violations, lack of landscaping, and several areas that present safety concerns.

**Exhibit 4-15  
Observed Maintenance Deficiencies**

**Uncovered Lighting Fixtures**



**Exposed Rebar**



**Gym Ceiling Deterioration**



**Roofing Leaks Inadequately Addressed**



*Source: Prismatic, December 2018*

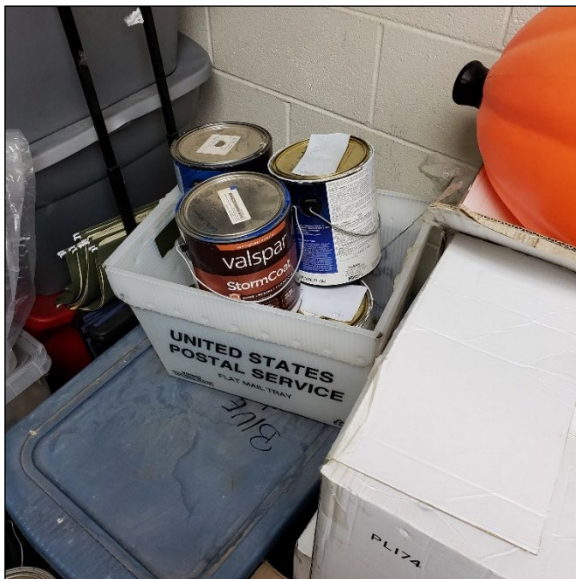


**Exhibit 4-15 (continued)  
Observed Maintenance Deficiencies**

**Numerous Ceiling Leaks and Stained Ceiling Tiles**



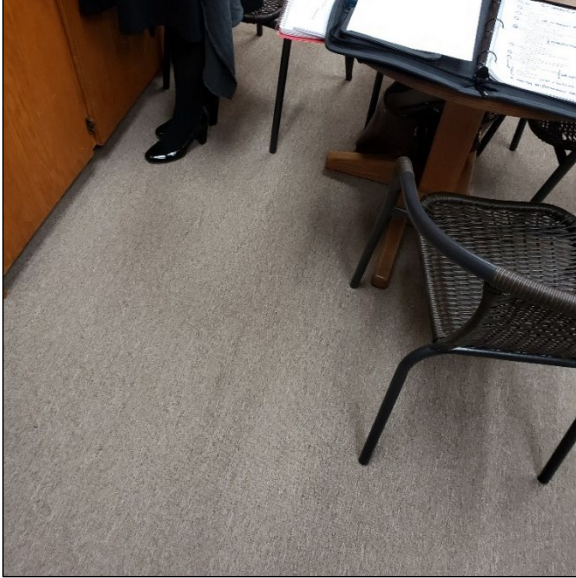
**Clutter in Storage Areas**



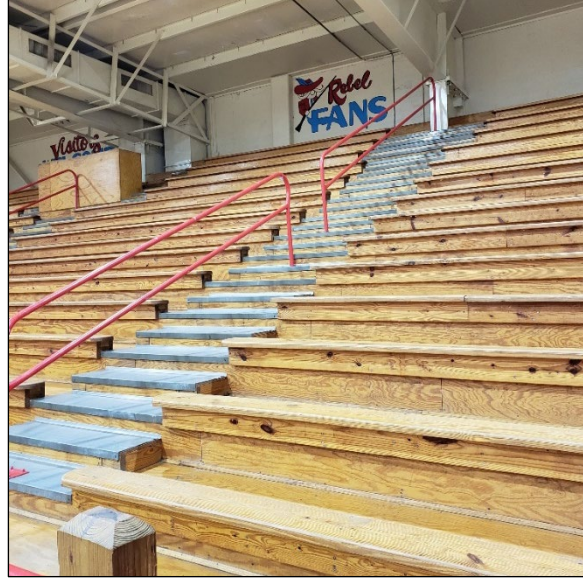
Source: Prismatic, December 2018

**Exhibit 4-15 (continued)  
Observed Maintenance Deficiencies**

**Poorly Adhered Carpeting**



**Potential Building Code Violations**



**Equipment Accessible to Students and Unauthorized Adults**

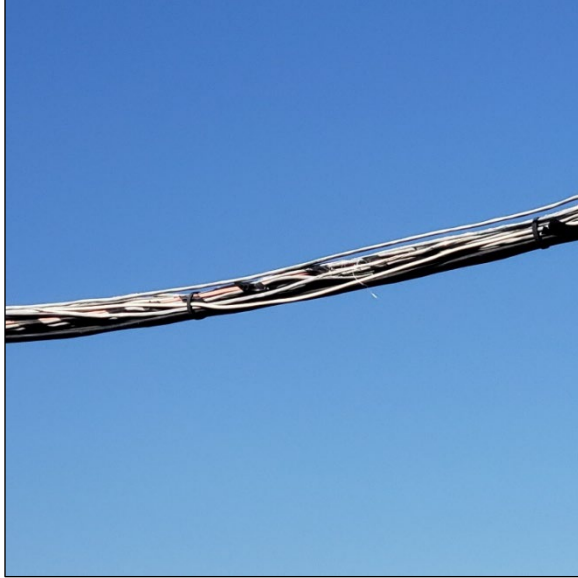


Source: Prismatic, December 2018

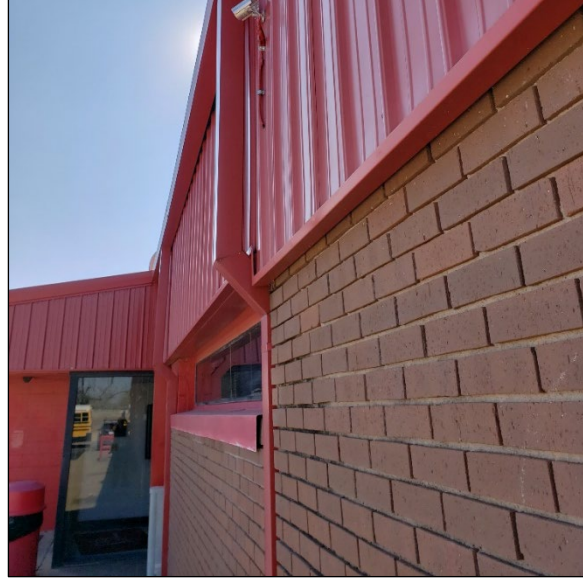


**Exhibit 4-15 (continued)**  
**Observed Maintenance Deficiencies**

**Exposed Wiring**



**Stark Exterior**



*Source: Prismatic, December 2018*

While improving exteriors has a lower priority than ensuring safety, it is all part of creating a positive and healthy environment for students. The longer that safety issues are left unaddressed, the more opportunities there are for injuries. While some areas, like exposed rebar and poorly adhered carpeting, require additional maintenance, ensuring custodial equipment is secure does not and should be a practice that is consistently enforced.

As a rule, waiting until a piece of equipment fails and must be replaced will cost significantly more than prolonging the service life of the equipment via PM, and then scheduling a replacement when the equipment has become obsolete or has outlived its life-expectancy. A complete maintenance program involves the following elements:

- a PM program to keep equipment running at peak efficiencies, to avoid equipment breakdowns, and prevent minor problems from escalating into major ones;
- timely attention to emergency and corrective maintenance conditions. Emergency and corrective maintenance occur when equipment fails, typically requiring more time and resources to correct than PM; and
- a long-range plan to address HVAC, mechanical, electrical, plumbing, and low voltage systems and/or component replacements required at the end of their expected useful life. The plan will typically indicate the current age of the components, what year to expect replacements to be needed, and anticipated costs using a Consumer Price Index multiplier or estimated inflation rate.

As noted in *The Real Cost of Deferred Maintenance*:

Facilities problems in rural schools that aren't addressed may seem to disappear, but they don't go away – like molds and mildew they just multiply out of sight. Poor conditions can affect the health and safety of everyone who uses the facility, damage the morale of students and teachers, and impair their ability to teach and learn, and threaten the facility itself.

Proper maintenance of rural schools is vital not only because facilities are often old, and have suffered deferred maintenance for years or even decades, but because the consequences of improper and inadequate maintenance are so serious. If a leak in the roof isn't repaired, it can – like the leak in the fabled dike in Holland – wash away the entire structure. If the district doesn't allocate funds to fix such leaks, or do other necessary preventive work and if state policies are predisposed to new construction, deferring maintenance may force the closure of a good rural school. Therefore, a thorough program of preventive maintenance with regularly scheduled inspections is critical.<sup>15</sup>

As an example, Spring Independent School District (SISD) in Texas developed a comprehensive PM program that includes the schedule shown in **Exhibit 4-16**.

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<sup>15</sup> Lawrence, B. K. (2003). *Save a penny, lose a school: The real cost of deferred maintenance*. The Rural School and Community Trust. Downloaded November 2016 from [http://www.ruraledu.org/user\\_uploads/file/Save\\_a\\_Penny\\_Lose\\_a.pdf](http://www.ruraledu.org/user_uploads/file/Save_a_Penny_Lose_a.pdf)

**Exhibit 4-16**  
**SISD Preventive Maintenance Program Schedule**

Preventive Maintenance Activity	Activity Frequency
Clean A/C unit filters	Bi-monthly
Change A/C unit filters	3 to 12 week intervals
Clean chiller condenser coils	Bi-annually
Clean fan coil and air handler evaporator coils	Annually
Clean ice machine condenser coils	Every 4 months
Inspect and capacity test chillers	Annually
Change chiller compressor oil and cores	Every 2 years
Check chemical levels in closed loop chilled and hot water piping	Monthly
Clean grease traps	Every 3 months
Inspect and test boilers	Annually
Check roofs, downspouts, and gutters	Monthly, repair as needed – 20-year roof warranty
Inspect exterior lighting	Semi-annually
Inspect elementary play gym lighting	Annually
Inspect and clean gym gas heaters	Annually
Inspect playground equipment	Monthly, repair as needed
Clean fire alarm system smoke detectors	Semi-annually
Inspect all interior and exterior bleachers	Annually, repair as needed
Clean, tighten, and lubricate roll out bleachers	Annually
Check exterior building and concrete caulking	Annually – 8-year replacement
Stripe exterior parking lots	Annually
Check condition of asphalt parking lots	Annually – 12-year replacement
Check carpet	15-year replacement
Check vinyl composition tile floors	20-year replacement
Spray wash exterior soffits and building	Every 2 years or as needed
Replace glass and Plexiglas	As needed
Paint interior of facilities	Every 5 years
Paint exterior of facilities	Every 8 years
Perform general facility inspections	Annually

*Source: SISD Facilities Department, November 2010*

## RECOMMENDATION

### Schedule preventive maintenance.

A strong PM program is essential to the smooth operation of any facility. SPS should develop and adhere to a schedule of PM. A PM schedule can be kept in a low-tech manner, such as a spreadsheet, or in a high-tech manner, through scheduling of PM work orders with a computerized maintenance management system (CMMS) that sets up PM tasks and tracks all work orders. Either system should be used to record vital information on all building and maintenance components, such as equipment type, manufacturer and location, PM requirements and frequencies, and other details.



**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

***Custodial Operations***

Safe, clean, and sanitary facilities are essential elements of the education environment. School systems across the United States use different means to address these elements. Typically, school boards either contract out (outsource) custodial services or organize a comprehensive in-house program with staff to provide custodial services. Personnel will be employed by either the outsourced company or the school board.

Management responsibility, if the program is in-house, may reside partially or wholly with the central office, the individual school, or maintenance department. Determining the desired structure usually involves several criteria, including minimizing costs to the school district, improving services to schools, and reducing (or increasing) the span of control of district or school-based administrators.

Studies conducted by APPA demonstrate that one custodian should be capable of cleaning between 20,000 and 30,000 square feet of school facilities to achieve a level 2 or level 3 standard of cleanliness, respectively. The levels of cleanliness in the APPA standard are shown in **Exhibit 4-17**.

### Exhibit 4-17

## Appearance Factors and the Five Levels of Clean

#### Level 1 – Orderly Spotlessness

- Floors and base moldings shine and/or are bright and clean; colors are fresh. There is no buildup in corners or along walls.
- All vertical and horizontal surfaces have a freshly cleaned or polished appearance and have no accumulation of dust, dirt, marks, streaks, smudges, or fingerprints.
- Lights all work and fixtures are clean.
- Washroom and shower fixtures and tile gleam and are odor-free. Supplies are adequate.
- Trash containers and pencil sharpeners hold only daily waste, are clean, and odor-free.

#### Level 2 – Ordinary Tidiness

- Floors and base moldings shine and/or are bright and clean. There is no buildup in corners or along walls, but there can be up to two days' worth of dust, dirt, stains, or streaks.
- All vertical and horizontal surfaces are clean, but marks, dust, smudges, and fingerprints are noticeable upon close observation. Lights all work and fixtures are clean.
- Washroom and shower fixtures and tile gleam and are odor-free. Supplies are adequate.
- Trash containers and pencil sharpeners hold only daily waste, are clean, and odor-free.

#### Level 3 – Casual Inattention

- Floors are swept or vacuumed clean, but upon close observation there can be stains. A buildup of dirt and/or floor finish in corners and along walls can be seen.
- There are dull spots and/or matted carpet in walking lanes. There are streaks or splashes on base molding.
- All vertical and horizontal surfaces have obvious dust, dirt, marks, smudges, and fingerprints. Lamps all work and fixtures are clean.
- Trash containers and pencil sharpeners hold only daily waste, are clean, and odor-free.

#### Level 4 – Moderate Dinginess

- Floors are swept or vacuumed clean, but are dull, dingy, and stained. There is an obvious buildup of dirt and/or floor finish in corners and along walls.
- There is a dull path and/or obviously matted carpet in the walking lanes. Base molding is dull and dingy with streaks or splashes.
- All vertical and horizontal surfaces have conspicuous dust, dirt, smudges, fingerprints, and marks.
- Lamp fixtures are dirty and some (up to 5 percent) lamps are burned out.
- Trash containers and pencil sharpeners have old trash and shavings. They are stained and marked.
- Trash containers smell sour.

#### Level 5 – Unkempt Neglect

- Floors and carpets are dull, dirty, dingy, scuffed, and/or matted. There is a conspicuous buildup of old dirt and/or floor finish in corners and along walls. Base molding is dirty, stained, and streaked. Gum, stains, dirt, dust balls, and trash are broadcast.
- All vertical and horizontal surfaces have major accumulations of dust, dirt, smudges, and fingerprints, all of which will be difficult to remove. Lack of attention is obvious.
- Light fixtures are dirty with dust balls and flies. Many lamps (more than 5 percent) are burned out.
- Trash containers and pencil sharpeners overflow. They are stained and marked. Trash containers smell sour.

Source: Fichter, G., (2011). *Maintenance of buildings, operational guidelines for educational facilities: Custodial*. APPA, third edition, pp. 72-73.

**Exhibit 4-18** provides survey results regarding student, staff, and parent perceptions of facility cleanliness of SPS’ facilities. As shown, a majority of each group *agreed* or *strongly agreed* that school facilities are kept clean.

**Exhibit 4-18  
Student, Staff, and Parent Survey Results Regarding Facility Cleanliness**

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Student	My school is clean.	21%	34%	24%	15%	6%
Staff	The district’s facilities are kept clean.	22%	58%	0%	18%	2%
Parent	My child’s school is clean.	39%	48%	7%	5%	1%

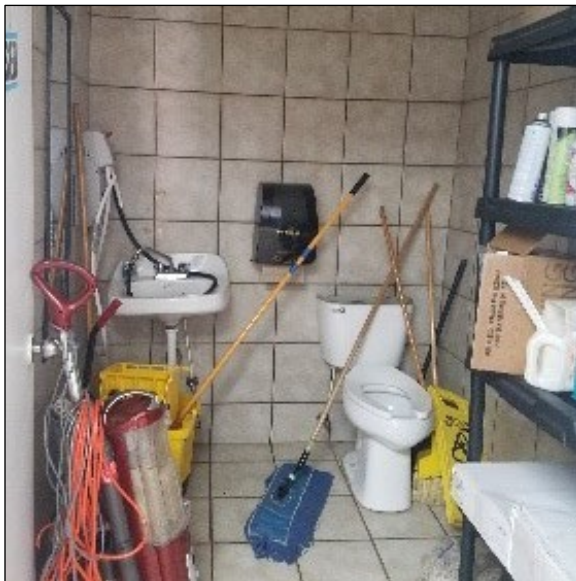
*Source: Prismatic Survey Results, December 2018*

**FINDING 4-7**

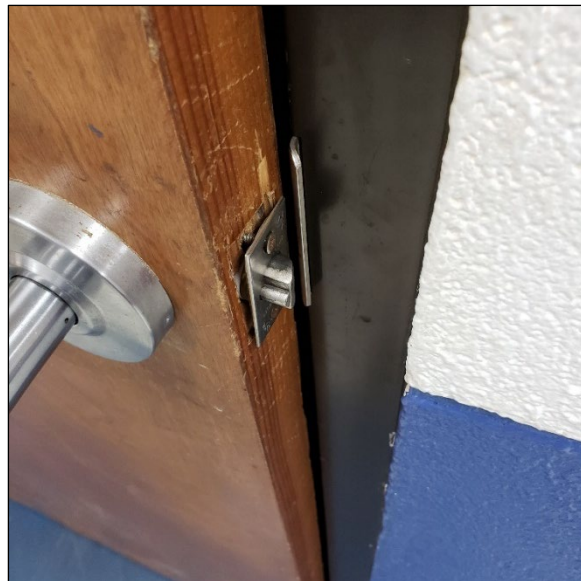
The consulting team found the custodial closets typically clean and well-organized (**Exhibit 4-19**). However, with few exceptions, they were also unlocked. One of the locks had been jimmied in an attempted or actual break-in.

**Exhibit 4-19  
SPS Custodial Closets**

**Custodial Closet**



**Broken Lock to Custodial Closet**



*Source: Prismatic, December 2018*

Custodial closets typically contain a variety of chemicals. Some of these can be dangerous if used improperly and should therefore be kept secure from students.

**RECOMMENDATION**

**Secure custodial closets at all times.**

The director of maintenance should inform custodians that all custodial closets be kept locked at all times. He should then periodically check that all closets are in fact secure. District administrators should be encouraged to report any instances where custodial closets are left unsecure.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 4-8**

Custodial staffing is, at the moment, sufficient at SPS. However, the current custodial staffing will be insufficient once the new school opens.

APPA guidelines recommend allocating custodial positions on the basis of 25,000 square feet per FTE. With slightly more than 130,000 square feet currently, the district’s allocation would be 5.5 FTE. The new elementary school will add an additional 31,000 square feet of space to be cleaned. The district currently has 4.0 FTE custodians, plus custodial assistance on contract.

**RECOMMENDATION**

**Add an additional custodial position once the new elementary school is operational.**

The district should hire an additional custodian once the new elementary school opens. At the same time, custodians should select from their group, and with the concurrence of the director of maintenance, a loyal and trustworthy custodian who will serve as lead custodian and report to the director of maintenance. The lead custodian should be responsible for preparing the ordinary daily cleaning assignments, ordering supplies as necessary, handling personnel issues (and referring them to the director if necessary), and instructing in cleaning protocol, as needed.

**FISCAL IMPACT**

An additional custodian is needed after the new elementary school becomes operational. In Oklahoma, the average school custodian’s salary, including benefits, is approximately \$26,000 per year.<sup>16</sup>

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Hire one extra custodian.	\$0	(\$13,000)	(\$26,000)	(\$26,000)	(\$26,000)

<sup>16</sup> <https://www.indeed.com/jobs?q=Custodian&l=Oklahoma&start=10>

### **C. ENERGY MANAGEMENT**

General energy consumption can be one of the most expensive operational areas for a school district. Due to the large infrastructure required for education, schools use large quantities of electricity, water, oil, and natural gas. Implementing an energy management program can assist in reducing a school district's operational costs associated with otherwise excessive utility use.

Energy management programs can be implemented in a wide variety of ways, from hiring full-time energy managers to sending out simple shut-down reminders before school dismissal or a break. One of the most beneficial practices of energy management is the recording of monthly utility bills and the communication of use and costs to the general staff. Tracking utility use can give a bird's eye view of how much each school is spending on its utilities compared to other schools. The energy manager can then target the most expensive utilities and work to reduce consumption. This communication helps foster awareness of the expenses of running a school and brings attention to energy conservation measures by both students and staff.

The American Society for Hospital Engineers (ASHE) has developed a list of ten components necessary for a successful energy management program. Although this list was originally intended for hospital organizations, they are applicable to all energy management programs. As recommended by ASHE, the items to consider are:

1. Measure/benchmark current energy consumption.
2. Develop an energy use profile.
3. Complete a greenhouse gas emissions inventory.
4. Build teams, get leadership support, and assign dedicated resources.
5. Set targets/goals.
6. Develop strategic action plans for improvement.
7. Consider adopting a strategic energy management plan.
8. Implement projects.
9. Track, measure, and report.
10. Train, educate, and celebrate.

The Association of School Business Officials (ASBO), in their publication *Planning Guide for Maintaining School Facilities*,<sup>17</sup> suggests that the following guidelines will help a school system accomplish more efficient energy management:

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<sup>17</sup> <http://nces.ed.gov/pubs2003/2003347.pdf>

1. Establish an energy policy with specific goals and objectives.
2. Assign someone to be responsible for the district's energy management program and give this energy manager access to top-level administrators.
3. Monitor each building's energy use.
4. Conduct energy audits in all buildings to identify energy inefficient units.
5. Institute performance contracting (i.e., contracts requiring desired results rather than simply a list of needed products) when replacing older, energy inefficient equipment.
6. Reward employees of schools or buildings that decrease their energy use.
7. Install energy efficient equipment including power factor correction units, electronic ballasts, high-efficiency lamps, set-back thermostats, and variable-speed drives for large motors and pumps.
8. Install motion detectors that turn lights on when a room is occupied and off when the room is unoccupied.

Additional information about energy management can be found through the National Clearinghouse for Educational Facilities' Energy website,<sup>18</sup> which provides a list of links, books, and journal articles on various methods of heating, cooling, and maintaining new and retrofitted K-12 school buildings and grounds.

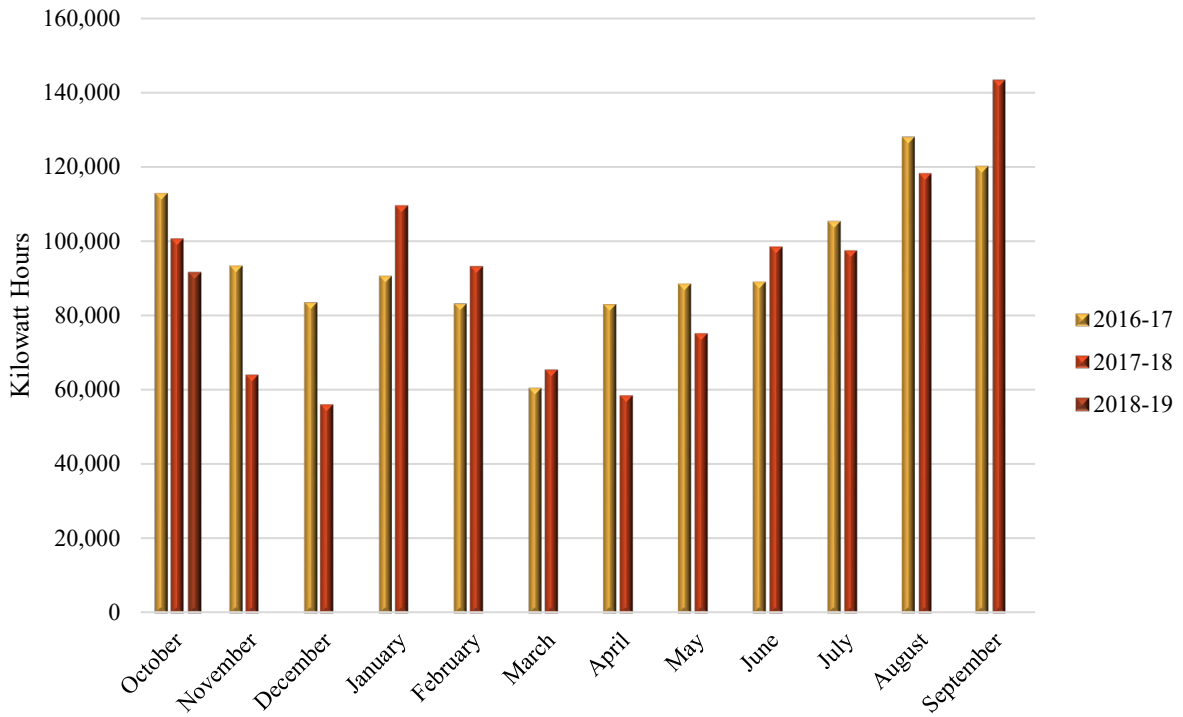
SPS receives electricity and natural gas from Southeastern Electric Cooperative, and propane gas from Blackburn Propane Service. Water is provided by Bryan County Rural Water District #2. The school district's consumption of utilities for the periods for which data were available are shown in **Exhibits 4-20** and **4-21**. Blackburn Propane Service has had an insufficient and intermittent shipment pattern and is therefore not included.

The electrical and natural gas consumption profiles reflect some of the inherent inefficiencies of the SPS facilities array with an excess of exterior walls, and an unusually large number of exterior doors. In the future, SPS may avail itself of wind farms and other forms of solar and wind power to reduce its dependence on power-generated electricity.

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<sup>18</sup> <http://www.ncef.org/search/node/energy%20management>

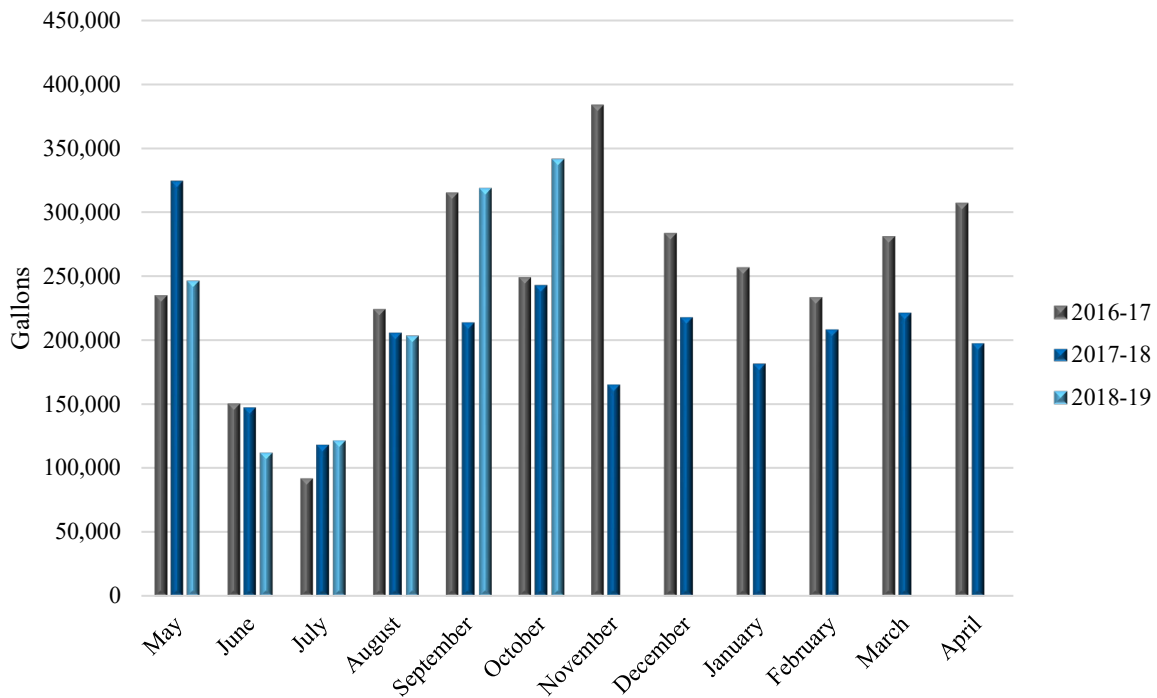
**Exhibit 4-20**  
**SPS Electricity Consumption**



Source: SPS and Prismatic calculations



**Exhibit 4-21  
SPS Water Consumption**



Source: Invoices from Bryan County Rural Water District #2 and Prismatic calculations

**FINDING 4-9**

The district has a number of areas of energy loss. In an effort to reduce spending on lighting, SPS converted its lamps to light emitting diode technology (LED). However, other areas of energy loss have not yet been addressed.

Areas of concern include:

- an excessive number of exterior walls compared to the amount of floor area enclosed;
- older windows throughout the district which are not designed to provide state-of-the-art energy efficiency; and
- substandard attic or roof insulation.

There are a number of energy conservation options districts can employ to increase their energy efficiency, ranging in cost and effort, from installing insulation to installing a wind farm. Energy efficiency is best achieved through multiple strategies, rather than focusing solely on one area to improve.

## RECOMMENDATION

### **Include insulation improvements and other energy saving actions in future serial bond issue initiatives.**

Boynnton-Williams & Associates should prepare a list of energy conservation items that are ready to be funded in the scope of the bond issue – if permitted – or outside of the scope and, instead, in future bond issue initiatives.

The items allowed for funding by the bond issue should be removed and placed together with the items in the performance contract. The estimated construction cost and the probable energy savings should be determined next. Other items that should be considered for inclusion in future bond issue initiatives include:

- replacement of HVAC equipment that has exceeded its useful service life;
- building envelope insulation/vapor barrier;
- window and exterior replacements; and
- wind farm installation.

## FISCAL IMPACT

The fiscal impact cannot be calculated with existing data.

## FINDING 4-10

SPS does not have an active energy awareness program to influence the energy use behavior of students, teachers, staff, administrators, and other building users. Energy use can be lowered significantly through energy-conscious behavior, as well as the use of solar or wind energy to supplement use of fossil fuel.

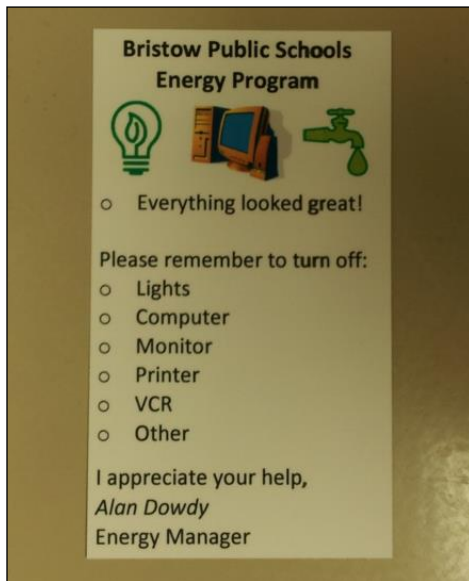
Energy-conscious behavior is not being encouraged or managed actively at SPS at this time. Day-to-day energy savings can be achieved via behavioral encouragements and reminders.

An active energy awareness program is a best practice for school districts. A number of school districts around the country use several techniques to keep energy costs down. The following are some examples of these conservation efforts:

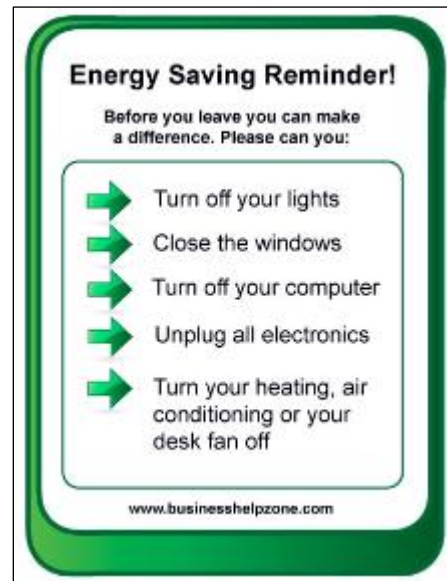
- entering monthly energy bill data into a spreadsheet to maintain a history of expenditures and to use in detecting problems (example: high-energy cost outliers that are contrary to experienced patterns at SPS);
- performing building checks to see if lights are turned off, doors are closed, water faucets are not dripping, etc.;

- leaving notes reminding teachers or staff of the proper procedure, such as those shown in **Exhibit 4-22**, if problems are found during building checks;
- establishing set points for thermostats at 76 degrees in the summer and 69 degrees in the winter;
- purchasing set-back thermostats and programming them to turn down cooling or heating in advance of daily adjournment and over the weekends; and
- setting water heaters or boilers at a maximum temperature of 140 degrees, except in areas requiring higher temperatures for sanitation purposes, such as kitchens.

**Exhibit 4-22**  
**Examples of Energy Saving Reminder Stickers**



Source: Prismatic Archives, April 2012



Source: BusinessHelpZone.com, December 2015

The U.S. Department of Energy determined that at least 25 percent of all energy consumed in a school facility is due to energy inefficiency. This inefficiency can be caused by:

- dry transformers;
- poor location of light switches;
- continuously burning hallway lights;
- excessive plug loads and use of personal appliances; and
- phantom loads.<sup>19</sup>

<sup>19</sup> See [http://www.stratenergy.ca/phantom\\_loads.htm](http://www.stratenergy.ca/phantom_loads.htm) for a detailed explanation.

Best practices in energy conservation include the consideration of performance contracting, as well as a full spectrum of plausible and feasible energy conservation actions. Performance contracts use energy savings as the collateral for loans to finance energy-saving projects. They are guaranteed to have a net-zero cost to the district. Energy conservation measures are most effective if employed in the context of the fullest and most complete array of all feasible conservation actions.

According to the U.S. Department of Energy, an Energy Services Company (ESCO) “develops, designs, builds, and funds projects that save **energy**, reduce **energy** costs, and decrease operations and maintenance costs at their customers’ facilities.”<sup>20</sup> Under a performance contracting arrangement, the ESCO finds financing for energy conservation projects, collateralized by the energy savings that result from these projects. Consequently, the money borrowed by the school district is a net-zero cost to the district: the district will never pay more than the energy savings it realizes. Should the savings ever lag at any time, the ESCO guarantees to make up the difference. This is the essence of performance contracting. A 2010 White Paper authored by Shan Bates of Schneider Electric, *The Performance Contracting Advantage: Using Energy Savings to Fund Energy Infrastructure Improvements in Schools, Universities and Municipalities*, provides an excellent and more detailed overview.<sup>21</sup>

Best practices in energy conservation also include consideration of alternative, cheaper sources of energy. One district served by the consulting team, Drummond Public Schools (DPS), operates a wind farm that generates supplemental electricity. DPS essentially sells the excess electricity back to the utility company and receives a billing credit. This reduces the district’s overall electricity spending by approximately 22 percent. Rather than the large-paddled windmill style, DPS’ wind farm has small propellers attached to equally small generators (**Exhibit 4-23**).

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<sup>20</sup> <https://www.energy.gov/eere/femp/energy-service-companies-0>

<sup>21</sup> [https://download.schneider-electric.com/files?p\\_File\\_Id=8635625899&p\\_File\\_Name=Performance-Contracting-Advantage.pdf&p\\_EndocType=Application%20solutions&p\\_Reference=0](https://download.schneider-electric.com/files?p_File_Id=8635625899&p_File_Name=Performance-Contracting-Advantage.pdf&p_EndocType=Application%20solutions&p_Reference=0)

**Exhibit 4-23**  
**The Wind Farm Installation at DPS**



*Source: Prismatic file photos, August 2018*

## **RECOMMENDATION**

### **Seek to reduce unnecessary energy use and to reduce energy costs.**

Over the summer months, the maintenance technician and head custodian should inspect each space within each building and generate a list of energy deficiencies which can then be integrated into a master maintenance list. Goals for an energy management program, as with any program, should be specific, realistic, and achievable:

- reducing energy consumption in each school facility by at least (a specified percentage) at the end of the (specific) school year and maintaining or lowering the achieved level of consumption for five years after attainment;
- establishing energy awareness training for all school employees to support stated objectives;



- 
- developing an “energy conservation project list” in conjunction with planned capital projects; and
  - obtaining and making available energy education materials, such as those offered by the U.S. Department of Energy,<sup>22</sup> for all teachers, for incorporation into their subject matter.

Other things to consider in developing the energy awareness plan are as follows:

- developing a means to evaluate the success of the overall program;
- developing a means for recognition of success in the program both internally and externally;
- informing the community that the energy awareness program exists, what has been accomplished, and how they can reduce their own energy bills; and
- regularly updating the program to reflect changing conditions, successes, and/or failures.

Typical areas on which SPS can concentrate include:

- Determine whether personal electrical devices (refrigerators, coffee makers, microwaves ovens, portable heaters, etc.) are appropriate in the district and either charge staff an appropriate fee for using the district’s electrical power or ask staff to remove personal electrical devices. All electrical devices, particularly refrigerators, add to the heat load within a space, thus requiring additional cooling in the warmer months. However, they supplement heating during the cold months.
- Replace deteriorated insulation on water heater piping or install on hot water piping where none currently exists.

In addition to internal efforts, the district should consider performance contracting. The consulting team recommends that the district request information from a minimum of three experienced ESCOs. After examining and rating these analysis packages, the top-ranked ESCOs should be invited for presentations and discussions before the school board and the community. If the potential dollar savings are substantial and seem achievable, the district enter into a performance contract.

Finally, the district should explore options for employing alternative sources of energy, including wind and solar. It may be possible to incorporate solar paneling into the new elementary school before its construction is completed.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources and should save the district at least \$8,000 a year, after cost-savings measures are fully implemented.

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<sup>22</sup> <http://www1.eere.energy.gov/education/lessonplans/>

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Implement measures to reduce energy spend.	\$2,000	\$4,000	\$6,000	\$8,000	\$8,000

**FINDING 4-11**

The existing SPS heating and cooling system reached its replacement age many years ago; parts for maintenance and repair are no longer available. Based on its age, it was designed to a no-longer-acceptable level of energy efficiency.

**Exhibit 4-24** shows the evaporator units that are part of the overall HVAC system. While the system is beneficial in that if one unit malfunctions, the rest of the system is able to continue functioning, overall it is out of date and energy inefficient.

**Exhibit 4-24  
HVAC Evaporator Units**



*Source: Prismatic, December 2018*

A more typical installation is a larger unit with air handlers in the building, and a two pipe or four pipe system. Such a system would cover most or all of a building. The two-pipe system would limit the district to either heating or cooling at any given time. With four pipes, the district can run hot water in one pair of pipes, and chilled water in the other pair. This allows some parts of the building to be heated while other parts are cooled.

**RECOMMENDATION**

**Schedule the replacement of the HVAC system.**

Although it is still functional, the district should not wait until it breaks down to replace it. Breakdowns and failures can produce high collateral damage, and, in some cases, result in disaster. Industry expert David Geaslin has hypothesized that the cost of allowing building equipment and components to default to failure mode is typically 15 times the cost of preventive maintenance protocols and can reach magnitudes up to the square of the cost of preventive maintenance, or even higher.<sup>23</sup> While deferral saves the district money in the moment, it can incur much larger costs over time.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### ***D. SAFETY AND SECURITY***

School districts are expected to provide a safe and secure environment for their students and staff. While districts are largely insulated from violent crime, incidents of violence at schools draw national attention. School districts must take proactive measures in safety and security even in incident-free schools. Students, teachers, and other district employees deserve a safe school environment in which to work and learn.

In 2003, Homeland Security Presidential Directive-5 (HSPD-5) initiated the development of a National Incident Management System (NIMS) and requires its use by public sector agencies, including school districts. The intent of this system is to provide a common template and language for responding organizations to work together in preventing, preparing for, responding to, and recovering from incidents. As noted by FEMA, NIMS represents “a core set of doctrine, concepts, principles, terminology, and organizational processes that enables effective, efficient, and collaborative incident management.”

NIMS emphasizes that true preparedness requires a commitment to continuous review and improvement. Most districts understand the continuous nature of emergency management as well as the four phases that comprise the process circle (**Exhibit 4-25**).

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<sup>23</sup> See [www.geaslin.com](http://www.geaslin.com) Read especially the Inverse Square Rule for Deferred Maintenance, and the description of Vertical Maintenance as a tool for the rapid elimination of deferred maintenance.



**Exhibit 4-25**  
**Continuous Process of Emergency Management**



*Source: The Office of Safe and Drug Free Schools' Practical information on Crisis Planning: A Guide for Schools and Communities, January 2007*

The Oklahoma Commission on School Safety, which was created in response to the Newtown tragedy, submitted several recommendations to the Oklahoma Legislature. Based upon the commission’s recommendations, the Legislature passed four new laws. Among other things, the laws require schools to update their safety plans every year and have frequent “intruder drills,” with students taking cover while the doors are locked and the windows are covered. The state also created a new Oklahoma School Security Institute to help schools keep their policies up to date.

**Exhibit 4-26** provides student responses to survey questions regarding school safety and security. As shown, a majority of students *agreed* or *strongly agreed* that they feel safe and secure at school.

**Exhibit 4-26**  
**Student Survey Results Regarding Safety in the Schools**

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I feel safe and secure at school.	29%	37%	16%	13%	4%
The school buildings and grounds are safe and secure.	24%	35%	22%	16%	3%

*Source: Prismatic Survey Results, December 2018*

**Exhibit 4-27** provides student responses to survey questions regarding drugs and bullying. As shown, 36 percent and 31 percent of student *agreed* or *strongly agreed* that drugs and bullying are a problem, respectively.

**Exhibit 4-27**  
**Student Survey Results Regarding Drugs and Bullying**

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Drugs are a problem at this school.	14%	22%	36%	13%	14%
Bullying is a problem at this school.	16%	15%	36%	22%	10%

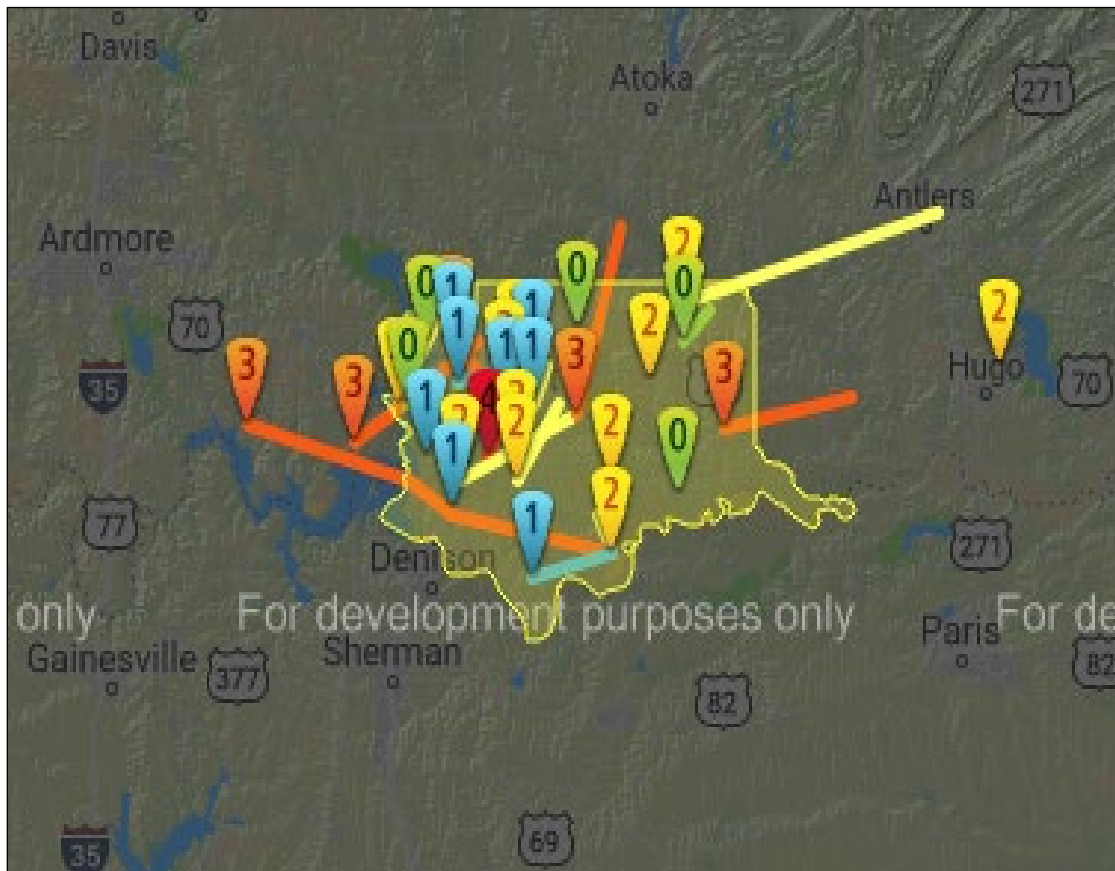
*Source: Prismatic Survey Results, December 2018*

The Oklahoma Department of Emergency Management (ODEM) reports that the state has had an increased number of earthquakes in recent years. In 2017, there were 304 earthquakes across the state with a magnitude of three or higher. Actions that the district can take regarding earthquakes, and teach to students, staff, and visitors are provided on the ODEM website.<sup>24</sup>

Since 1951, there have also been at least 33 tornadoes of varying strengths that have touched down in or tracked across Bryan County (**Exhibit 4-28**). The numbers indicate severity on the Fujita Scale. The highest severity storm, a “4” in 1957, injured three and killed three. With an average of one storm every two years, the area is rated “moderate” as a tornado zone.

<sup>24</sup> [https://www.ok.gov/OEM/Programs\\_&\\_Services/Preparedness/Preparedness\\_-\\_Earthquakes.html](https://www.ok.gov/OEM/Programs_&_Services/Preparedness/Preparedness_-_Earthquakes.html)

**Exhibit 4-28**  
**Tornado Tracks Through and Around SPS Since 1951**



*Source: Tornado History Project, December 2018*

**FINDING 4-12**

The district has taken several recent steps to ensure safety for their students and staff in a number of ways. These efforts demonstrate the district's concern for student and staff safety. These efforts include:

- the installation of electronically secured exterior doors that can be accessed via cardlocks;
- the construction of a third safe room on campus;
- awareness of emergency services' response time;
- hiring a full-time school resource officer who also serves as a county sheriff's deputy; and
- distribution of a Crisis Management and Emergency Procedures guide.

Further planned improvements for security include an upgrade of exterior door locks to affect a lockdown by remote control. Three main entrances will be re-constructed with security lobbies to

check, screen, and authenticate identification before admitting the visitor to the school.

## **COMMENDATION**

**SPS is commended for its efforts to increase safety and security in the district.**

### **FINDING 4-13**

The district has security cameras installed in the main buildings on the interior and exterior. However, surveillance and security gaps remain.

The remote lockdown wiring of all exterior doors is in progress and is expected to be operational at the beginning of 2019. The additional installation of interior and exterior cameras to remove gaps is expected complete during the summer of 2019. Three main entrances will be converted to secure lobbies where identification can be verified, and visitors detained. The target date is the start of the 2019-20 school year.

Remaining areas on which the district has not yet focused include perimeter fencing and separation of vehicles and pedestrians. A perimeter fence with parking inside would further enhance the safety of the campus. Currently, vehicular and pedestrian routes are not clearly separated.

## **RECOMMENDATION**

**Implement additional security measures by installing perimeter fencing and eliminating overlap between vehicular and pedestrian traffic.**

SPS' design consultant should complete conceptual site plan designs by the fall of 2019 to secure the perimeter of the school. A perimeter fence with parking inside would further enhance the safety of the campus. All playgrounds and outdoor event areas should be secured within the perimeter. Revised site plans should also separate vehicular and pedestrian routes are not clearly separated.

### **FISCAL IMPACT**

This recommendation is included in the scope of the bond issue and can be implemented with existing resources. If perimeter security was not included, the estimated cost by the design consultant will govern the fiscal impact, and perhaps the time of completion.

### **FINDING 4-14**

The district has not engaged the Oklahoma School Security Institute (OSSI) to conduct a district-wide security assessment. It is a free assessment that Oklahoma districts can request.

SPS administrators have engaged in serious efforts to make the school campus increasingly more protected and secure. Once the previous security recommendations have been accomplished, it is time for a final check.

The State of Oklahoma makes the OSSI available in a mandatory and voluntary fashion. Filing with OSSI by all school districts of reports on regularly required security and safety drills is mandatory. The voluntary aspect is the request by school districts for a full review of their security and safety programs.

### **RECOMMENDATION**

#### **Request a full, district-wide security assessment from the OSSI in 2019.**

Contact OSSI during the design professional's preparation of the perimeter security site plan and obtain commentary and recommendations. SPS should request a full visit after all security-related work is completed. There should be no limit to this review.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

*Chapter 5:*  
*Support Services*

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## Chapter 5

# Support Services

This chapter reviews several areas of support services in Silo Public Schools (SPS). It is divided into these sections:

- A. Child Nutrition
- B. Technology
- C. Transportation

### A. CHILD NUTRITION

Successful administration of the child nutrition program depends upon consistent program organization, strong financial reporting, and precise personnel management. All of these administrative areas must align and support the district's goals for student achievement.

School meal programs began in 1946, when the *National School Lunch Act* was signed, authorizing the National School Lunch Program (NSLP) to "safeguard the health and well-being of the nation's children." The program, administered by the U.S. Department of Agriculture (USDA), is open to all public and nonprofit private schools, as well as all residential childcare institutions. The NSLP also offers afterschool snacks for sites that meet the eligibility requirements.

The *Child Nutrition Act of 1966* established the School Breakfast Program (SBP). This is a federally-assisted meal program that provides nutritionally balanced, low-cost, or free breakfasts to children in public schools, nonprofit private schools, and residential child care institutions.

SPS participates in the NSLP, the SBP, the after school snack program, and the USDA Foods in Schools Program. Districts that participate in these federal programs receive cash subsidies and donated commodities from the USDA for each eligible meal they serve. In return, the district must serve student meals that meet federal guidelines for nutritional value, offer free or reduced price meals to eligible students, and accurately keep required records.

Students in the lowest socioeconomic bracket qualify for free lunches, while others qualify for reduced price lunches. Meals served according to federal guidelines receive some level of reimbursement, including those served to students who pay full price. School districts do not receive federal reimbursement support for teacher or guest meals. **Exhibit 5-1** shows the applicable 2017-18 and 2018-19 federal reimbursement rates for breakfast and lunch. SPS also receives an additional six cents per meal for meeting the meal pattern requirements.

**Exhibit 5-1**  
**School Meals: Federal per Meal Reimbursement Rates**  
**2017-18 and 2018-19**

Meal Type	School Breakfast Program - Severe Need <sup>1</sup>		National School Lunch Program (with 6 cents)	
	2017-18	2018-19	2017-18	2018-19
Free	\$2.09	\$2.14	\$3.29	\$3.37
Reduced Price	\$1.79	\$1.84	\$2.89	\$2.97
Paid	\$0.30	\$0.31	\$0.37	\$0.37

Source: <https://www.fns.usda.gov/school-meals/rates-reimbursement>

The *Healthy, Hunger-Free Kids Act of 2010 (HHFKA)* provided sweeping modifications to the school nutrition programs and made significant changes in the required meal components. The new regulations require districts to charge equitable prices for full-pay meals and non-reimbursable à la carte items, establish nutritional requirements for all foods sold on campuses at any time during the school day, provide free water where meals are served, provide nutrition education to students in the district, and require school nutrition directors/managers to meet education, training, and certification requirements.

**Exhibit 5-2** provides the nutritional requirements as specified in *HHFKA*. Both the breakfast and lunch menus now must offer more fruits and vegetables than before. Milk must be low-fat or fat-free. Sodium levels must be reduced. Whole grains must be increased and trans fats must be eliminated. In the last few years, while many districts have successfully implemented the requirements of *HHFKA*, there have been discussions at the federal level about rolling back some provisions and delaying the implementation of others. Those discussions concluded in December 2018, with the announcement by the USDA of the Final Rule on School Meal Flexibilities. The results of the Final Rule are shown in the exhibit.

<sup>1</sup> SPS is eligible to receive severe need reimbursements for breakfasts served to eligible students on sites where 40 percent or more of the lunches claimed at the site in the second preceding school year were served free or at a reduced price, and the site is participating in or initiating a school breakfast program.

**Exhibit 5-2  
Summary of Nutritional Requirements for Breakfast and Lunch**

	<b>Breakfast</b>		<b>Lunch</b>	
Fruit and Vegetables	1 cup per day (vegetable substitution allowed). Students are allowed to select ½ cup under Offer Versus Serve.		¾-1 cup vegetables plus ½-1 cup fruit per day.	
Grains	Daily minimum of 1 ounce equivalent minimum per day; weekly minimum ranges, varying by grade: K-5: 7-10 ounces 6-8: 8-10 ounces 9-12: 9-10 ounces		Daily minimums varying by grade: K-5: 1 oz. eq. min. daily (8-9 oz. weekly) 6-8: 1 oz. eq. min. daily (8-10 oz. weekly) 9-12: 2 oz. eq. min. daily (10-12 oz. weekly)	
Meat/Meat Alternate	May substitute meat/meat alternates after minimum daily requirement for grains is met.		K-5: 1 oz. eq. min. daily (8-10 oz. weekly) 6-8: 1 oz. eq. min. daily (9-10 oz. weekly) 9-12: 2 oz. eq. min. daily (10-12 oz. weekly)	
Whole Grains	At least half of weekly grains must be whole grain rich.		At least half of weekly grains must be whole grain rich.	
Milk	1 cup, 1% or fat-free (unflavored/flavored)		1 cup, 1% or fat-free (unflavored/flavored)	
Sodium*	Target 1 (2019-24): K-5: ≤ 540 mg 6-8: ≤ 600 mg 9-12: ≤ 640 mg	Target 2 (2024-25): K-5: ≤ 485 mg 6-8: ≤ 535 mg 9-12: ≤ 570 mg	Target 1 (2019-24): K-5: ≤ 1230 mg 6-8: ≤ 1360 mg 9-12: ≤ 1420 mg	Target 2 (2024-25): K-5: ≤ 935 mg 6-8: ≤ 1035 mg 9-12: ≤ 1080 mg
Trans Fat	Zero grams per serving (nutrition label)		Zero grams per serving (nutrition label)	

*Source: USDA, December 2018  
\*Target 1 was set to be implemented by 2014-15*

**Exhibit 5-3** provides photos of a sampling of SPS trays selected by students during the onsite period. Trays for both breakfast and lunch are shown.

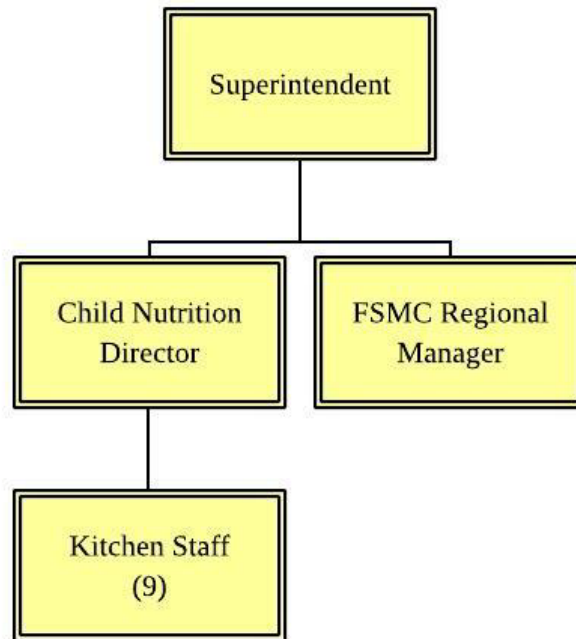
**Exhibit 5-3**  
**Sample of SPS Breakfast and Lunch Trays**



Source: Prismatic, December 2018

**Exhibit 5-4** shows the organization of staff within the SPS child nutrition department. As shown, the district has contracted with a food service management company (FSMC). The child nutrition director is an employee of the FSMC. Kitchen staff members are district employees.

**Exhibit 5-4**  
**SPS Child Nutrition Organizational Structure**



*Source: Created by Prismatic, December 2018*

**FINDING 5-1**

The child nutrition program is not adequately managing its staff. The child nutrition director has established staffing standards that are lower than those recommended by the SDE Child Nutrition Unit. The current Meals per Labor Hour (MPLH) are below industry standards when all labor hours for the preparation and service of meals are included.

During an interview with the child nutrition director it was stated that the FSMC (OPAA) computes the MPLH. She said her goal is 13 to 15 MPLH. This goal is lower than recommended standards for staffing school kitchens. She said OPAA converts meals as:

- one lunch = one meal equivalent;
- two breakfasts = one meal equivalent; and
- three snacks = one meal equivalent.

These are the same conversion formulas recommended by SDE.

The district is not using the SDE Child Nutrition Unit recommended staffing guidelines to set goals for productivity relative to meals served. SDE guidelines provide productivity goals based upon the number of meal equivalents served and the number of labor hours needed to prepare those meal equivalents. The student reimbursable lunch meal is the standard unit of conversion for determining meal equivalents. Therefore, all meal types are converted to meal equivalents for



the purposes of measurement. A meal equivalent is not a unit of production, but a calculation that allows a child nutrition manager to equate all meals to a standard. By converting all food sales to meal equivalents, a director can determine production rates. The SDE uses the following conversions to meal equivalents:

- one lunch equates to one meal equivalent;
- two breakfasts equate to one meal equivalent;
- three snacks equate to one meal equivalent; and
- à la carte sales of \$3.625 equate to one meal equivalent.

The most common means of measuring employee productivity in child nutrition is the MPLH measure. This is calculated by dividing the number of meal equivalents produced and served in a day by the number of labor hours required to produce those meal equivalents. The SDE guidelines for MPLH staffing are shown in **Exhibit 5-5**. The SDE provides MPLH guidelines for both conventional and convenience systems of food preparation. The consulting team found SPS to be largely using a conventional system of food preparation, largely preparing food items from scratch.

**Exhibit 5-5**  
**Oklahoma Staffing Guidelines for Onsite Production**

Number of Daily Meal Equivalents	Recommended for Conventional Systems <sup>2</sup>		Recommended for Convenience Systems <sup>3</sup>	
	Meals per Labor Hour (MPLH)	Total Hours	Meals per Labor Hour (MPLH)	Total Hours
10 – 100	12	< 8	16	< 6
101 – 150	12	8 – 12	16	6 - 9
151 – 200	12	12 – 16	16	9 – 12
201 – 250	14	14 – 17	17	12 – 14
251 – 300	14	17 – 21	18	14 – 16
301 – 400	15	20 – 26	18	17 – 21
401 – 500	16	25 – 31	19	21 – 25
501 – 600	17	29 – 35	20	25 – 30
601 – 700	18	33 – 37	22	27 – 31

*Source: OK SDE Child Nutrition Manual Compliance Section, July 2014*

**Exhibit 5-6** shows the 2017-18 monthly MPLH for the SPS cafeteria. The daily labor hours do not include hours the director spends in the meal preparation process since she technically is not assigned kitchen duties and her kitchen hours are variable, depending upon the menu and staff shortages. She estimated it to be two or three hours per day. If her hours were included in daily labor hours, the MPLH would be even lower. As shown, the MPLH is lower than recommended

<sup>2</sup> A system where meals are generally prepared from scratch onsite.

<sup>3</sup> A system where meals are generally only re-heated from frozen prepared items onsite.

standards. The consulting team found labor hours in the kitchen to be in excess of SDE recommendations. While the SPS cafeteria produced an average of 14.7 meals per labor hour in 2017-18, the state staffing guidelines suggest that SPS' MPLH should be 18. Using the formula  $\text{Daily ME} \div \text{Desired Productivity Rate (18)} = \text{Labor Hours}$ , the daily assigned labor hours should be 61, which would be a reduction of 17 hours per day.

**Exhibit 5-6**  
**SPS Cafeteria Meals per Labor Hour**  
**2017-18**

Month	Lunches Served	Breakfasts Served	Snacks Served	Meal Equivalents	Serving Days	Daily Meal Equiv.	Daily Labor Hours	MPLH
August	11,976	8,829	7,939	19,037	17	1,120	78	14.4
September	10,650	9,395	6,995	17,679	15	1,179	78	15.1
October	11,497	9,588	7,676	18,850	16	1,178	78	15.1
November	10,441	8,372	6,257	16,713	14	1,194	78	15.3
December	5,825	4,567	3,409	9,245	8	1,156	78	14.8
January	12,590	10,194	8,113	20,391	18	1,133	78	14.5
February	11,128	8,920	6,840	17,868	16	1,117	78	14.3
March	9,078	7,520	5,999	14,838	13	1,141	78	14.6
April	11,771	9,759	7,735	19,229	17	1,131	78	14.5
May	6,512	5,666	4,320	10,785	11	980	78	12.6
<b>Total</b>	<b>101,468</b>	<b>82,810</b>	<b>65,283</b>	<b>164,634</b>	<b>145</b>	<b>11,328</b>	<b>780</b>	<b>145.2</b>
<b>Average</b>	<b>10,147</b>	<b>8,281</b>	<b>6,528</b>	<b>16,463</b>	<b>14.5</b>	<b>1,133</b>	<b>78</b>	<b>14.7</b>

*Source: SPS and Prismatic calculations, December 2018*

Costs for labor and benefits are major expenditures for child nutrition programs. To maintain a sound financial position, goals for staffing must be established based upon industry standards. SDE has established guidelines for districts to calculate meal equivalents and assign labor hours. MPLH must be calculated and evaluated on a regular basis to ensure that each kitchen has adequate labor hours but are not overstaffed.

## RECOMMENDATION

### Staff kitchens using the SDE staffing standards based upon MPLH calculations.

There are two ways to increase the productivity rate and produce more meals per hour of paid labor:

- decrease the number of labor hours – the number of staff in the school could be reduced or the number of staff hours worked daily can be reduced by adjusting work schedules; and
- increase the number of meal equivalents – implement measures to increase participation and à la carte sales. Unless the child nutrition program is feeding all of the students, faculty, and staff every day, there are possibilities for increasing participation. Every student who is enrolled and every adult who is employed by the school is a potential customer.

The child nutrition director should analyze labor hours in the kitchen and determine where staff can be reduced, or labor hours cut. Positions being vacated due to retirement or resignation should not be replaced until productivity is more in line with SDE guidance. The director should institute advisory panels with all grade levels of students to determine how meal participation could increase. Data on meal participation versus menu items should be analyzed to determine menu changes. The district should consider offering a limited amount of à la carte items to secondary students to increase meal equivalents. The consulting team recommends a combination of reducing labor hours and increasing meal equivalents.

## FISCAL IMPACT

There is an excess of approximately 17 labor hours in the SPS kitchen. Kitchen staff are paid an annual salary and fringe rather than a per hour rate. If labor hours are reduced for all staff then an accompanying reduction in the annual rate for each would have to be calculated. The alternative is to reduce a staff person. If one hour of labor was reduced for each kitchen worker, except for the manager, labor hours would be reduced by eight per day or the equivalent cost of one person. The average annual salary/fringe benefit is a savings of \$19,738.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Reduce kitchen staffing.	\$19,738	\$19,738	\$19,738	\$19,738	\$19,738

## FINDING 5-2

The child nutrition department, as an enterprise operation, is not operating according to sound business practices. Expenditures exceed revenues; the program is being supported by the district general fund. **Exhibit 5-7** shows the SPS child nutrition program revenues and expenditures over time. The program was self-operated in 2014-15. In 2015-16, the program continued to be self-operated but utilized the services of a consulting company who assisted in the areas of purchasing, commodity processing, menu planning, and analysis of food and labor costs. The cost for the consulting company was \$7,500 for one year. Beginning in 2016-17, the district entered into a contract with the FSMC to provide overall management of the meals program. The superintendent indicated the decision to hire a FSMC was made due to numerous complaints, declining participation, and the district's lack of access to buying power and name brand foods.

The district pays the FSMC a fixed rate per meal served. This change accounted for a decrease in labor costs as the director's salary is paid by the FSMC. All other employees remain as district employees. The supplies expenditure includes the amount of fees paid to the FSMC. The FSMC is responsible for purchasing the food and supplies for the program and does not charge the district directly for these expenditures.

This table shows a concerning trend as two out of the three years the program operated at a loss requiring general fund support. The district's general fund is being negatively impacted by the need to subsidize the child nutrition program. Using the services of the consulting company in 2015-16 made a positive impact and resulted in a large reduction of costs.



**Exhibit 5-7**  
**SPS Child Nutrition Fund Revenues and Expenditures Over Time**

	2014-15	2015-16	2016-17
<b>Beginning Balance</b>	<b>\$39,613</b>	<b>\$61,126</b>	<b>\$48,728</b>
<b>Revenues</b>			
Return of Assets (Local Sources)	\$25	\$326	\$1,572
State Reimbursement	\$5,485	\$4,853	\$4,504
Federal Reimbursement	\$384,807	\$378,024	\$411,889
<b>Total Revenues</b>	<b>\$423,796</b>	<b>\$419,106</b>	<b>\$456,728</b>
<b>Expenses</b>			
Salaries and Benefits	\$241,500	\$200,255	\$210,776
Food and Supplies	\$327,942	\$262,502	\$342,897
Other Expenses	\$42,080	\$15,994	\$43,796
<b>Total Expenses</b>	<b>\$611,522</b>	<b>\$478,751</b>	<b>\$597,469</b>
<b>Beginning Balance + Revenues - Expenses</b>	<b>(\$148,113)</b>	<b>\$1,481</b>	<b>(\$92,013)</b>

*Source: SPS OCAS Revenue and Expenditures Reports 2015-17*

*Note: Totals may not reconcile completely due to rounding*

An important measure of program efficiency is the analysis of expenditures to revenue, which are called operating ratios. Operating ratios are calculated by dividing each expenditure category in a given time period by the total revenue for the same time period, yielding a percentage. Industry best practices exist to guide operators to ensure financial soundness of the program. Recommendations suggest that no more than 40 to 45 percent of revenue be spent on labor and benefits, and the same recommendation exists for food and supplies. No more than 85 percent of revenue should be spent on food, labor, and benefits combined. To operate a break-even program, the total operating ratio should be no more than 100 percent. If greater than 100 percent there are more expenditures than revenue.

**Exhibit 5-8** shows the amount SPS expended by category and the percentage of total revenue for each expenditure. As shown, all SPS operating ratios are out of line with industry recommendations.

**Exhibit 5-8**  
**SPS Child Nutrition Operating Ratios Over Time**

Category	2014-15	2015-16	2016-17	Industry Standard
Labor/Benefits	57%	48%	46%	40-45%
Food/Supplies	77%	63%	75%	40-45%
Other	10%	4%	10%	15-20%
<b>Total</b>	<b>144%</b>	<b>114%</b>	<b>131%</b>	<b>NA</b>

*Source: OCAS and Prismatic calculations, December 2018*

As noted, the SPS labor/benefits operating ratio has declined over the past three years, which is a positive sign. In 2016-17, it was close to the industry standard; however, this figure is misleading. There is no director salary included in this expenditure as it is included in the fees

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charged by the FSMC. The food/supplies operating ratio is extremely high. It was reduced during 2015-16 when the consulting company was providing services but dramatically increased again when the FSMC was hired and the district began to pay fees for meals served. When asked about the process the child nutrition director used to decide whether to renew the contract, the superintendent stated one of her criteria was if the claims (meal reimbursements) are enough to cover the bill (fees).

There are several factors contributing to the overall negative financial status of the program. They include:

- In 2014-15, the superintendent began the practice to offer all meals to both students and faculty at no cost. The current superintendent changed this policy and faculty now pay for their meals. The loss of revenue from full-pay students continues to have a negative impact on the financial status of the program.
- The department is overstaffed in comparison to best practices.
- The consulting team observed a great amount of food waste on the salad bar offered to secondary students. This practice does not have a direct impact on the program's expenditures because all food is purchased by the FSMC. However, if the district decided to return to self-operated, reducing food waste could have a significant impact. The child nutrition director stated the consulting company discontinued the salad bar due to the high cost.
- There are no à la carte items available. This could provide a significant increase in revenue even if only available to the high school students.
- The director stated she does not know how the program is doing financially. This lack of knowledge contributes to her making decisions that may not be financially sound.

## **RECOMMENDATION**

### **Analyze all expenditure categories to determine potential areas for cost savings.**

An analysis of each expenditure category should be performed to determine if any areas could be reduced. The district should evaluate whether the cost of using a FSMC is cost effective compared to the alternative of using a consulting company on an annual basis.

The district should perform a similar analysis of revenue sources to determine areas of potential new revenue as well as areas where revenue for meals can be increased. A community task force should be formed to evaluate the policy of offering meals at no cost to students. One potential solution would be to phase in charging students by grade level. Another would be to offer only the reduced meals at no cost. A new source of revenue would be to offer à la carte items for secondary students.

The child nutrition director should be provided with monthly financial reports on the program. They should include participation reports as well as the statement of revenue and expenditures.

This knowledge will help her make decisions to control costs as well as evaluate the potential for increasing participation, which results in additional revenue.

### FISCAL IMPACT

This recommendation can be implemented with existing resources.

### FINDING 5-3

The district's Identified Student Percentage (ISP) is lower than the peer district average (**Exhibit 5-9**). The ISP is determined by the number of students directly certified and is used to determine eligibility for Community Eligibility Provision (CEP). Students identified through direct certification are not required to submit an application for free meals.

The direct certification program requires state and local educational agencies to automatically enroll students from households already participating in the Supplemental Nutrition Assistance Program (SNAP) or the Food Distribution Program on Indian Reservations, without an additional application from the child's family to assist low-income households with children eligible for free meals at school. SPS usually starts this process of matching students with the Department of Human Services before the beginning of the school year and parents receive notification of their eligibility in the mail. During an interview, the staff person who processes the meal applications stated the matching process for direct certification was not started this year until after the school year started.

**Exhibit 5-9**  
**SPS and Peer Approval Eligibility and ISP Rates, 2017-18**

District	Eligibility %	ISP Rate
<b>Silo</b>	<b>72.7%</b>	<b>18.9%</b>
Caney Valley	62.8%	24.0%
Newkirk	66.1%	27.3%
Wilburton	68.2%	32.1%
Tishomingo	77.1%	31.8%
Hennessey	86.6%	18.6%
<b>Peer Average</b>	<b>72.3%</b>	<b>25.5%</b>

*Source: SDE Community Eligibility Reports, 2018*

### RECOMMENDATION

**Improve the process used to determine which students are eligible for free meals through direct certification to ensure the maximum number of students are captured.**

The district should evaluate their process to directly certify students for free meals. They should determine if their match engine can be improved by looking at potential errors due to nicknames, errors in birthdates, or addresses. They should make sure they are expanding the search beyond the mandatory SNAP and Temporary Assistance for Needy Families (TANF) and capturing students who are homeless, migrant, foster, and Head Start eligible.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-4

Breakfast participation is higher than industry best practices. Implementation of breakfast at no cost as well as breakfast after first period for the middle and high schools has contributed to high participation levels.

Industry best practices exist for both breakfast and lunch to compare a district's participation rates to those established as a benchmark. **Exhibit 5-10** shows best practice rates for breakfast. These benchmarks are the recommended percentage of participation of membership.

**Exhibit 5-10**  
**Best Practice Breakfast Participation Rates**

School Level	Best Practice
Elementary	35%
Middle	35%
High	25%

*Source: HealthierUS School Challenge Criteria, 2014*

**Exhibit 5-11** shows a trend in participation rates in SPS over four years. During 2014-15, the program was self-operated. Beginning in 2015-16 a consulting company was used. In 2016-17 meal service was contracted to a FSMC. As noted in the chart, participation rates have always been above industry standards. However, data shows the rates of participation have dropped since the program was self-operated. This trend is worrisome and should be closely monitored.

**Exhibit 5-11**  
**SPS Breakfast Participation Rates Over Time**

Month	2014-15	2015-16	2016-17	2017-18
August	86%	63%	56%	51%
September	70%	68%	64%	60%
October	70%	64%	64%	64%
November	79%	66%	66%	65%
December	85%	59%	61%	63%
January	81%	58%	60%	60%
February	77%	61%	61%	61%
March	75%	60%	62%	61%
April	77%	59%	63%	63%
May	60%	49%	52%	57%

*Source: SPS and Prismatic calculations, December 2018*

## COMMENDATION

**SPS has participation rates in the breakfast program that are higher than industry best practices. Offering breakfast at no cost as well as serving it after the first period has contributed to the high rates.**

### FINDING 5-5

Lunch participation for all levels, combined and averaged, were slightly lower than industry best practices for 2017-18. For 2018, when data are available by school levels, lunch participation rates are within industry best practices for elementary and middle school but lower than best practices for high school.

**Exhibit 5-12** shows best practice rates for lunch. These benchmarks are the recommended percentage of participation of membership.

**Exhibit 5-12**  
**Best Practice Lunch Participation Rates**

School Level	Best Practice
Elementary	75%
Middle	75%
High	65%

*Source: HealthierUS School Challenge Criteria, 2014*

Prior to school year 2018-19 meal participation was not broken down by grade levels on the meal claims making it difficult to assess how well participation by each grade level compared to industry best practices. For 2018-19 the meal claims are separated by elementary, middle, and high school resulting in a more accurate picture of participation levels by each grade as shown in **Exhibit 5-13**. With the exception of September, when lunch rates were low for all levels, the elementary and middle school levels showed participation rates at or higher than best practices. However, the high school had lower than best practices for all of the months.

**Exhibit 5-13**  
**SPS Lunch Participation Rates by School Level 2018-19**

Month	ES	MS	HS
August	77%	79%	61%
September	71%	64%	50%
October	82%	77%	58%
November	81%	75%	53%

*Source: SPS and Prismatic calculations, December 2018*

Student surveys indicated that 53 percent of them *disagreed* or *strongly disagreed* that they like the food being served in the cafeteria and 40 percent of them *disagreed* or *strongly disagreed* that the cafeteria serves a good variety of food (**Exhibit 5-14**). These survey data substantiate the

need for improvements to the meal programs, which should result in improved participation levels.

**Exhibit 5-14**  
**Student Survey Results Regarding SPS Cafeteria Food**

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I like the food served in the cafeteria.	8%	24%	15%	23%	30%
The cafeteria serves a good variety of food.	9%	38%	14%	16%	24%

*Source: Prismatic Survey Results, December 2018*

The consulting team found several practices contributing to rates lower than industry best practices:

- There are no self-serve options on line, from which students could make a selection and go, thereby speeding up the lines. Currently, students at all grade levels are asked which of each item they would like, which slows down the serving process.
- The last meal time is from 1:40 pm to 2:10 pm, which is quite late in the school day.
- Student input is not solicited on a regular basis.
- The same menu is served to all grade levels. Different age groups have different food preferences and menus need to accommodate the more developed palates of the older students. In addition, by the time a student reaches high school they have eaten the same menu for eight years. Offering more choices and different items for the high school students keeps them interested in the lunch program and more interested in participating.
- There are no à la carte items available for sale to high school students. An à la carte program has the potential to increase revenue, student satisfaction, and participation.

SNA's *Keys to Excellence* self-assessment program indicates the following as best practices when planning menus:

- student preferences are considered when planning menus;
- students are included in panels and/or committees used to select products and/or plan menus;
- menus are designed to accommodate flavor, texture, and service preferences of students;
- school nutrition personnel solicit feedback from students about meal choices; and
- school nutrition personnel are trained to monitor plate waste.

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## RECOMMENDATION

### Improve high school lunch participation.

The following are ways to improve the lunch participation:

- use the Smart Snacks guidelines of *HHFKA* to sell healthy à la carte items to high school students;
- develop different menus for the high school students; and
- organize a student advisory group of high school students.

The child nutrition director should organize a secondary student advisory group to provide input on the menus currently being used and to taste new food items and recipes. Feedback from these meetings should be used to revamp the menus. Menu planning should include multiple entrée choices at the secondary level that are different from the elementary and middle levels. An à la carte program should be started for the secondary students. Nutritional requirements of the *HHFKA* “Smart Snacks” must be followed when selecting items for sale.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-6

There is limited nutrition education provided to students in the district. Nutrition promotion is one of the requirements of the *Healthy Hunger Free Kids Act of 2014* in addition to the wellness requirement for nutrition education outlined in the *Child Reauthorization Act*.

During the onsite review, the consulting team observed minimal nutrition education materials posted in the cafeteria, and serving area. When asked about nutrition education efforts, the director stated in the past they have held Nutrition Advisory Council (NAC) meetings at all grade levels. They have also sent out student surveys. However, there have been no such efforts this school year. There is no nutrition information on the child nutrition portion of the district website.

Since the passage of the *National School Lunch Act*, there has been an expectation that nutrition education should be a strong component of the program. It was expected that child nutrition programs would become the schools’ learning laboratory for effective nutrition education in their communities. The contract with the FSMC states the following expectation in the Standard Terms and Conditions section 1.J. “The FSMA shall cooperate with the SFA in promoting nutrition education and coordinating the SFA’s food service with classroom instruction.”

**Exhibit 5-15** provides a comparison of the 2004 and 2010 federal requirements. Among other things, the current USDA guidelines add a requirement for nutrition promotion.



**Exhibit 5-15**  
**Comparison of Local School Wellness Policy Requirements**

Area	2004 Requirements	2010 Requirements
Overview	Direct local education agencies (LEAs) to have a local wellness policy (LWP) in place for each school under its jurisdiction.	Strengthens LWPs and adds requirements for public participation, transparency, and implementation.
Elements of the Local School Wellness Policy	LWP to include, at a minimum, goals for nutrition education, physical activity, and other school-based activities to promote student wellness, as well as nutrition guidelines for all foods available on school campus.	In addition to the 2004 requirements, the LWP is also to include goals for nutrition promotion.
Stakeholder Involvement	LEAs are required to involve parents, students, and representatives of the school food authority, the school board, school administrators, and the public in the development of a LWP.	In addition to the 2004 requirements, LEAs are now required to permit teachers of physical education and school health professionals to participate in the development of a LWP.
Stakeholder Participation	The stakeholders named above are required to participate in the development of the LWP.	In addition to the 2004 requirements, LEAs are now required to permit all stakeholders named above and in 2004 to participate in the implementation and periodic review and update of LWP.
Local Discretion	LEAs can determine the specific policies appropriate for the schools under their jurisdiction, provided that those policies include all required elements specified in the Act.	Same as 2004 requirement.
Public Notification	None.	LEAs are required to inform and update the public (including parents, students, and others in the community) about the content and implementation of the LWP.
Measuring Implementation	LEAs are required to establish a plan for measuring implementation of the LWP.	LEAs are required to periodically measure and make available to the public an assessment on the implementation of LWP, including the extent to which schools are in compliance with LWP, the extent to which the LWP compares to model LWP, and a description of the progress made in attaining the goals of the LWP.
Local Designation	LEAs are required to establish a plan for measuring LWP implementation to include delegating one or more persons with the responsibility for ensuring LWP compliance.	LEAs are required to designate one or more LEA officials or school officials to ensure that each school complies with the LWP.

Source: USDA Food and Nutrition Service: <http://www.fns.usda.gov/tn/local-school-wellness-policy>

Most child nutrition programs use the many free posters available from manufacturers and organizations to decorate their cafeterias, while also providing messages about good nutrition. Many districts use menus and the district website to provide nutrition information to both parents and students. There are a number of resources available to assist child nutrition programs in providing nutrition education information. Most are provided at no cost, such as:

- *USDA My Plate*, which has graphics, materials for educators such as lesson plans, and other printable materials that can be downloaded;<sup>4</sup>
- USDA Team Nutrition, which has nutrition education materials for the preschool, elementary, middle, and high school levels;<sup>5</sup>
- *Fuel Up to Play 60*, a school nutrition and physical activity program sponsored by the National Dairy Council and the National Football League that has nutrition education materials;<sup>6</sup>
- ICN, which provides professionals working in child nutrition with training materials on nutrition education;<sup>7</sup> and
- SNA,<sup>8</sup> the Oklahoma SNA,<sup>9</sup> and the Oklahoma SDE Child Nutrition Unit,<sup>10</sup> which provide nutrition education training materials for staff working in child nutrition.

## RECOMMENDATION

### **Provide nutrition education to students by displaying materials in the cafeterias using posters and menu boards.**

The child nutrition manager and the FSMC regional manager should evaluate the nutrition education materials available and determine which will be most appropriate for SPS students at all grade levels. Posters should be displayed in the cafeteria and changed often to maintain interest and continue to provide new information. Nutrition resources and information for parents and students should be added to the child nutrition page on the district website and kept updated. Menus should contain different nutrition messages every month.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-7

The child nutrition department is not maximizing the use of technology. Parents are not able to apply on-line to complete the Free and Reduced Price School Meals Application. Use of this technology would reduce the amount of district labor required to process the applications.

Meal program applications are distributed in schools in packets at pre-enrollment. Parents return them to the school or by USPS mail. They are processed by an aide in the elementary school using the Municipal Accounting System (MAS) application processing software. Applications

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<sup>4</sup> <http://www.choosemyplate.gov>

<sup>5</sup> <http://www.fns.usda.gov/tn/team-nutrition>

<sup>6</sup> <http://www.fueluptoplay60.com>

<sup>7</sup> <http://www.nfsmi.org>

<sup>8</sup> <https://schoolnutrition.org>

<sup>9</sup> <http://www.snaofok.org>

<sup>10</sup> <http://ok.gov/sde/child-nutrition-programs>

are not available for parents to download online and they have no opportunity to apply online. MAS does, however, have an online application available. The department does use MAS for other applications such as the point of service (POS). When asked in an interview, the aide noted the ability to apply online would be an idea for positive change.

Parents and students have a keen understanding of technology, use it in their daily lives, and come to expect it when they participate in the school meals program. Parent surveys indicated that 76 percent of them *agreed* or *strongly agreed* that they regularly use technology to keep up to date on their child's education (**Exhibit 5-16**). Putting the application on the district website for easy access and giving them the ability to apply online will be seen as a positive change and is an effective way to ensure all eligible students are enrolled in the free and reduced program. It will have the added benefit of reducing the amount of time the aide spends on the meal application process and the process should be completed more quickly.

**Exhibit 5-16**  
**Parent Survey Results on Technology**

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I regularly use technology to keep up-to-date on my child's education (emailing teachers, online gradebook, etc.).	34%	42%	13%	8%	3%

*Source: Prismatic Survey, December 2018*

## RECOMMENDATION

### Implement available components of the current software provider to automate the process of on-line meal applications.

The district should put a link to the meal application on their website and work with their automated software provider to enable parents to fill out their applications for meal benefits online. This should be implemented for the beginning of the 2019-20 school year. In addition, at pre enrollment time a computer should be available in the schools for parents who would like to immediately apply online.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-8

The district has implemented a sound system for monitoring the contract with OPAA specifically in the areas of the monthly invoices. The treasurer stated in an interview that she does a verification of the OPAA invoices every month. This was verified by the consulting team upon an examination of invoices. Notations showed changes to some numbers of meals served as well as totals for meal equivalencies. These changes matched number of meals served noted on the

meal claims submitted to SDE. A notation of “over charge” was shown at the bottom of some of the invoices. The child nutrition director and the treasurer have a good working relationship and good system of coordinating the meals claims and invoicing process.

The required Administrative Review performed by the SDE Child Nutrition Unit in April 2018 noted two noncompliant items regarding the FSMC. The FSMC was putting all meals (including adults) under student meals and several invoices had credits for labor. Both noted items were corrected and the district received a notice in May 2018 that the review was closed and a follow up visit was not necessary. As a result, the treasurer has instituted a thorough process for monitoring invoices.

When a school district enters into a contract with an FSMC, there are certain responsibilities of both parties. In April 2009, the USDA published a document titled *Contracting with Food Service Management Companies: Guidance for School Food Authorities*<sup>11</sup> to guide districts in the management of their contracts with food service management companies. In Chapter 7: SFA Monitoring and Recordkeeping Responsibilities, it states:

The SFA must monitor the billing invoices to ensure the number of meals served is reported correctly, the value of USDA Foods received is credited to the SFA for both “brown box” foods and processed end-products, and that USDA Foods are used in meals served.

## COMMENDATION

**The district has a thorough process to monitor the invoicing of its FSMC contract.**

## FINDING 5-9

The district is not effectively managing meal services times or its lunchroom space. Moreover, there is a lack of appropriate kitchen equipment and preparation space for the types of menu items purchased. There is only one kitchen and lunchroom for meal preparation and service to the entire student body, which is approximately 1,000 students. Currently, the lunchroom has seating for 385.

Breakfast for elementary students starts at 7:30 am and ends at 7:50 am. Breakfast for the middle school students does not start until 8:50 am, creating a one-hour gap. Breakfast is served to the high school students from 9:40 am to 10:00 am. Total breakfast service runs for 2.5 hours which is inefficient for the kitchen staff as they have to keep the breakfast service open while also starting lunch preparation. Staff are tied up serving breakfast during the same time as lunch preparation is going on.

The same scenario plays out during lunchtime. Elementary students are served at 11:40 am, which is less than two hours after breakfast service ended. Lunch is served until 2:10 pm. The district has determined it best not to have the middle and high students in the lunchroom at the same time even though there would be enough seating for the two groups. There is space within

<sup>11</sup> <http://www.fns.usda.gov/sites/default/files/FSMCguidance-sfa.pdf>, updated in May 2016.

the existing building footprint for additional seating. This meal service schedule has created a very inefficient meal preparation and service and has resulted in the need for a greater number of kitchen staff than industry standards.

The size of the kitchen and serving area is inadequate for the number of meals served. The FSMC uses a mainly scratch type of food preparation which is commendable and has helped to raise meal participation. In addition, they offer more than one entrée choice, a fruit and vegetable bar for all students, and a salad bar for the secondary students and adults. During the day of observation the consulting team observed cinnamon roll and holiday cookies preparation totally from scratch. There was inadequate table space for this baking preparation as well as breakfast burritos being assembled.

Preparation of the salad bar components, as well as the set up takes one staff person to complete. On the day of observation only six students chose the salad bar option as well as several adults. The director said some days there are as many as 25 students. The consulting team observed all the remaining items on the salad bar thrown away, which was a large volume and high food cost. The small percentage of students who choose the salad bar does not warrant the high cost in labor and food. The district's previous consulting team, used before the FSMC, came to the same conclusion. There are other options widely used in school programs such as individual entrée salads and cold sandwiches and wraps that would be a better option. They could be served out of a merchandiser that would take up less space than the salad bar and would relieve congestion. Such a merchandiser could also be used for assorted cold beverages if the district decides to start selling some à la carte items. **Exhibit 5-17** shows examples used in another district.



**Exhibit 5-17**  
**Examples Pre-Package Salads and Wraps and Merchandiser at Another District**



Source: Prismatic file photos

**RECOMMENDATION**

**Explore options for reconfiguring the kitchen and serving line for more efficient meal service.**

The district should explore the possibility of expanding the kitchen area by knocking out the wall separating it from the cafeteria. This would provide the potential for a reconfiguration of the kitchen preparation area as well as the serving area. The serving line could be bumped out to where the wall was located using a roll down metal opening covering. This would create more

preparation space and a less congested serving area. It also would create space for additional kitchen equipment, such as a steamer, that was noted as needed by numerous kitchen staff during interviews.

District administrators should also reconfigure the current daily schedule to one that staggers releasing middle and high school students in one meal period as opposed to the current practice of two separate meal periods. This should be done for both breakfast and lunch. There is no regulation requiring the separation of those grades; the consulting team has observed it to work without incident in numerous districts.

In addition, the director and FSMC should explore alternative food items that would reduce the space and time need for preparation yet maintain the desire for scratch cooking. Until the kitchen/cafeteria renovation is completed, they should adjust the types of items purchased and recipes used to accommodate the lack of adequate space and cooking equipment.

### **FISCAL IMPACT**

The costs for a kitchen reconfiguration are difficult to estimate until an analysis is performed, but it is likely that some could be completed using existing bond funds that do not end up being needed for current projects. The recommendation for a change in food items can be implemented with existing resources.

### **B. TECHNOLOGY**

Oklahoma is striving to further implement technology into all classrooms. For example, the first goal of the 2004 Oklahoma Plan for Instructional Technology/Telecommunications was that all Oklahoma students would achieve technological literacy by the eighth grade.

The Foundation for Excellence in Education's Digital Learning Council introduced the *10 Elements of High Quality Digital Learning* in the fall of 2010. These elements identify action to be taken by lawmakers and policymakers to promote a high quality education for all students. The Digital Learning 2014 State Analysis compared Oklahoma with the national average on each of the elements (**Exhibit 5-18**). Overall, Oklahoma earned a 77 percent or C+ on this report card. Oklahoma's biggest areas of concern were:

- Assessment and Accountability – non-use of evaluative outcomes-based student-performance data for virtual charter schools, online providers and online courses, and subsequent closure due to poor performance; and
- Delivery – lack of state actions to ensure broadband access and effective data use.<sup>12</sup>

However, Oklahoma scored high in providing student access to quality digital content.

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<sup>12</sup> This analysis has not been updated by Digital Learning Council.



**Exhibit 5-18**  
**Digital Learning 2014 State Analysis: Oklahoma**

10 Elements of High Quality Digital Learning	Oklahoma Grade & Percentage		National Average Grade & Percentage	
	Grade	Percentage	Grade	Percentage
1. Student eligibility: All students are digital learners.	D+	67%	D-	61%
2. Student access: All students have access to high-quality digital content and online courses.	A	100%	C	75%
3. Personalized learning: All students can customize their education using digital content through an approved provider.	C	75%	C+	77%
4. Advancement: Students progress based upon demonstrated competency.	B-	81%	F	59%
5. Quality content: Digital content, instructional materials, and online and blended learning courses are high quality.	A-	92%	A-	93%
6. Quality instruction: Digital instruction is high quality.	B-	82%	B-	84%
7. Quality choices: All students have access to multiple high-quality providers.	C+	79%	C-	74%
8. Assessment and accountability: Student learning is the metric for evaluating the quality of content and instruction.	F	58%	D+	68%
9. Funding: Funding creates incentives for performance, options, and innovation.	C	75%	F	54%
10. Delivery: Infrastructure: Infrastructure supports digital learning.	F	56%	D-	60%

Source: <http://www.digitalllearningnow.com/report-card/state/2014/oklahoma-3/>

Oklahoma was previously one of 22 states and one territory to create K-12 assessments aligned to Common Core State Standards through the Partnership for the Assessment of Readiness for College and Careers (PARCC).<sup>13</sup> A major impact of PARCC's Common Core assessments, and a concern of many Oklahoma school districts, involved technology. Oklahoma has transitioned to a new vendor, Measured Progress, for the Online Oklahoma School Testing Program (OSTP) to assess student mastery of the Oklahoma Academic Standards rather than the Common Core Standards; however, technology remains a major component of the assessment process. The State Department of Education (SDE) has released technology guidelines<sup>14</sup> for the Measured Progress assessments for schools so they will be properly equipped and ready to administer the tests this spring and in future retesting sessions.

<sup>13</sup> <http://www.parcconline.org/>

<sup>14</sup> [https://oklahoma.onlinehelp.measuredprogress.org/wp-content/uploads/sites/5/2018/02/OSTP\\_Technology\\_Guidelines\\_Spring\\_2018\\_v2.pdf](https://oklahoma.onlinehelp.measuredprogress.org/wp-content/uploads/sites/5/2018/02/OSTP_Technology_Guidelines_Spring_2018_v2.pdf)

**Exhibit 5-19** illustrates the most current assessment technology specifications that districts in Oklahoma must consider as they administer assessments in 2018-19. These include:

- Required Specifications – Unlike specifications provided in previous years, the technology guidelines are required. In the past, there were minimum and recommended specifications. These specifications provide the levels of computer and network capacity that are required to provide a smooth testing experience for students. Bolded items are new from previous specifications.

**Exhibit 5-19**  
**Oklahoma Spring 2019 OCCT Assessment Technology Specifications**

Component	Requirement
Connectivity	Must be able to connect to the Internet via wired or wireless networks
CPU	1.2 Ghz
Memory	<b>2 GB</b>
Screen Size	9.7” screen size or larger/”10-inch class” tablets or larger
Screen Resolution	1024 x 768
Windows Desktops/Laptops	Windows 7, 8.1, <b>10</b> 32-bit, 64-bit
Mac Desktops/Laptops	10.9-10.13
Linux Desktops/Laptops	<b>Ubuntu 14.04.5 LTS, 16.04.3 LTS, Fedora 25, 26</b> <b>(64-bit only)</b>
Windows-Based Tablets/Netbooks 2-in-1	<b>Windows 8.1, 10 (32-bit and 64-bit)</b>
Apple iOS	<b>iPad running iOS 11.2.5</b>
Chrome OS for Chromebooks	<b>62-64</b>
Browsers (Used for Practice Test Only)	<b>Internet Explorer 11</b> <b>Firefox 56 or newer</b> <b>Chrome 64 or newer</b> <b>Safari 9 or newer</b> <b>Microsoft Edge 40.15 or newer</b>
Input Device Requirements for All Desktops/Laptops	Keyboard – wired or wireless/Bluetooth Mouse or Touchpad
Headphone/Earphone/Ear Buds	Headphones/earphones/ear buds are required for students who have a text-to-speech accommodation

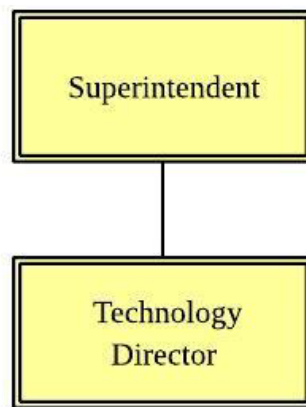
Source: [https://oklahoma.onlinehelp.measuredprogress.org/wp-content/uploads/sites/5/2018/02/OSTP\\_Technology\\_Guidelines\\_Spring\\_2018\\_v2.pdf](https://oklahoma.onlinehelp.measuredprogress.org/wp-content/uploads/sites/5/2018/02/OSTP_Technology_Guidelines_Spring_2018_v2.pdf)

The stated technology requirements further illustrate the importance of an adequate technology infrastructure and effective long-range planning to accommodate an increasing number of students participating in online testing in the coming years.

SPS uses a variety of technology tools to communicate with parents and the community. The district has had a full-time technology director in the past to address issues and implement new initiatives. SPS utilizes a consulting company to assist with acquiring E-rate funding for technology. The district has SMARTBoards in place. Staff has received initial training on the SMARTBoards.

The current technology organization for SPS is shown in **Exhibit 5-20**. The district has received technology support from a full-time technology director. The position is currently vacant due to the technology director's death.

**Exhibit 5-20**  
**SPS Technology Organizational Structure**



*Source: Created by Prismatic, December 2018*

**FINDING 5-10**

The district has experienced the death of the technology director. SPS' technology was well maintained in the past.

As the technology director's death was unexpected, critical technology access and services are nonexistent. SPS does not have anyone to respond to daily technology questions or issues or assist in the planning and implementation process. Passwords for district resources are not accessible or known. Staff members and administrators are unable to login to existing systems including the district wireless network. The technology director ensured the security of district resources, but was the only person with access to passwords and plans for technology implementation.

A 2015 nationwide survey of 173 district officials, principals, and teachers found that 71 percent believed a specific office or department should be dedicated to technology in their district. The survey also found that 53.9 percent of those surveyed felt the technology training available was insufficient.<sup>15</sup>

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<sup>15</sup> [https://s3.amazonaws.com/dive\\_assets/rpls/sys/State\\_of\\_EdTech\\_Survey\\_2015.pdf](https://s3.amazonaws.com/dive_assets/rpls/sys/State_of_EdTech_Survey_2015.pdf)

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## RECOMMENDATION

### Hire a full-time technology director.

The superintendent should work with the principals and other stakeholders to identify the kinds of skills that would be most needed in a technology director. A job description should be developed, and the salary schedule posted immediately. The support salary schedule dated July 9, 2018, lists a salary range of \$53,750 to \$75,950 for the technology director position. The district should consider an interim director in the meantime.

### FISCAL IMPACT

This recommendation can be implemented with existing resources.

### FINDING 5-11

Historically, SPS has relied on one person for everything related to technology. While systems were operating well under the former technology director, no other district staff member is trained to assist or take over duties.

In focus groups and interviews with staff, the general sentiment was that while systems have been well maintained in the past, no one other than the deceased technology director handled support in the district. If there was a problem, staff emailed or called the technician. He addressed the issues and managed all system passwords and access. No tracking process is in place to document the kinds of issues incurred or when they were completed. Additionally, no documentation exists on passwords or system access.

The International Society for Technology in Education (ISTE), an internationally recognized nonprofit organization dedicated to advancing the effective use of technology in K-12 education, has developed a Technology Support Index rubric to assist school districts in determining their needs in a variety of technology support areas. According to ISTE, “the Technology Support Index is designed to provide school districts with models for an efficient and effective technology support system based upon best practices in nationally recognized school districts. With the TSI framework and self-assessment tool, school districts can appraise the quality and efficiency of their current technology support program and learn about possible improvements they can employ.”<sup>16</sup>

In a recent version of the ISTE Index, four domains are assessed including equipment standards, staffing and processes, professional development, and enterprise management. School districts are ranked into one of four categories for various aspects of technology use and support. The assessment levels of efficiency are:

- low efficiency – a strategy or domain that needs attention and improvement;

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<sup>16</sup> <http://tsi.iste.org/>

- moderate efficiency – these strategies address major technical support issues but with incomplete implementation or inadequate resources;
- satisfactory efficiency – these strategies are generally effective in sustaining the technology infrastructure and promoting the integration of technology in teaching and learning; and
- high efficiency – these strategies make the most of available technology support resources, emergent problems are rapidly detected, solutions are quickly implemented, and problem sources are identified and corrected.

Exhibit 5-21 shows the ISTE Technology Support Index.

**Exhibit 5-21**  
**ISTE Technology Support Index**

Index Area	Efficiency of Technology			
	Low	Moderate	Satisfactory	High
Computer to Technician Staffing Ratio (# of computers : technician)	250:1	150:1 to 250:1	75:1 to 150:1	Less than 75:1

Source: [www.iste.org](http://www.iste.org), 2008

An article in Edutopia Magazine, “Technology Integration Research Review: Avoiding Pitfalls,” points to the most common complaints teachers make about technology integration. Specifically cited was a lack of adequate support, “hardware is purchased in bulk but then left to gather dust, or software is mandated but there is no tech support to make sure it runs smoothly.”<sup>17</sup>

## RECOMMENDATION

### Implement a cross-training program to ensure critical processes can be performed.

Maintaining district equipment and troubleshooting assistance should be primarily handled through a technology department. However, given current budget constraints, hiring additional support staff is likely not feasible. To assist with basic troubleshooting at the sites, the district should implement a cross-training program for teacher technicians.

The district should consider a teacher technician program with staff members cross-training for password and system management and equipment repair and servicing. Having sufficient technical support is critical to successful technology use, both in classrooms and in administrative offices.

## FISCAL IMPACT

The fiscal impact of this recommendation depends on the number of teacher technicians in the program. The consulting team recommends three teacher technicians. That would allow for assignments to elementary, middle, and high school. A \$500 stipend is recommended for the

<sup>17</sup> <https://www.edutopia.org/technology-integration-research-avoiding-pitfalls>

teacher technicians.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Develop a teacher technician program.	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)

### FINDING 5-12

The district does not have a current dedicated technology budget. There is no clear information on the total amount spent on technology at SPS.

SPS lacks a current district-wide technology budget. The most recent technology budget is found in the Technology Plan 2014-17. SPS draws on a number of sources to fund technology expenditures including grants, E-rate monies, state and federal funds, Title programs, and the General Fund. There is no clear information on the total amount spent on technology across the district.

In staff surveys, when asked about the lifespan of district technology equipment, 88 percent *agreed* or *strongly agreed* that equipment was operated past its useful lifespan (**Exhibit 5-22**). In onsite interviews and focus groups staff also expressed concerns about the age of equipment and the lack of funds needed to replace or maintain existing equipment. According to research from The Gartner Group, an independent technology research and consulting firm, the useful life of computers in public education is four to five years.

#### Exhibit 5-22 Staff Survey Results Regarding Technology Equipment Lifespan

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The district's technology equipment is often used past its useful lifespan.	27%	61%	0%	12%	0%

*Source: Prismatic Survey, December 2018*

To achieve satisfactory efficiency status on the International Society for Technology in Education (ISTE) Index, equipment should be placed on a four- to five-year life cycle. Some categories, such as student lab computers, may require more frequent replacement than those computers used in administrative capacities.

Technology can no longer be an afterthought or add-on in today's classrooms. It must be purposely integrated into instructional strategies and practices. In order for that to happen, funding must be available to ensure that classroom technology is up-to-date and usable. Several studies, including research by the Gartner Group, report that organizations should be budgeting between four and six percent of their overall budget to technology.

### RECOMMENDATION

**Establish a district technology budget that is realistic and supportive of classroom needs.**

The superintendent should work with the technology committee and new technology director to develop guidelines for an annual technology budget. The technology budget should be closely tied to the district strategic and technology plans.

According to the district Technology Plan 2014-17, \$118,000 was budgeted in 2017. Given the budgetary restraints, the consulting team recommends SPS continue to budget \$118,000 for 2019-2020. A reduced budget is possible in the following year due to retrofitting the building. A suggested breakdown is shown in **Exhibit 5-23** below.

**Exhibit 5-23  
Example Technology Budget**

Items	2018-19	Cost
Hardware	Computers, printers, video equipment, scanners, servers	\$70,000
Maintenance	Systems maintenance and operations cost for ineligible hardware and software, salaries of technology staff	\$3,000
Professional Development	Ongoing technology related training for technical staff, teachers and librarians	\$10,000
Retrofitting	Electrical wiring, building modifications, renovations and repairs to support technology infrastructure	\$10,000
Software	End user applications	\$70,000
	<b>Total</b>	<b>\$118,000</b>

*Source: SPS Technology Plan, 2014-17*

**FISCAL IMPACT**

The fiscal impact of this recommendation will depend upon the replacement schedule adopted and the ability to hire needed staff. The implementation of a four- to five-year replacement cycle is recommended. The district should begin with the budget estimates noted in the updated district technology plan.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Establish a district technology budget.	(\$118,000)	(\$108,000)	(\$108,000)	(\$108,000)	(\$108,000)

**FINDING 5-13**

The district’s Technology Plan was developed by the superintendent, technology director, and three classroom teachers. The plan is dated January 1, 2014.

The district has not formalized a process for including multiple stakeholders on a technology committee. From the district’s technology plan, a technology committee that included teachers was in place, but currently no such committee exists. Multiple stakeholders include parents,



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students, community members, and businesses. Community and business partnerships could provide additional perspective in planning, implementation, and evaluation.

Although the district's technology plan meets state and E-rate funding requirements, it is lacking several components, and is out of date. Dated January, 2014, the plan does not reflect the current state of technology at SPS, its' needs, or goals. Additionally, there is no evidence of committee participation by parents or community members, and the technology plan indicates only participation of district personnel. The plan includes general goals for an equipment replacement cycle, additional staff development, and increased student access. No specific plan exists for implementation or evaluation of technology and its use. Observation is listed as the key evaluation measure. The addition of these components, along with specific stakeholders, could further enhance the technology plan.

Budgetary information is included in the plan, including projected costs. The plan lists E-rate and general funds as revenue sources. However, the plan lacks details about how the district will gather or use assessment data to determine subsequent areas of need, or administrator observation and evaluation of technology use.

The National Center for Technology Planning recommends five phases for an effective planning model:

- **Phase 1: Recruit and organize the planning team.** It is important that the planning team consists of all stakeholder groups, and members should excel in planning and communication skills. Stakeholders may include technology specialists, district leaders, parents, students, community members, and business leaders.
- **Phase 2: Research.** This phase consists of a needs assessment and an effort to identify the technologies that can be applied to those needs and ascertain how they can be applied.
- **Phase 3: Construct the technology plan.** This phase focuses on applying the research to establish the district's vision/mission and to define the goals and objectives that will lead to fulfilling that vision and mission.
- **Phase 4: Formalize the planning.** This phase culminates into a comprehensive document that analyzes the present state of the district with respect to technology, articulates specific goals and objectives, incorporates clearly defined strategies and budgetary plans to realize the desired state of technology in the district, and includes a process for evaluation.
- **Phase 5: Continually implement, evaluate, and revise.** This phase deals with the ongoing implementation, evaluation, and revision of the plan to ensure progress is made.

The consulting team found little evidence that SPS has updated the plan since it was written in 2014, although many goals have been achieved. The existing plan does not contain evidence of a comprehensive needs assessment or survey results. Key to the planning process is conducting periodic needs assessments and structuring the plan around the results. Additionally, there are no parents, students, community members, or business leaders on a planning team. During the

review, the consulting team found no evidence of a technology planning committee in place since the 2014 technology plan was developed.

## **RECOMMENDATION**

### **Improve the technology planning process and develop a long-term strategic plan for technology with input from a variety of stakeholders.**

Establishing a committee that includes staff and outside stakeholders could provide additional perspectives in planning, implementation, and evaluation of technology. Such stakeholders could include parents, students, community members, and businesses as partners. Including teacher leaders on the technology committee could also enhance opportunities for strategic planning and could increase buy-in among staff members, as well as increase understanding of what is possible.

The SPS technology plan should be a current, comprehensive document that drives technology expenditures, implementation, and decision-making. The plan should be tied to the district strategic plan and professional development plan. The district should formalize and utilize a process for including a technology committee in technology strategic planning and the development of a long-term planning document. The superintendent should direct the technology committee to develop and periodically update a comprehensive technology plan. The plan should be achievable and based upon the current state of the district. By incorporating a clearly articulated vision statement and mission statement, followed by specific goals, measurable objectives, adequate funding and detailed evaluation process, the district ensures that technology purchases and services are in line with the goals set forth in the plan and result in student achievement gains. The plan and progress should then be communicated to all stakeholders to ensure a common understanding and purpose. To facilitate effective use of technology funds, the technology committee should:

- periodically review the technology plan for accuracy and make necessary additions and deletions;
- develop hardware and software standards, and review them with all personnel;
- centralize the software purchasing process to avoid purchases that cannot be supported or will not function properly on the district's equipment;
- recommend the types of computer equipment that should be purchased and the most effective distribution of that equipment;
- develop a training program for all staff; and
- establish a policy on the purchase of extended warranties for hardware and the standardization of operating systems, antivirus, applications, and office software.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 5-14**

The district has no process in place to record or track maintenance issues. Currently, no documentation, formal process, or procedure exists.

The district would benefit from developing and implementing procedures for submitting and tracking technology issues and resolutions. There is no observance or follow through of a formal, documented process for addressing computer issues such as set-up, configuration, software installation, and repair. In the past, teachers, support staff, and administrators called or emailed the technology director to report support issues and request assistance. This lack of documentation and procedure leads to unresolved or incomplete repairs; plus, there is no supporting information available to consult when purchasing equipment or accounting for man-hours on a task. This absence of processes and procedures leads to inefficiencies, additional costs, and unresolved support issues.

Time and manpower needed to provide appropriate responses to technology-based problems at SPS are limited. Additionally, the absence of support procedures and criteria, incident requests and completion data, communication and follow-up make staff members less effective in supporting technology.

**RECOMMENDATION**

**Complete and implement technology support procedures and a technology work order system that includes features such as logging, priority assignment, and completion.**

With an online work order system and written procedures, staff will be able to access it from the district network to report issues or dilemmas with technology. If fully implemented and utilized, the system should speed response times and provide a database for identifying and analyzing systemic problems.

The district should implement procedures and documentation processes to track district technology issues. Detailed support data provides staff with needed information when considering new equipment purchases, retiring existing equipment or accounting for man-hours on task.

One solution that SPS should consider is Zoho Desk, a cloud-based help desk ticketing software.<sup>18</sup> Zoho Desk allows the technician to document and track technology incidents, provide work queues, reminders and prioritization, as well as self-help troubleshooting for users. Detailed reports are available to determine the average resolution time, number of tickets opened and closed. A free version is available that allows for three technicians or agents.

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<sup>18</sup> <https://www.zoho.com/desk/>

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 5-15**

SPS does not have a district-wide inventory of technology. While the Technology Plan 2014-17 calls for a 4-year replacement cycle, no evidence exists that a replacement cycle is in place.

The district lacks a comprehensive inventory system for recording all technology hardware in the district. Neither the district nor individual sites have a formal method for documenting technology purchases and inventories.

There are few details outlining how many devices exist in the district, along with serial numbers and age of the device. Without a comprehensive inventory system in place, planning for future technology implementation is difficult. The Technology Plan indicates that a physical count or inventory is taken at the end of each year, but no tracking of purchases is made other than individual receipts. Cumulative information is not available. While this is a good starting point, no procedure or process exists for inventorying district equipment.

**RECOMMENDATION**

**Adopt a formal inventory process and procedure for computers and other technology equipment that includes assigning new equipment and maintaining a record of all technology devices.**

Items should be recorded in a digital file by serial number, tagged, and have their location and person of primary responsibility noted, along with the date of purchase. Multiple digital copies of this file should be saved and given to the superintendent and principals. Updates should be made as new purchases are received and obsolete equipment is retired. At a minimum, an annual inventory of all technology equipment should be conducted with pertinent device tracking information.

A procedure is needed for assigning new equipment and maintaining a record of all technology devices. Procedures for developing the entire district inventory should include specific steps regarding existing computers and other technology as well as subsequent purchases. The inventory should be periodically and systematically updated. For SPS, an Excel spreadsheet maintained by the technology director would be sufficient.

When new equipment is delivered, it should be received by the responsible technology staff member or designee and then processed into the inventory system. Physical inventories should be taken and status reports should be generated. Having the receiving, tagging, assignment and inventory processes standardized will prevent confusion about the count, value, age, and location of district technology assets.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

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**FINDING 5-16**

The district is currently having to deal with technology recovery as no plan was in place. While a general disaster recovery plan exists, the district lacks a written data backup and disaster recovery plan specifically for technology.

In the event of a natural disaster or severe power surge, or the death of the technology director, the district does not have procedures documented to ensure that its critical data, systems, and programs can be accessed or brought back to pre-disaster status. By failing to document a backup and recovery plan, system knowledge, recovery information, and responsibility are lost. A disaster recovery plan would aid the district in reloading data, programs, and systems, as well as recovery of hardware and software, in the event of a disaster or loss.

While a few backup systems are in place, including vendors storing data and an external hard drive, the district lacks the policies, procedures, and assigned personnel needed to mitigate the damage and reestablish critical data. **Exhibit 5-24** defines the process of developing an effective disaster recovery plan.

**Exhibit 5-24  
Key Considerations in Disaster Planning**

Area	Considerations
<p><i>Planning for the impact of an unexpected or catastrophic event on your school</i></p>	<ul style="list-style-type: none"> <li>• Identify a coordinator and/or team with defined roles for preparedness and response planning. Potential team members may include: Information Security, Operations, Systems, Police/Security, Physical Plant, Insurance, Legal Affairs, Public Affairs, Personnel Department, Comptroller, Audit Division, Safety Office, and/or Emergency Response Team.</li> <li>• Conduct a business process and services inventory to understand which processes are mission-critical to the school.</li> <li>• Determine acceptable levels of service during the recovery period, and what processes need to be maintained or restored first to keep the school running.</li> <li>• Identify essential employees and other critical inputs (sub-contractors, services, logistics, etc.) required to maintain business operations by location and function during the event.</li> <li>• Conduct a technology asset inventory to determine and document the mission-critical technology components, their location, how they're configured, and who is responsible for management.</li> <li>• Once key components are identified, determine what measures should be taken to protect and recover them.</li> <li>• Understand the rules or regulations governing your business operations. If you had a business failure, would you be able to maintain compliance? (HIPAA, FERPA, CIPA, etc.).</li> </ul>
<p><i>Assessing your data and technology needs in the event of a failure in operations</i></p>	<ul style="list-style-type: none"> <li>• Determine the status of the existing disaster recovery plan. Do you have one and is it maintained? Have you tested the plan?</li> <li>• Determine vulnerability of your organization's technology infrastructure to natural disasters, including floods, fires, earthquakes, as well as flu pandemics.</li> <li>• Set clear recovery time objectives for each of your business/technology areas.</li> <li>• Determine the need for off-site data storage and backup.</li> <li>• Develop a technology plan that includes hardware, software, facilities, and service vendors.</li> <li>• Secure clear understanding and commitment from vendors on your plan.</li> <li>• Secure a backup vendor to perform that critical function if your primary vendor is impacted by a business failure.</li> <li>• Perform security risk assessments around specific threats where possible. Examples of data security include: virus protection, intrusion detection, hacker prevention, network events, component failures, and systems crashes.</li> <li>• Assess, if possible and per prior events, how quickly and accurately your operations were restored by existing staff. What were the lessons learned so they can be addressed in future planning?</li> <li>• Determine the effectiveness of your data backup and recovery policies and procedures. Are the procedures fully documented and an appropriate staff member responsible for the maintenance of that documentation?</li> <li>• Perform a data recovery test. Was the test successful?</li> <li>• Prepare an incident plan for mitigating a security breach. Audit annually, as security threats can change.</li> </ul>

**Exhibit 5-24 (continued)**  
**Key Considerations in Disaster Planning**

Area	Considerations
<i>Communicating your plan to employees, students and their families, and vendor partners</i>	<ul style="list-style-type: none"> <li>• Determine who needs to be contacted with critical information. Build distribution lists and maintain for accuracy.</li> <li>• Develop a contact plan to reach employees: wireless, home, etc.</li> <li>• Ensure Student Information System (SIS) data is accurate to ensure alerts can be delivered to your community.</li> <li>• Ensure employees know where to receive information and updates about whether they can return to work, or if they are to report to a different location (Internet, conference bridges, etc.).</li> <li>• Ensure mission-critical employees know their role in the plan and have access from remote locations (i.e., home broadband, phone, VPN for security).</li> <li>• Make sure the plan can be executed by alternate employees who are not necessarily the “expert” in cases where those employees cannot be reached.</li> <li>• Ensure cross-functional training is established and refreshed on a regular basis.</li> <li>• Determine the need for a designated recovery site for your people to resume work. Plan for communications, data connectivity, desktops, and workspace at that site.</li> <li>• If you require support from vendor partners, ensure they also have a documented plan that complements your needs. Review periodically to keep the plan current.</li> </ul>
<i>Coordinating with external organizations and helping your community</i>	<ul style="list-style-type: none"> <li>• Collaborate with other local government agencies, including first responders, to share your plans and coordinate mock emergency drills to ensure coordination in the event of an emergency.</li> <li>• Share best practices with business leaders in your community, chambers of commerce, and business associations to improve community response efforts.</li> </ul>

*Source: Consortium of School Networking, February 2015*

## RECOMMENDATION

### Develop and test a disaster recovery plan that includes the district’s critical data, systems, and programs.

The district should address this problem immediately. The district should develop and test a disaster recovery plan that includes the district’s critical data, systems, and programs. The new district technology director and superintendent can lead the process of developing a plan adequate to meet the needs of SPS. The costs associated with losing vital information, services, and equipment in the event of a disaster could greatly impact the district.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-17

The district’s planning for one-to-one was led by the now deceased technology director. Access to accomplishments and planned next steps are unavailable.

No written implementation plan is accessible for one-to-one in the district. In focus groups and interviews, staff noted concerns about moving forward with the project. Wireless access points



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have been installed throughout the district in preparation for a one-to-one initiative. However, passwords for accessing the wireless are unknown.

A number of articles and research projects exist to assist schools with one-to-one computing. One such article published by the Center for Digital Education relates the 15 most common traits for successful K-12 implementations.<sup>19</sup> The main theme in the article is that devices alone will not impact learning. More importantly, an instructional shift must take place with ongoing professional development. Another article in Education Week, “One-to-One Laptop Initiatives Boost Student Scores, Researchers Find,”<sup>20</sup> supports this view stating, “teachers are slow to transform their practice.” The article further points to research to date and the impact in K-12 schools. The goal of one-to-one computing is to “enable teachers... to deliver more personalized content to students to boost students’ technology skills, and to empower children to do more complex and creative work.”

## RECOMMENDATION

### Revisit and adjust the technology plan to achieve one-to-one capability district-wide.

The superintendent, principals, new technology director, and teacher representatives should evaluate what has taken place and determine if one-to-one computing is in the best interests of students at SPS and needed next steps in the implementation process. The district committee should look to similar districts and learn from their experiences. One peer district, Caney Valley, has developed an implementation strategy and documentation that can assist Silo. If the committee chooses to move forward with a one-to-one initiative, a timeline should be developed for a pilot project, evaluation, and subsequent implementation.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-18

SPS enhances communication with parents and the community using a variety of technology tools. The district regularly uses social media to communicate with external stakeholders. SPS has implemented a notification system to increase communication with parents, patrons, staff, and students.

This practice supports stakeholder engagement and effective communications. SPS uses a Facebook group which allows parents, teachers, and staff to post questions, pictures, and relevant information. SPS posts pictures from events, fundraiser details, as well as updates to keep parents informed. This method of communication is free and provides parents quick and easy access to the information.

The district provides a Parent Portal through the district website. The Portal allows parents to view assignments and grades that teachers have posted. Additionally, SPS uses text messaging

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<sup>19</sup> <http://www.govtech.com/education/news/game-changers-one-to-one-computing.html>

<sup>20</sup> [https://blogs.edweek.org/edweek/DigitalEducation/2016/05/one-to-one\\_laptop\\_test\\_scores.html](https://blogs.edweek.org/edweek/DigitalEducation/2016/05/one-to-one_laptop_test_scores.html)

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through Messenger to communicate with staff, parents, and students. According to staff interviews and focus groups, text messaging and automated phone calls are used to inform users of school closures, activities, etc.

A report by Civic Enterprises, *Raising Their Voices: Engaging Students, Teachers, and Parents to Help End the High School Dropout Epidemic* (Bridgeland, Balfanz, Moore, & Friant, 2010)<sup>21</sup> points to the importance of communication in achieving student success. The report emphasized using technology capabilities to provide access to information for parents, students, and school personnel. The importance of communicating with parents not only to address a problem, but also to share positive aspects of the school experience was highlighted. SPS is making efforts to address these specific communication issues through the use of the Facebook group, the district website, and text messaging.

## COMMENDATION

**SPS enhances parent and community communication by using a variety of technology tools.**

### FINDING 5-19

The district has little or no technology staff development or plan. No technology integration sessions are planned or scheduled for staff.

During focus groups and interviews, staff reported a wide range of technology skills among the teaching staff. Initial training was provided when SMARTBoards were purchased but no follow-up training has been made available. Currently, staff development sessions are held at the start of school and focus on state requirements such as school security, and classroom management. Additionally, teachers related that when they request to attend sessions at other locations, administration is helpful in sending them. However, they do not always know what is available or what they need. Sessions with other districts were highlighted in focus groups as valuable for collaboration and increasing knowledge about technology initiatives.

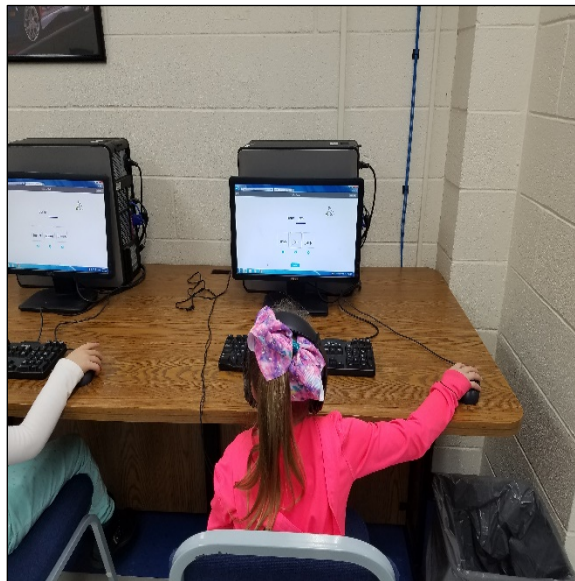
The district's Technology Plan 2014-17 includes a budgetary section on Educator Competencies and Professional Development. A budget of \$5,500 is allocated for this area.

In walkthroughs during the on-site portion of the review, the consulting team found limited examples of technology being used in the regular classrooms. A few teachers were using SMARTBoards to enrich instruction (**Exhibit 5-25**). Computers and other technology equipment were in use by students in one high school classroom. Elementary computer labs were in use (**Exhibit 5-26**). Most technology was used or controlled by teachers rather than students.

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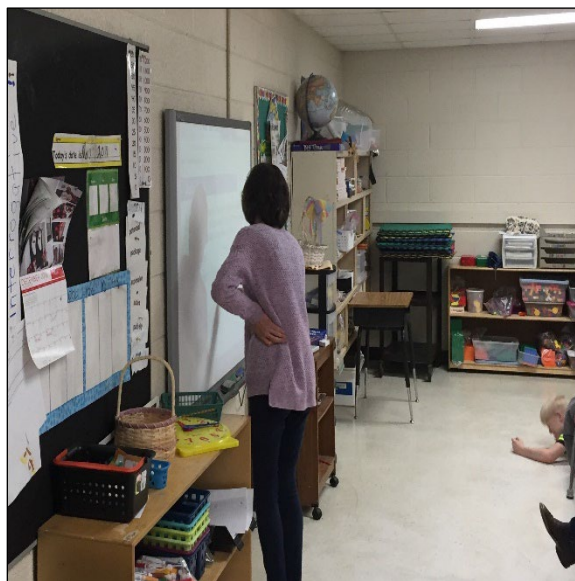
<sup>21</sup> Bridgeland, J. M., Balfanz, R., Moore, L. A., & Friant, R. S. (2010). *Raising their voices: engaging students, teachers, and parents to help end the high school dropout epidemic* (PDF file). Washington, DC: Civic Enterprises. Retrieved from [http://www.civicerprises.net/MediaLibrary/Docs/raising\\_their\\_voices.pdf](http://www.civicerprises.net/MediaLibrary/Docs/raising_their_voices.pdf)

**Exhibit 5-25**  
**Elementary Computer Lab**



*Source: Prismatic, December 2018*

**Exhibit 5-26**  
**High School Computer Classroom**



*Source: Prismatic, December 2018*

Possible causes for a lack of technology implementation and integration are the absence of district expectations and training. The ISTE Index identifies exemplary school districts as having these staff development practices related to technology:

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- A comprehensive staff development program is in place that impacts all staff. The program is progressive in nature and balances incentive, accountability, and diverse learning opportunities.
  - On-line training opportunities are provided for staff both on-site and remotely and represents a diversity of skill sets.
  - A process and delivery system has been established for just-in-time training organization-wide and is used consistently.
  - Expectations for all staff are clearly articulated and are broad in scope. Performance expectations are built into work functions and are part of the organizational culture.
  - Technical staff receives ample training as a normal part of their employment, including training towards certification.
  - Basic troubleshooting is built into the professional development program and is used as a first line of defense in conjunction with technical support.

## RECOMMENDATION

**Develop and implement an instructional technology plan in conjunction with a training program that focuses on increasing teachers' basic technology skills and integrating technology into the instructional program.**

Ongoing opportunities for professional development should be available to teachers, administrators, and support personnel at all levels. It should focus on the specific needs of individual staff and be sustained through coaching and periodic updates.

The technology committee and technology director should build upon the foundation already laid with previous training. The district should complete a needs assessment to identify areas for development. The next step is to identify minimum expectations for teacher skills in the district.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-20

A wireless Internet project has been started but not finished. The wireless network is not accessible to students or staff. Wireless access points have been installed throughout the district. The wireless network shows up under Wi-Fi networks, but no one in the district knows the password or how to access the network.

Wireless provides an easy solution to technology access for schools with limited resources. According to the SPS Technology Plan 2014-17, wireless access points are positioned to operate mobile laptops and other devices from anywhere on campus. Plans included additional wireless hardware to enable redundant connections for each campus building. During onsite interviews

and focus groups, staff shared concerns that the wireless network was in place but could not be accessed due to lack of passwords. A lack of access to the wireless password means no access for personal devices, whether district-, staff- or student-owned.

Students and staff would benefit from the opportunity to use personal technology on the district network through wireless access. Schools reap a number of benefits through the use of wireless networks in addition to increased student access. Everyone with a wireless device and password can access email, the Internet, and district servers through a high-speed connection. Additional access points and increased infrastructure can be added as needed.

A recent online article, “Why Wi-Fi is Needed in Schools,”<sup>22</sup> notes that many devices are only accessible through Wi-Fi, such as tablets and smartphones. Lack of wireless access eliminates the potential of these devices for classroom use. Further noted was mobility restrictions of wired devices. In 2013, studies showed that 73 percent of teachers used mobile devices for teaching and learning, requiring Wi-Fi for Internet access.

## RECOMMENDATION

### **Complete and implement the wireless access system throughout the district.**

SPS has a wireless network in place. The superintendent should contract with a network service provider to access the existing network and retrieve passwords. An assessment of the current state of the network and placement of wireless access points should be conducted. After the analysis, existing access points may need to be relocated or additional access points purchased. The superintendent, new technology director, and principals should create a plan for tiered access to the network and passwords. According to the existing Technology Plan 2014-17, funds are budgeted for system maintenance and operations costs. A portion of these funds should be used to ensure the accessibility of the wireless network.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-21

SPS provides a website that allows parents to remotely check grades and administration to communicate with staff, students, and parents. The website is easily accessible, updated and maintained. The district contracts with a company to maintain and host the district website at a cost of \$4,499 annually.

Staff and parent survey results indicate satisfaction with the SPS website (**Exhibit 5-27**). All staff and almost 80 percent of parents feel that the current website is useful.

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<sup>22</sup> <http://wifischools.ca/what-our-kids-lose/>

**Exhibit 5-27**  
**Staff and Parent Survey Results Regarding the Website**

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	The district website is useful for staff, parents and students.	38%	63%	0%	0%	0%
Parent	The district website is a useful tool for me and/or my child.	37%	42%	15%	4%	3%

*Source: Prismatic Survey, December 2018*

### COMMENDATION

**SPS is commended for providing a website that allows parents to remotely check grades and administration to communicate with staff, students, and parents.**

### FINDING 5-22

SPS offers online course enrollment for students in grades K-12. In compliance with SB 2319, the SPS Online Program is available to students free of charge.

According to the SPS Student Manual, SPS offers, under special circumstances, online course enrollment for students, K-12. Students are enrolled through SPS with an Individualized Learning Plan for each student. Courses align with Oklahoma Standards and ongoing enrollment is available.

### COMMENDATION

**SPS is commended for offering online course enrollment for students in grades K-12.**

### FINDING 5-23

The district has limited funds for technology initiatives. The district has not sufficiently sought to identify additional funding sources and grants for technology purchases, upgrades, and associated training.

Currently the district relies on purchasing equipment using general fund dollars, or E-rate for technology support and infrastructure enhancement. All funding sources are limited.

According to administration and staff, SPS computer equipment is out of date. The district has not maximized its efforts to identify and approach additional funding sources and grant providers for technology purchases, upgrades, and professional development. Although the district has technology available, the technology is outdated and technological professional development is lacking.

In addition, interviews and focus groups indicate a need for professional development in several areas related to technology, including using existing equipment, effective curriculum integration, and the use of technology to enhance communication with students and parents. As state funding



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continues to be an issue for districts in Oklahoma, the district has limited funding for the intensive professional development that is needed to establish a high level of comfort. Acquiring additional funding through grants and outside funding sources could help the district enhance professional development opportunities for teachers and staff.

### **RECOMMENDATION**

#### **Seek additional funding sources and grants to support long-range technology planning.**

Given the current needs in technology and professional development and the impact of decreasing school funding, SPS should continue to identify and pursue grants. Technology grants are available through many sources, including the K20 Center, the Oklahoma State Department of Education, and the Oklahoma Department of Career and Technology Education. In addition to many other sites, the following websites contain updated lists of grants:

- <http://oklahoma.grantwatch.com>;
- <http://schoolfundingcenter.com>; and
- <http://www.gettedfunding.com/>.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 5-24**

SPS uses a consulting firm to assist with E-rate funding requests and documentation. The district currently uses an E-rate consulting firm to assist with the annual application and associated documentation. This service helps the district ensure it is receiving the maximum funding possible and reporting expenditures properly.

E-rate funds allowed the district to provide Internet access and telecommunications capabilities campus-wide. According to the Technology Plan 2014-17, SPS anticipated:

- \$315,514 in E-rate funding for 2015;
- \$324,980 for 2016; and
- \$333,390 for 2017.

As the E-rate program requires extensive documentation and adherence to rules that change annually, it is often difficult for smaller districts to receive all potential E-rate funding.

It is challenging for a district or district employee to conduct the necessary research, gather documentation, and request specific technology-related services through the E-rate application. Also, the funding mechanism has changed recently and allows for Wi-Fi equipment, installation, and maintenance funding. Relying on a consultant ensures the district meets the changing



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requirements and takes advantage of the new regulations, resulting in maximum funding for the district.

## COMMENDATION

**SPS is commended for using a consulting firm to assist with E-rate funding requests and documentation.**

### C. TRANSPORTATION

The primary objective of school transportation is to provide safe, timely, and efficient transportation services to students. Oklahoma's 7,600 school buses travel more than 67 million miles a year, carrying nearly 369,000 children every day.

School districts collectively operate the safest form of transportation in the country and, per the National Highway Traffic Safety Administration school buses are safer than any other form of public or private mode of transportation. Students are nearly 50 times more likely to get to and from school safely when riding school buses instead of riding in cars, and school buses are built with crash-safety features unmatched by any other type of commuter vehicle. They also help ameliorate some of the adverse environmental effects of mass automobile commute – each school bus filled replaces 36 cars in America, saving over two billion gallons of fuel and nearly 45 billion pounds of carbon dioxide emissions each year.<sup>23</sup>

The Oklahoma School Code (OSC) authorizes school districts to provide student transportation services between school and home, from school to career and technology location, and for approved extracurricular activities. The federal *Individuals with Disabilities Education Act (IDEA)* requires districts to provide transportation services to students who must travel to receive special education services, if they provide regular school transportation services.

The Oklahoma State Department of Education (SDE) provides some funding for regular transportation of students who live more than 1.5 miles from the assigned school. Oklahoma school districts receive a transportation supplement that is calculated based upon a per capita allowance, the district's student density, and the number of students who live more than 1.5 miles from school (considered the average daily haul or ADH). These factors are multiplied by a state funding figure of \$1.39 (transportation factor), a figure that has not been updated since 1988.

This level of funding does not begin to support all transportation expenses in a typical Oklahoma school district. In general, the state transportation supplement provides just 16 percent of the funding needed to operate a district transportation program. Thus, every dollar saved in a school district's transportation program can instead be spent in other district programs, including classroom instruction.

The Oklahoma Department of Public Safety (ODPS) requires bus drivers to obtain a specialized bus driver's license. The SDE requires bus drivers to obtain bus driver certification, training, and

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<sup>23</sup> National Highway Transportation Safety Administration – <http://www.nhtsa.gov/>

to pass a license history review. SPS conducts criminal background checks on all new employees and annually evaluates the motor vehicle records of the personnel who drive school vehicles. New bus drivers also must pass an alcohol and drug test for pre-employment and submit to random drug tests that are administered throughout the year, as defined by the Federal Motor Carrier Safety Administration's regulation § 382.305.

The SPS transportation department provides route and extracurricular transportation for its students. With approximately 107 square miles to cover, the district uses 13 regular buses, two special education buses, and one activity bus (**Exhibit 5-28**).

**Exhibit 5-28**  
**SPS Bus Fleet Usage**

<b>Bus Type</b>	<b>Number</b>	<b>% of Fleet</b>
Regular	13	<b>81%</b>
Special Needs	2	<b>13%</b>
Activity Bus	1	<b>6%</b>
<b>Total</b>	<b>16</b>	

*Source: SPS, December 2018*

**Exhibit 5-29** provides a breakdown of the bus fleet. One of the special needs buses and one of the regular route buses have been placed out of service and are not being used, due to the expense of the repairs. Currently, the district is leasing nine of the 13 regular route buses.

**Exhibit 5-29**  
**SPS Bus Fleet**

<b>Inventory #</b>	<b>Year</b>	<b>Make/Model</b>
1	2017	Bluebird School Bus
2	2017	Bluebird School Bus
3	2017	Bluebird School Bus
4	2017	Bluebird School Bus
5	2017	Bluebird School Bus
6	2017	Bluebird School Bus
7	2017	Bluebird School Bus
8	2016	Bluebird School Bus
9	2017	Bluebird School Bus
10	2000	Bluebird School Bus
11	2000	Bluebird School Bus
12	1997	Bluebird School Bus
13	2018	Bluebird Special Needs Bus
14	1998	Bluebird Special Needs Bus
15	2005	Thomas Freightliner Activity Bus
16	1993	Bluebird School Bus

*Source: SPS, December 2018*

After morning routes and in the evenings, the buses are parked in an enclosed covered area (**Exhibit 5-30**). The gates are locked each evening and unlocked in the mornings.

**Exhibit 5-30**  
**SPS Bus Parking Area**

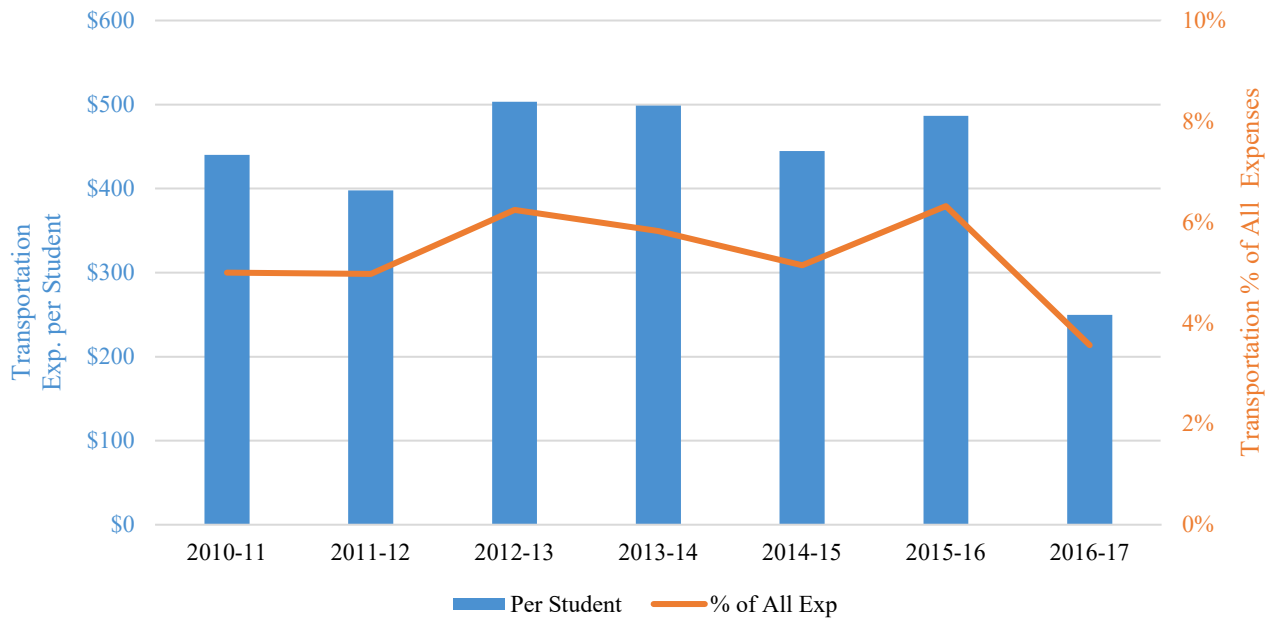


*Source: Google Maps, December 2018*

Currently, the district has 23 Oklahoma Commercial Driver's License (CDL) certified drivers to operate school buses. Of the 23, nine are regular route drivers while the other 14 are utilized on an as-needed basis. Drivers maintain a current Oklahoma CDL, with the proper endorsements, and must report any moving violations to the transportation director. At the start of each school year, drivers must submit to a full license review. SPS then reviews the licenses for proper endorsement and infraction history. SPS mandates that any traffic infraction must be reported to the director of transportation immediately. The district maintains and files driving records that comply with the SDE. The department maintains these records for the duration of the school year.

**Exhibit 5-31** provides a seven-year comparison of SPS transportation expenditures as a percent of total expenditures as well as the annual transportation expenditures per student. Over that time, transportation expenses have ranged from 3.6 percent to 6.3 percent of all expenditures. Transportation dollars per student have varied from \$250 to \$503 per student.

**Exhibit 5-31**  
**Trend in SPS Transportation Expenses**



Source: OCAS and Prismatic calculations

**Exhibit 5-32** compares SPS transportation costs by category. In the past five years, every category of transportation spending except for salaries, benefits, and property has decreased substantially.

**Exhibit 5-32**  
**Trend in SPS Transportation Operating Costs**

Expenditure Category	2012-13	2013-14	2014-15	2015-16	2016-17	Percent Change
Salaries	\$105,213	\$103,381	\$123,664	\$124,963	\$117,296	11.5%▲
Benefits	\$28,411	\$41,397	\$33,944	\$51,982	\$42,841	50.8%▲
Purchased Services	\$80,998	\$46,315	\$29,826	\$34,358	\$32,955	(59.3%)▼
Supplies	\$89,081	\$86,789	\$73,683	\$43,798	\$32,189	(63.9%)▼
Property	\$120,155	\$133,604	\$122,500	\$168,420	\$120,250	0.1%▲
Other	\$300	\$33	\$142	\$293	\$88	(70.8%)▼
<b>Total</b>	<b>\$424,157</b>	<b>\$411,519</b>	<b>\$383,759</b>	<b>\$423,815</b>	<b>\$345,618</b>	<b>(46.9%)▼</b>
<b>Annual Percent Change</b>		<b>(3.0%)▼</b>	<b>(6.7%)▼</b>	<b>10.4%▲</b>	<b>(18.5%)▼</b>	

Source: SDE, OCAS, School District Expenditures and Prismatic calculations

**Exhibit 5-33** compares the change in SPS and the peer districts' transportation costs over time, including all transportation expenses recorded in the Oklahoma Cost Accounting System (OCAS) by each district other than property expenses. As shown, SPS' transportation expenses are higher than all but one peer.

**Exhibit 5-33**  
**Comparison of Transportation Costs Over Time (Excluding Property Expenses)**

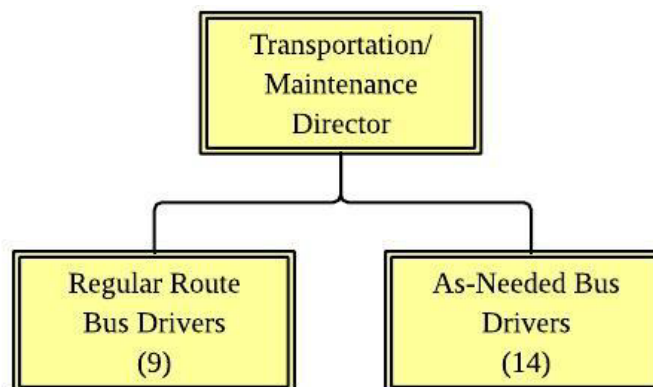
Entity	2012-13	2013-14	2014-15	2015-16	2016-17	Percent Change
Silo	\$304,003	\$277,915	\$261,259	\$255,394	\$225,368	(25.9%) ▼
Caney Valley	\$243,820	\$214,591	\$190,741	\$180,558	\$181,761	(25.5%) ▼
Newkirk	\$237,870	\$243,884	\$223,609	\$161,744	\$164,180	(31.0%) ▼
Wilburton	\$375,845	\$353,152	\$333,637	\$308,765	\$287,129	(23.6%) ▼
Tishomingo	\$218,696	\$236,292	\$261,087	\$211,637	\$185,559	(15.2%) ▼
Hennessey	\$266,920	\$149,450	\$103,888	\$111,137	\$115,023	(56.9%) ▼
<b>Peer Average</b>	<b>\$268,630</b>	<b>\$239,474</b>	<b>\$222,593</b>	<b>\$194,768</b>	<b>\$186,730</b>	<b>(30.5%) ▼</b>

*Source: SDE, OCAS, School District Expenditures, All Funds, 2012 through 2017, SDE State Aid Section, and Prismatic calculations*

The school board policies set the standard for administrative procedures created by transportation staff. Transportation policies should support a safe and economical operation. Although numerous state regulations govern transportation services, school districts have the flexibility to establish procedures that can enhance operations such as strategically setting bell schedules, designing more efficient routes, and fostering sound maintenance procedures.

**Exhibit 5-34** shows the current organization structure of the SPS transportation department. The transportation director also serves as the maintenance director and high school baseball coach.

**Exhibit 5-34**  
**SPS Transportation Organizational Structure**



*Source: Created by Prismatic, December 2018*

**FINDING 5-25**

The district has allowed buses to enter private property to pick students up, and then make a turn-around on private property. However, the district does not have a written agreement with the property owners to limit the district's liability.

In some cases, a turn-around on private property is the safest method. None of the stops appear to violate SDE regulations. Nevertheless, turn-arounds take additional time and increase the risk

of property damage.

Turn-around agreements between the district and the respective land owners limits the liability of the district while turning around on private property. A sample turn-around agreement is shown in **Exhibit 5-35**.

**Exhibit 5-35  
Sample Bus Turn-Around Agreement**

**[ ] PUBLIC SCHOOLS  
Address, City, State  
Phone: Fax:**

**SCHOOL BUS TURN-AROUND APPLICATION FORM  
(For School Bus Turn-Around on Private Property)**

Name of Parent(s)/Guardian(s): \_\_\_\_\_ Date: \_\_\_\_\_

Legal Land Description: \_\_\_\_\_ Address: \_\_\_\_\_

City/Town: \_\_\_\_\_ Postal Code: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_ Email: \_\_\_\_\_

We request that [ ] Public Schools consider turn-around service for the following students:

Name of Student(s)	Grade	School

Parent Comments: \_\_\_\_\_

\_\_\_\_\_

The Board retains the right to review and change the conditions on an ongoing basis.

Please return the "SCHOOL BUS TURN-AROUND AGREEMENT FORM" to the bus driver, who will forward to the Transportation Office for approval.

**TURN-AROUND SERVICE WILL ONLY BE OFFERED IF PRIVATE ROAD IS MAINTAINED (GRADED AND PLOWED) AND A SUFFICIENT TURN-AROUND IS PROVIDED.**



**Exhibit 5-35 (continued)**  
**Sample Bus Turn-Around Agreement**

<b>SCHOOL BUS TURN-AROUND AGREEMENT FORM</b>			
<p>I/We, _____ and _____, acknowledge that we are the owner(s) of the property hereinafter described: _____ (LEGAL LAND DESCRIPTION)</p>			
_____ (ADDRESS/ BOX)	_____ (TOWN)	_____ (STATE)	_____ (POSTAL CODE)
<p><b>I/We</b>, acknowledge that we have granted permission to the Board to operate a school bus or school busses on our property for the purpose of pick-up/drop off child(ren) who are students in the [ ] Public Schools division.</p> <p><b>WHEREAS</b> the Parent/Guardian has requested that the board provide School Bus Turn-Around Service to the above noted Legal Land Description upon the terms and subject to the conditions herein stated.</p> <p><b>WITNESSESED</b> that the Parent/Guardian/Owner agree as follows:</p> <ol style="list-style-type: none"> <li>1. To sign a school Bus Yard Turn-Around Agreement on a yearly basis;</li> <li>2. To ensure that the private road is developed and maintained to a standard to accommodate regular school bus travel;</li> <li>3. To ensure that a proper turn-around exists;</li> <li>4. Failure to maintain the road and turn-around in an acceptable condition can result in withdrawal of service;</li> </ol> <p><b>IN CONSIDERATION</b> of the Agreement of the Board to transport the forenamed child(ren), we/I agree to indemnify and to save harmless _____ Public Schools, its agents, administrators, and employees from and against all claims, demands, losses, costs, damages, actions, and causes of action of any nature whatsoever arising out of any act or omission, in relation to any damage to the real property described herein or any personal property on the said real property, if any of such damages arise from the operation of any matter related to operation of the said school bus or school busses.</p> <p>Signed this _____ day of _____, A.D. 20 _____.</p>			
_____ Parent/Guardian	_____ Witness	_____ Owner if different from Parent/Guardian	

*Source: Created by Prismatic, April 2013*

## RECOMMENDATION

### Develop a district policy and implement a school bus turn-around agreement form.

The district should not allow any new turn-arounds to be developed without the superintendent's prior approval. An acknowledgment/approval document that holds the district harmless should



be developed between the landowners and the district for the current turn-arounds.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 5-26**

The district was observed by the consulting team transporting preschool age children on district buses without a child restraint system available. It was further confirmed in the interview with the superintendent that the district has no policy for PreK bus transportation.

With the increasing number of preschool age children being transported in school buses, the NHTSA conducted crash testing dummies the size of preschool age children in school bus seats. The test results showed that preschool age children in school buses are safest when transported in child safety restraint systems (CSRS) that meet Federal Motor Vehicle Safety Standard 213, and are correctly attached to the seats. The NHTSA and the National School Transportation Specifications and Procedures manual<sup>24</sup> recommend the use of CSRS’ for all preschool age children under the age of five.

**RECOMMENDATION**

**Develop a policy and procedure for transporting preschool students on district buses.**

There are several businesses that specialize in meeting the CSRS needs for school districts. The team recommends the use of the CSRS booster seat due to the ease of installation and removal when necessary.

**FISCAL IMPACT**

The number of students being transported will determine the total cost to the district. The consulting team estimates the cost of each booster seat to be \$110. The consulting team recommends the district budget at least \$1,000 annually.

<b>Recommendation</b>	<b>2019-20</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>
Purchase CRS booster seats.	(\$1,000)	(\$1,000)	(\$1,000)	(\$1,000)	(\$1,000)

**FINDING 5-27**

The district lacks a dedicated school bus driver handbook with written procedures and instructions for the transportation of students. Bus drivers do not receive written procedures or instructions regarding job performance expectations. Those individuals assigned to drive a school bus receive some general information, but little information is documented.

<sup>24</sup> <http://ok.gov/sde/sites/ok.gov.sde/files/documents/files/SpecsProcedures.pdf>

During the onsite work, the consulting team ascertained that drivers were unaware of ODPS (**Exhibits 5-36 and 5-37**) or SDE (**Exhibits 5-38 and 5-39**) policies or manuals of instruction in the areas of pupil transportation that give information on such topics as cell phones, student interaction, danger zones, loading and unloading, and emergency exits.

What information is received is generally received by video, word of mouth, or by means of historical practice. Route changes or addendums are added to or changed in the route maps, as needed. Such information is kept on record in the director's office and is dispersed to the appropriate driver.

**Exhibit 5-36**  
**ODPS Commercial Driver’s License (CDL) Manual**

**SECTION 10 – School Buses**

- **Danger Zones and Use of Mirrors**
- **Loading and Unloading**
- **Emergency Exit and Evacuation**
- **Railroad-Highway Crossings**
- **Student Management**
- **Antilock Braking Systems**
- **Special Safety Considerations**



*This section is for drivers who will be driving school buses.*

Source: ODPS CDL Publication, December 2018

**Exhibit 5-37**  
**ODPS Commercial Driver’s License (CDL) Manual Excerpt**

**SECTION 10: School Buses**

*This Section Covers:*

- Danger Zones and Use of Mirrors
- Loading and Unloading
- Emergency Exit and Evacuation
- Railroad-Highway Grade Crossings
- Student Management
- Antilock Braking Systems
- Special Safety Situation

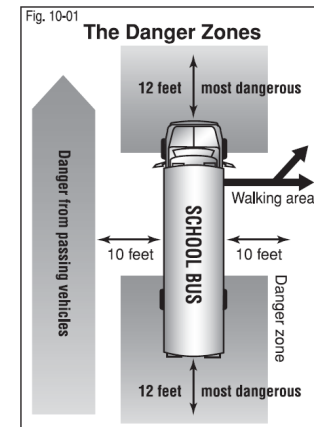
School bus drivers must have a commercial driver’s license if they drive a vehicle designed to transport (seat) 16 or more persons, including the driver.

School bus drivers must have a school bus endorsement in addition to a passenger endorsement on their commercial driver’s license (CDL). To get the school bus endorsement, you must pass a knowledge test on sections 2, 4, and 10 of this manual. (If your school bus has air brakes, you must also pass a knowledge test on Section 5.) You must also pass the skills test required for the class of school bus you drive or intend to drive.

This section does NOT provide information on all the federal and state requirements needed before you drive a school bus. You should be thoroughly familiar with all specific school bus procedures, laws, and regulations in your state and local school district.

State law requires school bus drivers to attend a 25-hour school bus driver workshop prior to operating a school bus in addition to obtaining a school bus endorsement. Contact your local school district transportation office for more information regarding the workshop.

around the bus and look for students, traffic, and other objects in this area. You should always check each mirror before operating the school bus to obtain the maximum viewing area consistent with the vision requirements of Federal Motor Vehicle Safety Standard No. 111, “Mirror Systems.” If necessary, have the mirrors adjusted.



**10.1 Danger Zones and Use of Mirrors**

**10.1.1 - Danger Zones**

The danger zone is the area anywhere outside of the bus where children are in the most danger of being hit, either by another vehicle or their own bus. The danger zones extend as much as 30 feet from the front bumper, 10 feet from the left and right sides of the bus and 10 feet behind the rear bumper of the school bus. In addition, the area to the left of the bus is always considered dangerous because of passing vehicles. Figure 10.01 illustrates these danger zones.

**10.1.2 - Correct Mirror Adjustment**

Proper adjustment and use of all mirrors is vital to the safe operation of the school bus. Use mirrors to observe the danger zone

**10.1.3 - Outside Left and Right Side Flat Mirrors**

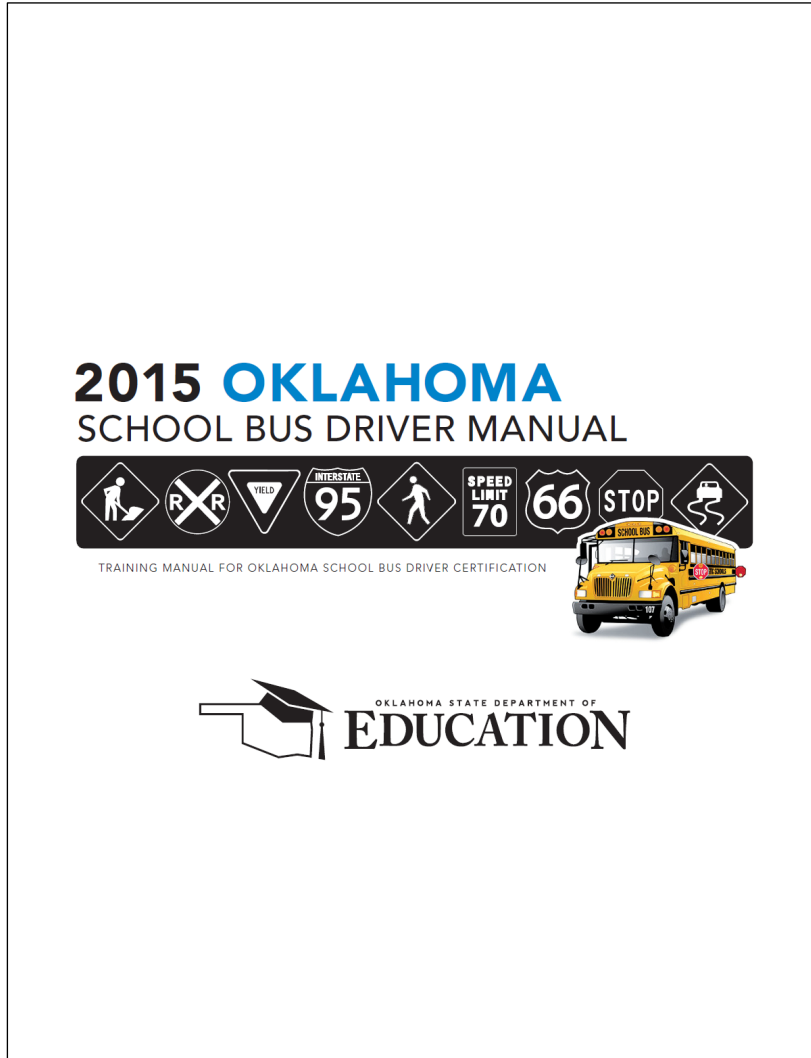
These mirrors are mounted at the left and right front corners of the bus at the side or front of the windshield. They are used to monitor traffic and check clearances and students on the sides and to the rear of the bus. There is a blind spot immediately below and in front of each mirror and directly in back of the rear bumper. The blind spot behind the bus could extend up to 400 feet depending on the width of the bus.

Ensure that the mirrors are properly adjusted so you can see:

- 200 feet or four bus lengths behind the bus
- Along the sides of the bus
- The rear tires touching the ground

Source: ODPS CDL Publication, December 2018

**Exhibit 5-38**  
**Oklahoma SDE School Bus Driver Manual**



Source: SDE Handbook, December 2018

**Exhibit 5-39**  
**Oklahoma SDE School Bus Driver Manual Excerpt**

# 5

CHAPTER

## Student Loading and Unloading

### INTRODUCTION

The one area of student transportation in which a child is at the greatest risk of injury or death occurs when the bus is stopped for the purpose of picking up and discharging students. The two greatest risks of injury/death to student passengers are from (1) traffic around the bus, and (2) the bus itself.

---

**More students are killed while getting on or off a school bus each year than are killed as passengers inside a school bus. As a result, knowing what to do before, during, and after loading or unloading students is critical. This chapter will give you specific procedures to help you avoid unsafe conditions which could result in injuries and fatalities during and after loading and unloading students. The information in this chapter is intended to provide a definitive set of actions. It is imperative that you learn and obey the procedures governing loading/unloading operations while you also maintain student behavior and follow proper driving procedures.**

Drivers of all vehicles must be aware of the **blind spots** that are unique to the vehicle they are in. This is especially important when driving a school bus because the **blind spots** on a school bus are greatly increased due to the vehicle's large size. If a student enters a blind spot, the school bus driver may not be able to see the student from their driver's seat and possibly not even with the use of the bus's mirrors. Because of this extreme danger, the driver of a school bus must completely focus on their job during this crucial time. The most hazardous blind spot areas are:

- Directly in front of the bus
- Directly behind the bus
- Areas close to each side of the bus
- Especially all areas near the rear wheels

**The Danger Zone**  
 The **Danger Zone** is the area immediately surrounding the school bus (see graphic on the next page). It includes the 15 foot area immediately surrounding the bus. It is in this Danger Zone where children entering and exiting the school bus are at greatest risk of being hit by another vehicle, or accidentally run over by their own bus.

Bus drivers must be aware of the danger zones around their school bus when loading and unloading students. The chapter on mirrors and danger zones gives detailed information about how to adjust mirrors for maximum coverage. Always check your mirrors before you begin your route to make sure they are adjusted correctly.

**Tools for the Bus Driver**  
 To help the driver accomplish the task of safely loading and unloading students, a professional school bus driver must use every tool available to keep their children safe.

**Education**  
 The school bus driver's most effective tool for promoting school bus safety is education. Drivers who take advantage of a child's first step onto a school bus to teach them how to safely approach the bus stop, board the bus, behave on the bus, exit the bus and walk home safely, will have fewer accidents than drivers who leave these matters to chance. Although we may want teachers and parents to teach these skills to children, we cannot assume that someone else has done this for us.

**Warning Devices**  
 School buses that transport children from home to school and from school to home must be painted National School Bus Yellow. This helps drivers identify the school bus quickly and hopefully encourages them to prepare for the frequent stops a school bus makes.

Additionally, school buses are equipped with a special eight-way light system. This system includes two amber flashing lights and two red flashing lights mounted on both the front and rear of the school bus. School buses also have a stop arm with a flashing stop sign mounted to the driver's side of the school bus.

Some buses in Oklahoma have a crossing control arm. The crossing control arm is a metal or plastic arm that extends out from the front bumper of the bus when loading or unloading. It reminds children to cross far enough in front of the bus to be seen easily by the driver. If the bus is equipped with a crossing arm is should be operational.

**Mirrors**  
 School buses are equipped with an extensive mirror system to enable the driver to see the danger zones around the bus. The mirrors must be used "continuously" when loading and unloading students. See the chapter on Mirrors and Danger zones for more information on adjusting and using mirrors on the school bus.

---

18 OKLAHOMA SCHOOL BUS DRIVER MANUAL • OKLAHOMA STATE DEPARTMENT OF EDUCATION

Source: SDE Handbook, December 2018

For example, Edmond Public Schools (EPS) has a robust training program for new drivers and a retraining program for existing drivers who need it. This surpasses state requirements and contributes to a safer working environment. EPS provides its transportation employees with a 52-page handbook that covers all aspects of employment as well as directions on how to pick up and drop off students, road courtesy, and what to do in case of an accident. **Exhibit 5-40** provides the table of contents for the EPS Handbook.

**Exhibit 5-40  
EPS Transportation Handbook Table of Contents**

Table of Contents	
Welcome to Edmond Public Schools Transportation .....	0
Table of Contents .....	4
Sexual Harassment .....	6
Harassment/Intimidation/Bullying .....	6
Employee Leave.....	6
Criminal Record Questionnaire.....	7
Family Educational Rights and Privacy Act and Health Insurance Portability and Accountability Act .....	8
Evaluation .....	8
Ethical Conduct Code .....	8
Dress/Appearance .....	9
F.M. Radio .....	9
Inclement Weather .....	9
Injuries At Work .....	10
Omnibus Act of 1991 (Drug Testing) .....	10
Performance Expectations.....	11
Drivers' and Monitors' Section .....	12
Requirements .....	14
Responsibilities .....	14
Assignment of Routes and Activity Trips* .....	14
Clocking In and Out .....	14
Time Centre and Payroll .....	15
Care of Bus .....	15
Flag Out Procedure .....	18
Loading and Unloading Students .....	19
Routes .....	20
Accidents.....	20
Student Management.....	21
Key Procedure.....	22
Bus Street Use and Parking Procedure at Office.....	22
<b>Information You Really Need to Know!!! A Practical Guide for the Edmond Public Schools Transportation</b>	
Department .....	24
Thriving at the Transportation Department.....	26
Employee Lounge .....	28
Bus Compound.....	29
Pick Up/Drop Off.....	29
Bus Loops.....	32
High Schools.....	32
Middle Schools .....	33
Late Elementary Schools.....	37
Choice Schools.....	40
On the Road.....	41
Road Courtesy.....	41
Accident Processing.....	42
Administration .....	43
<b>POLICY ON ALCOHOL AND DRUG TESTING FOR DRIVERS</b> .....	45
Notes.....	55

*Source: EPS Transportation, October 2013*

**RECOMMENDATION**

**Develop a driver handbook outlining district policies and procedures regarding transportation of students.**

The transportation director should develop and distribute a driver's information notebook, specific to SDE guidelines. General topics covered in the manual should include:

- Mission Statement / Vision / Goals
- Organizational Chart
- School Bus Operator Qualifications
- Driving Record Standards
- Driver Duties and Responsibilities
- Disciplinary Guidelines
- Student Conduct Form
- Student Management Techniques
- Cellular Telephone Use
- School Bus Idling
- Student Management Techniques
- Dress Code
- School Bus Crash/Accidents
- Incident Reporting Procedure
- Student Injuries and Illnesses
- Bus Stops and Walk-to-Stop Distances
- Field Trips
- Loading and Un-loading Students
- Certificate of Absence
- Leave Request
- Employee Agreement Form
- 2019-20 Payroll Schedule

Distribution of the notebook should be given during the mandated in-services held each school year. The transportation director should also set aside time during the in-service to brief and instruct employees on the driver's notebook.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 5-28**

The district does not have a video recording system on the buses to aid in management of both drivers and students. Drivers in the focus groups expressed a need for such a system.

Charged with transporting millions of children to and from school each year, it is only natural that safety is an essential element of a school bus. Video surveillance is a great safety tool for school buses. Benefits include the protection of children, buses, and drivers. Cameras can capture safety violations inside and outside the bus, which can protect both the driver and the district from false accusations. Safety violations can happen on the bus by students or drivers but they can also happen in the community by people violating bus stop procedures.

### **RECOMMENDATION**

**Install a video surveillance system in school buses.**



School bus safety continues to be a top concern, and a video surveillance system can be an important part of a school's safety plan. A school bus video surveillance system can increase student and driver safety and can deter bad behavior.

### FISCAL IMPACT

To place a video surveillance system in the bus would require a DVR recorder and at least two cameras. The consulting team recommends, upon speaking to a video system vendor (Safety Vision), a minimum of four cameras per bus. Three cameras would be pointed inside the bus to get the best coverage possible and one camera pointed out the front windshield to monitor driver behavior and driving patterns of other vehicles. The team recommends the purchase of the equipment so they can be moved to future leased buses. This pricing is for the purchase of a four-camera system at \$1,500 per system. Nine buses should have the systems installed for a total cost of \$13,500. The figures shown allow for three buses to be equipped with cameras each year.

Recommendation	2019-20	2020-21	2021-22	2022-23	2023-24
Purchase bus video surveillance systems.	(\$4,500)	(\$4,500)	(\$4,500)	\$0	\$0

### FINDING 5-29

The district has assigned the transportation director the responsibility of handling all school bus discipline problems. This has resulted in consistent treatment of incidents.

The director of transportation is also the first point of contact for all transportation discipline. Discipline records (**Exhibit 5-41**) are currently submitted to the transportation office for first response. Expectations in regard to discipline on the bus are spelled out in the district's student handbook.

**Exhibit 5-41  
Student Conduct Form**

Student Name:	<b>Transportation Discipline Report</b>	Bus Number: _____ AM or PM
Student Class/Grade:		Driver Name: _____
Date of Incident:		Date Incident Reported: _____
<u>Notice to Parent/Guardian</u>		
1. The purpose of this report is to inform you of a disciplinary incident involving your child. 2. You are urged to both understand the action taken by the driver and to cooperate with the corrective action initiated by the school administration.		
<u>Driver's Report</u>		
<input type="checkbox"/> Violation of Safety Procedures	<input type="checkbox"/> Throwing Objects In or Out of Bus	<input type="checkbox"/> Drugs/Alcohol/Tobacco Products
<input type="checkbox"/> Destruction of Property	<input type="checkbox"/> Eating/Drinking/Littering	<input type="checkbox"/> Standing/Moving Around Bus
<input type="checkbox"/> Fighting/Pushing/Tripping/Etc.	<input type="checkbox"/> Inappropriate Language/Gestures	Other: _____
<u>Driver's Detailed Explanation of Incident/Behavior:</u> _____		
<u>Action Taken</u>		<u>Consequences</u>
<input type="checkbox"/> Changed Student's Seat	<input type="checkbox"/> Reported to Principal	<input type="checkbox"/> Student Regrets Incident/Cooperative
<input type="checkbox"/> Contacted Parent	<input type="checkbox"/> Other: _____	<input type="checkbox"/> Recurring Incidents Will Be Reported
<input type="checkbox"/> Other: _____		<input type="checkbox"/> Student Denied Bus Privileges Until: _____
<input type="checkbox"/> Other: _____		<input type="checkbox"/> Other: _____
Driver's Signature: _____ Administrator's Signature: _____ Parent/Guardian Signature: _____		

*Source: SPS, December 2018*

**COMMENDATION**

**The transportation department is commended for supporting the safety of students riding the buses and adhering to the standard practices in discipline.**

**FINDING 5-30**

The consulting team observed numerous safety concerns during the ride along. The SDE loading and unloading procedures need to be addressed with the drivers.

During the ride along, it was observed:

- the driver did not follow the SDE manual guidelines;
- students walked across streets without the driver's directions; and
- the driver started moving the bus before students had reached their seats.

These practices are in direct violation of the SDE manual.

The Oklahoma School Bus Driver Certification requires each driver to follow the safety steps to load and unload all children on and off the bus. These steps are mandated in Section 10 of the CDL Manual for each state when loading and unloading students. While there have been many

adjustments to the SDE manual, these best practices have remained the same for loading and unloading children on and off the bus.

### **RECOMMENDATION**

**Provide before school in-service for the drivers to relay and reiterate policies and procedures by the district, SDE, ODPS, and federal guidelines.**

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 5-31**

The transportation director rides with each driver before the start of school while they perform a practice run to evaluate the route for any problems.

Before the beginning of each school year, the transportation director allows drivers to dry run each route to ensure proper route safety and efficiency. This is a useful tactic in that all current drivers are dual employees and the likelihood that one of the other SPS CDL holders may be tasked to do a route is probable. During dry runs, the nine bus routes are monitored for road conditions, new stops, doubled-up points of pick-up and possible abandoned stops. Routes are set to a beginning time and calculated to arrive at each school no later than ten minutes before the first bell.

### **COMMENDATION**

**SPS is commended for allowing bus drivers to pre-drive each bus route for safety and accuracy.**

### **FINDING 5-32**

The district relies on paid invoices as vehicle maintenance records. While this system records billed maintenance and fuel costs, it does not record any work done on site.

The current system limits the district's ability to schedule and track preventive maintenance on its buses such as changing oil, checking brakes, and inspecting tires. In addition, this practice places the district at risk should a severe accident occur and the vehicle history be questioned; when a school bus accident occurs, one of the first records reviewed is the buses maintenance record.

In addition to tracking and scheduling preventive maintenance, an effective maintenance program can be used to:

- maintain records of work orders;
- track parts and vendor history;

- track warranties;
- track fuel use and fuel inventory;
- track cost per mile;
- maintain personnel records; and
- generate management reports that allow the district to measure and monitor performance.

## **RECOMMENDATION**

### **Maintain a spreadsheet that documents all repairs and fuel for each vehicle.**

The district should develop an individual file for each district vehicle that would contain the complete history of the vehicle from purchase to disposal. Given the size of the fleet, a specialized computer system is not necessary; tracking the necessary information could easily be accomplished in a generic spreadsheet program. Copies of supporting documentation (i.e., invoices, warranties, etc.) should be maintained in files by vehicle as well.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 5-33**

The district's new garage will meet its needs for the future. The team observed the garage being shared with the maintenance department as lawn equipment was parked inside. With three bays available, there is ample room for both departments (**Exhibit 5-42**).

**Exhibit 5-42  
SPS Bus Garage****Maintenance Equipment Storage****School Bus Repair**

Source: Prismatic, December 2018

**COMMENDATION**

**SPS is commended for providing a facility for the transportation and maintenance department to provide upkeep for the districts buses, vehicles, and equipment.**

**FINDING 5-34**

The consulting team found most of the district's buses to be in good condition. However, there were some safety and mechanical issues which needed to be addressed.

Bus drivers are required to clean and inspect buses for mechanical malfunctions on a daily basis. However, the consulting team found several defects that were not reported by means of the Daily Inspection Sheet, as well as repairs or cleaning that had not been done. The consulting team found inspection sheets that were incomplete except for the mileage of the trip. This is a liability risk for the driver as well as SPS.

As a requirement for operating a school bus in the State of Oklahoma, drivers must complete a daily record (**Exhibit 5-43**) of the condition of the bus and report any defects. During the site visit, the consulting team conducted bus inspections. Several buses were found to have missing or damaged equipment (**Exhibit 5-44**).

### Exhibit 5-43 OSDE Pre-Trip Form

SDE Pre-Trip form OAC 210:30-5-6  
6/2016 Chapter 2 of the Oklahoma School Bus Driver's Manual has thorough Pre-Trip instructions

District \_\_\_\_\_  
 Dates \_\_\_\_\_ Bus \_\_\_\_\_  
 Starting Mileage \_\_\_\_\_  
 Ending Mileage \_\_\_\_\_  
 Driver \_\_\_\_\_  
 V - satisfactory condition  
 X - repair needed  
 O - Repair completed

**Exterior** Cross through days for weekend trips

	mo	tu	we	th	fr
Lights, Lenses and Reflective material					
Windshield					
Windows					
Wipers					
Service Door					
Mirrors					
Bumpers					
Fuel Cap/Door					
Drive Shaft					
Exhaust					
Frame					
Suspension					
Brakes					
Stop Arm					
Battery Box					
Optional equipment					

**Engine Compartment**

Fluids					
Belts and Hoses					
Fuses					
Wiring					
Air compressor					
Alternator					
Water pump					
Steering assembly					
Suspension					

**Wheels**

Tires (CTI)					
Rims/Lugs					
Hubs					

**Inside**

Step well					
Emergency Equipment					
Driver's Seat					
Mirrors					
Windshield					
Wipers					
Switches and gauges					
Lights (dome)					
Exits					
Seats					
Aisles					

**Air Brake Test**

Pressure Retention					
Low pressure warning					
Spring brake test					
Pressure build					
Parking brake hold					
5mph test					

**Hydraulic Brake Test**

Brake hold test (Emergency/Parking)					
Pedal pressure test					
Reserve system test (if equipped)					

**Other Items (If equipped)**

Lift					
Securement Equipment					
Crossing Gates					
A/C					

Comments on defects

Repairs complete by \_\_\_\_\_  
 Date \_\_\_\_\_

**POST TRIP Child Check**

--	--	--	--	--	--

Source: SDE, December 2018



**Exhibit 5-44  
SPS Fleet Inspection**

Bus #	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16		
Mirrors	✓	✓	✓	✓	✓	✓	✓	Vehicle Off Site	Vehicle Off Site	✓	✓	✓	✓	Vehicle out of Service	✓	Vehicle out of Service		
Glass	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		✓		✓	✓
Tires	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		✓		✓	✓
Body Damage	N/R	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		N/R		✓	✓
Seats	✓	✓	✓	N/R	✓	N/R	N/R			✓	✓	✓	✓		✓		✓	N/R
Flooring	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		✓		✓	✓
Emergency Door	✓	✓	✓	✓	✓	N/R	✓			✓	✓	✓	✓		✓		✓	N/R
Clean Inside	✓	N/R	✓	✓	✓	✓	✓			✓	✓	✓	✓		✓		✓	✓
Clean Outside																		
Fire Ext.	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		N/R		✓	✓
First Aid	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		✓		✓	✓
Body Fluid Kit	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		✓		✓	✓
Triangles	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓		✓		✓	✓
Alarm (Sleeping Kids)	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/R	N/R	N/R	✓	N/R				
Lights	✓	✓	✓	✓	N/R	✓	N/R	✓	✓	✓	✓	✓	✓	✓				

Source: Prismatic, December 2018  
Index: ✓ = OK, N/R = Needs Review

Exhibit 5-45 shows the deficiencies the consulting team found. As shown, several repairs are needed to prevent future safety issues.

**Exhibit 5-45  
Observed Bus Deficiencies**

**Emergency Door Safety Hazard**



**Torn Seat**





**Exhibit 5-45 (continued)  
Observed Bus Deficiencies**

**Trash Can Bungee Attached to Fire Extinguisher**



**Bus Damage**



**Broken Clip Light**



**Broken License Plate Light**



### Exhibit 5-45 (continued) Observed Bus Deficiencies

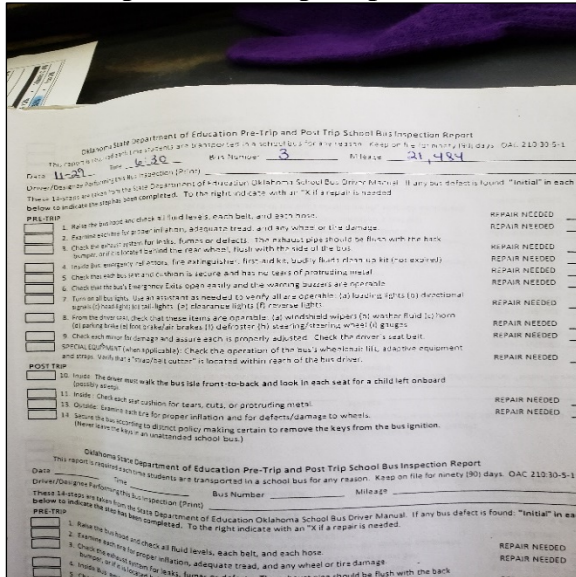
#### Wheel Seal Leaking



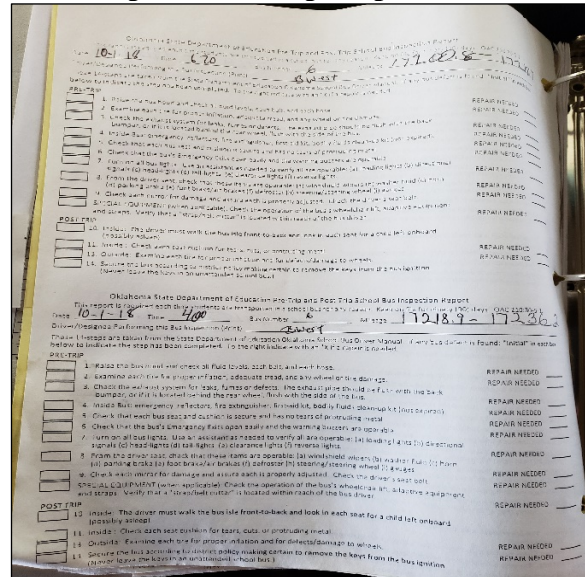
#### Cut Seat



#### Incomplete Pre-Trip Inspection Form



#### Incomplete Pre-Trip Inspection Form



Source: Prismatic, December 2018

### RECOMMENDATION

Address the conditions of buses as needed.

The SPS transportation director will need to ensure that all standards of performance on vehicle readiness and required documentation is complete before and after a vehicle is placed into service. The transportation director should ensure that each bus driver receives a copy of the

SDE Oklahoma School Bus Driver Manual. This manual will give each driver insights to policies that regulate pupil transportation until the district can develop their own driver's manual. The leasing company should be made aware of damages so that repairs can be made.

**FISCAL IMPACT**

This recommendation can be completed with existing resources.



*Appendix A:*  
*Staff Survey Results*

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# *Staff Survey*

*Surveys Completed: 60  
Totals may not add to 100 percent due to rounding.*

## *Statistical Data*

<b>How long have you been employed by the school district?</b>	
5 years or less	28%
6 – 10 years	35%
11 – 15 years	21%
16 – 20 years	7%
21 years or more	9%
<b>What is your role in the school district?</b>	
School Administrator	5%
Classroom Teacher	75%
Other Certified (Librarian, Guidance Counselor)	4%
School Aide/Nurse	2%
Instructional Aide	2%
Other Support Staff (Cafeteria, Office, Custodial)	13%

## *Survey Questions*

<b>Survey Questions</b>		<b>Strongly Agree</b>	<b>Agree</b>	<b>No Opinion</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
1	The district has a long-range strategic plan that guides the decision-making process.	25%	57%	17%	2%	0%
2	I understand the district's policies and procedures.	40%	52%	5%	3%	0%
3	I have an accurate, written job description to guide me in my work.	43%	35%	12%	8%	2%
4	I understand the district's organizational structure.	41%	44%	12%	3%	0%
5	I know to whom I report for all my job functions.	62%	30%	5%	3%	0%
6	I understand the district's salary schedule and justification for paying extra-duty stipends.	40%	35%	12%	12%	2%
7	I receive adequate training overall to perform my job functions.	42%	43%	5%	10%	0%



Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
8	I received an annual personnel evaluation last year.	50%	32%	17%	2%	0%
9	District staff works well together.	38%	50%	8%	3%	0%
10	The district has an adequate number of staff to carry out its operations.	12%	36%	9%	41%	2%
11	The district actively recruits high quality staff to fill vacant positions.	33%	37%	18%	12%	0%
12	The district has a pool of quality substitutes to fill positions when necessary.	7%	33%	20%	32%	8%
13	The district effectively communicates with parents and community members.	35%	53%	7%	5%	0%
14	The central office effectively communicates with district staff.	37%	53%	7%	3%	0%
15	The superintendent effectively communicates with district staff.	52%	42%	3%	3%	0%
16	The principals effectively communicate with their staffs.	42%	47%	3%	7%	2%
17	The teachers effectively communicate with students and parents.	32%	57%	10%	2%	0%
18	The district effectively uses volunteers to assist with meeting district goals.	13%	25%	43%	15%	3%
19	The district gives student needs a high priority when making major decisions.	37%	47%	10%	5%	0%
20	School board members listen to the opinions of parents and the community members.	22%	42%	33%	3%	0%
21	The school board understands the needs of the district.	24%	46%	24%	7%	0%
22	The superintendent is accessible to district staff.	65%	32%	3%	0%	0%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
23	The principals are accessible to their staffs.	50%	40%	5%	5%	0%
24	The teachers are accessible to students and parents.	51%	44%	5%	0%	0%
25	Teachers often collaborate on projects related to the curriculum.	28%	43%	12%	17%	0%
26	Teachers know what is to be taught and when because they have access to a district-adopted Pacing Calendar that reflects the current Oklahoma Academic Standards (PASS).	29%	39%	24%	7%	2%
27	The district's curriculum is aligned from grade to grade and from class to class.	23%	43%	20%	13%	0%
28	Teachers have scope and sequence documents that determine what is taught and when.	22%	28%	37%	13%	0%
29	Test data from district-adopted benchmarks and mandated end-of-year tests are used to improve the district's curriculum.	21%	47%	24%	9%	0%
30	Teachers effectively use student data to improve instructional practices.	26%	54%	14%	5%	0%
31	The principals are effective instructional leaders.	40%	41%	12%	5%	2%
32	There is adequate high quality professional development for the principals and teachers.	28%	38%	12%	22%	0%
33	Non-teaching staff has opportunities for professional development relevant to their responsibilities.	16%	29%	34%	21%	0%
34	At least some of the required annual professional development is offered online.	12%	21%	37%	26%	4%
35	The needs of the special education students are being met.	24%	48%	12%	14%	2%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
36	The needs of the gifted and talented are being met.	29%	50%	0%	15%	6%
37	Teachers adequately prepare students for state mandated tests.	25%	71%	0%	4%	0%
38	Students are adequately prepared for college, if they choose that path.	25%	65%	0%	10%	0%
39	Students receive timely information on college entrance requirements and scholarship offers.	28%	59%	0%	10%	3%
40	Students receive adequate vocational training to prepare them for the workforce, if they choose that path.	33%	60%	0%	7%	0%
41	The district provides students with adequate counseling services.	20%	57%	0%	20%	2%
42	The school library meets the needs of the teachers and students.	29%	58%	0%	13%	0%
43	District stakeholders provide input into the budgetary process.	30%	60%	0%	10%	0%
44	I understand the district's budgetary process.	29%	46%	0%	21%	4%
45	The district actively applies for competitive state and federal grants.	29%	71%	0%	0%	0%
46	I complete an annual inventory of the equipment in my work area.	54%	46%	0%	0%	0%
47	The district wisely manages its revenues and expenditures.	39%	56%	0%	5%	0%
48	The district has a long-range plan to address facility needs.	45%	52%	0%	2%	0%
49	The district's facilities are well-maintained.	20%	56%	0%	20%	4%
50	The district's facilities are kept clean.	22%	58%	0%	18%	2%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
51	The district has an energy management program in place to minimize energy consumption.	32%	61%	0%	7%	0%
52	There are facility and/or equipment concerns throughout the campus.	27%	64%	0%	9%	0%
53	The district's facilities are secure from unwanted visitors.	11%	18%	0%	56%	15%
54	I know what to do during a crisis or an emergency.	36%	64%	0%	0%	0%
55	Student discipline is well-maintained.	24%	61%	0%	16%	0%
56	Drugs are a problem in this district.	8%	50%	0%	36%	6%
57	Bullying is a problem in this district.	3%	44%	0%	46%	8%
58	I often purchase a meal from the cafeteria.	12%	27%	0%	35%	27%
59	Students seem to like the cafeteria meals.	13%	56%	0%	27%	4%
60	I find the cafeteria meals appealing and appetizing.	14%	43%	0%	21%	21%
61	I understand how to use technology as it relates to my job functions.	36%	63%	0%	2%	0%
62	District staff and administrators often use email to communicate with one another.	50%	50%	0%	0%	0%
63	The district has adequate technology to support its operations.	31%	47%	0%	20%	2%
64	When necessary, the district's technology equipment is quickly repaired or serviced.	51%	47%	0%	2%	0%
65	Technology is readily accessible and easy to use in the performance of my job duties.	41%	57%	0%	2%	0%
66	The district's technology equipment is often used past its useful lifespan.	27%	61%	0%	12%	0%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
67	The district website is a useful tool for staff, parents, and students.	38%	63%	0%	0%	0%
68	Buses arrive and depart on time each day.	25%	60%	0%	13%	2%
69	There are enough working buses to meet the needs of the district.	31%	57%	0%	12%	0%

### *Written Responses*

If you would like to provide any additional comments on the school district, please do so here. Where is the district doing well? In what areas could it be improved?

- Why are we hiring people and allowing them to not show up and not do their duties just so their kid can play ball when they don't live in our district? I feel this is one of the reasons the school is not clean. Why are people getting paid huge stipends for extra duties and another staff member is doing the job and not getting a cent or credit for it? Shouldn't they do the job they are paid to do? Hired based on merit not on whose kid plays ball or who they are related to or know.
- I believe the school would benefit by having a No-Bully policy. I believe the school would benefit by having a school calendar committee with input from faculty. I believe the school would benefit by having a strict student absentee policy that is enforced.
- The district does well in athletics. The staff are caring hardworking devoted individuals. I am grateful for everyone of them. Less emphasis on hiring for athletic.
- Silo School is a wonderful place to work. My supervisors and co-workers share common goals and work hard for the students. They are also friendly and caring. My supervisors see the needs we have in our classrooms and try to provide what we need.
- The school staff is working towards change and improvement.
- The faculty and staff are all very friendly and work well together. We need more hard working janitors.
- Students come first, need available substitutes and security, more technology for all students PRE\_K -5th grade.
- Tries to help individual students when they need it.
- The bond was passed to build a new building and that took a lot of work on the part of Mrs. McDonald and staff; their hard work is appreciated. The student body is growing and students have many needs and issues: Mr. Lawless (ms principal) is pulled in more than one direction because of coaching duties. We need to hire more administration to assist him.
- The [deleted] is undependable and difficult to work with for all staff members. The transportation and maintenance departments are also unreliable and there is difficulty as to who to contact for issues.

- We have outstanding Superintendent and Principals as well as dedicated and talented teachers and support staff.
- The meals do not fill you up at lunch. Poor tasting and very little. Same meals every week.
- We have a wonderful school. We need more textbooks especially a new Reading/Language Arts series. We need more student computer access in the regular classroom. We need more Special Education students pulled from the regular classroom. Their needs are not being met and they get most of the attention of the teacher instead of the regular and gifted students. We also need Activity Buses. I feel the school does everything they can to meet the educator's needs that they can. If they can't - it is usually due to lack of resources provided by the state. I would like to see more of the "routine" professional development online that we could do before starting school so that our time could be better served working in our classrooms. I would also like for a committee of students, parents, staff, teachers, administrators, and board members to have a voice in determining the school year schedule. Not whether we are going 4 days a week or 5 but when we start school, holidays, breaks, and if we could implement 4 days a week for the entire school year. I love our school. Proud to be a REBEL.
- Principal needs to support teachers and not be so worried about sports and hiring people because their children are athletes.
- Doing well: bringing in more classes for students, lowering our teacher-student ratio  
Could improve: security, communication, team building for staff, technology
- The new additions to our facilities is a great improvement. I would like to see a life skills class put in place for students with more severe disabilities. These kids need to be able to take care of themselves.





*Appendix B:*  
*Parent Survey Results*

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## ***Parent Survey***

*Surveys Completed: 193  
Totals may not add to 100 percent due to rounding.*

### ***Survey Questions***

<b>Survey Questions</b>		<b>Strongly Agree</b>	<b>Agree</b>	<b>No Opinion</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
1	School board members listen to the opinions and desires of parents and community members.	19%	33%	44%	2%	2%
2	School board members know and understand the educational needs of students in the district.	27%	36%	32%	4%	2%
3	The superintendent is a respected and effective leader.	40%	35%	22%	2%	1%
4	District and school staffs are accessible to parents.	47%	46%	6%	2%	1%
5	I feel welcome at my child's school.	58%	34%	4%	2%	2%
6	My child feels welcome and accepted at school.	57%	33%	3%	5%	2%
7	I receive timely communications from my child's teachers regarding his/her progress in school.	48%	40%	6%	5%	1%
8	My child's school encourages parents to volunteer, if they are able.	38%	38%	18%	4%	2%
9	Parents play an active role in decision-making in our school.	24%	35%	28%	10%	3%
10	Education is the main priority in our school district.	37%	42%	9%	9%	3%
11	Students learn the necessary material to be prepared for the next grade.	41%	46%	7%	6%	1%
12	I am satisfied with the education my child receives.	46%	41%	5%	7%	2%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
13	Teachers are held accountable for ensuring that students learn.	36%	38%	20%	6%	1%
14	I receive enough information from the district regarding academic expectations for my child (i.e. student testing, retention, etc.).	37%	45%	10%	6%	2%
15	Our school can be described as a “good place to learn.”	43%	45%	8%	3%	1%
16	The district spends its money wisely.	24%	33%	34%	6%	3%
17	The district asks the community for input when developing its budget.	18%	26%	39%	12%	5%
18	My child’s school is clean.	39%	48%	7%	5%	1%
19	My child’s school is attractive and welcoming.	37%	49%	8%	5%	1%
20	My child’s school is well maintained.	37%	46%	7%	8%	2%
21	District facilities are open for community use.	14%	36%	45%	3%	2%
22	My child feels safe and secure at school.	44%	45%	6%	4%	2%
23	Bullying is a problem in this district.	10%	17%	30%	33%	9%
24	Drugs are a problem in this district.	9%	12%	39%	28%	13%
25	The school buildings and grounds are safe and secure.	30%	43%	8%	15%	4%
26	Discipline is fairly and equitably administered in my child’s school.	27%	44%	19%	8%	3%
27	The district website is a useful tool for me and/or my child.	37%	42%	15%	4%	3%
28	I regularly use technology to keep up-to-date on my child’s education (emailing teachers, online gradebook, etc.).	34%	42%	13%	8%	3%
29	My child regularly uses technology at school.	26%	46%	21%	7%	1%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
30	Teachers know how to use technology in the classroom.	33%	47%	18%	2%	1%
31	Discipline and order are maintained in the school cafeteria.	29%	44%	24%	2%	1%
32	The school lunch period is long enough for my child to eat.	27%	51%	13%	7%	3%
33	My child likes the food served in the cafeteria.	24%	42%	12%	14%	7%
34	The cafeteria serves a good variety of food.	26%	45%	17%	7%	5%
35	My child's school bus runs on time nearly every day.	26%	23%	46%	4%	2%
36	My child feels safe riding the bus.	24%	25%	41%	6%	4%
37	Bus drivers effectively handle discipline issues on the bus.	23%	21%	51%	3%	3%
38	The length of my child's bus ride is reasonable.	22%	24%	47%	5%	2%

### ***Written Responses***

If you would like to provide any additional comments on the school district, please do so here. Where is the district doing well? In what areas could it be improved?

- The district should pay more attention to what students do in the bathrooms because my kids sometimes tell me that they vape.
- School faculty are always nice. I could not have chosen better teachers for my son every year that he has been at Silo school. I am very happy with Silo School.
- My child got suspended from bus after several attempts to keep him in his seat, I was not aware of this going on and I would like more interaction with bus driver.
- In regards to #21 I honestly don't know the answer. I have 4 kids in this school district and all 4 of them absolutely love school. They feel safe and comfortable when at school and they have even mentioned how welcoming everyone in the whole school is!
- The school bus runs by my home at 6:30 am, too early for our child to get up and ride the bus, we take her to school in the mornings, she rides the bus home in the afternoons.
- This is our 1st year at Silo so our opinions on this survey are limited to our experience. With that, my son loves Mrs. Wright, 2nd grade, and enjoys the cafeteria and bus rides. He's learning a lot so our impression so far is a very positive one.

- 
- I wish more doors were locked and there were more safety protocols in place in case of tragedy. The school staff is very welcoming.
  - Silo is a great place!
  - We absolutely love Silo School district. They are by far the best school district my kids have attended!
  - Buses need addressing. It's November, things should have been handled by now. I never know when the bus will show up. My child sometimes waits 10 minutes and sometimes 40 minutes.
  - We are new here and don't know how everything works yet. Both of my kids say the bus driver drives scary and they don't feel safe riding with him.
  - Mrs. Brister needs to be more of a people person if she continues as the Elementary Principal. Also, she needs to learn that putting her hands on adults is against the law!!! I never feel welcomed at my child's school because of her, and many other parents feel the same way, but are too afraid to say anything because they know their child will be treated unfairly.
  - Great Job!
  - The teachers and support staff are amazing! The school lunches and cafeteria are as good as any in our county!
  - We have always been informed and included in our children's education. Everyone has been very welcoming.
  - Thank you for everything you do for our kids.
  - Bullying is an issue.
  - The greatest school in Durant, and Bryan Cont. all teachers and staff are wonderful.
  - My kids love the school.
  - All of my kids feel unsafe after the accidents.
  - Bus #2's timing is inconsistent throughout the year and some days the bus may not even stop. Great school and great staff.
  - Just moved here.
  - I am satisfied with the level of educational services my children receives.
  - None of my kids feel safe anymore after all those kids were killed waiting for the bus.
  - I feel there are too many sporting events that pull student from daily class rooms. How is a teacher supposed to effectively teach to a partial class?
  - There needs to be smaller classroom sizes and improvement in meal times. Especially times the kids get out to go to breakfast and lunch. All the teachers are amazing.
  - The school district and its teachers are available when I have questions regarding my child's progress. I would like to see funds allocated on additional technology. I have concern regarding the security of the campus. I would like to have ongoing communication with parents and administration regarding current security measures and future needs/plans/goals. We love the school.
  - My kids just started this district this year. Since they started I see massive improvement in all their scores.
  - Silo is a very caring school.
  - We have felt welcomed here and appreciate the dedication to education.
  - Bus is so full kids have had to stand because there were no seats. (Bus #3)

- 
- I feel like the principal and staff should not hang up when trying to find out information about my child. Even if he is in trouble, the principal and staff shouldn't tell me as a parent that I don't understand and treat a parent as if we are stupid and they are smarter than everyone, same with the students.
  - I feel there could be more technology used in my child's education! I do not know any of the board members, there should be a meet and greet or way to express concerns or contact them. I do not know anything about the school budget. The pre-K and kindergarten building needs some upgrades.
  - I don't feel like the kids get enough to eat the younger kids get 2nd and 3rds and the older kids 4-6th grade dont get 2nds..
  - Communication could improve. As a parent of young children who have never had kids in school until starting pre-k this year I am not as informed as I would like to be.
  - My 4th grade student bring home to much homework. They are in school for 8 hours that should be plenty of time and not have to add an hour or TWO at night.
  - Bus driver does not stop at ANY rail road crossings, EVER!!! This needs to be taken care of. My kids are new to the district and I have only really felt welcome by two individuals. Starting my kids in a new school and not knowing where to go or what to do none of the staff at the beginning of the year were particularly helpful. GREAT special education program. Elementary basketball coach does not communicate well with the parents and when there is changes made regarding games, FACEBOOK is NOT where it needs to be posted. The school could benefit from using the REMIND APP or sending call-outs or even notes home. Not everyone has Facebook or access to the internet. The school is not very secure especially on Parent Teacher conference nights all the adults were inside while the children were allowed to run around the school and outside the school, this is an extreme safety issue. Parent Teacher conference night is kind of a joke considering the older kids have so many teachers that the teachers didn't even know anything about my child and one teacher scheduled for conferences but then went on the bus. Older grades should only have conferences if the child is not excelling or having behavior issues. I love all the small fundraisers the school does (donuts day, ice cream day, bake sale day). This is way better than expensive fundraisers that are too hard to sale.
  - The school district lets school out without regard on how this effects parents and does not consult with parents on these decisions
  - School Board meeting dates and times are not given to the parents, this has to change.
  - We LOVE our school, but feel like too much effort and money goes into sports and not enough money and effort go to the arts.
  - Kate McDonald is a great superintendent.
  - Communication between teachers and parents needs vast improvement. Few teachers actually make an effort to use effective communication, especially with divorced parents. I have not been invited to a parent teacher conference this year, which is a shame, because my child is struggling with assignments. The system is failing my child, and no one is being held accountable. This is not the first time I've talked with the principal about a lack of communication with both parents, but I feel the way things are, is the way it's been done for several years and it's not going to change. Hopefully, someone is actually listening to this survey, and it's not used as a tool to say that everything is hunky dory at Silo ISD.



- My 7th graders math book is from 2005 and held up by multi different colors of duct tape. The material she is learning now has already been taught from our previous district last year. The district is more concerned about sports and the fields rather than updated textbooks. The elementary playground is heartbreaking. Why don't they have a slide or a huge playset type to play on? They have two half basketball courts, a few swings and a couple of toys that spin. The schools are outdated cosmetically and in dire need of lipstick and rouge. Has the district approached the Choctaw Nation about a donation to our schools?
- Transportation, Hired certified staff, Cleanliness of the ground of the school and inside the buildings, Playground equipment
- Silo has teachers who really care about their students.
- Very disappointed with the library. Books are not repaired.- Ripped pages – marked in. Librarian doesn't help with the young kids. Can't find books. No help with the AP tests. Very unhappy!
- Teachers need to care more about the kids than themselves. Need to want the kids to learn instead of harsh rules. Should want a class full of happy kids instead of kids that hate to come to school
- No comments at this time we are only in Kindergarten haven't gotten into it enough to say much yet.
- Be more open to new programs presented by eager students.
- Mac & Cheese is not a main entrée it is a side. Food was better 3 years ago, gradually gotten worse every year since IMD.

*Appendix C:*  
*Student Survey Results*

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## *Student Survey*

*Surveys Completed: 97  
Totals may not add to 100 percent due to rounding.*

### *Survey Questions*

	<b>Survey Questions</b>	<b>Strongly Agree</b>	<b>Agree</b>	<b>No Opinion</b>	<b>Disagree</b>	<b>Strongly Disagree</b>
1	Education is the main priority in our school district.	30%	45%	10%	11%	3%
2	Students learn the necessary material to be prepared for the next grade.	24%	56%	12%	4%	4%
3	I am being academically prepared for life after high school.	26%	45%	20%	7%	2%
4	Our schools can be described as “good places to learn.”	29%	45%	13%	9%	3%
5	I knew what to expect on the state tests.	14%	45%	28%	7%	5%
6	There is at least one adult at school to whom I can go when I have a problem.	52%	31%	9%	5%	3%
7	I feel welcome and accepted at school.	32%	35%	16%	10%	6%
8	The school library meets my needs for books and other resources.	23%	42%	21%	10%	4%
9	I have received sufficient college and/or career counseling.	13%	25%	41%	17%	4%
10	My teachers communicate regularly with my parents about my academic progress.	16%	32%	30%	13%	8%
11	My school is clean.	21%	34%	24%	15%	6%
12	My school is attractive and welcoming.	26%	36%	30%	4%	4%
13	My school building is well maintained.	23%	46%	22%	6%	3%
14	I feel safe and secure at school.	29%	37%	16%	13%	4%
15	Bullying is a problem in this district.	16%	15%	36%	22%	10%
16	The school buildings and grounds are safe and secure.	24%	35%	22%	16%	3%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
17	Discipline is fairly and equitably administered in this school.	16%	39%	29%	6%	9%
18	Teachers and staff respect students in this school.	25%	41%	18%	12%	4%
19	Drugs are a problem in this school.	14%	22%	36%	13%	14%
20	Discipline and order are maintained in the school cafeteria.	17%	43%	27%	10%	3%
21	I have enough time to eat my lunch each day.	16%	47%	10%	11%	16%
22	I like the food served in the cafeteria.	8%	24%	15%	23%	30%
23	The cafeteria serves a good variety of food.	9%	38%	14%	16%	24%
24	The district has made online classes available to students.	13%	25%	53%	6%	3%
25	I regularly use technology to keep up-to-date on schoolwork (emailing teachers, using online gradebook, etc.)	14%	16%	36%	24%	10%
26	I regularly use computers or other technology at school.	21%	54%	13%	9%	3%
27	The district's technology is new enough to be useful to me.	20%	47%	19%	9%	5%
28	Teachers know how to use technology in the classroom.	27%	53%	13%	7%	0%
29	Teachers effectively integrate technology-based resources into instruction, such as online videos.	16%	59%	19%	6%	0%
30	I have regular Internet access at home.	34%	34%	10%	10%	10%
31	My bus runs on time nearly every day.	21%	22%	44%	9%	3%
32	Students feel safe riding the bus.	14%	28%	45%	9%	3%
33	Bus drivers effectively handle discipline issues on the bus.	22%	25%	43%	8%	1%
34	The length of my bus ride is reasonable.	21%	22%	44%	5%	7%

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## Written Responses

If you would like to provide any additional comments on the school district, please do so here. Where is the district doing well? In what areas could it be improved?

- Spend money wisely. Discipline all students (even the favorites)
- Its perfect
- Silo high school seems to like and respect its athletes more than anyone else. They are aloud to pretty much do whatever they want to. They also do not get called on in class.
- I think that we should have more time to eat breakfast. By the time we get sit down breakfast is already over.
- This school sucks. Our teacher Mr. [deleted] is awful. Our principal is [deleted]. A lot of the students are pretty shit not gonna lie.
- some of the hallways are small
- the bathrooms need alot of improvement more food
- having students treat other students that are in special education fairly
- I believe we should recognize the kids that have family issues, and when kids say something, even when they mean it as a joke, it could severely scar someone. Kids joke about rape, and even worst things. It's terrible being a party to these kinds of behaviors. I also believe we should take a few days out of the school year to recognize the kids that have been through so much. Sometimes, the ones that are hurting the most, give signs and everyone just ignores it. You may think they are seeking attention, but really they are crying out for help. People may be going through some kind of life crisis, and whenever they try to speak out to a friend, they play it off like it's an act, but the truth is it's not. Some kids will speak out, but when they do, all you do is give them a suicide prevention card to go see a professional, when you so that, your saying "Sorry, I can't help you. You need to talk to a professional..." That will destroy how they feel about sharing. If they come to you, they came to YOU for a reason. Don't ignore it... They are crying out for help... They came to you, because they feel safe coming to you.
- discipline is rly unreasonable
- the school needs tutoring programs at the school for students like me and my following class mates
- the bathrooms
- longer lunches longer buses[i fall out of my seat all the time] less children
- the bathrooms need improvement and it needs a better locker rooms
- we could use electric pencil sharpeners
- the technology could be improved
- Restrooms are outdated along with no warm or hot water available. Classrooms are too small for our number of students. Food provided by the school is poor quality.
- Security on the school could be improved drastically, our classrooms are to small to fit most of our kids in and our school is just continuing to grow.
- I think the FFA could improve.
- Discipline is not fair in the slightest.
- everywhere





*Appendix D:*  
*Resources Referenced in Chapter 2*

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Audit



Professional Learning Communities:  
source materials for school leaders and  
other leaders of professional learning

# Deciding where you are as a professional learning community

Louise Stoll, Ray Bolam, Agnes McMahon, Sally Thomas, Mike Wallace,  
Angela Greenwood and Kate Hawkey

## What is an implementation rubric?

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Rubrics are usually used as assessment tools to measure pupils' work. They are scoring guides that don't depend on a numerical score. Instead, they list a full range of criteria or elements to assess a particular piece of work or performance. They describe varying degrees of quality

for each element, increasing from left to right. A benefit of rubrics is that they provide signposts to where you can get to as a result of development, and pointers to next steps that might be taken when trying to develop particular activities.

## What is the purpose of this rubric?

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This implementation rubric helps you see where colleagues think you are as a professional learning community (PLC) as they reflect on different criteria related to specific characteristics and processes of PLCs. The 12 topics down the left-hand side are the eight characteristics and four developmental processes of PLCs we identified in our study. For each of these, a number of key descriptors are mapped out horizontally, showing the development of each through four phases of their journey, highlighted at the top of the four columns. These range

from what might be happening when you are starting on the journey to develop a PLC to action taken when the PLC is self-sustaining:

**Starting out;** acquiring information and beginning to use ideas.  
**Developing;** experimenting with strategies and building on initial commitment.  
**Deepening;** well on the way, having achieved a degree of mastery and feeling the benefits.  
**Sustaining;** introducing new developments, re-evaluating quality – PLC as a way of life.

## How might you use the rubric?

---

You might choose to use the rubric in a range of ways. For example:

- individual staff members complete the rubric privately and give it to a designated person or team who collate(s) responses and feed(s) these back to the staff for discussion
- individual staff members complete the rubric before sharing and discussing their responses with each other
- small groups complete the rubric together and then compare and summarise their responses

The rubric on pages 3–9 and summary response sheet on page 10 can be photocopied for circulation. Each person completing the rubric needs to look at the descriptors, perhaps highlighting comments that represent your PLC. They can then decide which phase best

represents the PLC's current position, either highlighting the appropriate box in the table or marking the box in the blank response sheet included after the rubric. There is also a space labelled 'How do you know?' where people can note down evidence.

Looking through individual highlighted responses can help you see trends and patterns as well as differences in opinion. You can prepare a summary sheet of all the responses using the blank summary response sheet.

At the end of the activity, you will find some questions to discuss once you have pulled together the results.

The process can be repeated each year. You can look at changes people think have occurred and discuss the reasons for these changes.

## Professional learning community implementation rubric



## PLC characteristics

## Starting out

*Acquiring information and beginning to use ideas*

## Developing

*Experimenting with strategies and building on initial commitment*

## Deepening

*Well on the way, having achieved a degree of mastery and feeling the benefits*

## Sustaining

*Introducing new developments, and re-evaluating quality – PLC as a way of life*

## Shared values and vision

Staff have diverse values related to educational issues. They are beginning to recognise the need to attend to some PLC-wide issues. There are initial discussions about these issues.

Some smaller groups (PLCs) within the staff may share values about education and leadership.

An increasing number of staff share educational values, and participate actively in discussions about vision and values.

Shared educational vision is often stronger and more apparent in particular sections or departments of the PLC.



Educational values and vision are fairly widely shared throughout the PLC and generally demonstrated through practice.



The vision is revisited regularly and commitment to whole-school, centre or college-wide professional values is increasing.

Educational values and vision are widely shared throughout the PLC, regularly revisited and revised as appropriate by the whole staff, and demonstrated through practice.

There is a high degree of commitment to whole-school, centre or college-wide professional values and a strong sense of cohesion and consistency of approach.

*How do you know this?*


PLC characteristics	Starting out <i>Acquiring information and beginning to use ideas</i>	Developing <i>Experimenting with strategies and building on initial commitment</i>	Deepening <i>Well on the way, having achieved a degree of mastery and feeling the benefits</i>	Sustaining <i>Introducing new developments, and re-evaluating quality – PLC as a way of life</i>
<p><b>Collective responsibility</b></p> <p><i>How do you know this?</i></p>	<p>Staff do not feel a sense of whole-school, centre or college-wide shared responsibility for <i>all</i> pupils.</p> <p>Some smaller groups, particularly those with common teaching or support responsibilities, feel a sense of shared responsibility.</p> <p>There are few whole-school, centre or college discussions about learning, progress, development and successes of pupils.</p>	<p>Some staff members feel a sense of collective responsibility for <i>all</i> pupils in the school, centre or college.</p> <p>Smaller groups (PLCs) feel a sense of shared responsibility for <i>all</i> pupils within their subject, year, key stage or phase.</p> <p>There are some whole-school, centre or college discussions about pupils' learning, progress, development and successes.</p>	<p>There is a growing sense of collective responsibility throughout the school, centre or college for the learning, progress, development and success of <i>all</i> pupils.</p> <p>Discussions of learning, progress, development and success of individual pupils.</p>	<p>A desire to do the best for all pupils pervades the school, centre or college.</p> <p>There is regular and deep whole-school, centre or college dialogue about learning, progress, development and successes of individual pupils.</p> 
<p><b>Learning-focused collaboration</b></p> <p><i>How do you know this?</i></p>	<p>Many staff mainly work in isolation. They focus on their own goals, value self-reliance and rarely share practices and strategies.</p> <p>Some smaller groups or departments collaborate and share learning and teaching and support strategies.</p>	<p>Some staff work together across the PLC, with joint planning, sharing strategies, and engaging in whole-school, centre or college-wide projects.</p> <p>Some support staff or care workers and teaching staff collaborate closely but this is not a common feature.</p>	<p>Staff increasingly plan together, collaborate and share ideas through meetings, website resources, team teaching etc.</p> <p>There are examples of productive teamwork between teachers and support staff.</p>	<p>Collaborative planning of learning and teaching activities is taken for granted.</p> <p>Sharing of ideas and strategies and joint problem-solving are widespread.</p> <p>Teamwork involving teachers and support or care staff is widespread.</p> 


PLC characteristics	Starting out <i>Acquiring information and beginning to use ideas</i>	Developing <i>Experimenting with strategies and building on initial commitment</i>	Deepening <i>Well on the way, having achieved a degree of mastery and feeling the benefits</i>	Sustaining <i>Introducing new developments, and re-evaluating quality – PLC as a way of life</i>
<p><b>Existence of professional learning</b></p>	<p>Professional learning mainly consists of formal, short courses and whole-school, centre or college in-service training. Take-up is largely based on individual interest. Enthusiasm for whole-school, centre or college professional learning experiences is limited. There are few work-based professional learning opportunities eg peer observation, coaching etc. There is mainly ad hoc talk about learning from external courses and visits.</p>	<p>A considerable number of staff are engaged in a variety of professional learning opportunities based on individual interest (eg courses, higher degrees etc) and increasingly this is also linked to school, centre or college aims. An increasing number of staff participate enthusiastically in whole-school, centre or college professional learning experiences. Staff feed back on their learning to smaller groups and, sometimes, the whole staff.</p>	<p>Staff are generally interested in a diverse range of individual and group opportunities to increase their knowledge, understanding and skills. Many staff participate enthusiastically in whole-school, centre or college professional learning experiences. Staff generally feed back their learning to the whole staff.</p>	<p>All staff are enthusiastically involved in a diverse range of individual, group and whole-school, centre or college professional learning experiences. The school, centre or college as a workplace is seen as an important site for learning by all staff. Staff devote effort and energy into incorporating valuable new strategies into their practice. Learning is widely shared across the whole staff.</p> 
<p><b>How do you know this?</b></p>				
<p><b>Reflective professional enquiry</b></p>	<p>There is little reflection on, or enquiry into, practice. Data collection and the use of learning and teaching practice are limited. Data may be seen as an end in itself and often as someone else's problem.</p>	<p>Some staff are involved in activities to investigate and improve learning and teaching, eg peer observation and coaching, action research, review and moderation of pupils' work etc. Data collection and the use of data to inform and develop learning and teaching are variable across the school, centre or college.</p>	<p>Many staff are actively involved and show increasing confidence about using different methods to explore and improve learning and teaching. Data collection and the use of data to inform and develop learning and teaching are increasingly consistent across the school, centre or college.</p>	<p>A questioning orientation to practice and 'need to know how we are doing and how we can improve' is pervasive. Staff confidently use a wide range of methods to investigate learning and teaching, using findings to inform and develop their practice. Data are collected, analysed and used to support this process.</p> 
<p><b>How do you know this?</b></p>				



<p><b>PLC characteristics</b></p>	<p><b>Starting out</b> <i>Acquiring information and beginning to use ideas</i></p>	<p><b>Developing</b> <i>Experimenting with strategies and building on initial commitment</i></p>	<p><b>Deepening</b> <i>Well on the way, having achieved a degree of mastery and feeling the benefits</i></p>	<p><b>Sustaining</b> <i>Introducing new developments, and re-evaluating quality – PLC as a way of life</i></p>
<p><b>Openness, networks and partnerships</b></p>	<p>There is very little professional contact outside the school, centre or college.</p> <p>External networks and partnerships are limited, as is the seeking of external ideas and strategies.</p> <p>The school, centre or college is relatively isolated from its community.</p>	<p>Some staff are interested and engaged in networks and activities beyond the school, centre or college as a source of generating and sharing ideas and strategies.</p> <p>There is some involvement with the community.</p>	<p>External sources for generating and sharing ideas and strategies are generally perceived as valuable.</p> <p>Staff are increasingly taking up opportunities to become involved in networks and external partnerships. Some whole-school, centre or college networking is being explored.</p> <p>Community partnerships are generally welcomed and positive.</p>	<p>Staff look beyond the school, centre or college for new ideas and strategies. External input is sought out and welcomed.</p> <p>Links with other schools, centres, colleges and external agencies are seen as valuable, productive and important.</p> <p>Many staff are involved in individual and school, centre or college-wide external networks.</p> <p>Community partnerships are thriving.</p>
<p><i>How do you know this?</i></p>	<p>Membership of the PLC is confined to a small group of teaching staff and some or all school leaders.</p> <p>Input of support staff is not invited.</p> <p>Parental and governor or school council member involvement is limited.</p>	<p>Classroom support staff are increasingly involved as active members of the PLC.</p> <p>Other support staff are less involved.</p> <p>Parental and governor or school council member involvement is generally welcomed.</p>	<p>Many support staff (teaching and other) participate as active members of the PLC.</p> <p>Parental and governor or school council member involvement is welcomed.</p>	<p>The PLC includes all members of staff.</p> <p>All support staff are highly valued members of the PLC.</p> <p>The whole-school, centre or college PLC draws people together from across the organisation.</p> <p>Parental, pupil and governor or school council member involvement is welcomed and encouraged.</p>
<p><i>How do you know this?</i></p>	<p>Membership of the PLC is confined to a small group of teaching staff and some or all school leaders.</p> <p>Input of support staff is not invited.</p> <p>Parental and governor or school council member involvement is limited.</p>	<p>Classroom support staff are increasingly involved as active members of the PLC.</p> <p>Other support staff are less involved.</p> <p>Parental and governor or school council member involvement is generally welcomed.</p>	<p>Many support staff (teaching and other) participate as active members of the PLC.</p> <p>Parental and governor or school council member involvement is welcomed.</p>	<p>The PLC includes all members of staff.</p> <p>All support staff are highly valued members of the PLC.</p> <p>The whole-school, centre or college PLC draws people together from across the organisation.</p> <p>Parental, pupil and governor or school council member involvement is welcomed and encouraged.</p>




PLC characteristics	Starting out <i>Acquiring information and beginning to use ideas</i>	Developing <i>Experimenting with strategies and building on initial commitment</i>	Deepening <i>Well on the way, having achieved a degree of mastery and feeling the benefits</i>	Sustaining <i>Introducing new developments, and re-evaluating quality – PLC as a way of life</i>
<b>Mutual trust, respect and support</b>	<p>Staff relationships highlight issues around trust and conflict.</p> <p>A blame culture may exist.</p> <p>Trust and respect exists among some members of smaller groups or departments.</p> <p>Development issues are viewed as a threat by a number of staff.</p>	<p>A moderate level of mutual trust exists school, centre or college-wide, with increasing mutual respect, although there is some anxiety about classroom observation etc.</p> <p>There is strong mutual trust and respect among some groups of staff who work closely together.</p>	<p>Trust, respect and positive professional relationships are developing school, centre or college-wide.</p> <p>Staff are increasingly open about their practice.</p>	<p>Staff relationships are characterised by openness, honesty, mutual trust, respect, support and care.</p> <p>Everyone's contribution is valued.</p>
<i>How do you know this?</i>				

<b>PLC processes</b>				
<b>Optimising resources and structures</b>	<p>There are few systems and policies in place to support the development of the PLC.</p> <p>Time, space, money and/or communication mechanisms tend to act as barriers.</p>	<p>Attention is paid to trying to put into place the necessary structures, systems and policies that will help support PLC development: creating time; locating space; planning communication mechanisms; use of meetings and other procedures; arranging staff deployment etc.</p>	<p>Most of the necessary structures, systems and policies are in place to support PLC development.</p> <p>Attention is paid to dealing with resource and structural issues that get in the way of PLC development.</p>	<p>Time, money, space, meetings, communication procedures and staff deployment are targeted as a priority to promote the ongoing development of the PLC.</p> <p>Resource and structural issues are dealt with swiftly and actively.</p>
<i>How do you know this?</i>				



<p><b>PLC processes</b></p>	<p><b>Starting out</b> <i>Acquiring information and beginning to use ideas</i></p>	<p><b>Developing</b> <i>Experimenting with strategies and building on initial commitment</i></p>	<p><b>Deepening</b> <i>Well on the way, having achieved a degree of mastery and feeling the benefits</i></p>	<p><b>Sustaining</b> <i>Introducing new developments, and re-evaluating quality – PLC as a way of life</i></p>
<p><b>Promoting professional learning</b></p> <p><i>How do you know this?</i></p>	<p>An explicit needs identification process is rarely used, either for individual staff or whole-school, centre or college needs.</p> <p>Co-ordination responsibility for continuing professional development is unspecified or unclear.</p> <p>Information for staff mainly comprises details about courses and training days.</p>	<p>A needs identification process has been developed and is being used for staff and whole-school, centre or college professional learning needs.</p> <p>Continuous learning of all staff is increasingly promoted.</p> <p>Attention is paid to strengthening the co-ordination of professional learning.</p> <p>Performance management is starting to be used as a process to support the PLC's development.</p>	<p>Staff and whole-school, centre or college professional learning needs are clearly identified.</p> <p>Continuous learning of all staff is promoted and carefully co-ordinated. A range of opportunities is planned to enable staff to learn from and with each other and facilitate the transfer of new learning into practice.</p> <p>Performance management is used as a positive process to support the PLC's development.</p> <p>Some staff are encouraged to take responsibility in promoting the professional learning of colleagues.</p>	<p>Staff and whole-school, centre or college professional learning needs are regularly and consistently identified.</p> <p>Continuous professional learning and development for all staff is actively promoted and carefully co-ordinated.</p> <p>Attention is paid to ensure that new learning is transferred into practice.</p> <p>Opportunities are automatically planned to ensure staff can learn with and from each other.</p> <p>Staff are actively encouraged to take responsibility in promoting the professional learning of colleagues.</p>

PLC processes	Starting out <i>Acquiring information and beginning to use ideas</i>	Developing <i>Experimenting with strategies and building on initial commitment</i>	Deepening <i>Well on the way, having achieved a degree of mastery and feeling the benefits</i>	Sustaining <i>Introducing new developments, and re-evaluating quality – PLC as a way of life</i>
<p><b>Evaluating and sustaining the PLC</b></p> <p><i>How do we know this</i></p>	<p>There is little or no discussion about the concept of a PLC.</p> <p>There is little evaluation of how the process of the PLC operates or how its development progresses.</p> <p>There is little evaluation of continuing professional development's (CPD's) impact or of other PLC activities.</p>	<p>The idea of a PLC is introduced to staff.</p> <p>There is occasional evaluation of how the process of the PLC operates or how its development progresses.</p> <p>There is some evaluation of CPD's impact and of other PLC activities.</p>	<p>The PLC is consciously and actively developed.</p> <p>There is regular evaluation of how the process of the PLC operates or how its development progresses.</p> <p>CPD's impact on practice is evaluated, as are many other PLC activities.</p>	<p>Being a PLC is just 'part of the way we do things here'.</p> <p>People understand and support the idea of a PLC.</p> <p>Regular attention is given to evaluating the process, progress and impact of the PLC and all of its activities, including CPD.</p> 
<p><b>Leading and managing to promote the PLC</b></p> <p><i>How do we know this</i></p>	<p>The headteacher (principal) works to build trust and begins to develop and share a learning vision and focus.</p> <p>Senior leadership team members are encouraged to participate in PLC leadership.</p> <p>Few other staff are involved in leading any PLC activities.</p>	<p>Attention is given by senior leaders to developing and spreading a learning vision and focus and building trust.</p> <p>Senior leaders model teamwork and leadership of learning.</p> <p>Other staff are involved in leading some PLC activities.</p>	<p>Senior leaders maintain their attention to developing and spreading a learning vision and focus and building trust.</p> <p>Senior leaders model learning.</p> <p>Leadership for different PLC activities is increasingly taken up by other staff.</p>	<p>Senior leaders are deeply committed to the development and sustainability of the school's PLC and prioritise this as a major leadership and management task.</p> <p>Distributing leadership among staff is an accepted practice.</p> 

## Summary response sheet

	Starting out	Developing	Deepening	Sustaining
Shared values and vision				
Collective responsibility				
Learning-focused collaboration				
Existence of professional learning				
Reflective professional enquiry				
Openness, networks and partnerships				
Inclusive membership				
Mutual trust, respect and support				
Optimising resources and structures				
Promoting professional learning				
Evaluating and sustaining the PLC				
Leading and managing to promote the PLC				

You can use this sheet to: a) mark down individual responses to the implementation rubric;  
b) summarise all of the responses of individuals.



### Questions for reflection and discussion



What did you notice as you were completing the rubric?

Which are the characteristics and processes, or aspects of these, where you feel you have progressed furthest along the route? What factors seem to have helped you?

Which are the characteristics and processes, or aspects of these, where you feel progression has been slower? What seems to have been holding back the PLC's development in these areas?

How will you move forward with this information? (You may also find it helpful to use *Investigating the culture of your professional learning community*, another *Audit* activity, to gather some different kinds of data. Alternatively, the *Planning* and *Action* materials may offer some ideas about next steps.)



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## Audit

Investigating the culture of your professional learning community  
Comparing your preferred future and the current situation in your  
professional learning community

**Deciding where you are as a professional learning community**

### **National College for School Leadership**

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Nottingham NG8 1DH

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F: 0115 872 2001  
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### **General Teaching Council for England**

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19-30 Alfred Place  
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T: 0870 001 0308  
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E: [info@gtce.org.uk](mailto:info@gtce.org.uk)  
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### **DfES Innovation Unit**

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W: [www.standards.dfes.gov.uk/innovation-unit](http://www.standards.dfes.gov.uk/innovation-unit)

### **Effective Professional Learning Communities**

University of Bristol  
Graduate School of Education  
8-10 Berkeley Square  
Bristol  
BS8 1HH

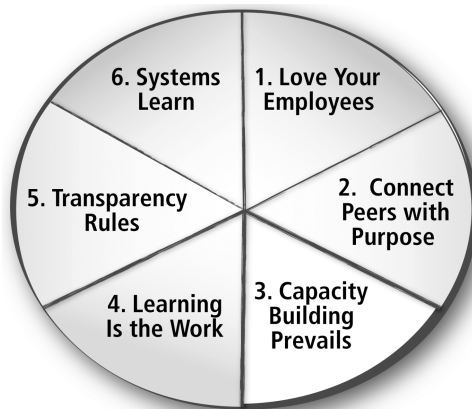
W: [www.eplc.info](http://www.eplc.info)



# THE SIX SECRETS OF CHANGE

MICHAEL FULLAN

## The Six Secrets of Change



— Fullan, 2008a

## Learning to Lead Change

### The Pathways Problem



### What is Change?

- New materials
- New behaviors/practices
- New beliefs/understanding

### The Implementation Dip



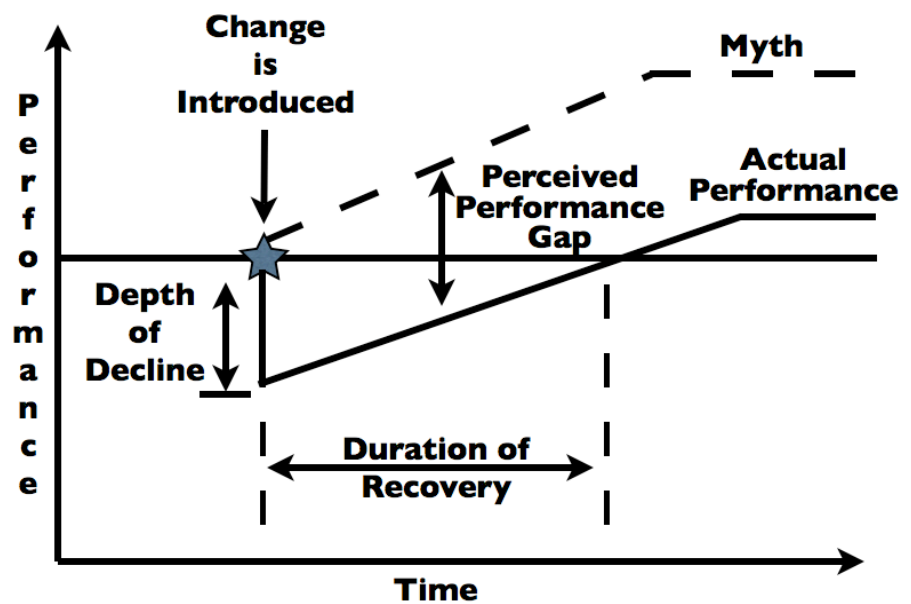
*education in motion*

## THE SIX SECRETS OF CHANGE

### Change Insights

- The implementation dip is normal
- Behaviors change before beliefs
- The size and prettiness of the planning document is inversely related to the quantity of action and student learning (Reeves, 2002)
- Shared vision or ownership is more of an outcome of a quality process than it is a precondition
- Feelings are more influential than thoughts (Kotter, 2008)

### Implementation



— Herold & Fedor, 2008

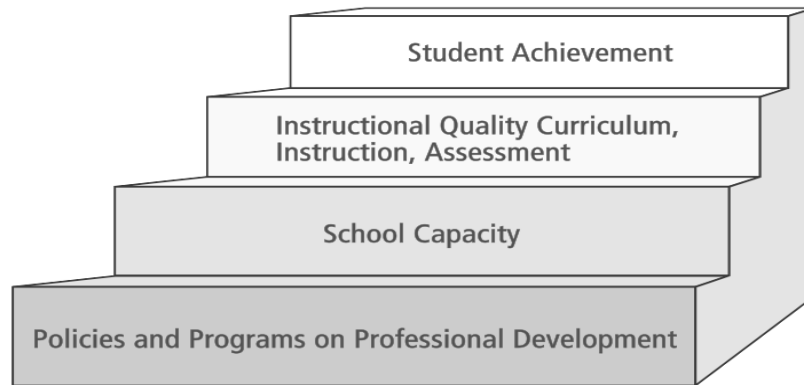
### Change Savvy

Change savvy leadership involves:

- Careful entry into the new setting
- Listening to and learning from those who have been there longer
- Engage in fact finding and joint problem solving
- Carefully (rather than rashly) diagnosing the situation
- Forthrightly addressing people's concerns
- Being enthusiastic, genuine and sincere about the change circumstances
- Obtaining buy-in for what needs fixing
- Developing a credible plan for making that fix

— Herold & Fedor, 2008

**Influences on School Capacity and School Student Achievement**



— *Newmann, King, & Youngs, 2000*

**School Capacity**

The collective power of the full staff to improve student achievement.

School capacity includes and requires:

1. Knowledge, skills, dispositions of individuals
2. Professional community
3. Program coherence
4. Technical resources
5. Shared leadership

— *Newmann, King, & Youngs, 2000*

**What is Collaboration?**

A systematic process in which we work together, interdependently, to analyze and impact professional practice in order to improve our individual and collective results.

— *Dufour, Dufour, & Eaker, 2002*

**Tri-Level Reform**



— *Fullan, 2005*



**Secret One: Love your Employees**

Explore the importance of building the school by focusing on both the teachers and staff, and students and the community. The key is enabling staff to learn continuously. Evidence will be provided from successful business companies as well as from education.

**Theory X Assumptions**

- The average human being has an inherent dislike of work and will avoid it if he or she can.
- Because of their dislike for work, most people must be controlled and threatened before they will work hard enough.
- The average human prefers to be directed, dislikes responsibility, is unambiguous, and desires security above everything else.

— *McGregor, 1960*

**Theory Y Assumptions**

- If a job is satisfying, then the result will be commitment to the organization.
- The average person learns under proper conditions not only to accept but to seek responsibility.
- Imagination, creativity, and ingenuity can be used to solve work problems by a large number of employees.

— *McGregor, 1960*

**Dimensions of Relational Coordination**

<b>Relationships</b>	<b>American</b>	<b>Southwest</b>
Shared goals	"Ninety percent of the ramp employees don't care what happens, even if the walls fall down, as long as they get their check."	"I've never seen so many people work so hard to do one thing. You see people checking their watches to get the on-time departure ... then it's over and you're back on time."
Shared knowledge	Participants revealed little awareness of the overall process. They typically explained their own set of tasks without reference to the overall process of flight departures.	Participants exhibited relatively clear mental models of the overall process — an understanding of the links between their own jobs and the jobs of other functions. Rather than just knowing what to do, they knew why, based on shared knowledge of how the overall process worked.
Mutual respect	"There are employees working here who think they're better than other employees. Gate and ticket agents think they're better than the ramp. The ramp think they're better than cabin cleaners — think it's a sissy, woman's job. Then the cabin cleaners look down on the building cleaners. The mechanics think the ramp are a bunch of luggage handlers.	"No one takes the job of another person for granted. The skycap is just as critical as the pilot. You can always count on the next guy standing there. No one department is any more important than another."

**Communications**

Frequent and timely communication	"Here you don't communicate. And sometimes you end up not knowing things ... Everyone says we need effective communication. But it's a low priority in action ... The hardest thing at the gates when flights are delayed is to get information."	"There is constant communication between customer service and the ramp. When planes have to be switched and bags must be moved, customer service will advise the ramp directly or through operations." If there's an aircraft swap "operations keeps everyone informed. ... It happens smoothly."
Problem-solving communication	"If you ask anyone here, what's the last thing you think of when there's a problem, I bet your bottom dollar it's the customer. And these are guys who work hard every day. But they're thinking, how do I keep my ass out of the sling?"	"We figure out the cause of the delay. We do not necessarily chastise, though sometimes that comes into play. It is a matter of working together. Figuring out what we can learn. Not finger pointing."

— Gittel, 2003

**Motivational Work**

- Meaningful, accomplishable work
- Enabling development
- Sense of camaraderie
- Being well led

**Characteristics of Firms of Endearment (FoEs)**

What we call a humanistic company is run in such a way that its stakeholders — customers, employees, suppliers, business partners, society, and many investors — develop an emotional connection with it, an affectionate regard not unlike the way many people feel about their favourite sports teams. Humanistic companies — or firms of endearment (FoEs) — seek to maximize their value to society as a whole, not just to their shareholders. They are the ultimate value creators: They create emotional value, experiential value, social value, and of course, financial value. People who interact with such companies feel safe, secure, and pleased in their dealings. They enjoy working with or for the company, buying from it, investing in it, and having it as a neighbour.

— *Sisodia, Wolfe, & Sheth, 2007*

**FoEs Performance**

- Over a ten-year horizon, FoEs outperformed the *Good to Great* companies: 1,026 percent return versus 331 percent (a 3-to-1 ratio).
- Over five years, FoEs returned 128 percent, compared to 77 percent by the *Good to Great* companies (a 1.7-to-1 ratio).

— *Sisodia, Wolfe, & Sheth, 2007*

**Reflection on Content: (Three-Person-Interview)**

In groups of three discuss the following questions:

1. Who are your stakeholders?
2. What does your organization believe in and stand for?
3. What conditions do you need to create a Theory Y (FoE) environment?

Worksheet



## THE SIX SECRETS OF CHANGE

### Secret Two: Connect Peers with Purpose

Purposeful peer interaction within the school is crucial. Student learning and achievement increase substantially when teachers work in learning communities supported by school leaders who focus on improvement.

#### Jersey Video

| Why is this a positive example of teaching connecting with peers?

#### Knowledge Sharing

| Literacy Learning Fair

#### Learning Fair Outcomes

- Forces schools to explain themselves
- Time for celebrating the work of the year
- Learn new ideas from other schools
- Friendly competition to outdo each other
- Fosters district identity

#### Results of Connecting

- Knowledge flows as people pursue and continuously learn what works best
- Identity with an entity larger than oneself expands the self into powerful consequences.

— Fullan, 2008a

#### We-We Commitment

| What are your two best strategies for connecting peers?

**Secret Three: Capacity Building Prevails**

The most effective strategies involve helping teachers and principals develop the instructional and management of change skills necessary for school improvement. The role of assessment for learning is essential in order to link data on learning to instructional practices that achieve student results.

**Capacity Building** | Capacity building concerns competencies, resources, and motivation. Individuals and groups are high on capacity if they possess and continue to develop these three components in concert.  
— Fullan, 2008a

**Judgmentalism** | Judgmentalism is not just perceiving something as ineffective, but doing so in a pejorative and negative way.  
— Fullan, 2008a

**Non-Judgmentalism** | Focused on improvement in the face of ineffective performance rather than labeling or categorizing weaknesses.  
— Fullan, 2008a

**Fear Prevents Acting on Knowledge** | When people fear for their jobs or their reputation it is unlikely that they will take risks. Fear causes a focus on the short-term to neglect of the mid or longer term. Fear creates a focus on the individual rather than the group. Teamwork suffers.

**Lincoln on Temperance** | Assume to dictate to his judgment, or command his action, or mark him to be one to be shunned and despised, and he will retreat within himself, close all avenues to his head and his heart; and tho your cause be naked truth itself, transformed to the heaviest lance harder than steel can be made, and tho you throw it with more than Herculean force and precision, you shall no more be able to pierce him than to penetrate the hard shell of a tortoise with a rye straw.  
— Quoted in Miller, 2002, pp. 148-149

**Lincoln on Slavery** | We can succeed only in concert. It is not 'can any of us imagine better', but 'can we all do better.'  
— Quoted in Miller, 2002, pp. 224; italics in original

## THE SIX SECRETS OF CHANGE

### Judgmentalism

Is it possible to perceive something as ineffective and not be judgmental about it?

Letter off A, B

- Pick any of the four quadrants that represents a situation that you have experienced
- Make a few notations within the quadrant
- Do a two-step interview with your partner A, B

FEELING	FEEDBACK	
	Indirect	Direct
Belittled		
Not Belittled		

### As a leader...

- Practice non-judgmentalism when you are giving feedback
- Practice non-defensiveness when you are receiving feedback

### Capacity Building

People who thrive here have a certain humility. They know they can get better; they want to learn from the best. We look for people who light up when they are around other talented people.

— Taylor & LaBarre, 2002

**Secret Four: Learning Is the Work**

Professional development (PD) in workshops and courses is only an input to continuous learning and precision in teaching. Successful growth itself is accomplished when the culture of the school supports day-to-day learning of teachers engaged in improving what they do in the classroom and school.

**Culture of Learning**

If we were to identify the single greatest difference between Toyota and other organizations (including service, healthcare, and manufacturing), it would be the depth of understanding among Toyota employees regarding their work.

— *Liker & Meier, 2007*

**Toyota's Approach**

The essence of Toyota's approach to improving performance consists of three components:

1. Identify critical knowledge
2. Transfer knowledge using job instruction
3. Verify learning and success

— *Liker & Meier, 2007*

**Breakthrough**



— *Fullan, Hill, & Crévola, 2006*

**The Container Store**

The Container Store provides 235 hours of training to first-year employees and 160 hours every year thereafter, all with a view to creating a culture where people learn from experience.

— *Sisodia, Wolfe, & Sheth, 2007*

**Non-Judgmentalism ... Again**

The objective is not to identify whom to blame for a problem, it is to find out where the system failed.

— *Liker & Meier, 2007*

### Secret Five: Transparency Rules

Ongoing data and access to seeing effective practices is necessary for success. It takes up the dilemmas of 'de-privatizing practice' in which it becomes normal and desirable for teachers to observe and be observed in teaching facilitated by coaches and mentors.

#### Getting Started with Transparency

Data walls — elementary teachers  
Data walls — high school teachers

— *Liker & Meier, 2007*

#### Medicine

To fix medicine we need to do two things: measure ourselves, and be open about what we are doing.

— *Gawande, 2007*

#### Classroom Improvement

Transparency + non-judgmentalism + good help = classroom improvement

— *Fullan, 2008a*

## Statistical Neighbors

As part of the overall strategy, Ontario created a new database, which is called “Statistical Neighbors.” All four thousand schools are in the system. They are organized into four bands — students and schools from the most disadvantaged communities, two bands in the middle, and a fourth comprising students in the least disadvantaged communities. Schools can be examined using other categories as well — size of school, percentage of ESL students, geographical setting (rural or urban), and so on.

We are now in a position to use the data, and here is where the nuance of Secret Five comes into play. Simply publishing the results can possibly do some good, but more likely than not would have negative side effects. Instead we operate under a set of ground rules:

1. We do not condone league tables — displaying the results of every school from lowest to highest scores without regard to context. Instead we do the following:
  - a. Help schools compare themselves with themselves — that is, look at what progress they are making compared to previous years;
  - b. Help schools compare themselves with their statistical neighbors, comparing apples with apples;
  - c. Help schools examine their results relative to an external or absolute standard, such as how other schools in the province are faring and how close they are to achieving 100 percent success in literacy and numeracy.
2. We work with the seventy-two school districts and their four thousand schools to set annual “aspirational targets” based on their current starting point.
3. We focus on capacity building, helping districts identify and use effective instructional practices.
4. Although we take each year’s results seriously, we are cautious about drawing conclusions about any particular school based on just one year’s results. We prefer to examine three-year trends to determine if schools or districts are “stuck” or “moving” (improving or declining).
5. For schools and districts that are continuing to under-perform, we intervene with a program called Ontario Focused Intervention Partnership (OFIP), which provides targeted help designed to improve performance. There are currently about 850 of the 4,000 schools in this program. We are careful not to stigmatize schools in OFIP (in keeping with Secret Three), because doing so gets people sidetracked into issues of blame.

Overall, we think that this approach to data-informed development is effective. There is quite a lot of pressure built into the process, but that pressure is based on constructive transparency. When data are precise, presented in a non-judgmental way, considered by peers, and used for improvement as well as for external accountability, they serve to balance pressure and support. This approach seems to work. After five years of flatlined results before beginning the program (1999 – 2003), the province’s literacy and numeracy scores have climbed by some ten percentage points, with OFIP schools improving more than the average.

In England, schools and LAs can also track their performance through a data system called RAISE in which they can trace their performance over time.

— Fullan, 2008a

### Secret Six: Systems Learn

Continuous learning depends on developing many leaders in the school in order to enhance continuity. It also depends on schools being confident in the face of complexity, and open to new ideas.

#### Systems Learn

The fact that Toyota can succeed over decades ... and that the company shows no "leadership effects" — or changes from succession — speaks to building a robust set of interrelated management practices and philosophies that provide advantage above and beyond the ideas or inspirations of single individuals.

— *Pfeffer & Sutton, 2006*

#### Certainty

Some people I've encountered seem more certain about everything than I am about anything.

— *Rubin, 2003*

#### Wisdom

Wisdom is using your knowledge while doubting what you know.

— *Pfeffer & Sutton, 2006*

#### Leaders ...

... Have to be more confident than the situation warrants. They have to develop leadership in others. Be specific about the few things that matter and keep repeating them.

— *Pfeffer & Sutton, 2006*

#### Systems Learning

Confidence but not certitude in the face of complexity. Get comfortable with being uncomfortable.

— *Fullan, 2008a*

Leadership

Shackleton Video

What evidence did you see of Shackleton's leadership style?

Scott

- Ambitious
- Naïve technically
- Hierarchical
- Arrogant
- Wary of colleagues more able than himself
- Indifferent selector
- Poor trainer
- Bad safety record
- Gifted writer

Shackleton

- Single-minded
- Excellent in crisis
- Technically sensible
- Gregarious
- Excellent public speaker
- Broadly objective
- Good conceptual planner
- Effective selector and trainer
- Good safety record
- Bored by administration
- Politically astute

— *Morrel & Capparell, 2001*

**On Leadership** ... Scott was dour, bullying and controlling; Shackleton was warm, humorous and egalitarian ... Scott tried to orchestrate every movement of his men; Shackleton gave his men responsibility and some measure of independence. Scott was secretive and untrusting; Shackleton talked openly and frankly with the men about all aspects of the work. Scott put his team at risk to achieve his goals; Shackleton valued his men's lives above all else.

Scott's men died. All of Shackleton's men survived the wreck of their ship, *Endurance* in the crushing Antarctic ice, stranded twelve thousand miles from civilization with no means of communication. Isolated for almost two years on an Antarctic ice flow, Shackleton and a few of his men endured an eight-hundred-mile trip across the frigid south Atlantic in little more than a rowboat to get help for his men. All twenty-seven men in the crew survived in good health.

— *Morrel & Capparell, 2001*

**Shackleton's Leadership Traits:**

- Cultivate a sense of compassion and responsibility for others.
- Once you commit, stick through the tough learning period.
- Do your part to help create an upbeat environment at work — important for productivity.
- Broaden your cultural and social horizons, learning to see things from different perspectives.
- In a rapidly changing world, be willing to venture in new directions to seize new opportunities and learn new skills.
- Find a way to turn setbacks and failures to your own advantage.
- Be bold in vision and careful in planning.
- Learn from past mistakes.
- Never insist on reaching a goal at any cost; it must be achieved without undue hardship for your staff.

— *Morrel & Capparell, 2001*



## THE SIX SECRETS OF CHANGE

**What's Worth Fighting  
for in the Principalship:  
Guidelines for Principals**

1. De-privatize teaching
2. Model instructional leadership
3. Build capacity first
4. Grow other leaders
5. Divert the distractors
6. Be a system leader

— Fullan, 2008

**What's Worth Fighting  
for in the Principalship:  
Guidelines for Systems**

1. Invest in the instructional leadership of principals
2. Combine direction and flexibility
3. Mobilize the power of data
4. Use peers to change district culture
5. Address the managerial requirements
6. Stay the course

— Fullan, 2008

## Leadership Therapy

A. Rowley, 2007

### ***The Leadership Circumplex***

The circumplex is based upon two related dimensions of leadership behavior — conviction and connection.

*Conviction* measures the following behaviors:

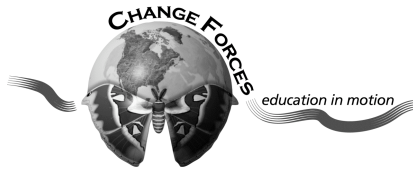
- The ability to provide a compelling vision;
- The capacity to manage or lead change;
- Reality sense — the ability to grasp what is happening in the industry and a commitment to understanding and servicing the needs of the customer;
- The capacity to display passion, conviction, belief and authenticity; and
- A commitment to continuous learning.

*Connection* measures the following:

- Self-awareness — an understanding of how your behavior affects others and how to change it according to the person/situation;
- Effective communication — you demonstrate a sense of power and competence through communication;
- Developing people — you put developing people as a priority and ensure that people have personal development plans; and
- The capacity to revitalize the business values

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## THE SIX SECRETS OF CHANGE



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## RTI Fidelity of Implementation Rubric

The Response to Intervention (RTI) Fidelity Rubric is for use by individuals who are responsible for monitoring school-level fidelity of RTI implementation. The rubric is aligned with the essential components of RTI and the infrastructure that is necessary for successful implementation. It is accompanied by a worksheet with guiding questions and score points for use in an interview with a school’s RTI leadership team.

<i>Assessments—Screening, progress monitoring, and other supporting assessments are used to inform data-based decision making.</i>			
Measures	1	3	5
<i>Screening—The RTI framework accurately identifies students at risk of poor learning outcomes or challenging behaviors.</i>			
<b>Screening Tools</b>	Insufficient evidence that the screening tools are reliable, correlations between the instruments and valued outcomes are strong, and predictions of risk status are accurate.	Evidence indicates that the screening tools are reliable, correlations between the instruments and valued outcomes are strong, and predictions of risk status are accurate, but staff is unable to articulate the supporting evidence.	Evidence indicates that the screening tools are reliable, correlations between the instruments and valued outcomes are strong, and predictions of risk status are accurate, and staff is able to articulate the supporting evidence.
<b>Universal Screening</b>	One or none of the following conditions is met: (1) screening is conducted for all students (i.e., is universal); (2) procedures are in place to ensure implementation accuracy (i.e., all students are tested, scores are accurate, cut points/decisions are accurate); and (3) a process to screen all students occurs more than once per year (e.g., fall, winter, spring).	Two of the following conditions are met: (1) screening is conducted for all students (i.e., is universal); (2) procedures are in place to ensure implementation accuracy (i.e., all students are tested, scores are accurate, cut points/decisions are accurate); and (3) a process to screen all students occurs more than once per year (e.g., fall, winter, spring).	All of the following conditions are met: (1) screening is conducted for all students (i.e., is universal); (2) procedures are in place to ensure implementation accuracy (i.e., all students are tested, scores are accurate, cut points/decisions are accurate); and (3) a process to screen all students occurs more than once per year (e.g., fall, winter, spring).
<b>Data Points to Verify Risk</b>	Screening data are not used or are used alone to verify decisions about whether a student is or is not at risk.	Screening data are used in concert with at least one other data source (e.g., classroom performance, curriculum-based assessment, performance on state	Screening data are used in concert with at least two other data sources (e.g., classroom performance, performance on state assessments, diagnostic assessment

		assessments, diagnostic assessment data, short-term progress monitoring) to verify decisions about whether a student is or is not at risk.	data, short-term progress monitoring) to verify decisions about whether a student is or is not at risk.
<b>Progress Monitoring</b> —Ongoing and frequent monitoring of progress quantifies rates of improvement and informs instructional practice and the development of individualized programs. Measures are appropriate for the student’s grade and/or skill level.			
<b>Progress-Monitoring Tools</b>	Selected progress-monitoring tools meet no more than one of the following criteria: (1) have sufficient number of alternate forms of equal and controlled difficulty to allow for progress monitoring at recommended intervals based on intervention level; (2) specify minimum acceptable growth; (3) provide benchmarks for minimum acceptable end-of-year performance; and (4) reliability and validity information for the performance-level score is available.	Selected progress-monitoring tools meet two or three of the following criteria: (1) have sufficient number of alternate forms of equal and controlled difficulty to allow for progress monitoring at recommended intervals based on intervention level; (2) specify minimum acceptable growth; (3) provide benchmarks for minimum acceptable end-of-year performance; and (4) reliability and validity information for the performance-level score is available.	Selected progress-monitoring tools meet all of the following criteria: (1) have sufficient number of alternate forms of equal and controlled difficulty to allow for progress monitoring at recommended intervals based on intervention level; (2) specify minimum acceptable growth; (3) provide benchmarks for minimum acceptable end-of-year performance; and (4) reliability and validity information for the performance-level score is available and staff is able to articulate the supporting evidence.
<b>Progress-Monitoring Process</b>	Neither of the following conditions is met: (1) progress monitoring occurs at least monthly for students receiving secondary-level intervention and at least weekly for students receiving intensive intervention; and (2) procedures are in place to ensure implementation accuracy (i.e., appropriate students are tested, scores are accurate, decision-making rules are applied consistently).	Only one of the following conditions is met: (1) progress monitoring occurs at least monthly for students receiving secondary-level intervention and at least weekly for students receiving intensive intervention; and (2) procedures are in place to ensure implementation accuracy (i.e., appropriate students are tested, scores are accurate, decision-making rules are applied consistently).	Both of the following conditions are met: (1) progress monitoring occurs at least monthly for students receiving secondary-level intervention and at least weekly for students receiving intensive intervention; and (2) procedures are in place to ensure implementation accuracy (i.e., appropriate students are tested, scores are accurate, decision-making rules are applied consistently).

***Data-Based Decision Making***—Data-based decision-making processes are used to inform instruction, movement within the multilevel system, and disability identification (in accordance with state law).

Measures	1	3	5
<b>Decision-Making Process</b>	The mechanism for making decisions about the participation of students in the instruction/ intervention levels meets no more than one of the following criteria: The process (1) is data-driven and based on validated methods; (2) involves a broad base of stakeholders; and (3) is operationalized with clear, established decision rules (e.g., movement between levels or tiers, determination of appropriate instruction or interventions).	The mechanism for making decisions about the participation of students in the instruction/ intervention levels meets two of the following criteria: The process (1) is data-driven and based on validated methods; (2) involves a broad base of stakeholders; and (3) is operationalized with clear, established decision rules (e.g., movement between levels or tiers, determination of appropriate instruction or interventions).	The mechanism for making decisions about the participation of students in the instruction/intervention levels meets all of the following criteria: The process (1) is data-driven and based on validated methods; (2) involves a broad base of stakeholders; and (3) is operationalized with clear, established decision rules (e.g., movement between levels or tiers, determination of appropriate instruction or interventions).
<b>Data System</b>	A data system is in place that meets two or fewer of the following conditions: (1) the system allows users to document and access individual student- level data (including screening and progress-monitoring data) and instructional decisions; (2) data are entered in a timely manner; (3) data can be represented graphically; and (4) there is a process for setting/evaluating goals.	A data system is in place that meets three of the following four conditions: (1) the system allows users to document and access individual student-level data (including screening and progress-monitoring data) and instructional decisions; (2) data are entered in a timely manner; (3) data can be represented graphically; and (4) there is a process for setting/evaluating goals.	A data system is in place that meets all of the following conditions: (1) the system allows users to document and access individual student-level data (including screening and progress-monitoring data) and instructional decisions; (2) data are entered in a timely manner; (3) data can be represented graphically; and (4) there is a process for setting/evaluating goals.
<b>Responsiveness to Secondary and Intensive Levels of Intervention</b>	Neither of the following conditions is met: (1) decisions about responsiveness to intervention are based on reliable and valid progress-monitoring data that reflect slope of improvement or progress toward the attainment of a goal at the end of the intervention; and (2) these decision-making criteria are implemented accurately.	Only one of the following conditions is met: (1) decisions about responsiveness to intervention are based on reliable and valid progress-monitoring data that reflect slope of improvement or progress toward the attainment of a goal at the end of the intervention; and (2) these decision-making criteria are implemented accurately.	Both of the following conditions are met: (1) decisions about responsiveness to intervention are based on reliable and valid progress-monitoring data that reflect slope of improvement or progress toward the attainment of a goal at the end of the intervention; and (2) these decision-making criteria are implemented accurately.

**Multilevel Instruction**—The RTI framework includes a school-wide, multilevel system of instruction and interventions for preventing school failure. Commonly represented by the three-tiered triangle, multilevel instruction also is known as the multi-tiered system of support (MTSS).

Measures	1	3	5
<b>Primary-Level Instruction/Core Curriculum (Tier I)</b>			
<b>Research-Based Curriculum Materials</b>	Few core curriculum materials are research based for the target population of learners (including subgroups).	Some core curriculum materials are research based for the target population of learners (including subgroups).	All core curriculum materials are research based for the target population of learners (including subgroups).
<b>Articulation of Teaching and Learning (in and across grade levels)</b>	Neither of the following conditions is met: (1) teaching and learning objectives are well articulated from one grade to another; and (2) teaching and learning is well articulated within grade levels so that students have highly similar experiences, regardless of their assigned teacher.	Only one of the following conditions is met: (1) teaching and learning objectives are well articulated from one grade to another; and (2) teaching and learning is well articulated within grade levels so that students have highly similar experiences, regardless of their assigned teacher.	Both of the following conditions are met: (1) teaching and learning objectives are well articulated from one grade to another; and (2) teaching and learning is well articulated within grade levels so that students have highly similar experiences, regardless of their assigned teacher.
<b>Differentiated Instruction</b>	Neither of the following conditions is met: (1) interviewed staff can describe how most teachers in the school differentiate instruction for students on, below, or above grade level; and (2) interviewed staff can explain how most teachers in the school use student data to identify and address the needs of students.	Only one of the following conditions is met: (1) interviewed staff can describe how most teachers in the school differentiate instruction for students on, below, or above grade level; and (2) interviewed staff can explain how most teachers in the school use student data to identify and address the needs of students.	Both of the following conditions are met: (1) interviewed staff can describe how most teachers in the school differentiate instruction for students on, below, or above grade level; and (2) interviewed staff can explain how most teachers in the school use data to identify and address the needs of students.
<b>Standards-Based</b>	The core curriculum (reading and mathematics) is not aligned with the Common Core or other state standards.	The core curriculum (reading and mathematics) is partially aligned with the Common Core or other state standards.	The core curriculum (reading and mathematics) is aligned with the Common Core or other state standards.

<b>Exceeding Benchmark</b>	Neither of the following conditions is met: (1) the school provides enrichment opportunities for students exceeding benchmarks; and (2) teachers implement those opportunities consistently at all grade levels.	One of the following conditions is met: (1) the school provides enrichment opportunities for students exceeding benchmarks; and (2) teachers implement those opportunities consistently at all grade levels.	Both of the following conditions are met: (1) the school provides enrichment opportunities for students exceeding benchmarks; and (2) teachers implement those opportunities consistently at all grade levels.
<b>Secondary-Level Intervention (Tier II)</b>			
<b>Evidence-Based Intervention</b>	Secondary-level interventions are not evidence based in content areas and grade levels where they are available.	Some secondary-level interventions are evidence based in content areas and grade levels where they are available.	All secondary-level interventions are evidence based in content areas and grade levels where they are available.
<b>Complements Core Instruction</b>	Secondary-level intervention is poorly aligned with core instruction and incorporates different topics, even though those topics are not foundational skills that support core program learning objectives.	Secondary-level intervention incorporates foundational skills, but these only occasionally align with the learning objectives of core instruction.	Secondary-level intervention is well aligned with core instruction and incorporates foundational skills that support the learning objectives of core instruction.
<b>Instructional Characteristics</b>	One or none of the following conditions is met: (1) interventions are standardized; (2) secondary-level interventions are led by staff trained in the intervention according to developer requirements; and (3) group size and dosage are optimal (according to research) for the age and needs of students.	Two of the following conditions are met: (1) interventions are standardized; (2) secondary-level interventions are led by staff trained in the intervention according to developer requirements; and (3) group size and dosage are optimal (according to research) for the age and needs of students.	All three of the following conditions are met: (1) interventions are standardized; (2) secondary-level interventions are led by staff trained in the intervention according to developer requirements; and (3) group size and dosage are optimal (according to research) for the age and needs of students.
<b>Addition to Primary</b>	Secondary-level interventions replace core instruction.	Secondary-level interventions sometimes supplement core instruction and sometimes replace core instruction.	Secondary-level interventions supplement core instruction.



<b>Intensive Intervention—Individualized with a focus on the academic needs of students with disabilities and those significantly below grade level (Tier III)</b>			
<b>Data-Based Interventions Adapted Based on Student Need</b>	Intensive interventions are not more intensive (e.g., no increase in duration or frequency, change in interventionist, change in group size, or change in intervention) than secondary interventions.	Intensive interventions are more intensive than secondary interventions based only on preset methods to increase intensity (e.g., sole reliance on increased duration or frequency, change in interventionist, decreased group size, or change in intervention program).	Intensive interventions are more intensive than secondary interventions and are adapted to address individual student needs in a number of ways (e.g., increased duration or frequency, change in interventionist, decreased group size, change in instructional delivery, and change in type of intervention) through an iterative manner based on student data.
<b>Instructional Characteristics</b>	None of the following conditions is met: (1) the intervention is individualized; (2) intensive interventions are led by well-trained staff experienced in individualizing instruction based on student data; and (3) the group size is optimal (according to research) for the age and needs of students.	Only one of the following conditions is met: (1) the intervention is individualized; (2) intensive interventions are led by well-trained staff experienced in individualizing instruction based on student data; and (3) the group size is optimal (according to research) for the age and needs of students.	All of the following conditions are met: (1) the intervention is individualized; (2) intensive interventions are led by well-trained staff experienced in individualizing instruction based on student data; and (3) the group size is optimal (according to research) for the age and needs of students.
<b>Relationship to Primary</b>	Neither of the following conditions is met: (1) decisions regarding student participation in both core instruction and intensive intervention are made on a case-by-case basis, according to student need; and (2) intensive interventions are aligned to the specific skill needs of students to help them make progress toward core curriculum standards.	Only one of the following conditions is met: (1) decisions regarding student participation in both core instruction and intensive intervention are made on a case-by-case basis, according to student need; and (2) intensive interventions address the general education curriculum in an appropriate manner for students.	Both of the following conditions are met: (1) decisions regarding student participation in both core instruction and intensive intervention are made on a case-by-case basis, according to student need; and (2) intensive interventions address the general education curriculum in an appropriate manner for students.

***Infrastructure and Support Mechanisms***—*Knowledge, resources, and organizational structures necessary to operationalize all components of RTI in a unified system to meet the established goals.*

<b>Measures</b>	<b>1</b>	<b>3</b>	<b>5</b>
<b>Prevention Focus</b>	Staff generally perceives RTI as a program that solely supports the prereferral process for special education.	Some staff understand that RTI is a framework to prevent all students, including students with disabilities, from having academic problems.	All staff understand that RTI is a framework to prevent all students, including students with disabilities, from having academic problems.
<b>Leadership Personnel</b>	Decisions and actions by school and district leaders undermine the effectiveness of the essential components of the RTI framework at the school.	Decisions and actions by school and district leaders are inconsistent and only somewhat supportive of the essential components of the RTI framework at the school; support for RTI implementation is not very evident.	Decisions and actions by school and district leaders proactively support the essential components of the RTI framework at the school, and help make the RTI framework more effective; support for RTI implementation is a high priority.
<b>School-Based Professional Development</b>	The school has no well-defined, school-based professional development mechanism to support continuous improvement of instructional practice, data-based decision making, and delivery of interventions.	Some forms of school-based professional development are available, but most are not consistent or job embedded to ensure continuous improvement in instructional practice, data-based decision making, and delivery of interventions.	School-based professional development is institutionalized and structured so that all teachers continuously examine, reflect upon, and improve instructional practice, data-based decision making, and delivery of interventions.
<b>Schedules</b>	School wide schedules are not aligned to support multiple levels of intervention based on student need; inadequate time is available for interventions.	School wide schedules are partially aligned to support multiple levels of intervention based on student need; some additional time is built in for interventions.	School wide schedules are aligned to support multiple levels of intervention based on student need; adequate additional time is built in for interventions.
<b>Resources</b>	Resources (e.g., funds, programs) are not allocated to support RTI implementation.	Resources (e.g., funds, programs) are partially allocated to support RTI implementation.	Resources (e.g., funds, programs) are adequately allocated to support RTI implementation.
<b>Cultural and Linguistic Responsiveness</b>	One or none of the following conditions is met: Staff can articulate information and factors that they consider when adopting	Two of the following conditions are met: Staff can articulate information and factors that they consider when adopting	All three of the following conditions are met: Staff can articulate information and factors that they consider when adopting

	culturally and linguistically relevant (1) instructional practices, (2) assessments, and (3) intervention programs.	culturally and linguistically relevant (1) instructional practices, (2) assessments, and (3) intervention programs.	culturally and linguistically relevant (1) instructional practices, (2) assessments, and (3) intervention programs.
<b>Communications With and Involvement of Parents</b>	One or none of the following conditions is met: (1) a description of the school’s essential components of RTI is shared with parents; (2) a coherent mechanism is implemented for updating parents on the progress of their child who is receiving secondary or intensive interventions; and (3) parents are involved during decision making regarding the progress of students receiving intensive intervention.	Two of the following conditions are met: (1) a description of the school’s essential components of RTI is shared with parents; (2) a coherent mechanism is implemented for updating parents on the progress of their child who is receiving secondary or intensive interventions; and (3) parents are involved during decision making regarding the progress of students receiving intensive intervention.	All of the following conditions are met: (1) a description of the school’s essential components of RTI is shared with parents; (2) a coherent mechanism is implemented for updating parents on the progress of their child who is receiving secondary or intensive interventions; and (3) parents are informed about decision making regarding the progress of students receiving intensive intervention.
<b>Communication With and Involvement of All Staff</b>	One or none of the following conditions is met: (1) a description of the school’s essential components of RTI and data-based decision- making process is shared with staff; (2) a system is in place to keep staff informed; and (3) teacher teams collaborate frequently.	At least two of the following conditions are met: (1) a description of the school’s essential components of RTI and data-based decision-making process is shared with staff; (2) a system is in place to keep staff informed; and (3) teacher teams collaborate frequently.	All of the following conditions are met: (1) a description of the school’s essential components of RTI and data-based decision- making process is shared with staff; (2) a system is in place to keep staff informed; and (3) teacher teams collaborate frequently.
<b>RTI Teams</b>	Only one of the following conditions is met: (1) the RTI team is representative of all key stakeholders; (2) structures and clear processes are in place to guide decision making; and (3) time is set aside for the team to meet regularly.	At least two of the following conditions are met: (1) the RTI team is representative of all key stakeholders; (2) structures and clear processes are in place to guide decision making; and (3) time is set aside for the team to meet regularly.	All of the following conditions are met: (1) the RTI team is representative of all key stakeholders; (2) structures and clear processes are in place to guide decision making; and (3) time is set aside for the team to meet regularly.

***Fidelity and Evaluation***—System for collecting and analyzing data to measure fidelity and effectiveness of the RTI model.

Measures	1	3	5
<b>Fidelity</b>	Neither of the following conditions is met: (1) procedures are in place to monitor the fidelity of implementation of the core curriculum and secondary and intensive interventions; and (2) procedures are in place to monitor the processes of administering and analyzing assessments.	One of the following conditions is met: (1) procedures are in place to monitor the fidelity of implementation of the core curriculum and secondary and intensive interventions; and (2) procedures are in place to monitor the processes of administering and analyzing assessments.	Both of the following conditions are met: (1) procedures are in place to monitor the fidelity of implementation of the core curriculum and secondary and intensive interventions; and (2) procedures are in place to monitor the processes of administering and analyzing assessments.
<b>Evaluation</b>	None of the following conditions are met: (1) an evaluation plan is in place to monitor short- and long-term goals; (2) student data are reviewed for all students and subgroups of students across the essential components to evaluate effectiveness of the RTI framework (i.e., core curriculum is effective, interventions are effective, screening process is effective); and (3) implementation data (e.g., walk-throughs) are reviewed to monitor fidelity and efficiency across all components of the RTI framework.	At least one of the following conditions is met: (1) an evaluation plan is in place to monitor short- and long-term goals; (2) student data are reviewed for all students and subgroups of students across the essential components to evaluate effectiveness of the RTI framework (i.e., core curriculum is effective, interventions are effective, screening process is effective); and (3) implementation data (e.g., walk-throughs) are reviewed to monitor fidelity and efficiency across all components of the RTI framework.	All of the following conditions are met: (1) an evaluation plan is in place to monitor short- and long-term goals; (2) student data are reviewed for all students and subgroups of students across the essential components to evaluate effectiveness of the RTI framework (i.e., core curriculum is effective, interventions are effective, screening process is effective); and (3) implementation data (e.g., walk-throughs) are reviewed to monitor fidelity and efficiency across all components of the RTI framework.

## RTI Essential Components Worksheet

School: \_\_\_\_\_ District: \_\_\_\_\_ Date: \_\_\_\_\_

Person(s) Interviewed: \_\_\_\_\_

Interviewer(s): \_\_\_\_\_

### **Purpose:**

The purpose of this worksheet is to provide a tool for collecting relevant information and for recording a school's rating on various items related to response to intervention (RTI) implementation. Descriptions of ratings for each item are provided on the RTI Essential Components Integrity Rubric (the Rubric).

Information about school-level implementation (Grades K–8) may be collected through interviews with school personnel and through observations and document review. After all of the information has been collected, use your notes and the Rubric to rate the school on each item. The Rubric provides a five-point rating scale and descriptions of practices that would score a 1, 3, or 5. Data collectors may assign the school a rating of 2 or 4 if the information collected suggests the school falls between the rubric descriptions. For example, if the reviewer judges a school to be performing at a level higher than the Rubric describes for a 3 rating but not quite at the level described for a 5, then the reviewer should rate the school as performing at a 4.

***Assessments: Screening, progress monitoring, and other supporting assessments are used to inform data-based decision making.***

Item	Sample Interview Questions	Comments/Remarks	Ratings
<b><i>Screening—The RTI system accurately identifies students at risk of poor learning outcomes or challenging behaviors.</i></b>			
<b>1. Screening Tools</b>	<p>What tools do you use for universal screening (probe across content areas)?</p> <p>How much attention was given to the vendor’s evidence regarding the validity, reliability, and accuracy of the tools when selected?</p> <p>Does your school have documentation from the vendor that these tools have been shown to be valid, reliable, and accurate with subgroups in your school?</p> <p>Does staff understand how the tool is intended to be used?</p> <p>Can you or other staff provide evidence of the technical adequacy (i.e., reliability, validity, classification accuracy) of the tools?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification for rating</p>

<p><b>2. Universal Screening</b></p>	<p>Describe the process for conducting screening in your school. To what extent is this process consistently followed?</p> <p>Are all students screened?</p> <p>How many times during the school year are students screened?</p> <p>Do you use a well-defined cut score or decision point to identify students at risk?</p> <p>How do you ensure that administration of screening assessments follows the developer's guidelines?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>3. Data Points to Verify Risk</b></p>	<p>Do you review other information to help verify that the results of the initial screening are accurate before placing a student in secondary-level or intensive intervention? If so, what other types of assessment data do you use?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

**Progress Monitoring**—Ongoing and frequent monitoring of progress quantifies rates of improvement and informs instructional practice and the development of individualized programs. Measures are appropriate for the student’s grade and/or skill level.

Item	Sample Interview Questions	Comments/Remarks	Ratings
<b>Progress Monitoring Tools</b>	<p>What tools does your school use for progress monitoring (probe across content areas)?</p> <p>Did school or district staff consider the evidence from the vendor regarding the validity, reliability, and accuracy of the progress monitoring tool(s) when selecting it/them?</p> <p>Does your school have documentation from the vendor that the tool(s) have been shown to be valid, reliable, and accurate with subgroups in your school?</p> <p>Can staff articulate the evidence supporting the rigor of the tool(s)?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<b>Progress Monitoring Process</b>	<p>Describe the process used for monitoring progress.</p> <p>How often is the progress of students in secondary level interventions monitored?</p> <p>How often is the progress of students in intensive intervention monitored?</p> <p>Does monitoring occur with sufficient frequency to show a trend in academic progress over time?</p> <p>How closely does administration of the progress monitoring tool(s) follow the developer’s guidelines?</p> <p>To what extent is this process</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>



	consistently followed?		
<b><i>Data-Based Decision-Making—Data-based decision-making processes are used to inform instruction, movement within the multilevel system, and disability identification (in accordance with state law).</i></b>			
<b>Item</b>	<b>Sample Interview Questions</b>	<b>Comments/Remarks</b>	<b>Ratings</b>
<b>Decision-Making Process</b>	<p>Describe how decisions are made to move students between tiers.</p> <p>Who is involved in decision making?</p> <p>What data are used to inform those decisions, and how are they used?</p> <p>What criteria and guidelines are used for making decisions?</p> <p>To what extent are the screening, progress monitoring, and other assessment data used to inform instruction at all tiers, including the core instruction?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<b>Data System</b>	<p>Is there a system for collecting and organizing student academic data, screening data, progress monitoring data, and other forms of data? If so, please describe.</p> <p>Is the system used consistently across school staff?</p> <p>Are instructional decisions made about students tracked in the data system or through another method (including movement between tiers)?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<p><b>Responsiveness to Secondary and Intensive Levels of Intervention</b></p>	<p>Describe how decisions about responsiveness to secondary-level interventions or intensive intervention are made.</p> <ul style="list-style-type: none"> <li>▪ Are progress monitoring data used?</li> <li>▪ How is baseline performance established?</li> <li>▪ What goal setting method is used? (e.g., end-of-year benchmarks, rate of improvement, intra-individual framework? Are rates or norms provided by the vendor/developer?</li> <li>▪ What decision rules are used?</li> </ul> <p>Are the criteria implemented accurately and consistently?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
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**Multilevel Instruction**—The RTI framework includes a school-wide, multilevel system of instruction and interventions for preventing school failure. Commonly represented by the three-tiered triangle, multilevel instruction also is known as the multi-tiered system of support (MTSS).

Item	Sample Interview Questions	Comments/Remarks	Ratings
<b>Primary-Level Instruction/Core Curriculum (Tier I)</b>			
<b>Research-Based Curriculum Materials</b>	Describe primary-level instruction (core curriculum) materials.  What is the research base?  When your school selected its core instructional materials, how much attention was paid to the research base?	Notes   Evidence Sources   Recommendations	Rating: ① ② ③ ④ ⑤  Justification of Rating
<b>Articulation of Teaching and Learning (in and across grade levels)</b>	Describe the process that supports the articulation of teaching and learning from one grade to another.  Describe the process that supports the articulation of teaching and learning among teachers in the same grade.  How consistent is the learning experience among students in the same grade and subject with different teachers?	Notes   Evidence Sources   Recommendations	Rating: ① ② ③ ④ ⑤  Justification of Rating

<p><b>Differentiated Instruction</b></p>	<p>To what extent do teachers in this school use student assessment data and knowledge of student readiness, language, and culture to offer students in the same class different teaching and learning strategies to address student needs?</p> <p>How consistent is this effort among the teaching staff?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>Standards-Based</b></p>	<p>To what extent is the core curriculum in reading and mathematics aligned to state standards?</p> <p>Are the instructional materials aligned to the standards? Are model or sample lessons and activities that demonstrate effective teaching of the standards available to teachers?</p> <p>Have teachers been trained in the content of the standards and in how to use that content within their lessons?</p> <p>Are teachers utilizing their training and aligning their instruction to these standards?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<p><b>Exceeding Benchmark</b></p>	<p>Are programs and activities provided to enrich or augment the curriculum for students exceeding benchmarks? If so, please describe.</p> <p>Are any of these programs and activities available above and beyond the core instruction?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>Secondary-Level Intervention (Tier II)</b></p>			
<p><b>Evidence-Based Intervention</b></p>	<p>What program(s) does your school use for secondary-level intervention?</p> <p>How were these programs selected?</p> <p>Have these programs demonstrated efficacy with the target populations (e.g., has research shown that the interventions positively impact student achievement)?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<p><b>Complements Core Instruction</b></p>	<p>How do instructors of secondary-level interventions ensure that the content they address is well aligned and complements the core instruction for each student?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>Instructional Characteristics</b></p>	<p>Are the secondary level interventions always led by staff adequately trained to implement the interventions with fidelity?</p> <p>If not, who provides the secondary level intervention and what is their background?</p> <p>Are the secondary interventions always conducted with small groups of students?</p> <p>What is the maximum group size?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>Addition to Primary</b></p>	<p>Are secondary-level interventions (i.e., Tier II) always implemented as supplements to the core curriculum?</p> <p>If not, please explain.</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<b>Intensive Intervention</b> — <i>Individualized with a focus on the academic needs of students with disabilities and those significantly below grade level (Tier III)</i>			
<p><b>Data-Based Interventions Adapted Based on Student Need</b></p>	<p>How are evidence-based interventions intensified or individualized at the intensive level?</p> <p>How are the interventions used at this level developed?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>Instructional Characteristics</b></p>	<p>Who provides intensive intervention? Can you describe their background and level of training in providing data-based individualized instruction?</p> <p>Does the group size allow for the interventionist to adjust and individualize instruction to address the needs of each student?</p> <p>Describe an example of a student experiencing intensive intervention.</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<b>Relationship to Primary</b>	<p>Are intensive interventions always implemented as supplements to the core curriculum?</p> <p>If not, please explain.</p> <p>How do you decide if a student receiving intensive intervention should remain in primary-level instruction?</p> <p>How do you ensure meaningful connections between intensive intervention and the general education curriculum (e.g., the Common Core)?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
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<b><i>Infrastructure and Support Mechanisms—Knowledge, resources, and organizational structures necessary to operationalize all components of RTI in a unified system to meet the established goals.</i></b>			
<b>Item</b>	<b>Sample Interview Questions</b>	<b>Comments/Remarks</b>	<b>Ratings</b>
<b>Prevention Focus</b>	<p>To what extent do you believe the teaching staff views the purpose of RTI as primarily to prevent students from having academic and/or behavioral problems?</p> <p>What portion of the teaching staff view RTI as primarily a means for special education identification?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>



<p><b>Leadership Personnel</b></p>	<p>To what extent are the school and district administrators aware of the RTI framework at your school?</p> <p>To what extent do the actions taken and decisions made by district administrators improve the effectiveness of the RTI framework at your school?</p> <p>To what extent do the actions taken and decisions made by school administrators improve the effectiveness of the RTI framework at your school?</p> <p>Does your school have a designated person who oversees and manages RTI implementation? If yes, what percentage of that person's time is devoted to overseeing and managing RTI?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>School-Based Professional Development</b></p>	<p>Has the staff been trained on the RTI framework and essential components?</p> <p>How often is refresher or new training provided?</p> <p>Is RTI training provided to new teachers?</p> <p>What ongoing professional development is made available for those who provide secondary-level and intensive intervention?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<p><b>Schedules</b></p>	<p>Does the schedule reflect additional time beyond the core for secondary-level and intensive intervention?</p> <p>Is there time scheduled for teacher collaboration on instruction and interventions?</p> <p>Are all the pertinent teachers and interventionists available for these collaborative meetings?</p>	<p>Notes</p>   <p>Evidence Sources</p>   <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>Resources</b></p>	<p>Are there adequate materials, programs, and resources allocated to support interventions, assessments, professional development, staffing?</p> <p>Do the programs and materials match the needs of the students at each tier?</p> <p>Is there a process for monitoring the use of resources?</p>	<p>Notes</p>   <p>Evidence Sources</p>   <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<p><b>Cultural and Linguistic Responsiveness</b></p>	<p>What efforts have been made to ensure that core instruction, secondary-level and intensive intervention, and assessments take into account cultural and linguistic factors?</p> <p>How are the demographic and academic data of subgroups represented in your school used to inform the RTI framework?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>Communications With and Involvement of Parents</b></p>	<p>Are parents knowledgeable about the RTI framework in your school?</p> <p>Describe how you communicate with parents about RTI and student performance.</p> <p>How are parents involved in decision making regarding the participation of their child in secondary-level or intensive intervention?</p> <p>How are parents of students at the secondary or intensive level informed of the progress of their children?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

<p><b>Communication With and Involvement of All Staff</b></p>	<p>Are teachers in your school knowledgeable about the RTI framework?</p> <p>Describe how you communicate with teachers about the school's RTI plan.</p> <p>How are teachers of students at the secondary or intensive level informed of their progress in the intervention?</p> <p>What process does your school use to ensure teacher collaboration in implementing RTI?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<p><b>RTI Teams</b></p>	<p>Does your school have an RTI team? If so:</p> <ul style="list-style-type: none"> <li>▪ Who composes that team?</li> <li>▪ How often does the team meet?</li> <li>▪ Are there established processes and protocols that help the team work effectively? What are they?</li> </ul> <p>How does the team communicate and collaborate with other staff?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>

***Fidelity and Evaluation***—System for collecting and analyzing data to measure fidelity and effectiveness of the RTI model.

Item	Sample Interview Questions	Comments/Remarks	Ratings
<b>Fidelity</b>	<p>Are procedures in place to monitor the fidelity of implementation of the core curriculum? Of secondary-level and intensive intervention? Of screening, progress monitoring, and the decision-making process? If so please describe.</p> <p>Who is involved in monitoring the fidelity of implementation?</p> <p>Does the evidence indicate that instruction, interventions, assessments, and decisions are implemented with fidelity?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>
<b>Evaluation</b>	<p>How is RTI evaluated at your school?</p> <ul style="list-style-type: none"> <li>▪ Is a plan in place for evaluation?</li> <li>▪ Is a process in place for reviewing student-level data for all students and for subgroups of students?</li> <li>▪ Is a process in place to evaluate implementation fidelity?</li> </ul> <p>How are evaluation data used?</p> <ul style="list-style-type: none"> <li>▪ Are teachers and interventionists involved in giving and receiving feedback on the effectiveness of the programs and materials?</li> </ul> <p>Who is involved in evaluating RTI implementation?</p>	<p>Notes</p> <p>Evidence Sources</p> <p>Recommendations</p>	<p>Rating: ① ② ③ ④ ⑤</p> <p>Justification of Rating</p>



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