

Oklahoma School Performance Review

June 2022



Crescent Public Schools



OKLAHOMA
Educational Quality
and Accountability



OFFICE OF EDUCATIONAL QUALITY & ACCOUNTABILITY

June, 2022

Fellow Oklahomans:

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

Crescent Public Schools (CPS) 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 CPS 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 CPS 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.oeka.ok.gov

Respectfully yours,

Renee Launey-Rodolf
Interim Executive Director

Oklahoma School Performance Review

Crescent Public Schools

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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 contracted with Prismatic Services to perform the review. The performance review of Crescent Public Schools (CPS) began in December 2021. 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 C**.

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: Cashion, Comanche, Empire, Morrison, and Minco. These districts are called peer districts throughout this report.

For further comparison, a Community Group average is also used throughout the report. CPS falls into community group F1, which includes districts with an Average Daily Membership (ADM) of between 500-999 students. The “1” indicates that the percentage of CPS students eligible to receive free or reduced-price meals is below the state average.

During this review, 86 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; Crescent Public Schools, its Superintendent, Dr. Courtney Knapp, its principals, Mr. Bart Watkins, Ms. Lauren Kelly, and the many district employees, students, parents, and community residents who supported and provided input for this review.

CRESCENT PUBLIC SCHOOLS

Located in the town of Crescent in central Oklahoma in Logan County, CPS is approximately 40 miles north of Oklahoma City. The town of Crescent covers 1.1 square miles and is estimated to

have a population of 1,618 in 2022. CPS, as a school district, covers 137 square miles and serves parts of both Logan and Kingfisher Counties. CPS operates three campuses that serve approximately 550 students from Pre-K through 12th grade.

In 2019-20, the fall enrollment in CPS was 557, with most identifying as Caucasian (**Exhibit 1**). Of all students enrolled at SPS, more than half were approved for free or reduced-price meals.

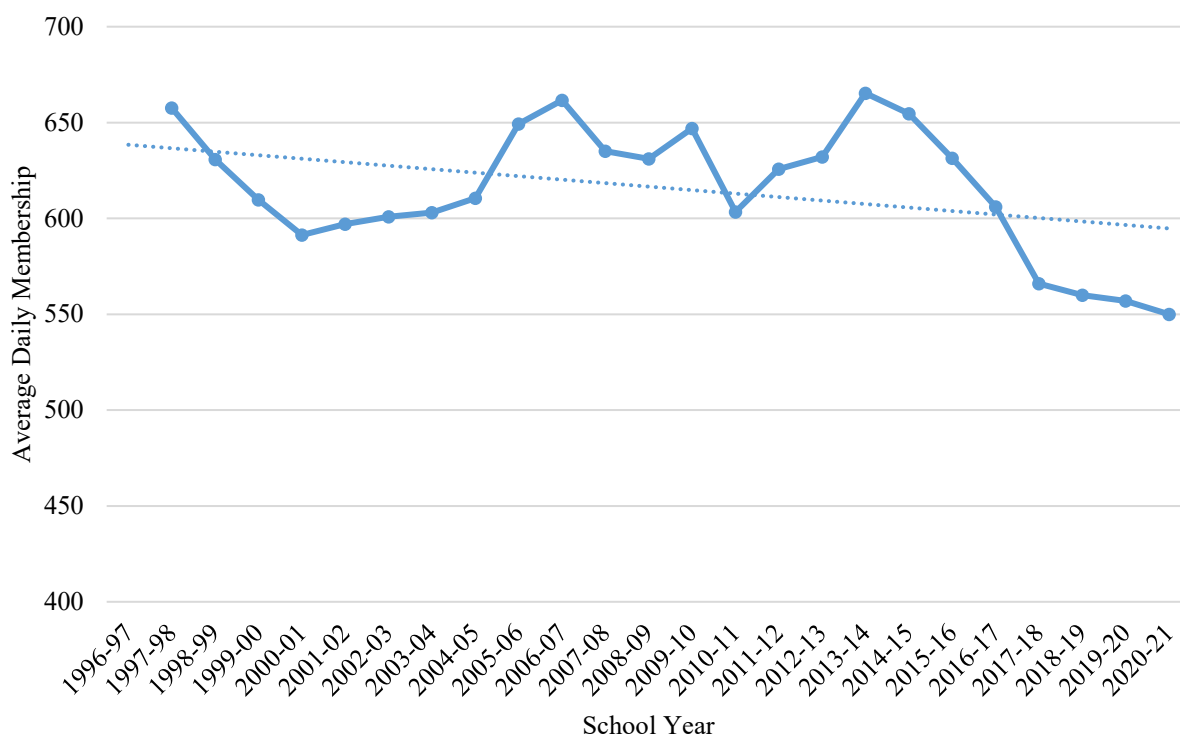
Exhibit 1
CPS Student Enrollment and Socioeconomic Characteristics, 2019-20

School	Grade Span	Fall Enrollment	Caucasian	Black	Asian	Hispanic	Native American	Two or More Races	Eligible for Free or Reduced-Price Meals
Crescent ES	EC-5	299	75%	7%	1%	3%	12%	3%	53%
Crescent MS	6-8	90	72%	9%	0%	3%	14%	1%	42%
Crescent HS	9-12	168	76%	4%	0%	4%	16%	1%	46%

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 2 shows trends in average daily membership (ADM) among CPS schools. Over the past seven years, ADM has declined and is now at its lowest point since before 1996-97. The sharpest decline was between 2015-16 and 2016-17. At the time of this report, any lasting impact of COVID-19 on CPS' enrollment has yet to be determined.

Exhibit 2
Trend in CPS Average Daily Membership



Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 3 compares CPS' demographics with its peers, the community group, and the state. Over the past five years, CPS had the highest decline in ADM of the comparison group. Half of the peers and the state had a decline while the other half of the peers and the community group experienced growth in ADM.

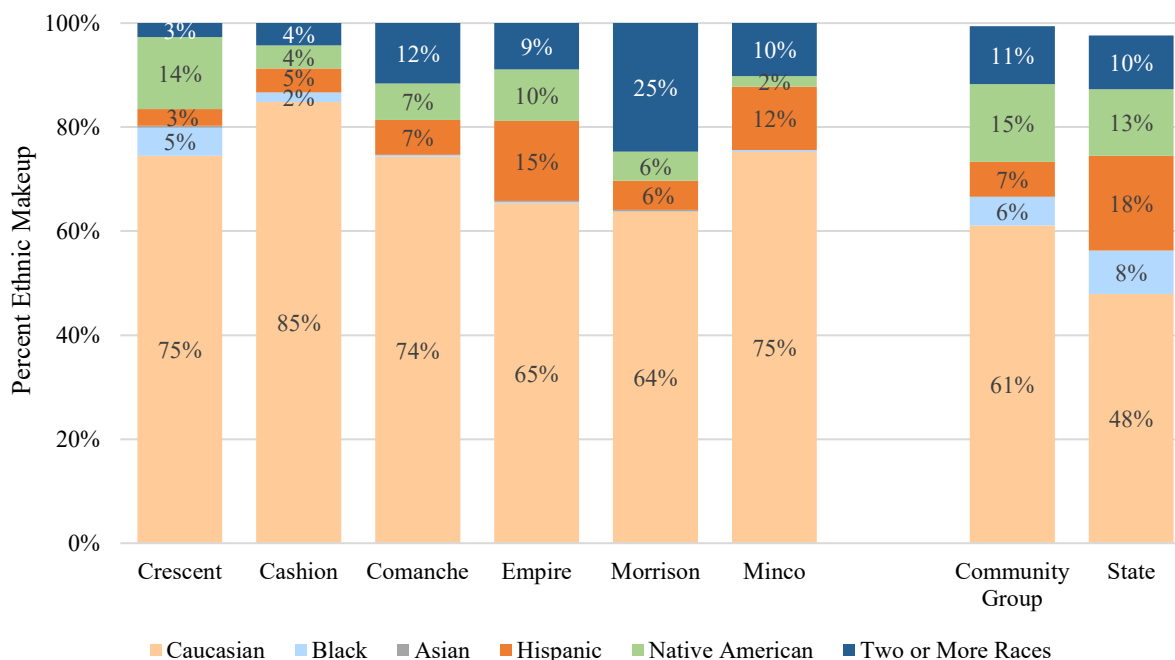
Exhibit 3
Trend in Crescent, Peer Districts, and State Student ADM

Entity	ADM					Percent Change
	2015-16	2016-17	2017-18	2018-19	2019-20	
Crescent	631	606	566	560	557	(11.8%) ▼
Cashion	516	521	549	601	632	22.6% ▲
Comanche	1,023	1,018	957	951	924	(9.7%) ▼
Empire	504	539	534	520	530	5.1% ▲
Morrison	584	599	612	594	587	0.5% ▲
Minco	562	575	592	565	547	(2.7%) ▼
Community Group	669	662	675	686	707	5.6% ▲
State	1,305	1,267	1,280	1,289	1,304	(0.1%) ▼

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 4 compares CPS’ demographics with its peers, the community group, and the state for 2019-20. All entities were mostly Caucasian.

Exhibit 4
Comparison of Student Demographics, 2019-20



Source: Office of Educational Quality and Accountability, Profiles Database

COMMENDATIONS

Prismatic Services identified “exemplary” or “best practices” in Crescent Public Schools that led to 19 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 Crescent Board of Education and superintendent are commended for their philosophy to improve the educational opportunities for all students, which leads to overall improved academic achievement.

The CPS board of education is commended for hosting well organized meetings that are conducted according to established procedures where public input is welcomed.

CPS and the Crescent community is commended for having strong community relationships.

The superintendent and administration is commended for making substantial efforts to keep the staff, parents, and community informed.

Chapter 2: INSTRUCTIONAL DELIVERY SYSTEM

The CPS superintendent is commended as an instructional leader.

CPS is commended for implementing standardized processes and procedures to support state and federal compliance and implementing visionary identification procedures and inclusionary practices.

CPS is commended for working to improve the Gifted Program by administering the CogAT in 2nd to 8th grade and starting a pullout program for gifted students.

Chapter 3: BUSINESS OPERATIONS

CPS is commended for consistently expending a higher percentage of funds on instruction than peer districts and the state overall.

CPS is commended for a process that helps ensure that the receipt of materials and services is verified before processing payments to vendors.

Chapter 4: FACILITIES USE AND MANAGEMENT

CPS is commended for its volunteer initiative to rejuvenate the exterior and interior of the high school gymnasium, plus the high school's interior renovation initiative.

CPS is commended for its choice of a nearly leakproof, low-maintenance metal roof retrofit on most of the campus buildings.

CPS is commended for its success in finding a conscientious and responsive custodial contractor.

Chapter 5: SUPPORT SERVICES

CPS make the conscious decision to not allow vending machines in school buildings, which supports student health.

CPS has a closed campus policy that contributes to student health and safety.

CPS is commended for employing two staff members to manage the district's technology resources and service needs.

CPS is commended for implementing implemented a district-wide wireless access system to increase Internet access.

CPS is commended for implementing Google Classroom to increase communication and classroom collaboration throughout the district.

CPS is commended for implementing a one-to-one technology initiative for students in grades 3rd to 12th.

CPS employs several commendable practices in its transportation operations, including emergency drills and driver recordkeeping.

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.

Prismatic Services recommends that the Crescent 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
		2022-23	2023-24	2024-25	2025-26	2026-27	
Chapter 1	Management, Personnel, and Communications						
1	Revise the superintendent's performance evaluation to include a performance review that is based on board-superintendent goals/standards that are evaluated by the board and support ongoing communication and feedback.	(\$720)	(\$120)	(\$120)	(\$120)	(\$360)	(\$1,440)
2	Explore options to ensure that: all CPS board members meet training requirements; the protocols of Professional Conduct are adhered to; and board members have a common knowledge base for legal, visionary governance, policy making, and financial oversight.						\$0
3	Develop systematic procedures to regularly review and maintain district policies.	(\$4,000)	(\$4,000)	(\$4,000)	(\$4,000)	(\$4,000)	(\$20,000)
4	Create additional financial reports and a comprehensive budget guide to support transparency and understanding of the financial structure and budgeting process of the district.						\$0
5	Implement an ongoing strategic planning process involving community stakeholders, administration, faculty, and staff, which defines decision-making processes and provides governance and direction for long-range goals, implementation strategies, and accountability measures.	(\$20,000)	(\$10,000)	\$0	\$0	\$0	(\$30,000)
6	Continue to improve opportunities to develop leaders from within the teacher ranks.						\$0
7	Adopt common metrics, policies, and procedures related to annual program evaluation.	(\$15,000)	(\$15,000)	(\$15,000)	\$0	\$0	(\$45,000)
8	Improve recruiting that reflects the diversity of the district by building relationships with surrounding universities and developing an intentional recruiting program.						\$0
9	Improve the availability and preparedness of substitutes.						\$0
10	Establish a committee of certified and support employees for the purpose of reviewing and communicating personnel policies, job descriptions, and extra-duty assignments.						\$0

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2022-23	2023-24	2024-25	2025-26	2026-27	
11	Increase parental involvement and participation in parent-teacher conferences.						\$0
	Subtotal	(\$39,720)	(\$29,120)	(\$19,120)	(\$4,120)	(\$4,360)	(\$96,440)
Chapter 2	Instructional Delivery System						
12	Develop and implement with fidelity core content area Pre-K-12 horizontal and vertical standards-based curriculum frameworks to align, pace, and monitor OAS.						\$0
13	Develop and implement district-wide processes and procedures for administering formative assessments and summative assessments to monitor student progress and measure mastery of OAS, then use the data to pace and adjust curriculum, instructional practices, and inform targeted remediation and interventions.	(\$2,000)	\$0	\$0	\$0	\$0	(\$2,000)
14	Add elective classes to improve the middle and high school course offerings.						\$0
15	Review and implement with fidelity a more robust, accurate, and student-driven secondary class schedule.						\$0
16	Implement regularly scheduled, structured, release time opportunities for administrators and teachers to collaborate horizontally and vertically regarding aligning and pacing core content, high impact instructional strategies, and interventions that drive improved learning for all students.	(\$5,000)	\$0	\$0	\$0	\$0	(\$5,000)
17	Implement a comprehensive evaluation process to ensure textbooks, software, and supplemental instructional materials/resources are developmentally appropriate, relevant, consistent across grade levels and content areas, and aligned vertically and horizontally with Oklahoma Academic Standards (OAS).						\$0
18	Provide training, support, and set clear expectations for building principals in their role as instructional leaders.						\$0
19	Adopt and implement a district-wide instructional plan.						\$0
20	Implement district-wide professional development and feedback loops in order to improve the district's school culture.						\$0
21	Continue improving services to special education students by ensuring all receive the OAS taught and tested curricula and are supported by IEP modifications.						\$0

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2022-23	2023-24	2024-25	2025-26	2026-27	
22	Continue exploring technology, instructional resources, and scheduling options that improve teacher collaboration, alignment with classroom content, student interest, integration of OAS standards.						\$0
23	Continue building and improving a comprehensive counseling program.						\$0
	Subtotal	(\$7,000)	\$0	\$0	\$0	\$0	(\$7,000)
Chapter 3	Business Operations						
24	Develop and adopt a formal policy for tracking and periodically reporting on the status of audit and other report recommendations.						\$0
25	Revise and update job descriptions for the encumbrance clerk and treasurer and create one for the activity funds custodian to clarify job expectations and responsibilities.						\$0
26	Develop reports to the board of education that show actual revenues and expenditures compared to budgeted amounts.						\$0
27	Establish a budget development process that provides for input from the public and school and department staffs.						\$0
28	Develop a budget document that clearly identifies types of estimated revenues and types of expenditures.						\$0
29	Establish a general fund balance policy to provide guidance on how to achieve the minimum required balance, provide a desired fund balance range, and require fund balance status reports to the board of education.						\$0
30	Require the use of a separate fund for the child nutrition program and develop reports for the child nutrition fund that show fund balances, revenues, expenditures, and whether the program is making or losing money.						\$0
31	Develop a payroll reconciliation process to provide the superintendent with a listing of changes made from the previous month's payroll for easy approval.						\$0
32	Develop desk procedures for the important duties performed by the encumbrance clerk and treasurer and cross-train each in the other's critical processes for emergency situations.						\$0

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2022-23	2023-24	2024-25	2025-26	2026-27	
33	Deposit child nutrition cash received directly into the child nutrition fund instead of into activity funds.						\$0
34	Enhance the CPS Activity Fund Manual by adding detailed procedures for all processes and additional forms, then ensure all personnel involved in activity fund transactions are properly trained.						\$0
35	Develop a policy requiring competitive proposals for professional independent financial auditing services at a designated interval of at least every five years.						\$0
36	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
37	Require use of the automated purchase order component of the district's financial management system.						\$0
38	Authorize the superintendent and encumbrance clerk to release payments to vendors without prior school board approval and provide the school board with listing of payments made for information purposes.						\$0
	Subtotal	\$0	\$0	\$0	\$0	\$0	\$0
Chapter 4	Facilities Use and Management						
39	Transition from the current part-time maintenance and transportation director to an experienced, full-time maintenance and transportation director within the next 18 months.	\$0	(\$33,000)	(\$66,000)	(\$66,000)	(\$66,000)	(\$231,000)
40	Adopt, implement, and use a continuous facilities master planning protocol.	\$0	\$0	(\$20,000)	(\$15,000)	(\$15,000)	(\$50,000)
41	Complete building condition assessment and fund maintenance operations to achieve an FCI of 10 percent or below.	\$0	(\$6,000)	\$0	\$0	\$0	(\$6,000)
42	Prepare and begin a preventive maintenance protocol.	\$0	\$0	(\$166,666)	(\$166,666)	(\$166,666)	(\$499,998)
43	Hire a full-time maintenance and transportation assistant.	\$0	\$0	(\$32,470)	(\$32,470)	(\$32,470)	(\$97,410)
44	Modify the custodial contract to provide one of the five custodians as a day porter.						\$0
45	Add "experience with energy management programs and initiatives preferred" to the job qualifications for the next hire of a director of maintenance and transportation.						\$0

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2022-23	2023-24	2024-25	2025-26	2026-27	
46	Pursue energy conservation opportunities.						\$0
47	Contact OSSI to arrange a free consultancy and follow through on report recommendations.						\$0
	Subtotal	\$0	(\$39,000)	(\$285,136)	(\$280,136)	(\$280,136)	(\$884,408)
Chapter 5	Support Services						
48	Ensure an adult teacher or administrator is present and providing supervision in the cafeteria during the entirety of both breakfast and lunch meal service.						\$0
49	Implement a combination of a reduction in labor hours and efforts to increase meal equivalents to yield higher productivity rates.	\$19,514	\$19,514	\$19,514	\$19,514	\$19,514	\$97,570
50	Rearrange custodial work schedules to provide support during meal periods.						\$0
51	Implement changes that will result in a more cost-effective child nutrition program.	\$45,000	\$45,000	\$45,000	\$45,000	\$45,000	\$225,000
52	Develop child nutrition program reports that provide meaningful data in a format that can be used for analysis and decision-making.						\$0
53	Develop strategies to improve the rate of parents submitting the Free and Reduced School Meals Application.	\$45,931	\$45,931	\$45,931	\$45,931	\$45,931	\$229,655
54	Develop strategies for increasing breakfast participation.						\$0
55	Develop strategies for increasing student lunch participation rates.						\$0
56	Organize and implement a program using a variety of methods, such as advisory groups, testing and evaluation, and surveys to collect student feedback at the elementary and secondary level.						\$0
57	Implement the available component of the current software provider to automate the process of online meal applications.						\$0
58	Establish a district technology budget that is realistic, supportive of classroom needs, and included a replacement cycle.						\$0
59	Develop and test a disaster recovery plan that includes the district's critical data, systems, and programs.						\$0
60	Develop and implement a tiered professional development plan to include offerings at all skill levels to ensure teachers move beyond basic use of the equipment.						\$0
61	Implement a cross-training program that would ensure critical processes can be performed by multiple staff members.	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)	(\$7,500)

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2022-23	2023-24	2024-25	2025-26	2026-27	
62	Develop district technology standards, procedures, and processes for administrative tasks, equipment and software purchases, implementation, and upgrades.						\$0
63	Improve the technology planning process and create a long-term strategic plan for technology.						\$0
64	Complete and implement support procedures and a technology work order system that includes features such as logging, priority assignment, and completion.						\$0
65	Develop procedures to assess technology use and satisfaction with the goal of establishing higher use.						\$0
66	Ensure all teachers have the skills to maximize use of the interactive whiteboard.						\$0
67	Expand and utilize online learning opportunities for staff development, curriculum expansion, and student courses.						\$0
68	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
69	Hire only non-administrators as route drivers and seek to hire at least two whose primary district role is bus driver.	(\$26,437)	(\$26,437)	(\$26,437)	(\$26,437)	(\$26,437)	(\$132,185)
70	Develop a transportation department handbook.						\$0
71	Require bus drivers to complete their own daily pre-trip inspections.						\$0
72	Obtain drug and alcohol abuse recognition for the transportation director and at least one alternate district administrator.						\$0
73	Develop and follow an anti-idling policy as required by SDE.						\$0
74	Continue to refine drop-off and pick-up procedures to enhance safety and traffic flow by ensuring that afternoon bus loading is continuously supervised, that buses are not left running unattended, and that buses are not parked too close together.						\$0
75	Enforce bus safety rules with students.						\$0
76	Certify the transportation director or a bus driver as a bus driver instructor or gain access to one for assistance with training.						\$0
77	Train the Vo-Tech bus drivers to cover one or more of the in-district routes.						\$0
78	Improve CPS bus routing.						\$0
79	Establish contracts for purchase of bus parts, supplies, and repairs.						\$0

	Recommendation	Estimated (Costs) or Savings					Total Five-Year (Costs) or Savings
		2022-23	2023-24	2024-25	2025-26	2026-27	
80	Seek a cooperative agreement with a nearby district for skilled maintenance services.	(\$30,000)	(\$30,000)	(\$30,000)	(\$30,000)	(\$30,000)	(\$150,000)
81	Discontinue use of non-conforming vans.						\$0
82	Establish and follow a bus fleet replacement schedule that is appropriate to the resources of CPS and the size of its busing program.	(\$100,000)	(\$100,000)	(\$100,000)	(\$100,000)	(\$100,000)	(\$500,000)
83	Purchase and install radios on all CPS buses.	(\$5,200)	(\$4,200)	(\$4,200)	(\$4,200)	(\$4,200)	(\$22,000)
84	Reconfigure the wash bay with a deeper drainage pit and wash system, then require buses to be washed weekly.	(\$10,000)	\$0	\$0	\$0	\$0	(\$10,000)
85	Improve maintenance recordkeeping.						\$0
86	Address the conditions of buses as needed.						\$0
	Subtotal	(\$62,692)	(\$51,692)	(\$51,692)	(\$51,692)	(\$51,692)	(\$269,460)
	Total savings	\$110,445	\$110,445	\$110,445	\$110,445	\$110,445	\$552,225
	Total costs	(\$219,857)	(\$230,257)	(\$466,393)	(\$446,393)	(\$446,633)	(\$1,589,676)
	Total net savings and costs	(\$109,412)	(\$119,812)	(\$355,948)	(\$335,948)	(\$336,188)	(\$1,257,308)

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

Of the 86 recommendations made, Prismatic Services believes these nine recommendations to be the most critical:

- **Establish a committee of certified and support employees for the purpose of reviewing and communicating personnel policies, job descriptions, and extra-duty assignments.** A process should be established for the selection of employees to serve on an employee advisory committee that meets regularly to review policies and make recommendations for improvements in policies, procedures, salaries, and supplements. Representatives should report out to the employees they represent to keep them abreast of changes. Allowing employees to have a voice in decisions can increase the retention rate and improve the culture of the district.
- **Adopt common metrics, policies, and procedures related to annual program evaluation.** The district does not currently have a process for the evaluation of academic or social programs to determine their effectiveness. The development of an annual evaluation will inform decisions made by district leadership regarding programs moving forward.
- **Adopt and implement a district-wide instructional plan.** Mapping out a clear, aligned instructional plan used across the district will provide vertical and horizontal alignment in instructional strategies, content, and expectations. A systematic professional development plan, aligned with the instructional plan, should be created and implemented so all teachers are able to carry out the instructional plan.
- **Implement district-wide professional development and feedback loops in order to improve the district’s school culture.** Creating a method for receiving feedback from employees, students, and parents through surveys or focus groups will provide insight into the culture in CPS. Knowledge gained should be used to make systematic improvements.
- **Develop a budget document that clearly identifies types of estimated revenues and types of expenditures.** A budget should be developed annually to ensure fiscal alignment with priorities. A clear budget will also ensure fiscal responsibility and allow leadership to ensure funds are available to operate a balanced budget.
- **Transition from the current part-time maintenance and transportation director to an experienced, full-time maintenance and transportation director within the next 18 months.** The current director was hired on a part-time basis. A full-time experienced director should have the capacity to create preventative maintenance protocols and plan for long-term facilities and technology needs.

- **Improve participation rates for breakfast and lunch.** This can be achieved by implementing program changes such as providing alternative service models, adjusting menus for different age groups, soliciting student input, and starting an ala carte program.
- **Develop and implement a tiered professional development plan to include offerings at all skill levels to ensure teachers move beyond the basic use of the equipment.** The district has technology available that is not utilized to capacity because teachers have not received appropriate professional development. Identifying clear goals, objectives, and expectations for the use of technology, supported by quality professional development, will result in improved technology use and integration in instruction.
- **Commit to the modernization and professionalization of the school busing program.** A lack of conformance with Oklahoma State Department of Education requirements and expectations for pupil transportation was a common theme throughout the specific recommendations for transportation. In many respects, CPS does not operate the busing program at current standards that are promoted by the Oklahoma Association for Pupil Transportation (OAPT) and the National Association for Pupil Transportation (NAPT). The transportation department should become actively involved with OAPT, computerize, record, and share bus routes, student rosters, and driver directions, and track bus maintenance costs using software designed for transportation management.

Chapter 1:
Management, Personnel, and
Communications

Chapter 1

Management, Personnel, and Communications

This chapter addresses the management, personnel, and communications of Crescent Public Schools (CPS) 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 (BOE) and staff of the district. The BOE'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 BOE 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

As noted in the district's Educational Mission and Philosophy (policy AC), "The mission of CPS is to educate students and enhance positive character within a safe, nurturing environment while encouraging lifelong learning, productivity, responsibility, success and citizenship".

CPS operates three campuses that serve approximately 550 students from Pre-K through 12th grade. Located in the town of Crescent in central Oklahoma in Logan County, CPS is approximately 40 miles north of Oklahoma City. The town of Crescent covers 1.1 square miles and is estimated to have a population of 1,618 in 2022. CPS, as a school district, covers 137 square miles and serves parts of both Logan and Kingfisher Counties.

In 2019-20, the fall enrollment in CPS was 557, with most identifying as Caucasian (**Exhibit 1-1**). Nearly half of the student population is eligible for free or reduced-price meals.¹

¹ Currently, all CEP students receive free meals due to the district's participation in Community Eligibility Provision (CEP), a non-pricing meal service option for school districts in low-income areas established by the U.S. Department of Agriculture. See <https://www.fns.usda.gov/cn/community-eligibility-provision> for additional information.

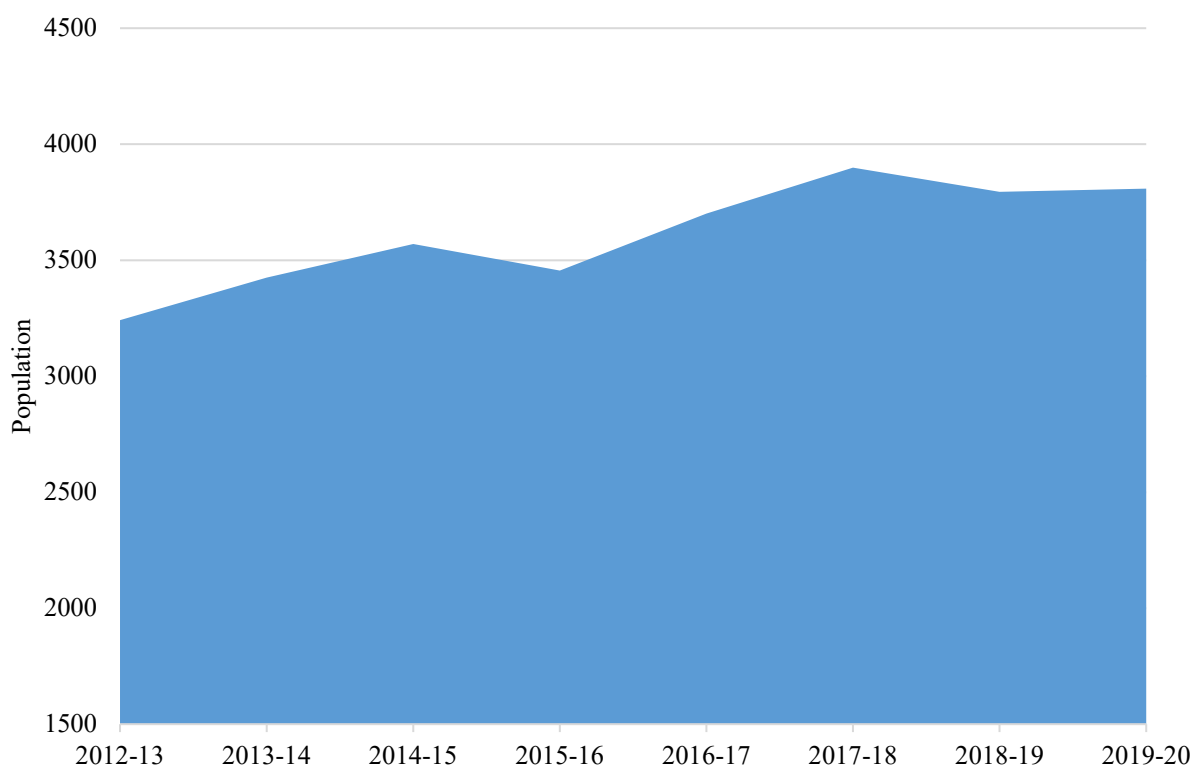
Exhibit 1-1
Crescent Student Enrollment and Socioeconomic Characteristics, 2019-20

School	Grade Span	Fall Enrollment	Caucasian	Black	Asian	Hispanic	Native American	Two or More Races	Eligible for Free or Reduced-Price Meals
Crescent ES	EC-5	299	75%	7%	1%	3%	12%	3%	53%
Crescent MS	6-8	90	72%	9%	0%	3%	14%	1%	42%
Crescent HS	9-12	168	76%	4%	0%	4%	16%	1%	46%

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 1-2 displays the population trend for the Crescent community. There has been a 17 percent increase in overall population since 2012-13.

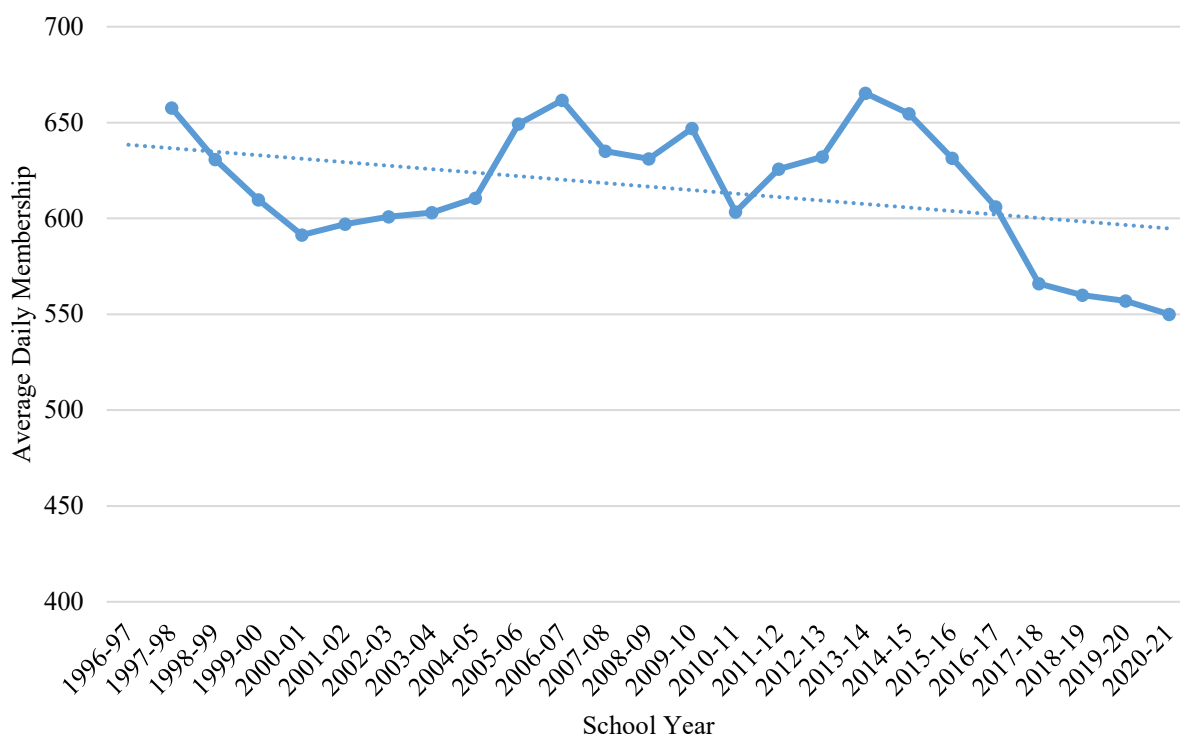
Exhibit 1-2
Population Trend for Crescent Community



Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 1-3 shows trends in average daily membership (ADM) among CPS schools. Over the past seven years, ADM has declined and is now at its lowest point since before 1996-97. The sharpest decline was between 2015-16 and 2016-17. At the time of this report, any lasting impact of COVID-19 on CPS' enrollment has yet to be determined.

Exhibit 1-3
Trend in CPS Average Daily Membership



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. CPS had the highest decline in ADM of the comparison groups. Half of the peers and the state had a decline while the other half of the peers and the community group experienced growth in ADM.

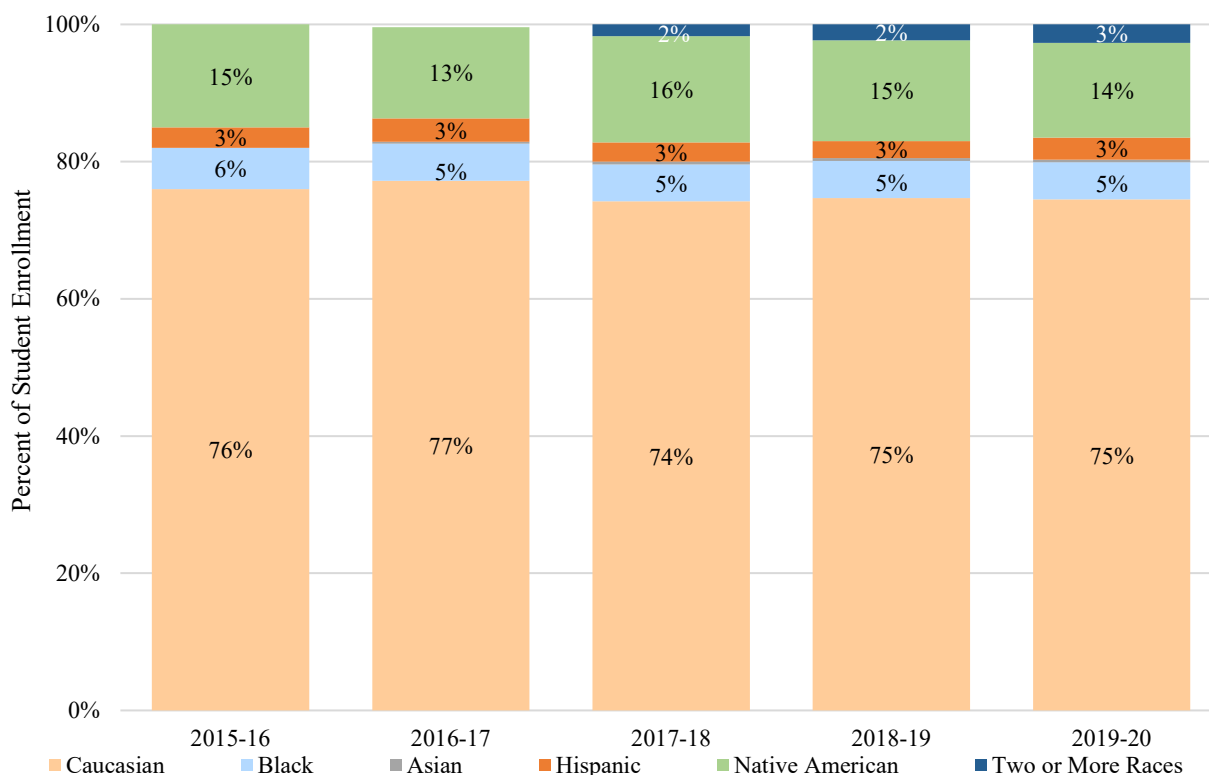
Exhibit 1-4
Crescent, Peer Districts, and State Student ADM Trends

Entity	ADM					Percent Change
	2015-16	2016-17	2017-18	2018-19	2019-20	
Crescent	631	606	566	560	557	(11.8%) ▼
Cashion	516	521	549	601	632	22.6% ▲
Comanche	1,023	1,018	957	951	924	(9.7%) ▼
Empire	504	539	534	520	530	5.1% ▲
Morrison	584	599	612	594	587	0.5% ▲
Minco	562	575	592	565	547	(2.7%) ▼
Community Group	669	662	675	686	707	5.6% ▲
State	1,305	1,267	1,280	1,289	1,304	(0.1%) ▼

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 1-5 illustrates changes in CPS student demographics over the past five years. The largest portion of students was Caucasian each year, with little fluctuation.

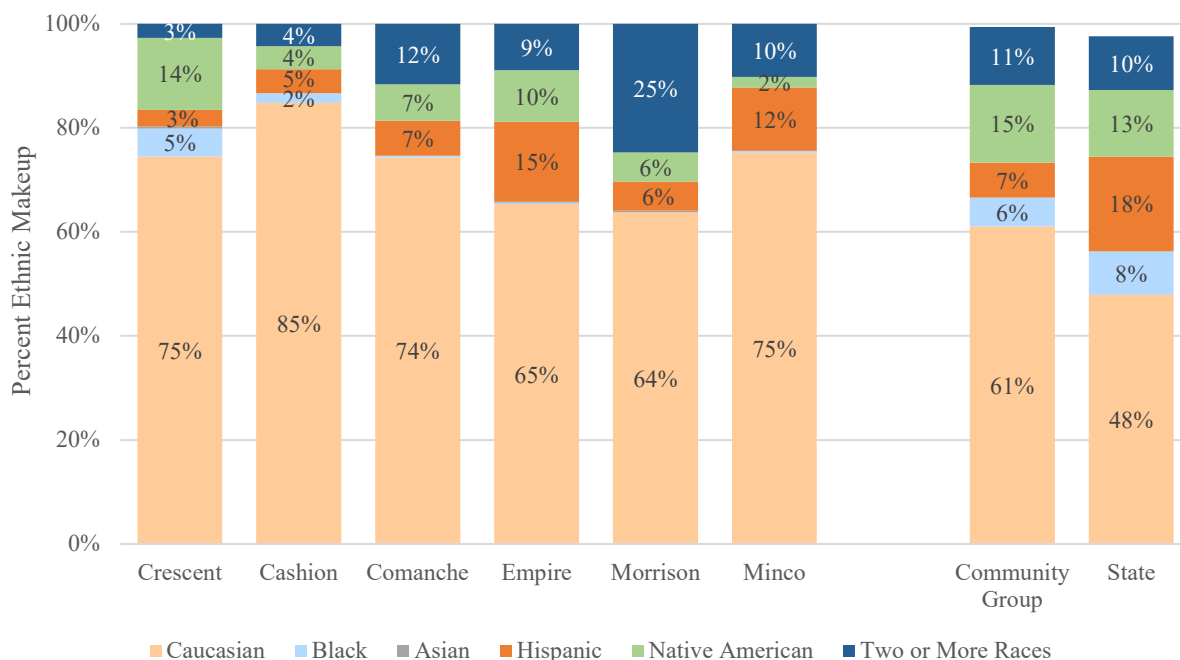
Exhibit 1-5
Trend in CPS Student Demographics



Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 1-6 compares CPS' demographics with its peers, the community group, and the state for 2019-20. All entities were mostly Caucasian.

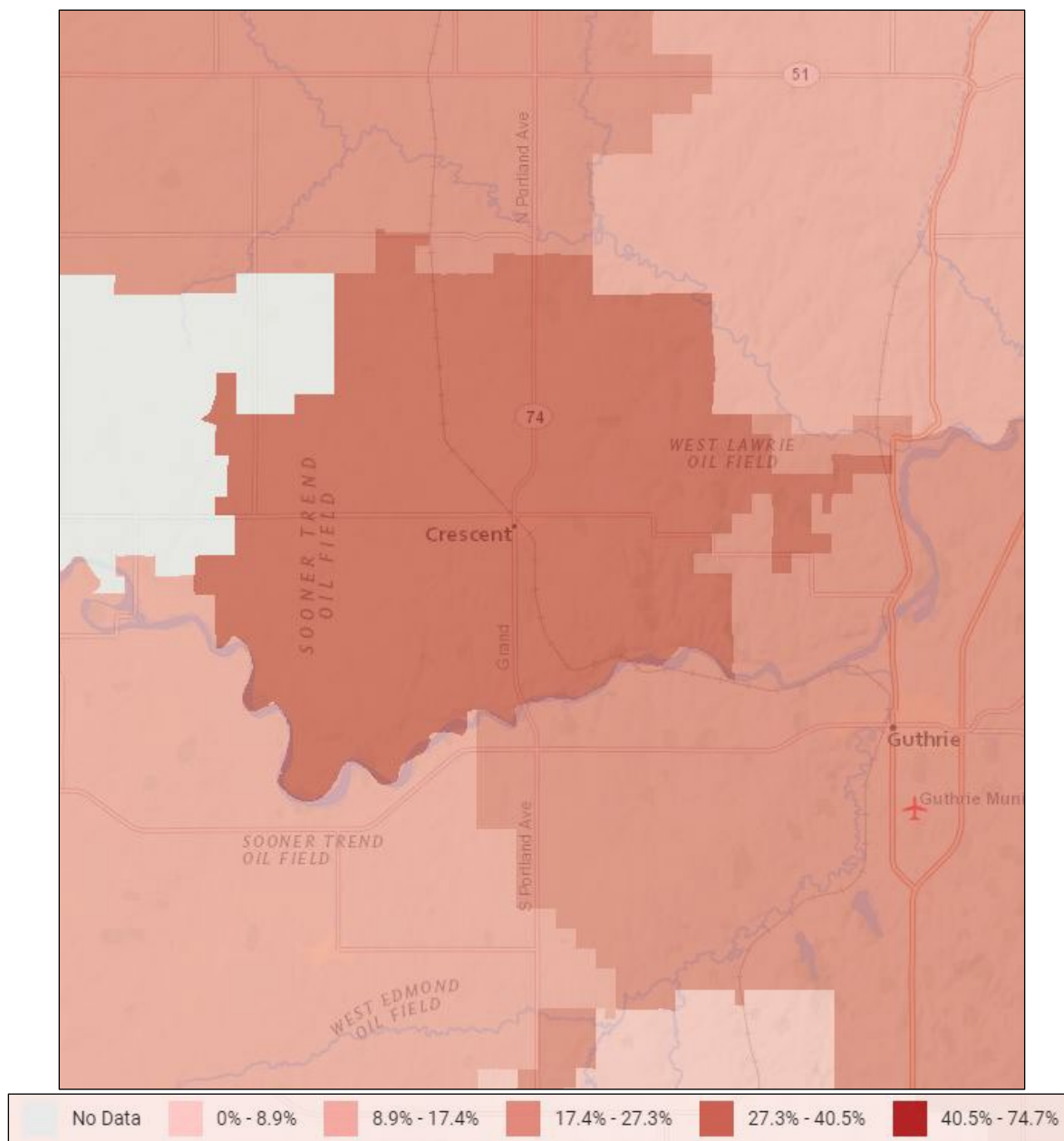
Exhibit 1-6
Comparison of Student Demographics, 2019-20



Source: Office of Educational Quality and Accountability, Profiles Database

Crescent is generally challenged by poverty. **Exhibit 1-7** displays a comparative map of the child poverty rate for Crescent and the surrounding districts. According to the National Center for Education Statistics, 35 percent of Crescent residents under the age of 18 live in poverty.

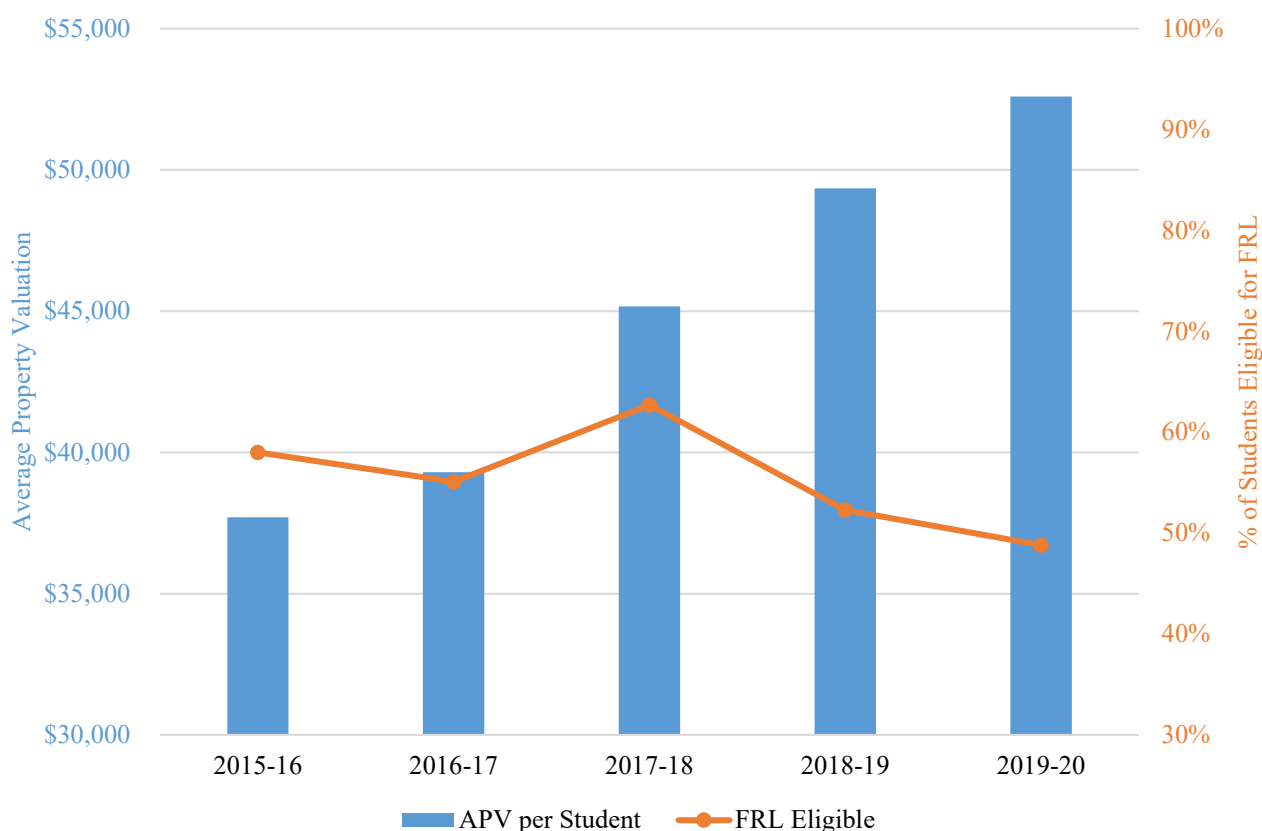
Exhibit 1-7
Rate of Child Poverty in Crescent Area



Source: <https://nces.ed.gov/programs/maped/ACSMaps/>

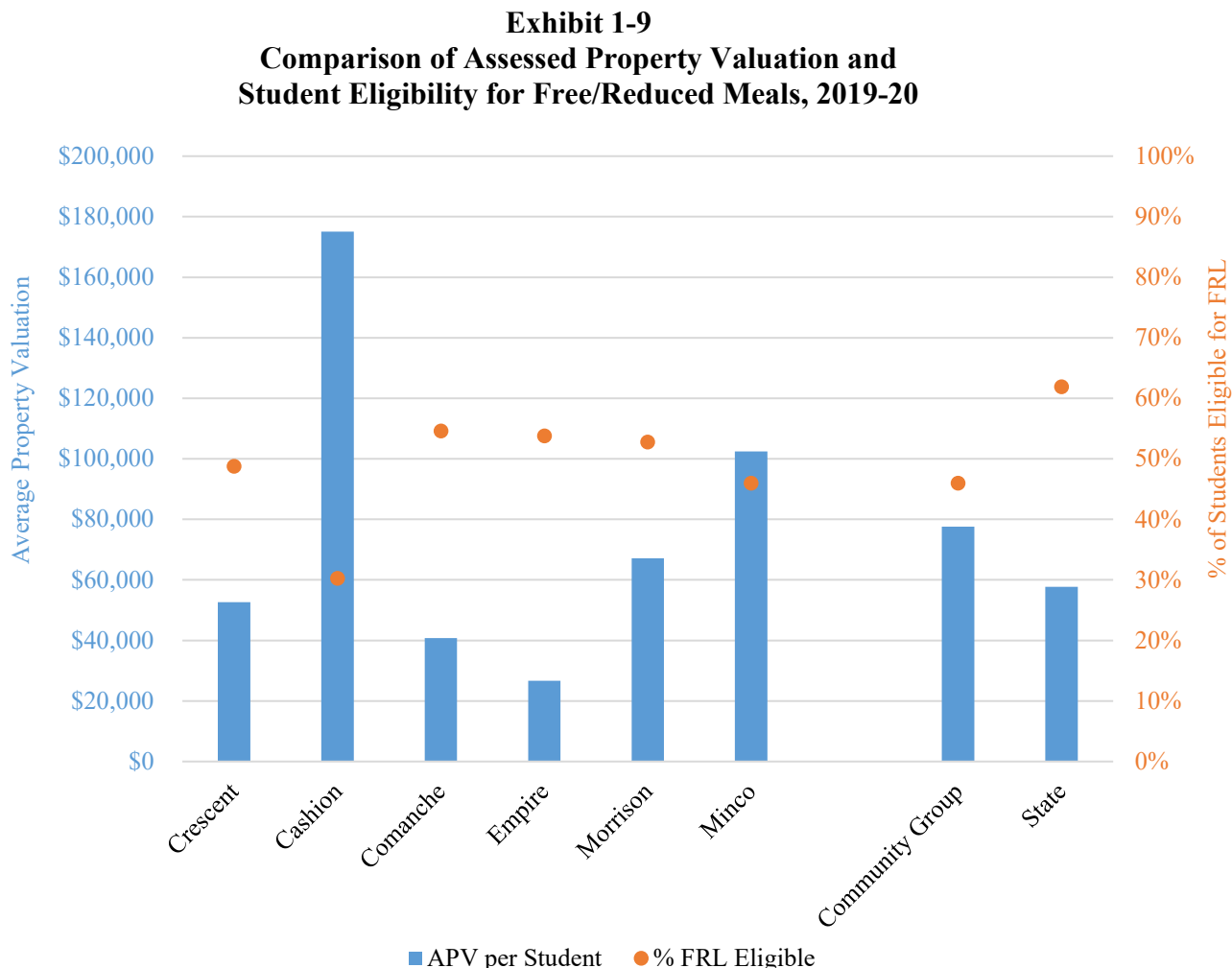
Exhibit 1-8 shows the trend in CPS assessed property value per student and the percent of students eligible for free/reduced-price meals over the last five years. Over that period, assessed property valuation has increased by 39.5 percent, while eligibility for free and reduced-price meals decreased by 15.9 percent.

Exhibit 1-8
Trend in Assessed Property Value and Student Eligibility for Free/Reduced Meals



Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 1-9 shows the comparison of CPS Assessed Property Value (APV) and percent of student eligibility for free/reduced-price meals to its peer districts, community group, and state. CPS had the second lowest APV and had the fourth-highest percentage of students eligible for free/reduced-price meals.



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 (BOE) 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 1-10** reflects sections relevant to BOE organization and basic governance principles.

Exhibit 1-10
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, 2021

Powers and duties of the local board of education are contained in Sections 125 and 138 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 of education policies;
- building and operating schools and related facilities; and
- contracting for an annual audit of all district and school activity funds.

Section 126 of the School Law Book addresses the size and election of local boards of education in Oklahoma, and Section 149 provides a description of the required officers for them. The CPS board of education consists of five members, each of whom is elected to a five-year term. School districts having fewer than 1,800 students in average daily membership, such as CPS, choose to elect all board members at large. **Exhibit 1-11** reflects the year elected and the next election date for each CPS school board member.

Exhibit 1-11
Crescent Board of Education Members

Board Member	Board Position	Year of Election or Appointment	Term Expires
Chris Channel	President	2016, 2021	2026
Lisa Graff	Vice President	2017	2022
Emily Williams	Clerk	2019	2024
Kevin Armer	Deputy Clerk	2018	2023
Cara Cox	Member	2020	2025

Source: CPS, January 2022

The district holds school board elections each February unless otherwise changed by state directives. The board of education members swear in elected members and vote on officers at the next meeting. A contract is in place for an annual audit of district finances.

The Crescent Board of Education meets at 5:30 p.m. on the second Monday of the month at the Superintendent's office. The dates were recently changed to allow for staff to prepare their monthly financial and personnel reports. The meeting place and time may be changed by agreement of a majority of the board members. They are open to the public. Special meetings are held as needed, and board members receive agendas and any supporting information in advance of the meeting.

Section 127 outlines the training requirements for school board members. Within 15 months following the election, new 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.

FINDING 1-1

Through school board and administrative interviews, the consulting team found that the evaluation tool utilized in the superintendent's evaluation was out of date and not conducive to building an effective relationship between the board of education and superintendent. Productive collaboration between a superintendent and their school board requires frequent, diplomatic communication and clear definitions of goals and responsibilities.

Unrevised for more than ten years, all CPS school board members and the superintendent mentioned a need to update their superintendent evaluation tool. They further stated that the tool was not applicable to the current responsibilities and duties of the superintendent. At the time of the onsite work, school board members were in the process of researching alternate evaluation tools to use in the future.

The superintendent is currently evaluated once a year with the outdated tool. The school board does not have an electronic version of the tool and must make paper copies for each evaluation. School board members pick and choose from the items on the tool that they feel are appropriate to use. Each school board member provides their feedback on the evaluation to the board president who then shares the results with the superintendent. This process does not encourage ongoing collaboration or feedback. The evaluation takes place towards the end of the year and does not support growth and improvement throughout the year.

A strong, effective relationship between a superintendent and their board of education is the foundation that supports a successful district. Productive collaboration between the superintendent and board requires frequent diplomatic communication and clear definitions of goals and responsibilities. Utilizing a formative evaluation process that allows the board to give feedback based on goals and expectations supports a healthy board-superintendent partnership.

There was a nationwide study that reported on school board and superintendent collaboration for high student achievement. What they found was that without strong collaborative leadership, districts are unlikely to raise student achievement.² Oklahoma statute 70 O.S. § 6-101.10 mandates an annual evaluation of superintendents; however, the evaluation process can do more

² *Thinking Differently: Recommendations for 21st Century School Board/Superintendent Leadership*, Educational Research Service, (2000).

than meet the statute. It can foster meaningful communication and encourage growth and opportunities for improvement.

RECOMMENDATION

Revise the superintendent's performance evaluation to include a performance review that is based on board-superintendent goals/standards that are evaluated by the board and support ongoing communication and feedback.

The school board should adopt an evaluation tool that requires reviews and feedback a minimum of each quarter. The Oklahoma State School Boards Association (OSSBA) has developed a tool for evaluating superintendents that supports continuous feedback and communication. OSSBA provides training on how to utilize the tool as part of their whole board development services.

FISCAL IMPACT

Training on the OSSBA superintendent evaluation tool is \$60 per credit hour for OSSBA members and \$120 per credit hour for non-members. The training is set up as one credit hour and is presented in person or as a recorded version online. This training may cost from \$360 to \$720 in the first year depending on how many individuals take the training. In subsequent years, new board members will need the same training.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Receive OSSBA training on superintendent evaluation.	(\$720)	(\$120)	(\$120)	(\$120)	(\$360)

FINDING 1-2

The CPS board of education and superintendent are committed to improving educational opportunities for all students. This commitment is a positive, necessary step on the road to improved academic achievement.

The consulting team found that the superintendent and school board have an open and collaborative working relationship focused on improving academic achievement. The superintendent's efforts to create change and build strategic initiatives have been received by the board of education with trust and support.

This team approach to initiating change has earned the confidence of parents, administrators, staff, and the community. Parent, student, and community surveys reflected statements to the effect that "the district is moving in the right direction."

Parents surveyed gave CPS school board members and the superintendent generally high marks (**Exhibit 1-12**). Nearly half of parents (46 percent) parents *agreed* or *strongly agreed* that board

members understood the educational needs of CPS students. A higher percentage (60 percent) of parents *agreed* or *strongly agreed* that the superintendent is a respected and effective leader.

Exhibit 1-12
Parent Survey Responses Regarding School Board Members

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
School board members know and understand the educational needs of students in the district.	18%	28%	27%	22%	6%
The superintendent is a respected and effective leader.	30%	30%	30%	6%	3%

Source: Prismatic Survey Results, January 2022

Every school leader, whether at the school site or the district office, has an opportunity to leverage trust to support the complex work of educating students. Determining how to best leverage this trust remains a challenge. According to Battle (2007), leadership is much more than the complex work of educating students; it also includes meeting the needs of those who work to set the vision of the district.³

COMMENDATION

The Crescent Board of Education and superintendent are commended for their philosophy to improve the educational opportunities for all students, which leads to overall improved academic achievement.

FINDING 1-3

The consulting team found evidence that school board members perform their duties with respect and transparency. Agenda and minutes are maintained on their website. The agenda and related documents are provided to the board on Thursday of the week before the board of education meeting. School board members noted that this afforded them ample time to prepare and review important information.

The CPS school board promotes public participation and outlines guidelines for members of the public to provide suggestions or concerns on the district's website. Faculty and staff interviewed noted awareness of the policy and processes necessary to submit items for the school board meetings.

Building strong public transparency is a key objective of good school boards. Facilitating and promoting transparent operations for school board business and decisions that impact the district builds trust with its citizens and stakeholders. Providing this kind of easy, intuitive public access opens other doors for civic trust and engagement and gives citizens from all perspectives equal

³ https://digitalcommons.umassglobal.edu/cgi/viewcontent.cgi?article=1327&context=edd_dissertations

opportunity to participate as well-informed contributors. In addition, effective meetings by good school boards lead to informed decision-making, community trust, and improved student achievement. School board members who fulfill their responsibilities and conduct effective meetings, are known for doing effective and efficient work for the district and community.⁴

COMMENDATION

CPS board of education meetings are well organized, conducted according to established procedures, and public input is welcomed.

FINDING 1-4

The CPS board of education does not have a dedicated support staff beyond the superintendent to help them keep up with training requirements and other administrative tasks. One school board member had to request special permission from the SDE to stay on the school board because they had not met the annual training requirements.

The elementary secretary at CPS is responsible for keeping the minutes of all school board meetings. However, this position does not assume all the responsibilities of a typical board clerk. Instead, requests and communication by the school board are usually filtered through the superintendent. Open communication between the superintendent and board of education is necessary for key items. However, clerical requests and maintaining training hours for school board members is best delegated to a school board clerk or other administrative staff.

Oklahoma law requires school board members to annually complete training requirements within 15 months of appointment/election to remain in good standing. In addition to meeting state-mandated requirements, school board training is often designed to provide pertinent information for overall board member effectiveness. The training gives the board members a common knowledge base for adhering to a set of protocols and ethics for professional conduct, guidelines for governance and sound financial and policy decisions, and leverages comprehensive school improvement. Board training provides direction in setting policies to improve student achievement. All training should contain relevant and timely information to help members be responsive to changing community dynamics while honoring the values, beliefs, and priorities of the community they serve.

An effective school board plays an important watchdog role in keeping the local school on track and setting policies that affect all students. The following study identifies characteristics of effective school boards and can be used as a filter for determining additional training needs and best practices:

- **Effective Boards Focus on Student Achievement.** Policies and resources are targeted to promote achievement for all students. All school policy is targeted to high standards, a rigorous curriculum, and high-quality teachers.

⁴ <https://insights.diligent.com/meeting-management-public-education/how-run-school-board-meeting-effectively>

- **Effective Boards Allocate Resources to Needs.** Not all students have the same needs. Good school boards recognize this fact and allocate resources of time, money, and personnel and adjust practices to reach all student-learning priorities.
- **Effective Boards Watch the Return on Investment.** Productive school boards are mindful of their accountability to their communities. They routinely measure and report the return on investment. As effective policymakers, they recognize the importance of being good stewards of tax dollars.
- **Effective Boards Use Data.** Informed policy making is complex and requires using data. Data assure that all students are progressing and reaching high standards. Accountability and reports about return on investments are unconvincing without data.
- **Effective Boards Engage the Communities They Serve.** There are established mechanisms for community involvement in setting the district's vision, representing the values of the community, and identifying the district's short-term and long-term priorities.⁵

Research published by the National School Boards Association (NSBA) Center for Public Education makes it clear that school boards in high-achieving districts exhibit habits and characteristics that are markedly different from boards in low-achieving districts. CPS board members were clear in their intent to govern with the focus of raising the achievement level of all students. The board can use the information in **Exhibit 1-13** as an operational guide and filter for adopting policies that supports strategic overall school improvement planning.

⁵ <https://www.edutopia.org/five-characteristics-effective-school-board>

Exhibit 1-13
Eight Characteristics of an Effective School Board

1. Effective school boards commit to a vision of high expectations for student achievement and quality instruction and define clear goals toward that vision.
2. Effective school boards have strong shared beliefs and values about what is possible for students and their ability to learn, and of the system and its ability to teach all children at high levels.
3. Effective school boards are accountability-driven; spending less time on operational issues and more time focused on policies to improve student achievement.
4. Effective school boards have a collaborative relationship with staff and the community and establish a strong communications structure to inform and engage both internal and external stakeholders in setting and achieving district goals.
5. Effective boards are data-savvy; they embrace and monitor data, even when the information is negative, and use it to drive continuous improvement.
6. Effective school boards align and sustain resources, such as professional development, to meet district goals.
7. Effective school boards lead as a united team with the superintendent, each from their respective roles, with strong collaboration and mutual trust.
8. 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.

Source: [cpe-eight-characteristics-of-effective-school-boards-report-december-2019.pdf](#)

RECOMMENDATION

Explore options to ensure that:

- **all CPS board members meet training requirements;**
- **the protocols of Professional Conduct are adhered to; and**
- **board members have a common knowledge base for legal, visionary governance, policymaking, and financial oversight.**

The superintendent and board members should explore options available to meet state requirements and provide members with relevant training for being a productive and responsible board of education. OSSBA offers onsite and virtual training conferences for school board members. Board members can earn their credits and deepen their expertise regarding the roles and responsibilities of effective school board members through digital or in-person offerings. OSSBA offers an Online Board Bundle that provides unlimited training for board members and

superintendents via subscription.⁶ The pricing of the training is equal to the annual August conference costs.

Further, CPS should designate a support administrative staff to maintain training points and apprise school board members of opportunities for board trainings. Ideally, this is a clerical staff member who is close to the superintendent's office.

FISCAL IMPACT

This recommendation can be implemented with existing resources. The superintendent should assess the training requirements needed and keep new and returning board members apprised of their training needs and base cost accordingly.

FINDING 1-5

Although some practices are in place to update policies, it was unclear how policies are regularly reviewed, updated, and approved at board meetings. The district has no process in place to routinely update and revise all school board policies.

CPS lacks administrative procedures for the adoption and updating of all school board policies. Some policies have been updated in the last two years; however, there has not been a comprehensive review of policies to ensure they are applicable and congruent with new legislation. For example, in General Personnel Policies (policy DA) in the section related to substitutes and the number of days a substitute may teach, the policy did not have the latest limits according to 70 o.s.2021, section 6-105 and had not been updated since the new legislation was enacted. Legislation passed in 2021 increased the number of days a substitute can consecutively teach from 90 to 135 for non-certified substitutes and slightly higher for certified substitutes.

Policies adopted by the board of education provide direction, control, and/or management of its legal functions. The goals of all policies are to present clear, concise, and specific directives to the staff and to serve as a primary communication tool with the general public, students, and parents. Regulations state that procedures and rules developed by board policy are to guide and direct the administration in the implementation of all school board policies. Adoption of new policies or revision of existing policies is solely the responsibility of the school board. The updated policy manuals must be made available to the public and placed for easy access at district locations for use by employees and the public. Many school districts post computerized versions of the policies on the school website. This provides a convenient and effective venue for keeping all stakeholders informed.⁷

To govern properly, school boards must keep their policies current and relevant. If a district is sued, applicable board policies and implementing procedures will be scrutinized. School boards help themselves by closely examining policies and keeping policies current.

⁶ <https://www.ossba.org/training-events/webinars/>

⁷ An example can be found here: https://www.netq.org/dmsView/PolicyManual_75079

RECOMMENDATION

Develop systematic procedures to regularly review and maintain district policies.

The school board and superintendent should review options available through the OSSBA or the Center for Education Law for regular policy updates. Both entities follow new legislation and can provide guidance on which policies may need to be updated. Once an option has been selected and implemented, the superintendent should direct the inclusion of policies on the district's website.

FISCAL IMPACT

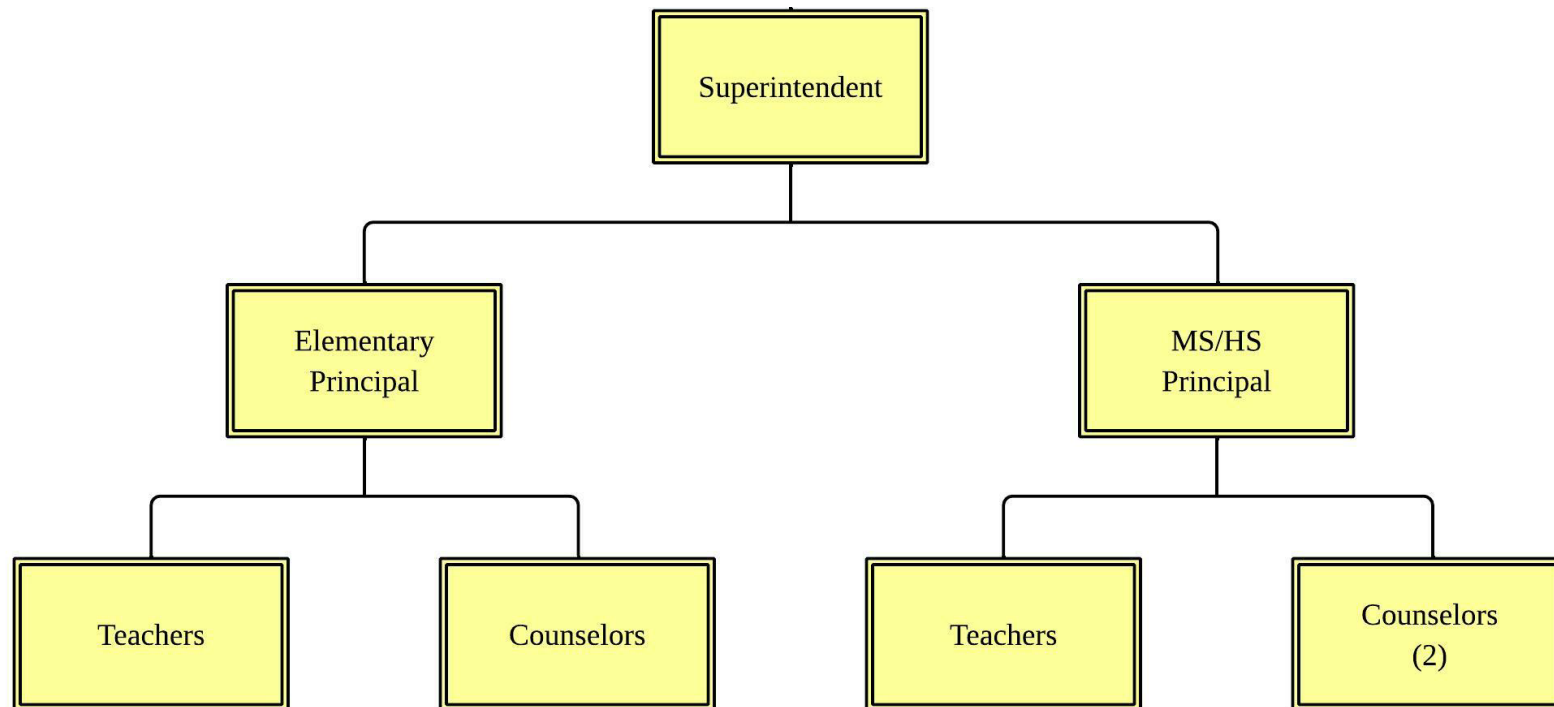
The OSSBA and the Center for Education Law provides districts with multiple options for keeping policies updated. The costs can vary from \$750 to \$6,000 per year for a customized policy service. The fiscal impact of this recommendation will depend upon the school board's direction regarding which services the superintendent should purchase. The consulting team estimates an average annual cost of \$4,000.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Develop procedures to review and maintain district policies.	(\$4,000)	(\$4,000)	(\$4,000)	(\$4,000)	(\$4,000)

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 organizational charts. Effective central office structures encourage communication at all levels. **Exhibit 1-14** reflects the current organizational chart for CPS.

Exhibit 1-14
CPS Organizational Chart



Source: Created by Prismatic, February 2022

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 1-15** provides the results for central office administration and the superintendent. A majority (78 percent) of staff gave the superintendent an A or B grade; the same percentage gave central office administration, in general, an A or B. School-level administrators also earned high marks.

Exhibit 1-15
Staff Survey Results Regarding Central Office Administration and Superintendent

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Superintendent's work as the educational leader of the district.	38%	40%	4%	2%	2%	15%
Superintendent's work as the chief administrator of the district.	38%	38%	6%	2%	2%	15%
Central office administration.	38%	40%	4%	4%	0%	13%
School-level administration.	29%	31%	15%	4%	6%	15%
Principals' work as instructional leaders.	27%	25%	19%	4%	10%	15%
Principals' work as managers of the staff and teachers.	28%	30%	11%	6%	13%	13%

Source: Prismatic Survey Results, January 2022

Similar to staff results, a majority of parents gave the superintendent high marks (**Exhibit 1-16**). Only nine percent of parents did not.

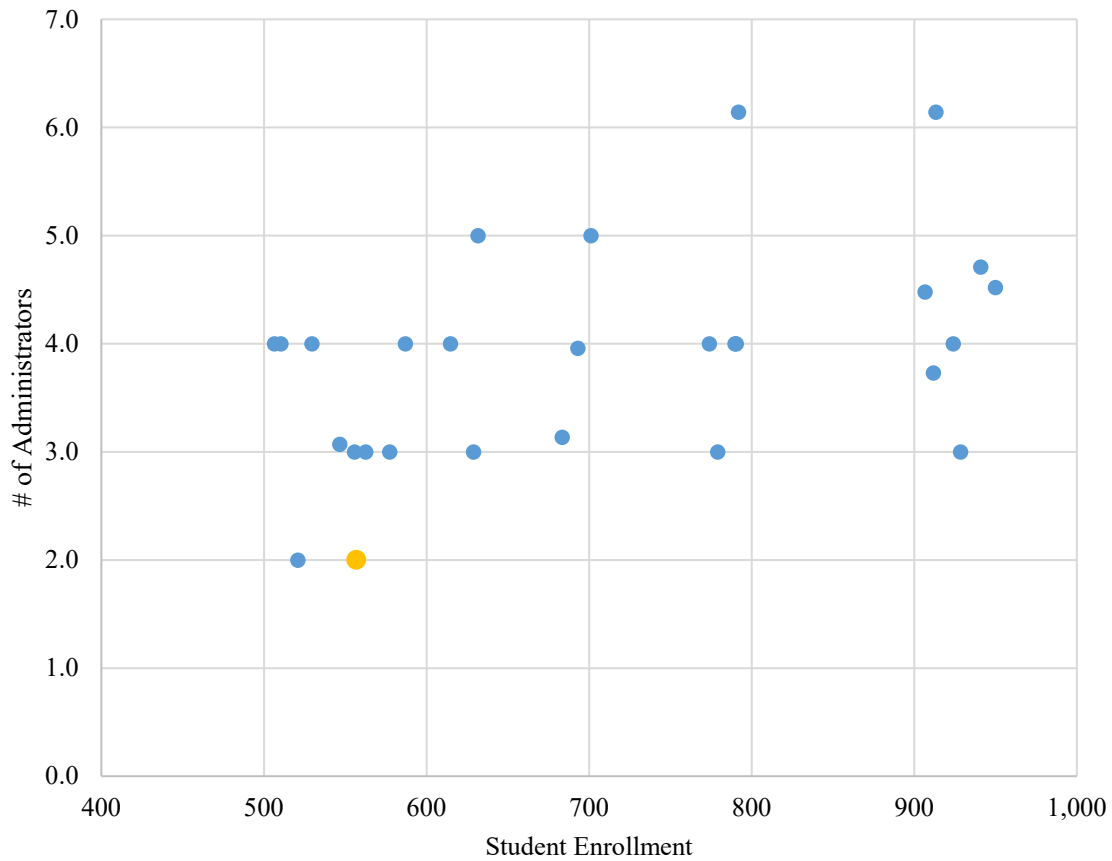
Exhibit 1-16
Parent Survey Responses Regarding School Board Members

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The superintendent is a respected and effective leader.	30%	30%	30%	6%	3%

Source: Prismatic Survey Results, January 2022

Considering all districts in the F1 Community Group and the district's current enrollment, having 2.0 administrative positions is comparable to similarly-sized Oklahoma districts. **Exhibit 1-17** compares the number of administrative positions with student enrollment for all 28 of the F1 districts. The CPS data point is shown in orange. As shown, CPS' 2019-20 administrative staffing was lower than nearly all F1 peers. With the current 3.0 administrative positions, CPS is more in line with its peers.

Exhibit 1-17
Administrative Staffing as a Function of Enrollment
All F1 Oklahoma School Districts, 2019-20



Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 1-18 compares the CPS ratio of administrators to teaching staff with the five comparison districts. CPS has the highest ratio of teachers to administrators. With the current 3.0 CPS administrators, has a ratio of 11 teachers per administrator, which is in the middle of the peers.

Exhibit 1-18
Comparison of Teacher and Administrator Staffing, 2019-20

Entity	ADM	Number of Administrators (FTE)	Number of Classroom Teachers (FTE)	Ratio of Teachers to Administrators
Crescent	557	2.0	32.6	16:1
Cashion	632	5.0	44.3	9:1
Comanche	924	4.0	56.9	14:1
Empire	530	4.0	32.5	8:1
Morrison	587	4.0	35.7	9:1
Minco	547	3.1	34.7	11:1
Peer Average	644	4.0	41.0	10:1

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

Exhibit 1-19 compares CPS' per-student spending on administrator salaries with that of its peer districts. As shown, CPS' administrator cost per student was the lowest of its peers, despite having the second-largest gross salary total.

Exhibit 1-19
Administrative Expenditures Comparison, 2019-20

Entity	ADM	Number of Administrators (FTE)	Total Salary	Administrator Cost per Student
Crescent	557	2.0	\$99,934	\$359
Cashion	632	5.0	\$93,321	\$738
Comanche	924	4.0	\$94,278	\$408
Empire	530	4.0	\$86,194	\$651
Morrison	587	4.0	\$72,652	\$495
Minco	547	3.1	\$101,439	\$575
Peer Average	644	4.0	\$89,577	\$556

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

FINDING 1-6

In general, CPS board members, teachers, and the community at large had a lack of understanding of the school finances and budget. The superintendent has made efforts to improve the financial information provided to board members and the public. The district also hired a financial consultant to help develop and explain reports utilized in school board meetings. However, there is still a need for improved transparency and greater stakeholder understanding of the CPS budget and finances. Universally, board members indicated that they still had difficulty understanding all the finances and would like greater understanding. **Exhibit 1-20**

provides staff survey results related to funding, budgets, and allocation of resources. As shown, the high rates of staff members indicating *no opinion* on these questions is a concern.

Exhibit 1-20
Staff Survey Results Regarding Budgets and Allocation of Resources

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Funds are managed wisely to support education in this district.	4%	55%	33%	6%	2%
The budgeting process effectively involves administrators and staff.	8%	20%	43%	20%	8%
My school/department allocates financial resources equitably and fairly.	6%	43%	43%	4%	4%

Source: Prismatic Survey Results, January 2022

Exhibit 1-21 provides parent survey results related to the allocation of resources. As with the staff survey, the high percentage of parents having *no opinion* is a concern. Furthermore, large percentages of parents feel that more should be spent in the areas of facilities and classroom supplies. Only a small percentage, 13 percent, of parents said the district asked for input when developing its budget.

Exhibit 1-21
Parent Survey Results Regarding Budgets and Allocation of Resources

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The district spends its money wisely.	15%	27%	40%	10%	8%
The district needs to spend more of its budget on its facilities.	9%	22%	49%	17%	2%
The district needs to spend more of its budget on classroom supplies.	18%	39%	35%	8%	0%
The district asks the community for input when developing its budget.	3%	10%	45%	29%	13%

Source: Prismatic Survey Results, January 2022

A comprehensive budget guide outlining the financial structure and budget allocations can build understanding and clearly communicate with stakeholders' budget priorities and realities. Developing transparent budget processes and a comprehensive financial overview allows stakeholders to provide meaningful input that supports the successful administration and

financial stability of the district. According to “Focused Schools,” the amount of resources is not as important as how districts use the resources they have.⁸

A clear understanding of financial and budget trends can support the effective allocation of resources. The financial stability of districts requires strategic and deliberate school budgeting. Effective districts develop data-driven budgets that link school spending to educational outcomes. Their budgets and budget processes are transparent and accessible to stakeholders, building trust and stakeholder support.

RECOMMENDATION

Create additional financial reports and a comprehensive budget guide to support transparency and understanding of the financial structure and budgeting process of the district.

CPS should include additional budget reports each month to support a better understanding of the district’s finances. The Wen-GAGE accounting software utilized by CPS includes reports that can be generated on demand. One of those reports is the budget analysis. This is an essential report for school boards to review the status of appropriations. It provides the amount of appropriation, amount of encumbrances, amount paid, amount unappropriated, and percent of budget encumbered.

In addition, the district should consider:

- creating summary reports utilizing graphs as another method to build an understanding of the district’s finances; and
- developing a comprehensive budget guide that maintains essential district data over time.

The district can begin with an already made template or model budget guide.⁹ The Cooperative Council of School Administrators has developed a budget guide template that allows districts to fill in their numbers to create their own guide.¹⁰ Most of the language and tables are already set up. Their budget guide provides a comprehensive overview of the district, district initiatives and budget. In addition, the Association of School Business Officials International has several model budget guides that can be used as a resource. These additional reports will support better understanding, enhanced transparency, and effective resource allocation.

There will likely be background research and data collection necessary to begin the budgeting guide. However, once the document is created, maintenance should be straightforward.

⁸ Purcell, K., Bishop, B., Leight, J., Palumbo, J. (2019). *Focused Schools: Transforming Teaching and Learning for Every Student, Every Day*.

⁹ Association of School Business Officials International (2021). MBA and pathway resources. Retrieved from: network.asbointl.org/viewdocument/award-winning-budget-examples-2019-5

¹⁰ Zockoff, N. (2012). *Smart school budgeting: Resources for districts*. Rennie Center for Education Research and Policy. Retrieved from: <http://www.renniecenter.org/sites/default/files/2017-01/SmartSchoolBudgeting.pdf>

FISCAL IMPACT

This recommendation can be implemented with existing resources.

C. PLANNING AND EVALUATION

Planning, evaluating, correcting weaknesses, and supporting strengths 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 and improvement 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 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 district's organization. Finally, the organization must provide periodic reports on the status of 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.¹¹ 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 long-term goals.

FINDING 1-7

As a district, CPS has not historically engaged in strategic planning, nor is it currently engaged in it. However, current board members acknowledged a need for strategic planning and indicated they would like to do so.

In 2007, Reeves summarized his work, which analyzed hundreds of strategic plans across 20 dimensions, controlled the study for school demographics, and compared student achievement to a baseline year. The study found that substantially higher student 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

¹¹ Cook, Jr., W. (2000). *Strategics: The art and science of holistic strategy*. Westport, Connecticut: Quorum Books.

- attribution by teachers and leaders that their work is the fundamental cause of student growth rather than demographics.¹²

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:

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.¹³

The graphic in **Exhibit 1-22** explains the logic of the balanced scorecard approach to strategic planning.

¹² Reeves, D.B. (2007). Leading to change/making strategic planning work. *Educational Leadership*, 65(4).

¹³ <http://balancedscorecard.org/Resources/Strategic-Planning-Basics>

Exhibit 1-22
The Balanced Scorecard *Nine Steps to Success*TM Model



Source: <https://balancedscorecard.org/about/nine-steps/>

RECOMMENDATION

Implement an ongoing strategic planning process involving community stakeholders, administration, faculty, and staff, which defines decision-making processes and provides governance and direction for long-range goals, implementation strategies, and accountability measures.

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 guides continued positive district growth. A strategic planning process can start with an annual superintendent's report to the school board detailing all facets of the school system. The basic steps for a strategic planning effort are:

- convene an internal administrative staff planning group. They decide who will chair the main committee and/or serve as liaison to the group;
- establish a board of education approved strategic planning committee heavily weighted to include teachers, students, community members and parents. As many as two of the board members can serve if so desired. The committee should also represent the diversity of the community and district;
- collect survey data on perceived strengths and weaknesses of the district from the community, students, parents, and other community stakeholders;

- 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;
- revise the existing vision statement, as needed;
- 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; and
- develop follow-up and review procedures.

Once a strategic plan is established, the board and key administrative staff should communicate the goals of the plan and provide ongoing updates on the district's progress. The board, superintendent, and key committee members should perform an annual review of 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 "SMARTIE": Specific, Measurable, Achievable, Relevant, Time-bound, Inclusive, and Equitable. The recent challenges facing education with the pandemic and other factors require goals to address not only the "SMART" attributes but also equity and inclusion.

FISCAL IMPACT

To achieve authentic collaboration and stakeholder input the consulting team recommends this process be facilitated by outside services. The board can publish a request for proposals and enter a contract for services. These services are commonly priced by district size and may range between \$15,000 to \$30,000.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Contract for strategic planning facilitation.	(\$20,000)	(\$10,000)	\$0	\$0	\$0

FINDING 1-8

The CPS superintendent and administration have made recent efforts to establish a leadership team in order to guide and support the practices and goals for continued growth and academic success of their students. However, staff stated that over the prior three or more years some of the leadership opportunities that had been present have become inactive. The professional development committee was one example given by participants during focus group discussions that had become inactive.

CPS recently had changes in crucial leadership positions. The 2021-22 school year was the first year for the superintendent and the elementary school principal. The new team acknowledged the importance of building leadership opportunities during their interviews; however, some of their initial priorities have necessarily focused more on compliance issues.

Exhibit 1-23 shows that according to staff surveys, nearly one-fifth of the staff do not feel like they are an integral part of the team. Moreover, only 17 percent strongly felt they are part of the team.

Exhibit 1-23
Staff Survey Results on Team Integration

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I feel that I am an integral part of team here.	17%	54%	10%	15%	4%

Source: Prismatic Survey Results, January 2022

According to the Southern Cross University’s “What is Good Leadership in Schools?”, good leadership in schools helps to foster both a positive and motivating culture for staff and a high-quality experience for learners. The same study found that not one school (out of 180 surveyed) was able to improve student achievement records without effective school leadership. This research shows a clear connection between skilled school leadership and positive student learning outcomes. It is proof that good leadership in schools directly impacts students’ experience and performance.¹⁴ Good leadership in schools encourages and enables school-wide teaching expertise to achieve a strong rate of progress for all learners. This leadership can be driven by principals and executive staff in traditional leadership roles, as well as by school leaders and teachers without defined leadership roles.

RECOMMENDATION

Continue to improve opportunities to develop leaders from within the teacher ranks.

According to “Focused Schools,” leadership of one single person is no longer sufficient. Schools and school districts are so complex it now takes many different leaders for all students to achieve at high levels.¹⁵

The district should create formal and informal leadership opportunities for teachers and staff members. In some cases, the district may just need to activate opportunities that had become inactive such as the professional development committee. Other opportunities can be book studies, student club sponsors, administrative interns, or more formal opportunities such as their leadership committee. In addition, the superintendent should encourage teachers and staff to

¹⁴ Content provided by Southern Cross University. “What Is Good Leadership in Schools?” ESchool News, 20 Aug. 2019, <http://www.eschoolnews.com/2019/06/25/what-is-good-leadership-in-schools/>.

¹⁵ Purcell, K., Bishop, B., Leight, J., Palumbo, J. (2019) *Focused Schools: Transforming Teaching and Learning for Every Student, Every Day*.

participate in some of the state-sponsored leadership opportunities such as the OKMath/OKSci leadership programs.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 1-9

CPS does not have a formalized process for the evaluation of its various academic and social programs. There are no common metrics, consistent procedures, or policy to collect, analyze, and use data to assess the effectiveness and efficiency of implemented programs systematically and routinely. The consulting team found no evidence to indicate program evaluations are used to measure the cost-benefits, effects on student learning, or provide recommendations to improve program implementation.

Program evaluation is designed to assess the implementation and the effects of a program. The purposes for program evaluation include how and where to improve a program, assess the overall value of a program and the individual components, align cost with effectiveness and impact on student performance. Results of program evaluations are used for making decisions about whether to continue, improve, expand, or eliminate a program, allocate resources among competing programs, or accept or reject a program approach or theory. Sound policy drives thorough program evaluations and is viewed as a deliberate means for managing and directing decision-making.¹⁶ Other sources for best practices in evaluation note that:

- “Knowledge is power, and there’s nothing more powerful than data to help district and school leaders develop a solid blueprint with measurable results of continuous improvement”.¹⁷
- Purposeful data leads not only to first-order, direct changes in classroom practice and individual student achievement, but also to second-order, system level changes in school culture that ultimately benefit all students.¹⁸

RECOMMENDATION

Adopt common metrics, policies, and procedures related to annual program evaluation.

The superintendent and school board should adopt policies, metrics, and timelines for annual evaluations of all programs – educational, social, and others. The policies should include directives for identifying needs, creating goals, and designing action plans with evidence-based

¹⁶ https://education.nova.edu/Resources/uploads/app/35/files/arc_doc/progeval.pdf

¹⁷ Messelt, J. (2004). *Data Driven Decision Making: A Powerful Tool for School Improvement*.

¹⁸ Ainsworth, L., White, S. et.al (2007). *Ahead of the Curve*. Solution Tree Press.

practices. Implementation and reflection are substantial components of the planning and evaluation process.^{19,20}

A key to successful program evaluation is leaders who understand the impact of data analysis and are committed to the process. Data-driven decision-making takes time, effort, and understanding. The district should begin by creating a data inventory that identifies available data sources collected by the district and its appropriate use for evaluating a program. The data inventory will build capacity for providing timely and accurate information by focusing on the most appropriate data necessary for analysis. **Exhibit 1-24** provides an example of a data inventory sheet designed for teachers or administrators.

Exhibit 1-24
Data Inventory Example

Defining the Types of Data- Example	
Description	Oklahoma School Testing Program Results: Performance Level of student, Percent Correct by standard, Scale Score of student
Purpose	Provide information on what students know and are able to do in relation to the grade-level content standards
Source	Oklahoma School Testing Program
Timeframe & Frequency	Two months after the assessment at the end of the school year. Data is collected once a year.
Limitations	Data reflects the effectiveness of past instruction and curriculum.
Data Interpretation	What patterns of learning does the data reflect? What are the trends of student performance? Did we meet goals that were set as a school, team or teacher? What goals should I set for students based on their performance of the previous year?

Source: Created by Prismatic consultant, 2020

It includes the following information about the data collected in your district:

- **Description:** Describes the type of data.
- **Purpose:** What is the core purpose for collecting the data elements.
- **Source:** Where does the data originate and what entity “owns” or maintains the data.

¹⁹ <https://sde.ok.gov/search/node/low%20performing%20schools>

²⁰ <https://sde.ok.gov/sites/default/files/9EE%20Booklet.pdf>

- Timeframe & Frequency: When and how often is the data collected.
- Limitations: All data has limitations. Identifying limitations supports the appropriate use of the data.
- Data Interpretations: Identifies the questions that can be answered from analyzing the data.

Data Wise by Boudett, City, & Murane (2010), provides another template for developing a data inventory.²¹ In addition, the superintendent, administrators, and select faculty should review the following resources that provide basic information for initiating program evaluations:

- Poorvu Center for Teaching and Learning Program Evaluation Overview;²²
- Using Program Evaluation to Enhance Student Success;²³
- Jump Start Your School's Program Evaluation;²⁴ and
- Getting the Information You Need from Your Evaluation.²⁵

Program evaluation can start by asking what the district is doing right. The district should continue to build excellence and capacity with their professional learning communities, improve on data analysis, and leverage resources provided by the SDE through its Office of School Support and Improvement. The school support office assists schools with support, assistance, and/or resources needed to build capacity and sustain change that positively impacts students and their achievement.

FISCAL IMPACT

The superintendent should investigate the resources available to CPS for conducting appropriate evaluations. The consulting team anticipates minimal additional time needed to develop a data inventory and possibly develop assessments or metrics that are common across schools for each of the domains. The selected overall evaluation approach will determine the final costs. Given that the district does not yet have in-house expertise to conduct a robust schedule of program evaluation, the consulting team recommends that CPS contract out for one or two programmatic evaluations for each of the next three years. Once the district builds some in-house expertise, it can choose to conduct more evaluations in-house. The cost for an external programmatic evaluation typically varies on the size of the program evaluated and the extent of evaluation methods used. The consulting team recommends allocating \$15,000 per year for the next three years.

²¹ Boudeee, City, & Murane (2010). School Data Inventory from Data Wise.

²² <https://poorvucenter.yale.edu/EvaluatingPrograms#:~:text=Program%20evaluation%20looks%20at%20the,various%20models%20of%20program%20review>

²³ <https://www.aacu.org/publications-research/periodicals/using-program-evaluation-enhance-student-success>

²⁴ https://www.educationworld.com/a_curr/school-program-evaluation-basics.shtml

²⁵ <https://www2.ed.gov/about/offices/list/oese/sst/evaluationmatters.pdf>

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Contract with a consulting company to do program evaluations.	(\$15,000)	(\$15,000)	(\$15,000)	\$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.

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 1-25** provides the results for personnel areas. Less than a majority of staff gave recruitment and selection an A or B grade; but a slight majority (53 percent) gave personnel evaluation an A or B.

Exhibit 1-25
Staff Survey Results Regarding Central Office Administration and Superintendent

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Personnel recruitment	10%	23%	15%	19%	2%	31%
Personnel selection	15%	31%	19%	13%	4%	19%
Personnel evaluation	17%	36%	11%	17%	2%	17%

Source: Prismatic Survey Results, January 2022

FINDING 1-10

The current CPS staff has almost no diversity. This does not reflect the diversity of students in the district.

Survey responses by parents, staff members, and students reflect that some percentage of responses that *disagree* or *strongly disagree* with statements related to a diverse and equitable school community (**Exhibit 1-26**).

Exhibit 1-26
Survey Results Regarding Diversity

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	This district values diversity in its employees.	2%	58%	23%	13%	4%
Student	Students in this school accept each other's differences.	11%	32%	26%	23%	9%
Student	Most adults in my school treat student diversity as a good thing, not a bad thing.	18%	47%	27%	4%	4%
Parent	Students are treated equitably in this district.	17%	31%	19%	23%	9%

Source: Prismatic Survey Results, January 2022

In the past decade, U.S. educational leaders have begun to take a deeper look at inequities to better understand the complex systems that affect student performance. To ensure that these concerns will be systemically targeted, school districts are establishing in-district departments to develop frameworks that use research-based tools and processes to study and translate data into transformational actions and activities that will promote educational equity system-wide. This framework provides the district staff the ability to:

- consider the perspectives of multiple stakeholders;
- develop a common understanding about equity;
- create safe spaces for dialogue about data;
- build capacity and ownership internally to perform ongoing and practical equity reviews; and
- encourage transparent communication.

Building partnerships with university educator preparation programs supports the district in possibly gaining effective teachers and provides experiences for new teachers to gain the skills necessary to be successful.²⁶ Building a school-university partnership can benefit CPS by adding additional teachers and simultaneously supporting their recruitment efforts. In addition, the partnership with a university offers more resources and professional development for prospective teachers as they are still attending the university.

²⁶ Miller, S., Duffy, G., Rohr, J., Gasparello, R., & Mercier, S. (2005). Preparing teachers for high-poverty schools. *Educational Leadership*, 62(8), 62-65.

RECOMMENDATION

Improve recruiting that reflects the diversity of the district by building relationships with surrounding universities and developing an intentional recruiting program.

The superintendent should contact the closest universities to CPS to both recruit teachers and advocate placement of student teachers within the district. They should identify the appropriate personnel who are over the education programs and inform them of the district's eagerness to house student teachers. They can convey the benefits student teachers will experience at CPS. The superintendent should then develop a recruitment and retention study team to:

- identify the strengths and challenges of recruitment and retention in the district;
- set short- and long-term goals for improving recruitment practices; • ensure an organized approach to recruitment efforts;
- make sure that recruitment and retention becomes an ongoing priority for the district; and
- bring skills, knowledge, and energy to the district to implement successful recruitment and retention practices.²⁷

The team should include a cross-section of district personnel that represents teachers, administrators, paraprofessionals, and retired educators. In addition, there should be representatives from the community that include board members, parents, business leaders, Chamber of Commerce leaders, civic organization representatives, and marketing and human resource professionals. The team should be explicitly diverse, to match the district's student diversity.

The team should consider the “promising strategies” identified by the New Hampshire Department of Education:

- improve the image of your district through ongoing public relations and marketing;
- expand district outreach to reach more potential applicants;
- enlist community help in recruitment efforts;
- define the characteristics and skills of the ideal applicant and align recruitment strategies;
- strengthen relationships with institutions of higher education and teacher preparation programs;
- work on efforts to “grow your own” candidates and explore alternative certification opportunities; and

²⁷ <https://www.ascd.org/el/articles/preparing-teachers-for-high-poverty-schools>

- identify incentives available for candidates that will attract and help retain quality educators.²⁸

The team should also review the 2015 report by the Oklahoma Teacher Shortage Task Force to identify recruitment and retention recommendations that can be modified or adapted. Examples of a few of the recommendations from the task force report that might be helpful to local planning include:

- target and recruit high school students, undergraduate students, mid-career professionals, and military personnel to enter the teaching profession;
- allow for retired teachers to serve in the role of mentor – the retired mentor would not be employed by the district;
- create a scholarship program to provide a one-time scholarship for test takers; • adopt and fund a teacher recruitment program, with matching funds from the business and education community; and
- create a pilot program on different teacher/leader models that include mentors, lead teachers, or instructional coaches.²⁹

Once the team has determined key components of the plan, it might be helpful to use a planning template and explore the literature to compose the implementation strategies. These sample templates and planning resources can be of use:

- recruitment strategy template;³⁰
- steps to building a recruiting strategy;³¹ and
- planning the steps in your recruitment.³²

In developing and implementing an effective recruitment plan, the committee must be conscious of how the district is perceived externally. For example, is the culture of the district attracting applicants? Are teachers included in all aspects of the recruitment and selection process? Are district teachers included in job fair recruitment and on interview committees? Teachers can be the best recruiters.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

²⁸ http://www.nheon.org/prof_dev/RetainRecruit/AS3Plan.html

²⁹ <http://sde.ok.gov/sde/sites/ok.gov.sde/files/documents/files/Prelim.%20report%20Dec.%2015%202015.pdf>

³⁰ <https://www.template.net/business/strategy-templates/sample-recruitment-strategy-template/>

³¹ <https://www.ere.net/6-easy-steps-to-building-a-recruiting-strategy-and-successfully-measuring-the-outcome/>

³² <https://www.go2hr.ca/article-category/recruitment/planning>

FINDING 1-11

The district lacks sufficient substitutes. This results in lost quality academic time for students. For the staff pulled from other duties to fulfill substitute duties, this results in lost time to complete their regular duties.

During focus groups, support staff reported that they routinely had to cover classes for absent teachers. This practice negatively impacts classrooms instruction and services by removing personnel from their intended responsibilities. In addition, staff noted that there was not any training for substitutes and that students were more likely to take advantage of the situation as a result.

RECOMMENDATION**Improve the availability and preparedness of substitutes.**

To meet this recommendation the district should take the following steps:

- Develop a substitute handbook that includes essential information about the district and the substitute's responsibilities. The document should contain information such as calendar, policy and procedures, substitute code of ethics, job requirements, and information on compensation. Oklahoma City Public Schools has a professionally prepared document that the district can use as an example.³³
- 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 CPS letterhead and signed, so that teachers looking for permanent positions could use them in their application packages.
- Provide training on basic classroom management, essential procedures such as blood-borne pathogens, and professional development targeted to the special needs of the substitute. The basic trainings should be provided to new substitutes multiple times per year (semester, quarter, or monthly).
- Ensure that CPS is paying slightly higher for substitutes than neighboring districts.
- Implement a tiered salary schedule, offering an incremental increase in pay for attending training and/or completing a specified number of substituting days each year.
- Provide a substitute pay differential between certified and non-certified substitutes.

FISCAL IMPACT

Most of this recommendation can be implemented with existing resources but increasing pay will have a fiscal impact. The specific impact cannot be determined at this time.

³³ <https://www.okecps.org/cms/lib/OK01913268/Centricity/Domain/110/Substitute%20Teacher%20Handbook.pdf>

FINDING 1-12

CPS does not have local unions for certified or support staff. Information on processes for salary scale placement and other personnel processes that are normally found in a negotiated agreement are therefore not present. One negative result of this is that staff indicated a lack of control or understanding of policies and processes that affect their employment.

In addition, the consulting team found through interview and survey questions that several staff members had extra duty stipends without a clear description of the work required for that stipend or if the duty was still necessary. Variations in reports from one year to the next were extreme. For example, the Oklahoma Annual Certified Personnel Report for the year ending in 2020-21 reported the number of contract days for a teaching position as 180 and in 2021-22 the number of contract days for a teaching position was 164 with the same level of overall pay. In other words, it appears that certified teachers received close to a 4 dollar per hour raise between school years 2020-21 and 2021-22. Days contracted for paraprofessional positions were reported at 175 days in school year 2020-21 and 158 days in school year 2021-22 with the same level of overall pay.

The certified information sheets detailing a teacher's compensation for the 2021-22 school year indicated a district supplement of \$1,220. However, the supplement is not designated in the pay scales approved by the board. Teachers interviewed believed that their pay was based on the State Minimum Pay Scale; however, if the supplement was added to their pay scale they would be above the state minimum. These inconsistencies reduce employees' trust in the organization and the administration.

Staff survey results represented low agreement responses for competitive and fair salary practices. According to **Exhibit 1-27**, only about one-third of staff members *agreed* that salary levels in the school district are competitive, or that their salary level is adequate for their level of work and experience. There are no formal channels for staff members to improve their school environment as it relates to personnel policy and practices.

Exhibit 1-27
Staff Survey Results on Salary Expectations

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Salary levels in this district are competitive.	0%	27%	24%	39%	10%
My salary level is adequate for my level of work and experience.	0%	33%	20%	39%	8%

Source: Prismatic Survey Results, January 2022

According to the National Education Association survey (2022), approximately 55 percent of educators are thinking of leaving the profession.³⁴ This high turnover rate costs substantial amounts of money when a district must then recruit and train new teachers and ultimately hinders the district's success and bottom line. Research recommends focusing on teacher

³⁴ <https://www.nea.org/sites/default/files/2022-02/NEA%20Member%20COVID-19%20Survey%20Summary.pdf>

retention to overcome these challenges. A study on school district working conditions found that providing a supportive context in which teachers can work appears to contribute to improved retention and student achievement.³⁵

RECOMMENDATION

Establish a committee of certified and support employees for the purpose of reviewing and communicating personnel policies, job descriptions, and extra-duty assignments.

Developing a consistent salary and personnel policy for all positions is necessary to provide transparency and ensure fair and consistent compensation practices. Effective policies and procedures are living documents that should grow and adapt with the district. Fostering open communication by developing a personnel committee will support a positive culture and increase retention of staff. It will also help to protect the district from potential EEO or discrimination complaints.

The superintendent should encourage employee participation in decision-making for the district by creating a personnel policies committee. The personnel policies committee would organize itself in the first quarter of each school year. This committee should meet at a minimum quarterly but monthly is recommended to review the district's personnel policies (including compensation) and determine if additional policies or amendments to existing policies are needed. The superintendent should consider selecting members of the committee to serve for a designated term. The process may look something like the following steps:

- Each school faculty will nominate candidates to represent the respective school;
- Upon granting permission, nominated candidates will be placed on the District ballot;
- During the first week of school, all teachers will have an opportunity to vote on all the candidates; and
- Results will be tallied and the candidate with the majority or highest number of votes in each race will represent his or her school.

Members of the personnel policies committee should serve a two-year term. If a member of the Committee is unable to complete his/her term of service, the committee will appoint a successor from that member's building to serve until the next personnel policies committee election. If the term of the elected member has not expired, a teacher from that member's building shall be elected to serve the remainder of the term. **Exhibit 1-28** is an example of a personnel policy committee.

³⁵ Johnson, S.M., Kraft, M. A., Papay, J.P.(2012) *How Context Matters in High-Need Schools: The Effects of Teachers' Working Conditions on Their Professional Satisfaction and Their Students' Achievement*.
<http://www.tcrecord.org/content.asp?contentid=16685>

Exhibit 1-28

Sample Personnel Policy Committee for Van Buren Schools

3.3 – PERSONNEL POLICY COMMITTEE

General

It shall be the policy of the Van Buren Board of Education to encourage employee participation in decision-making for the school district. The Superintendent is authorized to establish committees as necessary to recommend policies and rules for the proper functioning of the district.

The classroom teachers of the Van Buren School District shall be represented by the Personnel Policies Committee. It shall be composed of the following equal voting members: the superintendent or designee, one teacher from each elementary school; two teachers from each middle school; one teacher from the Freshman Academy; two teachers from the senior high school; and one secondary administrator and one elementary administrator seated annually and appointed by the superintendent.

Election of members of the Personnel Policies Committee shall be held during the first month of school. The teacher members of the Personnel Policies Committee shall be elected by a majority vote of the classroom teachers employed by the district. The election shall be conducted by the classroom teachers and shall be by secret ballot.

The current Personnel Policies Committee will post in each building a Nomination Form listing open position(s) for the purpose of securing nominees for the Personnel Policy Committee. Any teacher may nominate himself/herself or his/her fellow teacher to serve on the Personnel Policies Committee by placing the teacher's name on the Nomination Form. The names of all consenting candidates will appear on the District ballot in the appropriate nominated position. All certified staff will vote in all candidate races. A member shall be elected to the committee when he/she receives a majority of the votes cast. If more than two candidates run for a given position and no candidate receives a majority of the votes cast, a run-off election will be held among the candidates receiving the greatest number of votes after the candidates receiving the lowest numbers of votes are dropped from the ballot. This process will continue until a simple majority is reached.

Election Procedure

- Each school faculty will nominate candidates to represent the respective school.
- Upon granting permission, nominated candidates will be placed on the District ballot.
- During the first week of school, all teachers will have an opportunity to vote on all the candidates.
- Results will be tallied and the candidate with majority or highest number of votes in each race will represent his or her school.

Members of the Personnel Policies Committee will serve two-year terms. If a member of the Committee is unable to complete his/her term of service, the Personnel Policies Committee will appoint a successor from that member's building to serve until the next

Personnel Policies Committee election. If the term of the elected member has not expired, a teacher from that member's building shall be elected to serve the remainder of the term.

The Personnel Policies Committee shall organize itself in the first quarter of each school year; elect a chairperson, a co-chairperson (optional), and secretary (optional). The PPC shall also develop a calendar of meetings throughout the year to review the district's personnel policies and determine if additional policies or amendments to existing policies are needed. The Personnel Policy Committee shall review any proposed distribution of a salary underpayment from previous years. The review of the personnel policies and the resulting report shall be completed by the end of the year. The report shall be filed with the Superintendent of Schools and presented to the Board of Education by the chairman of the Personnel Policies Committee or his/her designee for consideration in accordance with the Arkansas law.

Minutes of the committee meetings shall be promptly reported and distributed to members of the Board of Directors and posted in the building of the school district including the administrative offices.

Approved by Board of Education 04/04/06
Amended by Board of Education 05/19/09
Amended by Board of Education 06/12/12
Amended by Board of Education 04/12/16
Amended by Board of Education 04/11/17

Source: <https://www.vbsd.us/assets/uploads/2017/04/20170421133013-33-personnel-policy-committeepdf.pdf>

The superintendent should consider prioritizing the review of contracts, pay scales, and extra-duty contracts once the committee has been developed.

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. 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 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 1-13

The district benefits from a high level of community involvement as evidenced by its ongoing support from banks, businesses, and private donations.

What happens before the school day starts and after it ends can be just as important and impactful in the lives of students as what happens during the school day. For this reason, community engagement and involvement in schools is an important factor in the educational process. Consistent community involvement and engagement have shown to have major short and long-term benefits.

According to a policy brief from the National Education Association (NEA), “when schools, parents, families, and communities work together to support learning, students tend to earn higher grades, attend school more regularly, stay in school longer, and enroll in higher level programs”.³⁶ Therefore, maintaining and increasing community involvement programs/opportunities should be a consistent goal for schools and school districts.³⁷

³⁶ http://www.nea.org/assets/docs/PB11_ParentInvolvement08.pdf

³⁷ Henderson, A. T., Mapp, K. L. (2002). *A new wave of evidence: The impact of school, family, and the community connections on student achievement*. SEDL. Retrieved from: <https://www.sedl.org/connections/resources/evidence.pdf>

COMMENDATION

CPS and the Crescent community have a strong community relationships.

FINDING 1-14

CPS is below their peers on attendance of parent teacher conferences. As a result, the district is missing out on a key opportunity to engage and communicate with parents.

Exhibit 1-29 shows a five-year comparison of parent conference attendance rates for CPS, its peers, and the state. The district had participation rates lower than that of the state each year and below those of most peers as well.

Exhibit 1-29
Trend in Parent Conference Attendance

Entity	2015-16	2016-17	2017-18	2018-19	2019-20
Crescent	64%	73%	64%	62%	61%
Cashion	86%	86%	85%	88%	90%
Comanche	73%	69%	70%	69%	75%
Empire	87%	82%	90%	80%	76%
Morrison	77%	79%	79%	71%	64%
Minco	56%	57%	52%	47%	42%
State	74%	73%	72%	73%	72%

Source: Office of Educational Quality and Accountability, Profiles Database

Parent survey results reflect less than half or 48 percent of parents *agree* or *strongly agree* that their child's school encourages parents to be involved in the school and offers a variety of ways to do so (**Exhibit 1-30**).

Exhibit 1-30
Parent Survey Results Regarding Parent Involvement

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I feel welcome at my child's school.	36%	47%	3%	11%	3%
My child's school encourages parents to be involved in school and offers a variety of ways to do so.	15%	33%	20%	24%	7%

Source: Prismatic Survey Results, January 2022

Epstein (2001) at Johns Hopkins University³⁸ and others have documented research showing the positive effect that strong parental involvement has on schools and on student achievement. Their findings include:

³⁸ Epstein, J. L. (2001). *School, family and community partnerships: Preparing educators and improving schools*. Boulder, CO: Westview Press.

- 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

Increase parental involvement and participation in parent-teacher conferences.

Communication is the glue that encourages parent and school partnerships. Getting Smart is a consulting team that highlights innovations in learning. One of the guest authors on their site identified “10 Strategies for Schools to Improve Parent Engagement.” (**Exhibit 1-31**)

Exhibit 1-31
10 Strategies for Schools to Improve Parent Engagement

1. **Pick one tool:** School leaders ought to conduct a communications audit to get a handle on how teachers are communicating with parents, and then provide clear direction on which tool to use, as well as some general communication protocols.
2. **Issue shorter, more frequent communications:** Don't kick off the year with one long communication or wait until the end of the term to reach out with an extensive recap. Just as schools have moved to more frequent assessments of students, school communications should also be concise and frequent to keep parents in the loop on an ongoing basis.
3. **Personalize:** Personalization isn't just for students. Parents expect it, too. Personalization features include giving parents the option to "subscribe" to the channels featuring updates they wish to receive – personalizing the information, not just the delivery method – which ensures they get the information they feel is relevant without it getting lost amid other information overload.
4. **Set the tone:** Encourage teachers to share a bit of information about themselves at the start of the year, perhaps at parent night, to set the tone for an open exchange with students' parents and caregivers.
5. **Build relationships:** Teachers should focus on building relationships with parents to establish trust and foster those relationships throughout the year.
6. **Share accountability:** Make it clear that all faculty members are expected to participate in the school's communications efforts. By providing clear guidance on this expectation, along with the proper tools and protocols to make it actionable, leaders can make it a reality.
7. **Invite parents to be partners:** If educators don't already know the school's parent body, they should be sure to reach out and learn more about them. Teachers should invite parents to share information about their child's strengths and weaknesses, what type of support system they have at home, and whether anything going on in the child's life may impact classroom behavior.
8. **Empower parents to opt in:** Design opportunities where parents can opt in (or out) of certain information or updates that are relevant, or irrelevant, to their child. Bombarding every parent with every update is just as ineffective as under-communicating, and parents will find it impossible to keep up, if they don't tune out entirely.
9. **Provide actionable information:** Providing information for the sake of keeping parents up-to-date is recommended, but schools also need to make sure they are sharing information that parents can act on.
10. **Share the positive:** Parents may dread the rare phone call home, so it's important to find opportunities to communicate good news, as well.

Source: Guest Author <https://www.gettingsmart.com/2019/10/05/10-strategies-for-schools-to-improve-parent-engagement/>

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 messages and images consistent with the board of education policies and implemented through procedures established by the superintendent and district staff. Strategies for externally communicating with the community and internally communicating within the school district are critical components of communication.

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 1-32** provides the results for communications and community relations.

Exhibit 1-32
Staff Survey Results Regarding Communications

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Community relations and communication.	40%	38%	8%	6%	0%	8%

Source: Prismatic Survey Results, January 2022

FINDING 1-15

CPS utilizes its website, social media, and automated calls to reach out to parents and community. The superintendent recently updated the website platform that includes an app to push notifications to parents. The information contained on the CPS website is well organized and updated frequently.

The superintendent and elementary principal send out weekly newsletters to parents and staff. Short quick messages are sent out through social media and included on their website. On the survey, more than 85 percent of parents *agreed* or *strongly agreed* that they access information on the district website; a majority (60 percent) also stated they receive timely communications from their child's teacher regarding their child's progress in school (**Exhibit 1-33**).

Exhibit 1-33
Parent Survey Results Regarding Communication

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I regularly access information via the district website.	28%	58%	7%	5%	2%
I receive timely communications from my child's teachers regarding his/her progress in school.	24%	36%	10%	19%	10%

Source: Prismatic Survey Results, January 2022

COMMENDATION

The CPS superintendent and administration make substantial efforts to keep the staff, parents, and community informed.

Chapter 2:
Instructional Delivery

Chapter 2

Instructional Delivery System

This chapter addresses the instructional delivery of Crescent Public Schools (CPS) in the following sections:

- A. The Instructional Delivery System
- B. Management and Oversight of Instructional Programs
- C. Special Programs
- D. Student Services

The primary purpose of any school system is to educate 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 on student performance data are also essential.

A. INSTRUCTIONAL DELIVERY SYSTEM

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 workforce environments.

Exhibit 2-1 further explains the OAS standards.

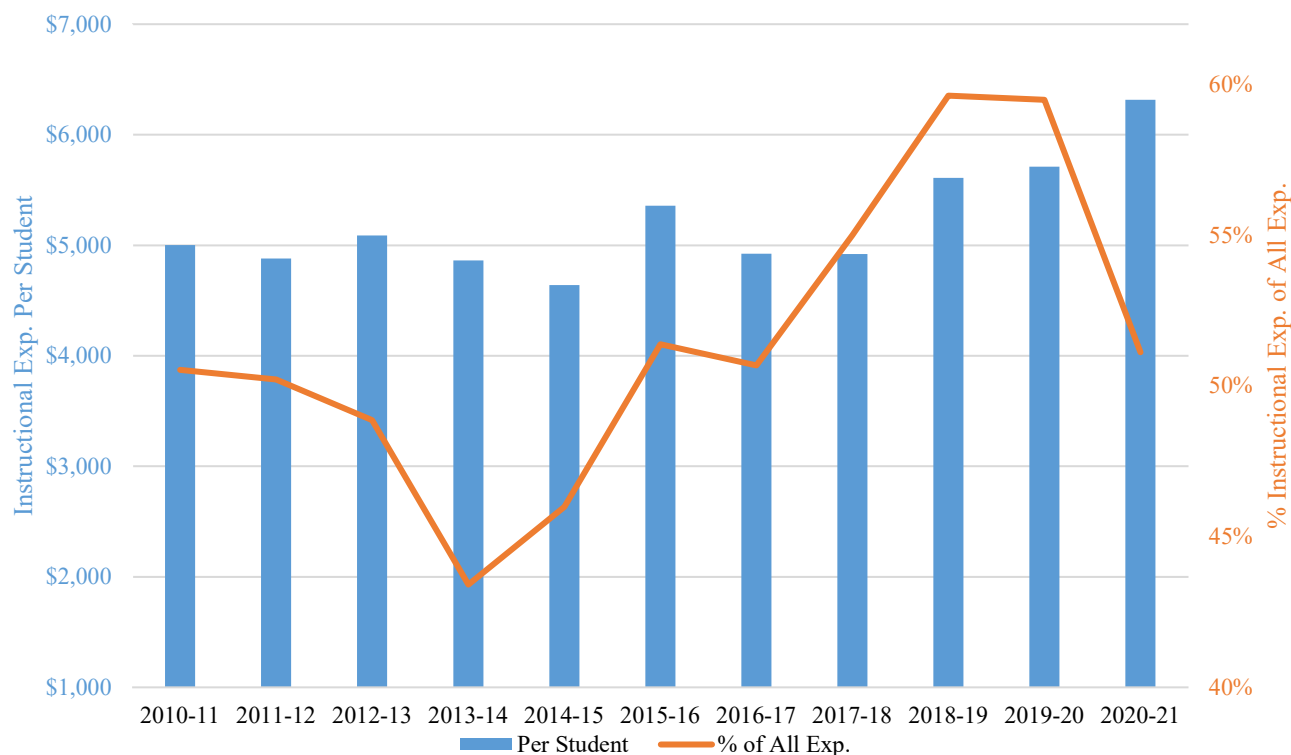
Exhibit 2-1
Oklahoma Academic Standards

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

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

Exhibit 2-2 provides a ten-year comparison of CPS instructional expenditures as a percentage of total expenditures as well as the annual instructional expenditures per student. Over that period, instructional expenses have ranged from 43 percent to 60 percent of all expenditures. Instructional dollars per student have varied from \$4,639 in 2014-15 to \$6,315 in 2020-21.

Exhibit 2-2
Trend in CPS Instructional Spending



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

On the stakeholder survey conducted for this review, staff members were asked to assign a letter grade to various CPS functional areas. **Exhibit 2-3** provides the results for regular education programs and education generally in CPS, from just district educators (administrators, classroom teachers, other certified, and instructional aides). More than half of educators, 59 percent, gave overall quality of education at CPS an A or B; 12 percent gave it a D or F. More than a half of educators, 52 percent gave the high school education an A or B; 19 percent gave them a D or F. Almost three-quarters, 73 and 65 percent respectively, gave elementary and middle school education an A or B; only 4 percent of each gave it a D or F.

Exhibit 2-3
Educator Survey Results Regarding CPS Education

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Elementary Education	29%	44%	6%	2%	2%	17%
Middle School Education	23%	42%	10%	2%	2%	21%
High School Education	17%	35%	13%	15%	4%	17%
Overall quality of education in this district, compared to other districts in Oklahoma	13%	46%	21%	8%	4%	8%

Source: Prismatic Survey Results, January 2022

FINDING 2-1

No district-wide instructional document or process guides teachers in aligning or pacing core curriculum and instruction. The district does not have common district-wide curriculum frameworks to horizontally and vertically align a standards-based core curriculum.

The consulting team found that only 5th and 6th grade science follows a written mapping document to teach and paces the OAS standards. Focus groups and interviews indicated no horizontal or vertical alignment processes and procedures are in place generally. CPS teachers primarily make their own decisions regarding what and when curricula are taught. At CPS, vertical and horizontal curriculum alignment is not an ongoing process of mapping all content, skills, assessments, learning activities, instructional strategies, and digital resources based on student data.

The district has not yet evolved from a misaligned textbook-driven to a standards-based curriculum. The teachers have autonomy in choosing curriculum, resources, and making decisions regarding when standards are taught and how the curricula is paced. It was reported the district adopted new math textbooks from differing publishers and math teachers across the district find their own supplemental resources. New science textbooks were also purchased. However, elementary science books are not appropriately used to guide the curriculum, nor were Pre-K to 4th grade science and social studies grades reported on the semester report card to parents. No process, curriculum maps, or pacing guides direct or monitor when OAS (Oklahoma Academic Standards) are taught, tested, and students have mastered grade level and content area OAS requirements.

CPS teachers reported an understanding of OAS. The elementary school reported initiating SMART (Specific, Measurable, Achievable, Realistic, Timely) Goals and beginning efforts to focus on standards-based curriculum. However, across the district, no uniform efforts anchor details for mapping and pacing standards-based instruction. No guidelines direct integration of digital programs and resources.

At the time of the onsite review, student assessment data indicated a decline rather than a consistent upward spiral for improvement. This was true in both math and reading. Without a common vertical and horizontal document to guide teacher decision-making and implementation

of a standards-based curriculum, improving student academic performance is unlikely to occur. There is no uniform use of student data to measure horizontal and vertical alignment that ensures teachers adhere to standards of excellence and a high-quality, comprehensive curriculum.

Vertical and horizontal curriculum alignment is the first step to improved student performance. Standards-based horizontal curricula alignment details what students learn in each grade level content area. For example, what standards and skills taught and learned in one 4th grade math class are mirrored in all other 4th grade math classes. Horizontal curriculum alignment takes place collaboratively with all grade levels or subject teachers. Each classroom provides the same written, taught, and tested curricula standards. Content and instruction are equitable horizontally across each classroom. Horizontal alignment of curricula standards ensures each grade level and subject area classroom receives equitable OAS instruction. A written framework must guide and pace each grade level or subject area curriculum.

Standards-based vertically aligned curricula detail what students must learn in one lesson, course, or grade level to prepare them for the next lesson, course, or grade level. Curricula and instruction are purposefully structured and sequenced so that students are learning the content and skills that prepare them for success with more challenging and higher-level work. Vertical curriculum alignment identifies content and skills students are to master and maintain so they are successful in the next lesson, grade level, or course. Mastering and maintaining the content and skills in one lesson, course, or grade level enables students to experience a smooth upward spiral of curriculum.

As part of the curriculum alignment, the district lacks a common focus for leveraging the key components of digital learning. Effective technology integration includes “active engagement, participation in groups, frequent interaction and feedback, and connection to real-world experts.”¹

Content standards that are aligned with and support digital age learning and work are essential in today’s schools. Technology is best able to enhance learning when educators use it intentionally within the adopted curriculum. A curriculum framework pairs defined content standards with aligned digital curriculum resources. A curriculum framework guides both how and when technology is used for learning. It ensures that technology is applied:

- in ways that address real-world skills;
- to learn the right skills at the right times for the right reasons; and
- to meet specific learning objectives.

As noted by the International Society for Technology in Education: Technology is all too often applied as a replacement or add-on to existing curriculum. To maximize its potential benefits – such as the development of higher-order thinking skills – educators must weave it into the curriculum in such a way that the tool matches the daily desired learning outcome. A standards-

¹ <https://www.edutopia.org/video/introduction-technology-integration>

based curriculum framework bridges the gap between overall curriculum goals and the use of technology for supporting learning and teaching.²

Finally, there is no indication the district's administrators and technology integration specialist make intentional effort to raise awareness, provide options, and set expectations to standardize the core curriculum using a Pre-K-12 grade curriculum framework.³⁴ Research citing the importance of vertical and horizontal frameworks emerged as schools moved to a standards-based education rather than textbook-driven education. A curriculum framework organizes standards into learning outcomes. At each grade level or content area, frameworks define and explain the content standards to learn. The framework clearly articulates what the students are to master at each respective grade level and subject area. Frameworks guide teachers in planning and delivering grade level curricula and instruction. They identify the essential standards, learning experiences, foundational and maintenance skills, and key learning concepts. The framework clearly details the curriculum standards in each subject area at each grade level that students are expected to learn, and teachers are expected to teach. The framework identifies supplemental and digital resources that correlate and provide support and/or remediation that leads students to mastery.

The state of Oklahoma has developed comprehensive curriculum frameworks. Available on the SDE website, there are frameworks in Mathematics, English Language Arts, and Science. A portion of the Learning Progression for the Algebra 1 curriculum framework is provided in **Exhibit 2-4**.

² <https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.469.1189&rep=rep1&type=pdf>

³ <https://sde.ok.gov/oklahoma-curriculum-frameworks>

⁴ <http://id.iste.org/connected/standards/essential-conditions/curriculum-framework>

Exhibit 2-4
Oklahoma Algebra 1 Curriculum Framework
Excerpt of Learning Progression

Unit	Overarching Question	Essential Questions	Big Ideas	Full Objectives
Unit 0: Growth Mindset	How does improving student attitudes toward math affect their learning?		<ol style="list-style-type: none"> 1. Math is about learning not performing. 2. Math is about making sense. 3. Math is filled with conjectures, creativity, and uncertainty. 4. Mistakes are beautiful things. 	<ol style="list-style-type: none"> 1. Students will understand the importance of a growth mindset (e.g., that math is not about talent or natural ability but is about thoughtful practice) and what it means to talk and listen. Students will also understand that class is where students practice thinking and doing math. 2. Students will learn the value of taking time to think about math and listen to how others make sense of their work to arrive at a common understanding. 3. Students will build the habits of using precise language, practicing, and sharing their thoughts.
Unit 1: Expressions Equations and Inequalities Timing ~4 weeks Objectives A1.A.3.2 A1.A.3.4 A1.A.3.3 A1.N.1.1 A1.N.1.2 A1.A.1.1 A1.A.1.2 A1.A.3.1 A1.A.2.2	How can we manipulate information to help us solve real-world problems?	<ol style="list-style-type: none"> 1. How can we represent information symbolically? 2. How do we develop mathematical arguments/proofs for solving real-world situations? 3. How can we use related, but different representations to solve real-world problems? 	<ul style="list-style-type: none"> • Polynomial expressions can be simplified and evaluated. • Polynomial expressions can be written as factors. • Square and cube roots can be added, subtracted, multiplied, divided, and simplified • Equations and inequalities can be solved in both algebraic and real-world contexts 	A1.A.3.2 Simplify polynomial expressions by adding, subtracting or multiplying. A1.A.3.4 Evaluate linear, absolute value, rational, and radical expressions. Include applying a nonstandard operation such as $a \odot b = 2a + b$. A1.A.3.3 Factor common monomial factors from polynomial expressions and factor quadratic expressions with a leading coefficient of 1. A1.N.1.1 Write square roots and cube roots of monomial algebraic expressions in simplest radical form. A1.N.1.2 Add, subtract, multiply, and simplify square roots of monomial algebraic expressions and divide square roots of whole numbers, rationalizing the denominator when necessary. A1.A.1.1 Use knowledge of solving equations with rational values to represent and solve mathematical and real-world problems (e.g., angle measures, geometric formulas, science, or statistics) and interpret the solutions in the original context. A1.A.1.2 Solve absolute value equations and interpret the solutions in the original context. A1.A.3.1 Solve equations involving several variables for one variable in terms of the others. A1.A.2.2 Represent relationships in various contexts with compound and absolute value inequalities and solve the resulting inequalities by graphing and interpreting the solutions on a number line.
Unit 2: Data	How does data help us interpret real-world situations?	<ol style="list-style-type: none"> 1. How do we use evidence to support 	<ul style="list-style-type: none"> • Data sets can be described with various models, both 	A1.D.1.1 Describe a data set using data displays, describe and compare data sets using summary statistics, including measures of central tendency, location and spread. Know how to use calculators,

Source: [http://okmathframework.pbworks.com/w/page/118991895/Algebra%201%20Learning%20Progression%20\(v2\)](http://okmathframework.pbworks.com/w/page/118991895/Algebra%201%20Learning%20Progression%20(v2))

RECOMMENDATION

Develop and implement with fidelity core content area Pre-K-12 horizontal and vertical standards-based curriculum frameworks to align, pace, and monitor OAS.

Several recommendations were included in the 2013 report related to this topic. The consulting team found that CPS either did not implement the 2013 recommendations or began implementation but did not sustain it.

District leaders should begin by introducing CPS teachers to various local, state, and national frameworks. With increased teacher awareness in place, the district should standardize the curriculum and adopt a Pre-K-12 grade district-wide curriculum framework. In adopting curriculum frameworks, there is no need to reinvent the wheel. The district should begin by reviewing the SDE frameworks along with frameworks from other Oklahoma districts.

Along with adopting the framework, teachers need an accountability system to ensure the framework is taught with fidelity. The district's leadership and select teachers must provide the leadership, support, and release time for teachers to adopt frameworks that provide consistent guidelines for shaping and managing their respective curriculum along with the integration of appropriate resources and technology. There is a need for regularly scheduled meetings with focused agendas where teachers use formative and summative student performance data to make needed curricula and pacing adjustments. Restructuring release time, refocusing the summer, and reordering the beginning of the year professional development days are possible venues for framework adoption.

FISCAL IMPACT

This recommendation can be implemented with existing resources. It can be implemented by restructuring Friday release time and use of existing professional development funds.

FINDING 2-2

The district has no process for teachers to use formative and summative assessments across all grade levels. No comprehensive efforts or expectations are in place, so formative and summative student performance data are not currently uniformly used to inform and adjust content, instructional practices, or drive targeted remediation and interventions.

Several CPS teachers reported using formative assessment, but use is limited, random, and sporadic. The elementary school has initiated efforts to create SMART goals, but this is only in the beginning stages. Without analyzing formative and summative data, it is difficult to assess student progress. Common processes for analyzing vertical and horizontal student formative performance data are not in place. Teachers reported using an assortment of formative software, such as Study Island, end of chapter textbook tests, and teacher-created formative assessments. There were minimal and isolated efforts reported of using formative data to plan, adjust, pace, and design instruction or to close skill gaps and inform direct instruction and remediation.

A variety of summative assessments are being administered, including Starr, the SDE Oklahoma School Testing Program (OSTP), and College and Career Ready Assessment (CCRA) tests. There are sporadic efforts among grade levels and subject areas to analyze these summative data.

There are varying principal expectations and practices between the elementary, middle, and high schools to analyze formative and summative data. OSTP summative student performance data assist teachers in applying the results to instructional pacing and adjusting curriculum frameworks. There is no CPS process to routinely use student performance data to vertically align and pace curricula and make adjustments in re-teaching, remediation, and maintenance of specific concepts and skills.

On the staff survey conducted for this review, 63 percent of educators (administrators, classroom teachers, other certified, and instructional support staff) either did not know, *disagreed*, or *strongly disagreed* that formative (benchmark) and summative (end-of-year) are used to improve the district's curriculum (**Exhibit 2-5**). Conversely, 61 percent of educators indicated data were used to improve instructional practices, but, as the consulting team found during the onsite work, these efforts are neither consistent nor uniform.

Exhibit 2-5
Educator Survey Results Regarding the Use of Student Performance Data

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Test data from district-adopted benchmarks and mandated end-of-year tests are used to improve the district's curriculum.	4%	33%	43%	20%	0%
Teachers effectively use student data to improve instructional practices.	10%	51%	27%	10%	2%

Source: Prismatic Survey Results, January 2022

The consulting team learned of isolated efforts where teachers used item analysis to find trends and patterns in student learning. However, the input was unclear and teacher understanding was incomplete. Focus groups and interviews reflected marginal understandings and expectations for using either summative or formative data to re-design instruction, change instructional practices, and determine if reteaching or remediation is needed. No evidence indicated student performance data were collected at the end of a grading period and then routinely revisited over time to maintain mastery. There are no uniform processes and procedures to assist all teachers in using OSTP data to inform targeted instruction, form flex groups for targeted remedial instruction, and identify then close vertical and horizontal learning gaps. No evidence was presented that teachers use student data to identify district-wide, site-based, grade level, or subject area reoccurring curricula redundancies caused by pacing gaps.

Long-standing research contends effective teachers use both formative and summative data to identify patterns of success and failure and then determine next steps in instruction. 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." The foundational correlates are being used to incorporate recent research and school improvement findings and continue to offer challenging developmental stages to which schools can aspire in the Learning for All mission.⁵

As stated in the original research on 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.⁶

More recently, effective schools research was conducted by the National Association of Elementary School Principals (NAESP). NAESP published best practices for schools, including that using student achievement data must be included in instructional decision-making. 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.⁷

RECOMMENDATION

Develop and implement district-wide processes and procedures for administering formative assessments and summative assessments to monitor student progress and measure mastery of OAS, then use the data to pace and adjust curriculum, instructional practices, and inform targeted remediation and interventions.

A similar recommendation was included in the 2013 report. The purpose for CPS teachers analyzing classroom data is to determine what the students have learned, what they need help to learn, and how they should revise 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 should 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 CPS teachers monitor performance data, patterns of teaching and individual student learning successes and challenges become evident. It is essential for teachers to have ongoing formative

⁵ <https://www.hwdsb.on.ca/secondaryarc/files/2011/01/L4All-Summary.pdf>

⁶ <https://static1.squarespace.com/static/57c4731c893fc047731cea43/t/5946db3b2994cac227699178/1497815867695/Correlates+of+Effective+Schools.pdf>

⁷ http://www.naesp.org/sites/default/files/Student%20Achievement_blue.pdf

data to measure learning at the end of each instructional segment. This allows teachers to make informed, collaborative decisions to address gaps or mastery in learning.

Working with the teachers, the principals should develop a timeline that details which student assessment data are required throughout the school year. Using this timeline, they should hold Professional Learning Communities (PLC) meetings to analyze data. Meetings should focus on determining the strengths and weaknesses of 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. The district process should examine classroom data and ask key questions, such as:

- Which content standards are 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 upon individual student performance, what do teachers need to do next to move the student to proficiency?
- Based upon the class performance, what re-teaching needs to be done?
- After re-assessing, did students demonstrate proficiency?
- Is 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 is 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?⁸

For data to be used effectively, teachers should go beyond just tallying the data and diagnosing learning gaps. An important part of the data discussions involves sharing ideas about improving instructional practices based on student need. Conversations should also center around, “What are you doing in your class that I’m not doing in my class?” CPS teachers should abandon

⁸ Nichols, B. W. & Singer K. P. (2000). Developing data mentors. *Educational Leadership*, 57(5).

teaching in isolation. They need to share and find quick, practical strategies for maximizing data analysis, including shared dialog for how to easily adjust instructional delivery practices.⁹

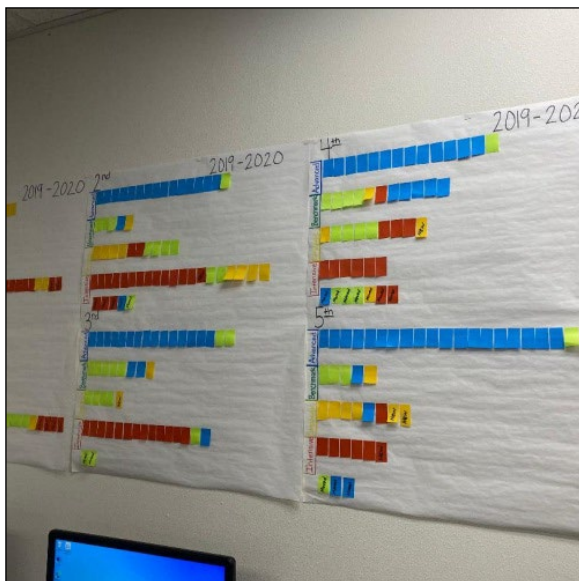
Principals and teachers should consider regularly graphing data. A visual depiction of the information often yields additional insights and has proven helpful to teachers. A way for teachers to get a quick visual picture of who needs additional support is to color code the data recorded in the grading 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.¹⁰

⁹ <https://files.eric.ed.gov/fulltext/ED536742.pdf> <https://blog.advancementcourses.com/articles/data-driveninstruction/> <https://www.edutopia.org/blog/new-teachers-how-use-data-inform-instruction-rebecca-alber>

¹⁰ <http://mdk12.msde.maryland.gov/instruction/progress/using.html> Instructional

Exhibit 2-6 provides examples of dedicated data walls in other schools/districts. Data charts are color-coded and labeled for teachers to review as they work with students to make progress in reading skills.

Exhibit 2-6
Example Dedicated Data Walls



Source: Prismatic, 2018-20

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 6th Grade. The SDE Family Guides are resources aligned with the Oklahoma Academic Standards 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.¹¹

FISCAL IMPACT

This recommendation can be implemented with existing resources. The superintendent and elementary principal have the expertise to support this recommendation. 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 \$2,000.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Hire a consultant to teach use of formative and summative data, if needed.	(\$2,000)	\$0	\$0	\$0	\$0

FINDING 2-3

CPS middle school and high school course electives are limited. Due to recent financial issues, band and music were eliminated. In middle school, STEM is an elective in the 6th to 8th grades. However, not all students are able to enroll because of class size limitations. In 5th and 6th grades, one hour per day is identified as “academic achievement” period. Interviews reported this is basically a study hall, not an elective, as many of the students do not need structured help, remediation, or tutoring. In addition, there is minimal communication among teachers regarding which students attending the period may need academic support and what help is needed. At the high school, some students are enrolled in “courses” that provide little to no academic content but are instead designed ostensibly to support teachers. Students reported that those classes typically involve going to get coffee for teachers.

A comparison of core units in the high school curriculum reveals a general lack of curriculum offerings (**Exhibit 2-7**). In 2019-20, the district:

- offered the lowest number of language arts and social studies units among the peer districts—both offerings were also below the community group and state;
- offered the second-lowest number of math and science units among the peer districts—both offerings were also below the state;
- offered the second-lowest number of fine arts units among the peers, which was higher than the community group but lower than the state;

¹¹ <https://sde.ok.gov/oklahoma-family-guides>

- offered no units in languages or computer education; and
- offered the third-lowest number of units in electives among all comparison groups.

Exhibit 2-7
Comparison of Core Curriculum Units by Subject, 2019-20

Subjects	Crescent	Cashion	Comanche	Empire	Morrison	Minco	Community Group	State
Fine Arts	7.0	8.0	11.0	5.0	8.0	10.0	6.5	8.1
Science	5.0	8.0	6.0	5.0	6.0	4.0	5.0	6.1
Math	4.0	6.0	6.0	3.0	4.0	5.0	4.8	5.5
Computer Education	0.0	0.0	1.0	3.0	0.0	0.0	1.9	2.2
Social Studies	4.0	5.0	7.0	4.0	5.0	7.0	5.6	6.8
Languages	0.0	3.0	0.0	2.0	4.0	2.0	1.8	2.5
Language Arts	4.0	5.0	6.0	4.0	5.0	4.0	4.6	4.8
Electives	15.0	20.0	19.0	11.0	20.0	12.0	15.2	17.8
Total	24.0	35.0	37.0	26.0	32.0	32.0	30.2	36.0

Source: Office of Educational Quality and Accountability, Profiles Database

At the high school more elective diversity is needed with electives that interest and challenge students. Interviews and focus groups reported the need for job shadowing and more college/career planning. The district appeared unaware that colleges often take student electives into consideration when awarding scholarships. Some examples of electives cited on the 2021-22 high school published schedule included:

- Speech I, II, III all offered fifth hour by the same teacher;
- Spanish I and II offered sixth hour by the same teacher;
- Art II/III/AP first hour with the same teacher, and
- Art I and II offered fifth hour with the same teacher.

It can be difficult for a teacher to offer a varied course experience across multiple levels in the same class period. Some of the other electives are Career Tech, Multi-Media, Desktop Publishing, Agriculture, and FACS. CPS has students taking concurrent enrollment and attending either a morning or afternoon course at Francis Tuttle Career Tech.

Over the last five years, CPS ACT scores have declined. **Exhibit 2-8** compares the trend in ACT composite scores over time. CPS' composite score averaged 19.7 in 2015-16 and decreased to 17.3 in 2019-20. In the same period, scores for all the peer districts except one also decreased. In 2019-20, CPS had the lowest ACT scores of all the peer districts and was below the community group and state.

Exhibit 2-8
Trend in CPS ACT Composite Scores

Entity	2015-16	2016-17	2017-18	2018-19	2019-20	Percentage Change
Crescent	19.7	19.1	17.9	17.3	17.3	(12.2%) ▼
Cashion	21.3	20.0	20.4	19.9	20.3	(4.7%) ▼
Comanche	20.9	19.8	18.3	17.6	17.9	(14.4%) ▼
Empire	18.2	18.7	17.6	17.3	18.4	1.1% ▲
Morrison	21.6	21.4	21.8	18.4	19.9	(7.9%) ▼
Minco	20.1	20.6	20.3	18.7	19.2	(4.5%) ▼
Community Group	20.1	19.9	19.3	18.4	18.6	(7.5%) ▼
State	20.6	19.5	19.4	18.9	18.8	(8.7%) ▼

Source: Office of Educational Quality and Accountability, Profiles Database

Research indicates that elective classes in middle and secondary schools allow students one or two periods a day with choice. According to education researcher Robert Marzano, choice “has also been linked to increases in student effort, task performance, and subsequent learning.” Choice has also been linked to increases in student effort, task performance, and subsequent learning.”¹²

Nationwide surveys note a need for students to feel more connected to the adults on their school campuses. Electives, many times, reflect the interests of the teachers that teach them as well as the students that choose them. This fosters healthy student-teacher connections. Yearbook, robotics, film society, photography, world languages, theater, speech and debate, music appreciation, and current events – all these classes can still tap into “core” areas of reading, writing, listening, and speaking.

Elective courses give student choices to explore coursework outside of the required core curriculum graduation requirements. Electives allow students to study different topics, engage in acquiring new skills, participate in hands-on projects, and explore new interests.

RECOMMENDATION

Add elective classes to improve the middle and high school course offerings.

The superintendent should form a stakeholder group to identify desired electives. The Board of Education, principals, teachers, parents, students, and community members should be represented on the committee. Band and music electives should be consideration. The hour of the day and the number of students that can populate an elective should be a major consideration. The district should purposefully explore feasible elective options, available teacher certification, and courses of study that offer students opportunities to engage in learning new skills, exploring

¹² https://www.google.com/search?q=research+on+why+high+schools+need+elective+classes&rlz=1C1CHZL_enUS721US721&oq=research+on+why+high+schools+need+elective+&aqs=chrome.1.69i57j33i16014.19802j0j7&sourceid=chrome&ie=UTF-8

new interests, doing hands-on projects. In adding electives, the district should strongly consider viable online education opportunities.

FISCAL IMPACT

This recommendation can potentially be implemented with existing resources, although the district may choose to add some teacher staffing if there is not sufficient expertise among the existing staff or if online electives have a cost.

B. MANAGEMENT AND OVERSIGHT OF INSTRUCTIONAL PROGRAMS

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 leadership to implement the curriculum. The principal and teachers, working collaboratively, are responsible for consistent implementation, quality instruction in the classroom, and student performance. The principal's 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 2-9** describes the five core beliefs that drive the work in school leadership at the Center and **Exhibit 2-10** describes the four dimensions of instructional leadership.

Exhibit 2-9
Core Beliefs - Center for Educational Leadership

Beliefs	
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 on 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 2-10
Dimensions of Instructional Leadership

Dimensions	
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/4-dimensions-of-instructional-leadership>

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.¹³

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

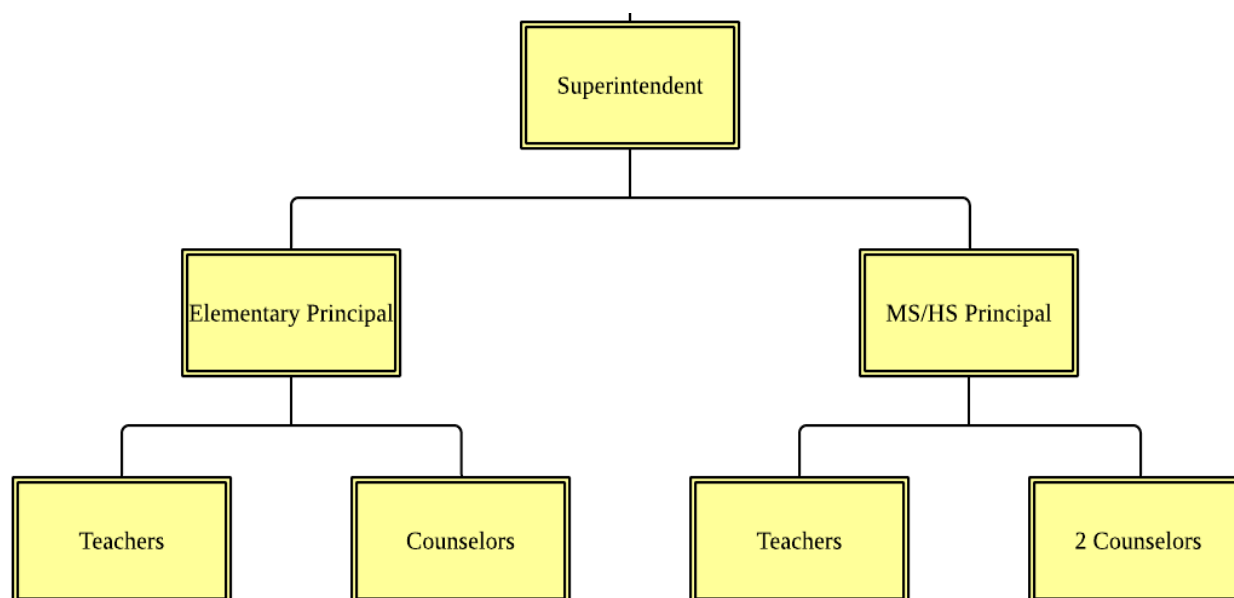
- Instructional Vision - instructional practices that are guided by a common, research-based instructional vision that articulates what students do to learn the subject effectively.
- Continuous Improvement of Instruction - resources (i.e., professional development, allocation of teacher time, budget decisions), policies, and procedures (i.e., school improvement plans, teacher evaluation) aligned toward continuous improvement of instructional practice guided by the instructional vision.

¹³ <http://www.youblisher.com/p/110815-New-thinking-about-educational-leadership/>

- 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 2-11 provides the current organizational structure for instructional delivery at CPS.

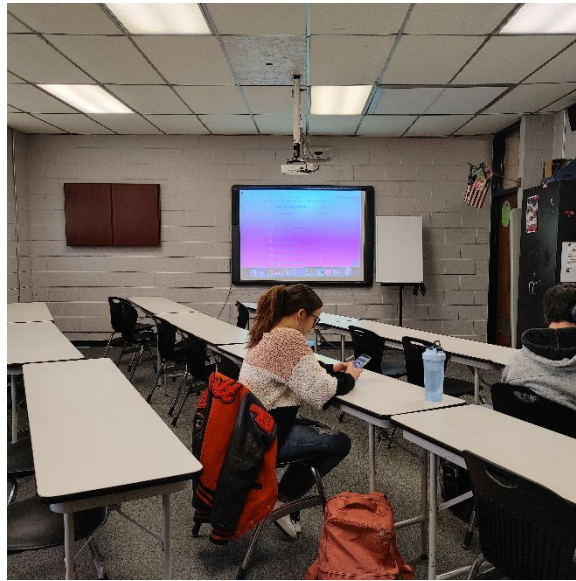
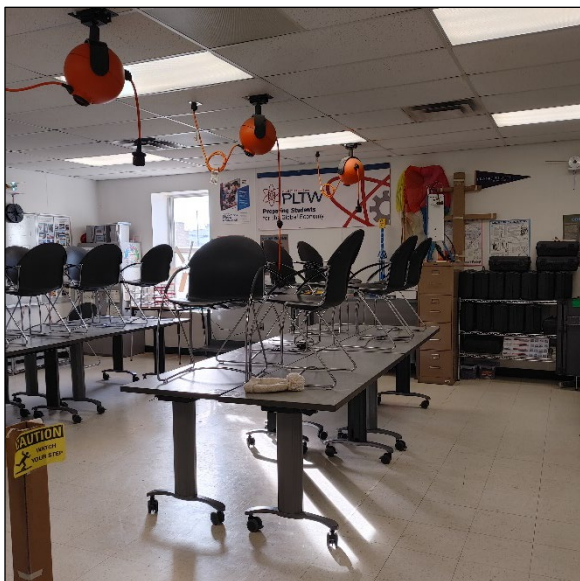
Exhibit 2-11
CPS Organization Chart for Instructional Delivery



Created by Prismatic, January 2022

Exhibit 2-12 provides illustrations of CPS classrooms.

**Exhibit 2-12
CPS Classrooms**



Source: Prismatic, January 2022

Oklahoma School Testing Program

Student assessment is an integral part of measuring student performance. The Oklahoma School Testing Program (OSTP) for students in 3rd and 8th grades and the College and Career Ready Assessment (CCRA) for students in 11th grade continue implementation of the current standards-based tests that students must take during the school year. The OSTP consists of Criterion-Referenced Tests (CRTs) designed to measure student attainment of skills established for core

subjects and helps monitor student and school performance relative to the OAS. 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, Mathematics, and Science;
- sixth grade: English Language Arts and Mathematics;
- seventh grade English Language Arts and Mathematics;
- eighth grade: English Language Arts, Mathematics, and Science; and
- eleventh grade: CCRA consists 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.

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 and who does not have a gap of ten or more consecutive instructional days prior to dates that vary by indicator type.

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 2017.¹⁴

Exhibit 2-13 provides the results of the math OCCTs in 2020-21. Only slightly more than half of the CPS 3rd grade students demonstrated proficiency, but this was higher than all comparison points. Conversely, CPS 4th grade students scored the lowest of all comparison points. Results for CPS 6th-8th graders were also poor.

Exhibit 2-13
Percentage of CPS and Peer District
Full Academic Year Students Scoring Proficient or Above in Math
2020-21

Entity	3 rd Grade	4 th Grade	5 th Grade	6 th Grade	7 th Grade	8 th Grade
Crescent	53%	24%	DNS	28%	20%	14%
Cashion	36%	36%	47%	22%	11%	9%
Comanche	27%	31%	14%	31%	8%	DNS
Empire	33%	51%	33%	DNS	DNS	DNS
Morrison	50%	53%	40%	16%	13%	DNS
Minco	19%	DNS	25%	17%	21%	14%
State	29%	28%	23%	21%	20%	14%

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 2-14 provides the results of the reading OCCTs in 2020-21. Less than half of CPS 3rd grade students demonstrated proficiency, but this was the highest of all comparison points. Results for CPS students in the remaining grades were poor.

¹⁴ <http://sde.ok.gov/sde/assessment-administrator-resources-administrators>

Exhibit 2-14
Percentage of CPS and Peer District
Full Academic Year Students Scoring Proficient or Above in Reading
2020-21

Entity	3 rd Grade	4 th Grade	5 th Grade	6 th Grade	7 th Grade	8 th Grade
Crescent	44%	16%	26%	23%	DNS	18%
Cashion	30%	29%	49%	31%	9%	45%
Comanche	20%	17%	24%	22%	8%	14%
Empire	20%	13%	19%	23%	9%	17%
Morrison	33%	21%	37%	23%	8%	11%
Minco	25%	24%	28%	23%	29%	34%
State	25%	22%	28%	26%	19%	24%

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 2-15 shows the 2020-21 science scores. In 5th grade, CPS students scored the lowest among peers and below the state. CPS 8th grade students scored highest among their peers and above the state.

Exhibit 2-15
Percentage of CPS and Peer District
Full Academic Year Students Scoring Proficient or Above in Science
2020-21

Entity	5 th Grade	8 th Grade
Crescent	23%	51%
Cashion	44%	32%
Comanche	29%	32%
Empire	42%	17%
Morrison	36%	11%
Minco	34%	45%
State	32%	32%

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 2-16 shows math scores over a five-year period. From 2015-16 to 2020-21, CPS scores generally declined in math. Scores from 2017-18 forward reflect Oklahoma's higher performance standards adopted in 2017. OCCTs were not taken in 2019-20.

Exhibit 2-16
Five-year Data Trend in Math

Grade	2015-16		2016-17		2017-18		2018-19		2020-21	
	Crescent	State	Crescent	State	Crescent	State	Crescent	State	Crescent	State
3 rd	72%	75%	43%	54%	68%	51%	55%	53%	53%	29%
4 th	84%	77%	46%	49%	31%	45%	49%	47%	24%	28%
5 th	56%	79%	49%	42%	42%	37%	18%	39%	DNS	23%
6 th	71%	76%	15%	42%	38%	34%	20%	37%	28%	21%
7 th	55%	76%	30%	42%	17%	41%	47%	40%	20%	20%
8 th	32%	64%	22%	29%	10%	25%	15%	28%	14%	14%

Source: Office of Educational Quality and Accountability, Profiles Database, and Oklahoma Data Matrix Website

Exhibit 2-17 shows reading scores over a five-year period. From 2015-16 to 2020-21, CPS scores generally declined in reading. Scores from 2017-18 forward reflect Oklahoma's higher performance standards adopted in 2017. OCCTs were not taken in 2019-20.

Exhibit 2-17
Five-year Data Trend in Reading

Grade	2015-16		2016-17		2017-18		2018-19		2020-21	
	Crescent	State	Crescent	State	Crescent	State	Crescent	State	Crescent	State
3 rd	88%	82%	47%	49%	32%	43%	48%	49%	44%	25%
4 th	75%	78%	37%	46%	35%	46%	29%	39%	16%	22%
5 th	61%	82%	50%	49%	48%	46%	27%	45%	26%	28%
6 th	DNS	74%	21%	48%	41%	46%	43%	45%	23%	26%
7 th	DNS	82%	44%	42%	19%	33%	33%	36%	DNS	19%
8 th	DNS	86%	28%	43%	43%	41%	21%	37%	18%	24%

Source: Office of Educational Quality and Accountability, Profiles Database, and Oklahoma Data Matrix Website

Exhibit 2-18 displays results for the 2020-21 11th grade test scores. CPS had the second-lowest score in English among peer districts and was lower than the state. In math, CPS had the third-lowest score among peers and same score as the state. In science, CPS had the second-lowest score among peers and was lower than the state.

Exhibit 2-18
Percentage CPS and Peer District Grade 11 Regular Education,
Full Academic Year Students Scoring Proficient or Above, 2020-21

Entity	English	Math	Science
Crescent	24%	20%	16%
Cashion	46%	35%	21%
Comanche	17%	6%	16%
Empire	25%	14%	11%
Morrison	36%	25%	24%
Minco	31%	23%	18%
State	30%	20%	24%

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 2-19 shows that in four out of the past five years CPS' number of high school graduates completing Regents' College-Bound Curriculum was 84 to 100 percent. These rates largely track slightly higher than the community group and state.

Exhibit 2-19
Trend in Graduates Completing
Regents' College-Bound Curriculum

Entity	2014-15	2015-16	2016-17	2017-18	2018-19
Crescent	76%	97%	85%	100%	91%
Atoka	55%	69%	73%	86%	100%
Haskell	100%	80%	0%	75%	100%
Haworth	94%	90%	95%	DNS	DNS
Porter	100%	100%	95%	75%	0%
Vian	86%	96%	93%	98%	90%
Community Group	73%	82%	76%	79%	82%
State	81%	81%	80%	80%	83%

Source: Office of Educational Quality and Accountability, Profiles Database

In 2019-20, CPS had the lowest four-year dropout rate and a 100 percent graduation rate. CPS' four-year dropout rate was lower than both the community group and state, as well as all but one of the peers. CPS' senior graduation rate was higher than both the community group and state (**Exhibit 2-20**).

Exhibit 2-20
CPS and Peer District Four-Year Dropout and Senior Graduation Rates, 2019-20

Entity	Four-Year Dropout Rate	Senior Graduation Rate
Crescent	0.0%	100.0%
Cashion	0.0%	100.0%
Comanche	1.4%	100.0%
Empire	0.0%	100.0%
Morrison	4.7%	100.0%
Minco	0.0%	100.0%
Community Group	4.2%	99.0%
State	9.8%	98.0%

Source: Office of Educational Quality and Accountability, Profiles Database

FINDING 2-4

The high school class schedule has not been recently or regularly reviewed to determine if class scheduling is based on the student educational best instead of adult preferences. An in-depth, detailed review would ensure appropriate sequencing of subjects, high school graduation requirements, content pre-requisites, and balanced classroom population. A review is needed to phase in additional elective classes and a research-based, best practice justification for the ten-minute break between the second and third hour.

The consulting team learned of possible high school scheduling irregularities, including:

- students having an unassigned free period who are then allowed to attend classes in which they are not enrolled;
- the published schedule not being followed with fidelity;
- some students having difficulty finding enough units for graduation; and
- inconsistencies existing in the quality of instruction across courses.

Effective schools methodically build secondary schedules. Schedules are built for learning and not convenience. Research supports the view that the more time a student spends learning, and the more efficiently that time is used, the higher their achievement. When it comes to secondary schedules, there are four basic steps to include:

- determine goals;
- understand parameters;
- select the underlying structure, and
- incorporate structure.

Ultimately, schedules are built for learning and not convenience. The schedule is founded in the school mission and goals. The goal of schedules is to maximize sequential, active learning where students learn to collaborate, create, and work on interdisciplinary projects.¹⁵

RECOMMENDATION

Review and implement with fidelity a more robust, accurate, and student-driven secondary class schedule.

The BOE, superintendent, principals, teachers, and students should strategically approach the secondary schedules with both the immediate requirements of current students and long-term improved learning opportunities for CPS students. The schedule should be revised with intentional focus based on maximized learning opportunities and student need. The schedule should include additional elective classes. The processes and procedure to add new electives and to implement a more robust, accurate, student driven schedule matrix should be addressed simultaneously. **Exhibit 2-21** provides some guidelines for this work.

¹⁵ <https://www.gettingsmart.com/2017/02/24/scheduling-for-learning-not-convenience/>

Exhibit 2-21

Guidelines for Creating Secondary Schedules

1. **Set priorities *before* you begin building the schedule:** Before starting to build a schedule, schools and districts must pause to refine and hone a theory of action and establish an *ordered* set of priorities that will help schedulers manage the endless tradeoffs in a strategic and purposeful way.
2. **Focus on the content of your schedule, not the structure.** No single scheduling structure is the “silver bullet” structure. According to research:
 - a. Period length only impacts student outcomes if teachers effectively utilize the time.
 - b. Block schedules have mixed results regarding the impact on student achievement – there is no “right” number of courses for students to take at one time.
 - c. There is a large, positive relationship between academic learning time – the period when instructional activity is perfectly aligned with a student’s readiness and learning occurs – and student achievement.
 - d. Districts should stick with the structure they have unless there is a significant reason to switch.
3. **Provide extra time for general education intervention.**
 - a. In secondary schools, “extra help” for struggling students is provided either during class period through co-teaching, push-in, or paraprofessional support. More help and more adults are provided; but not more time to learn.
 - b. Best practice for secondary intervention calls for a double-time model that provides “extra help” *in addition* to core instruction.
 - i. In class, struggling students are exposed to a first presentation of the content – 100% of their current year materials—during core instruction; allows them to be immersed in the classroom experience, learn from peers, stay socially engaged, and have the benefit of being exposed to the material from their skilled core-instruction teacher.
 - ii. In an extra period, students receive interventions and supports needed to fully master the material. Extra-time interventions include: pre-teaching the next day’s lesson, re-teaching current-year materials, and going back to address missing foundational skills and gaps that have accumulated from prior years.
4. **Maximize access to rigor.** Schools can also create more learning via better schedules by examining access to rigorous courses, including advanced placement (AP) and honors courses. Many districts do not systematically analyze scheduling data to understand how students are distributed among levels of rigorous courses in different departments. Dissecting data by department and level of rigor clarifies where there may be actions that don’t match stated priorities.
 - a. One district found that less than 10% of all math seats were in AP or honors sections and 15% of math seats were below grade level. Meanwhile, in science, a much larger 21% of students were in rigorous classes, with only 2% receiving below-grade-level content. In this case, district leaders discovered that the Math department set a very high bar for students to qualify for enrollment into AP/honors sections, excluding some students who could handle greater rigor; they also discovered that there was an above-average number of students in “instead of” or remedial classes. Prioritizing an extra-time secondary intervention strategy allowed struggling learners to catch up to grade level and encouraged a greater number of students to enroll in advanced classes, especially in math.
5. **Set nuanced class size targets.** Another key preparatory step before building the schedule is to determine a nuanced approach to class-size targets.
6. **Match staffing to course enrollment with precision—to the decimal place!** Every principal, superintendent, and CFO asks how many of each type of teacher is needed each year. A typical process for determining staffing needs might begin with setting a class size target of 25 students per section and a teaching load requirement of five sections per FTE *strategic approach to secondary school scheduling can raise student achievement.*

Source: <https://www.dmgrouper12.com/blog/how-to-build-a-better-secondary-school-schedule>

Scheduling will always include tradeoffs and difficult choices – it is a challenging task. But scheduling should not keep district leaders from achieving important goals, learning goals, and objectives for students. In fact, when approached strategically, scheduling should open the door to increased student achievement and better support for teachers.¹⁶

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 2-5

CPS teachers lack release time for curricular and instructional dialog and discussion. Declining student performance data indicates a need for instructional changes. The elementary school has initiated some release time opportunities, but the process is not district-wide and does not include all administrators and teachers at every grade level/content area.

The district does not provide regularly scheduled PLC release time for all teachers to participate in discussions that address data analysis or using formative and summative data to design, adjust, and pace curricula and instruction. Across the district, only random and informal dialogue takes place for teachers to address instructional issues. Principals lack designated times with teachers to collaborate and engage in meaningful dialog around addressing learning gaps and redundancies, best common assessments for monitoring student processes, and evidence-based teaching strategies that improve achievement. The consulting team found a dearth of recurring meetings that consistently articulate the district's expectations for effective lesson planning, implementing evidence-based instructional delivery strategies, standards-based, student-centered learning, and accountability for implementation. Administrators and several teachers recognized there is expertise, innovative strategies, and valuable resources among the staff, but no consistent structured time or process to share their work and expertise. Staff meetings are not routinely held where teachers share successful interventions and daily remediation practices across grade levels and subject areas.

CPS teachers are functioning at varied instructional proficiency levels. Without scheduled time to work together, administrators are unable to explore new information and the foundational knowledge base with teachers who need to improve. Focus groups and interviews indicated the need for training all teachers, instructional aides, counselors, librarians, and technology directors in the purpose, expectations, and essential components of a successful PLC. PLCs could be used to address issues of accountability, monitor student progress, use data to inform instruction, and align the horizontal and vertical curriculum.

Research is clear that PLC teacher collaboration has profound positive implications for schools. As a school improves and 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?

¹⁶ <https://www.dmgrouppk12.com/blog/how-to-build-a-better-secondary-school-schedule>

- How will we know when each student has learned it?
- How will we respond when a student experiences difficulty in learning?

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

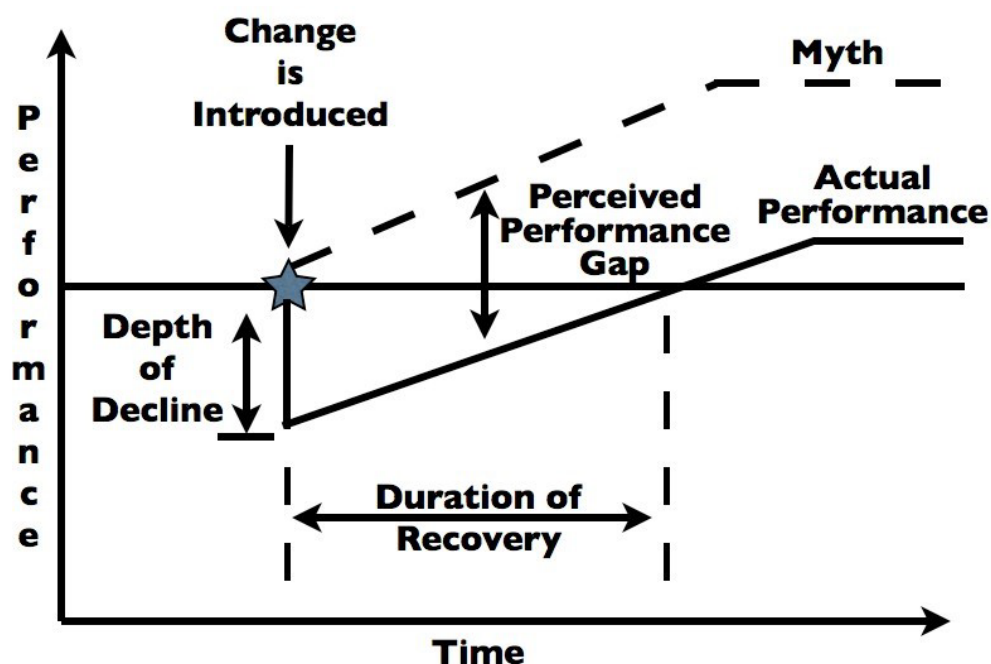
- supportive and shared leadership;
- collective creativity;
- shared values and vision;
- supportive conditions; and
- shared personal practice.¹⁷

Establishing PLCs does not occur quickly or spontaneously. It requires dedicated and intentional effort on the part of the principals as instructional leaders and the teaching 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 isolated comfort zone and into shared learning.

Exhibit 2-22 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.

¹⁷ <http://www.sedl.org/change/issues/issues61.html>

Exhibit 2-22
Change Implementation



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

A district seeking to improve must be mindful that initial capacity building is more important than accountability because the former is the route to the latter, (i.e. building the capacity of teachers is the route to being held accountable for implementing new, best practices). Clearly, one needs both. Finding the right combination and integration of the two is the trick.¹⁸ Being the change agent in successful schools means that growing and learning are ongoing phenomena.¹⁹ **Exhibit 2-23** summarizes Fullan's insights regarding change.

¹⁸ Fullan, M. (2008). The six secrets of change. San Francisco, CA: Jossey-Bass.

¹⁹ <http://www.sedl.org/change/issues/issues61.html>

Exhibit 2-23
Insights on Change for Continuous Improvement

Change Insights	<ul style="list-style-type: none"> • 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)
Change Savvy Leadership	<p>Change savvy leadership involves:</p> <ul style="list-style-type: none"> • Careful entry into the new setting • Listening to and learning from those who have been there longer • Engaging 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

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

Learning by Doing: A Handbook for Professional Learning Communities at Work provides a road map to narrow the “knowing-doing gap” regarding PLC.²⁰ This book outlines the importance of common vocabulary and common understanding of PLC concepts and characteristics. It provides the rationale for implementing PLC that benefits 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) 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.²¹ Darling-Hammond (1996) cited shared decision-making as a factor in curriculum reform and the transformation of teaching roles in some schools.²² In such schools, structured time is provided for teachers to work together in planning instruction, observing each other's classrooms, and sharing feedback.

²⁰ 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.

²¹ 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.

²² Darling-Hammond, L. (1996). The quiet revolution: Rethinking teacher development. *Educational Leadership*, 53(6), 4-10.

For administrators and teachers to build the kind of trust needed to not only talk candidly but also to observe one another teach is a major 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 is 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 and cross-grade level dialogue. Continuous improvement evolves successfully through PLC collaboration, corporate thinking, and shared decision-making. Implementation of new initiatives, such as the standards-based instruction, student-centered outcomes, along with the day-to-day decisions, and improvements in schools, is more robust and maximized when districts provide teachers with PLC opportunities.

RECOMMENDATION

Implement regularly scheduled, structured, release time opportunities for administrators and teachers to collaborate horizontally and vertically regarding aligning and pacing core content, high impact instructional strategies, and interventions that drive improved learning for all students.

When implementing a PLC process, CPS administrative staff should understand the need for finding the balance between capacity building and accountability for improving instructional practice. This calls for freedom and self-direction that leads to improvement. At the same time, teachers also need support, direction, and expectations that help them develop expertise and grow the practice of professional dialogue with fellow teachers. Administrators should use the PLC process to guide teachers to move past blaming the parent or socioeconomic status for deficiencies to taking ownership for reaching the child through effective instruction and student-centered classrooms. CPS teachers should evolve to talking about curriculum standards and developing effective lesson plans based on student performance data the content and skills students must learn. Teachers should no longer be tethered to textbook curriculum. PLCs should make teachers aware they have a wealth of expertise and options for professional learning among themselves, next door, and across the hall. PLCs should provide the time for sharing and collaboration as they engage in standards-based, student-centered classrooms.

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

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

The BOE, superintendent, principals, and select teachers should determine the initial process for PLC implementation. Then, together with teaching staff, they should transition 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.”²³

Exhibit 2-24 is a resource for exploring scheduling options for teacher collaboration.

Exhibit 2-24 **Examples for Providing Collaboration Time**

- **Common Prep Time:** Build a master schedule to provide daily common prep time for teachers of the same course or department.
- **Parallel Scheduling:** 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.
- **Adjust Start and End Times:** Gain collaborative time by starting the workday early or extending the workday one day each week to gain time.
- **Shared Classes:** Combine students across two different grade levels or courses into one class for instruction.
- **Group Activities, Events, and Testing:** Teams of teachers and non-teaching staff coordinate activities that require supervision of students rather than instructional expertise.
- **Banking Time:** Over a period of days, extend the instructional minutes beyond the school day.
- **In-Service and Faculty Meeting Time:** Schedule extended time for teams to work together on staff development days and during faculty meeting times.

Source: Dufour, R. (2006). Learning by doing: A handbook for professional learning communities at work. Bloomington, IN: Solution Tree.

FISCAL IMPACT

Initially, if an outsourced vendor is needed to provide training to instructional staff in PLC, the consulting team estimates \$5,000 for one year.

Recommendation	2022-23	2023-24	2023-24	2024-25	2025-26
Hire a firm to help with PLC if needed.	(\$5,000)	\$0	\$0	\$0	\$0

²³ Eaker, R., DuFour, R., & DuFour, R. (2002). *Getting started: Reculturing schools to become professional learning communities*. Bloomington, IN: Solution Tree Press.

FINDING 2-6

Textbooks and/or teacher-selected resources drive CPS curriculums. This is not a best practice. Moreover, the district lacks processes and procedures to annually evaluate instructional resources.

No vertical or horizontal alignment exists among grade levels and across content areas regarding textbooks, software, instructional materials, and resources routinely used. Across grade levels, math textbooks are new, yet from differing publishers. One teacher reported using the SDE curriculum frameworks, but others did not. The consulting team found elementary science textbooks implemented sporadically or not at all. CPS teachers determine the textbooks and instructional resources used in each grade level and content area. In most grade levels and content areas teachers primarily work in isolation when selecting their supplemental resources.

A portion of CPS secondary students noted the lack of curriculum coherence in responding to the student survey (**Exhibit 2-25**). Nearly one-third of secondary students (32 percent) do not feel that they learn what they need to learn to be prepared for the next grade. Similarly, more than two-fifths (43 percent) stated that they did not know what to expect on the state tests.

Exhibit 2-25
Student Survey Results Regarding Curriculum Coherence

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Students learn the necessary material to be prepared for the next grade.	12%	57%	17%	12%	3%
I knew what to expect on the state tests.	13%	45%	24%	16%	3%

Source: Prismatic Survey Results, January 2022

No filter or screening process is in place to regulate vertical alignment of textbooks and instructional materials. No process determines the degree to which the instructional materials address student achievement gaps on state tests, especially the lower quartiles. There are no inclusive evaluation processes to measure whether the instructional materials used align closely with OAS. No evidence was presented to indicate that student OSTP data are routinely disaggregated to determine if the content and skills missed in the lower quartiles are appropriately covered in the implemented textbooks and instructional materials.

The district does not clearly define efforts to evaluate software, programs, texts, and supplemental resources to determine relevancy, alignment with OAS, and how resources directly impact improved student achievement. The consulting team did not find evidence of an evaluation process to determine how core curriculum textbooks, software programs used, supplemental and remedial interventions, instructional strategies, and enrichment activities are aligned with longitudinal OSTP data results. No evidence was presented to indicate how all CPS taught and tested curriculum aligns with state Blueprints, Test and Items Specifications, and Performance Level Descriptors (PLD). No evaluation or screening process is in place to ensure

new purchases support the identified student needs based on student test scores and are align with target remediation and interventions for students.

Without implementing a regularly scheduled evaluation system, CPS positions itself to fund instructional resources/programs that are misaligned, not teaching to identified student needs or the intent behind their implementation. The Crescent community and stakeholders need assurance the district is not spending money and time on ineffective instructional resources/programs.

Most federal and state instructional resources/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 teaching state standards, 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 standards-driven student learning. Likewise, an annual evaluation process determines if instructional resource materials are addressing identified learning gaps or perpetuating redundant and repetitive overlaps.

Research is clear that instructional resources must be relevant, support curricula rigor, and most importantly, seamlessly align with state standards and improve student performance. Without comprehensive instructional resource/program evaluations, schools risk getting into curricular and instructional traps. They continue doing what they have always done – using instructional resources with students without focused intent and alignment.

Systematically collecting and analyzing quantitative and qualitative information regarding instructional resources provides district administrators and teachers with valuable assessment information. Ideally, evaluations 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, including all subgroups?
- 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 a positive impact on students, teachers, school climate, and culture?²⁴

High-performing districts use the evaluation to make data-driven, informed decisions. The evaluation guides the district to keep or abandon instructional resources/programs. Based on data, modifications, additions, deletions, or revisions to instructional resources/programs are determined. The evaluation determines the instructional impact resources have on subgroups such as gifted, struggling readers, English Language Learners (ELLs), and special education students.

RECOMMENDATION

Implement a comprehensive evaluation process to ensure textbooks, software, and supplemental instructional materials/resources are developmentally appropriate, relevant, consistent across grade levels and content areas, and aligned vertically and horizontally with Oklahoma Academic Standards (OAS).

The BOE, superintendent, principals, and select teachers should develop and implement a plan to annually evaluate curricular and instructional resources, software, enrichment, and remediation materials to ensure alignment with OAS and data-driven student performance needs. High performing districts annually evaluate all instructional resources/programs, new initiatives, grants, and district processes. The combined data determines if there is a need to add, 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 in all subgroups;
- contributes to the relevance and rigor of instruction and OAS 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 tool to build upon successes and leads to ongoing improvement in practices and outcomes.

The CPS superintendent, principals, and all teachers should develop a list of all major curricular and instructional resources routinely implemented to supplement, remediate, or enrich their instruction, and support the curriculum. Proof or justification of how the resource aligns with teaching state standards and supporting student test data results must be included. 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

²⁴ http://ies.ed.gov/ncee/edlabs/regions/pacific/pdf/REL_2014007.pdf

relevant to the knowledge base students need for OAS and 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 can 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 whether it is adapted with fidelity. **Exhibit 2-26** presents examples of formative evaluation questions to explore.

Exhibit 2-26

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 BCPS 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

Summative instructional resource/program evaluation takes place after the instructional resource/program is implemented and routinely used. It is conducted at the end of each school year, or at another logical time, such as the end of instructional resource/programmatic intervention. **Exhibit 2-27** presents examples of summative evaluation questions to explore.

Exhibit 2-27
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

In addition to asking these evaluation questions, it is also important to make certain that the instructional resources/programs align and tightly support the OAS, Oklahoma School Testing Program (OSTP) student performance data Depth of Knowledge expectations, Test and Item Specifications. CPS demographics such as subgroups, 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 correlation for teaching the concepts and skills identified in learning gaps. The evaluation process should ensure CPS has instructional resources that teach and reinforce the identified skills and concepts that students in the lower quartiles routinely miss.²⁵

²⁵ There are many free resources available to gather additional information, including:
Resources on designing and planning instructional resource/program evaluation;
<https://www.cde.state.co.us/fedprograms/designing-and-planning-your-program-evaluation>
A basic guide to instructional resource/program evaluation;
<https://managementhelp.org/evaluation/program-evaluation->

FISCAL IMPACT

A similar recommendation was provided in Chapter 1 regarding programmatic evaluation in general. The cost for implementing this recommendation can be absorbed in the cost estimated in Chapter 1.

Initially, CPS staff could objectively and fairly evaluate resources with input from all administrators and teachers. However, federal guidance notes that districts should expect to spend between five to seven percent of the total funding of an instructional resource/program on evaluation.

FINDING 2-7

The superintendent is a strong instructional leader. Not only does the superintendent have a strong knowledge base of instructional leadership she also exhibits that expertise with skills, and a vision and passion for continuous improvement at CPS.

The consulting team learned through BOE and staff interviews, surveys, and observations, that the superintendent's drive and desire to take meaningful steps to help CPS build on its strengths is highly evident. As the instructional leader, she sees the need to continuously improve through:

- building community and engaging relationships at all levels;
- improving communication with staff, parents, and community; and
- expecting principals and staff to improve student achievement through engaging in best practices and setting high standards of performance.

The CPS superintendent clearly understands effective teaching and evidence-based instructional delivery strategies that lead to improved student learning. The superintendent's expertise and leadership skills enable the district to improve instructional systems, provide job-embedded professional development, focus on consistent, effective, and purposeful standards-based instruction, and improve pedagogical teacher practices and behaviors.

She is driven by both the urgency and the responsibility of ensuring all CPS students are prepared for the next level of study and ultimately college and careers. She leverages pertinent and positive communication with the staff, parents, community via social media, and weekly newsletters. She is keenly aware of the importance of keeping all stakeholders informed about all positive aspects of the school. She is also focused on building, not resting, on the district's strengths.

Research indicates that district instructional leadership provides the critical bridge between educational-improvement initiatives, and having those initiatives make a genuine difference for

An evaluation matrix and template focused on high expectations to teach identified curriculum.
<https://www2.ed.gov/about/offices/list/oese/sst/evaluationmatters>

all students. Such leadership comes not just from superintendents but also from the supportive boards of education and the principals.²⁶

District instructional leadership is connected to positive student achievement. The role of the superintendent is critical. Marzano (2009) points to the following five research-based best practices for district level leadership responsibilities:

- ensuring collaborative goal setting;
- establishing non-negotiable goals for achievement and instruction;
- creating board alignment with and support of district goals;
- monitoring achievement and instruction goals; and
- allocating resources to support the goals for achievement and instruction.

The CPS superintendent exhibits all five research-based behaviors and practices.

COMMENDATION

The CPS superintendent is commended as an instructional leader.

FINDING 2-8

The current CPS principals need training, support, and clear expectations for their roles as instructional leaders. CPS demographic and student performance data confirm the need for principals to set high expectations, facilitate reaching higher instructional goals, guide improved student achievement, and assist teachers in engaging in highly effective curricular and instructional practices.

CPS test scores require principals capable of managing classroom instructional changes that improve student achievement. As shown in previous exhibits, both reading and math scores are low and in some cases declining from year to year. In most grades, reading and math scores are below those of peer school districts. Beyond state test scores, there is a lack of accountability for teachers. For example, Pre-K to 4th grade elementary teachers did not even post science and social studies grades for the first semester of 2021-22.

Effective school leadership today must combine the traditional school leadership duties, such as teacher evaluation, budgeting, scheduling, and facilities maintenance with a deep involvement with specific aspects of teaching and learning. Effective instructional leaders are intensely involved in curricular and instructional issues that directly affect student achievement (Cotton, 2003).²⁷ Research indicates that principals are inseparably linked to student achievement. Principals are called upon to be instructional leaders and impact classroom instruction that leads

²⁶ <https://conservancy.umn.edu/bitstream/handle/11299/2035/CAREI?sequence=1>

²⁷ <https://sedl.org/pubs/reading100/RF-NB-2005-Spring.pdf>

to improved student achievement. Principals keep their staff focused on learning goals and help them determine the effectiveness of their instructional strategies.²⁸

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 (**Exhibit 2-28**). McREL identified 21 leadership responsibilities that are substantially associated with student achievement. They have translated the results of this research into a balanced leadership framework that describes the knowledge, skills, strategies, and tools leaders need to positively affect student achievement. The framework moves beyond abstraction to concrete responsibilities, practices, knowledge, strategies, tools, and resources that principals and others need to be effective leaders. McREL's leadership framework is based upon the idea that effective leadership means more than simply knowing what to do. Effective leadership means knowing how, when, and why to take action. A combination of knowledge and skills is the essence of balanced leadership.

Successful instructional leaders guide teachers and staff to establish a positive learning environment in their buildings, develop systems for supporting teachers, and regularly monitor the progress of student achievement. They promote a strong school culture by empowering teachers with strong instructional expertise and coordinating the work of all teachers around shared instructional goals that increases student engagement.

²⁸ <https://www.readingrockets.org/article/role-principal-leadership-improving-student-achievement>

Exhibit 2-28
McRel Instructional Leadership Characteristics and Behaviors

Figure 3: Principal leadership responsibilities: Average r and 95% Confidence Intervals

Responsibilities	<i>The extent to which the principal ...</i>	Avg. r	N schools	N studies	95% CI
Culture	fosters shared beliefs & a sense of community & cooperation	.29	709	13	.23-.37
Order	establishes a set of standard operating procedures & routines	.26	456	17	.17-.35
Discipline	protects teachers from issues & influences that would detract from their teaching time or focus	.24	397	10	.14-.33
Resources	provides teachers with materials & professional development necessary for the successful execution of their jobs	.26	570	17	.18-.34
Curriculum, instruction, assessment	is directly involved in the design & implementation of curriculum, instruction, & assessment practices	.16	636	19	.08-.24
Focus	establishes clear goals & keeps those goals in the forefront of the school's attention	.24	1109	30	.18-.29
Knowledge of curriculum, instruction assessment	is knowledgeable about current curriculum, instruction, and assessment practices	.24	327	8	.13-.35
Visibility:	has quality contact & interactions with teachers & students	.16	432	11	.06-.25
Contingent rewards	recognizes & rewards individual accomplishments	.15	420	7	.05-.24
Communication	establishes strong lines of communication with teachers & among students	.23	245	10	.10-.35
Outreach	is an advocate & spokesperson for the school to all stakeholders	.28	478	14	.19-.35
Input	involves teachers in the design & implementation of important decisions & policies	.30	504	13	.21-.38
Affirmation	recognizes & celebrates school accomplishments & acknowledges failures	.25	345	7	.14-.35
Relationship	demonstrates an awareness of the personal aspects of teachers & staff	.19	497	12	.10-.24
Change agent	is willing to & actively challenges the status quo	.30	479	7	.22-.38
Optimizer	inspires & leads new & challenging innovations	.20	444	9	.11-.29
Ideals/beliefs	communicates & operates from strong ideals & beliefs about schooling	.25	526	8	.17-.33
Monitors/evaluates	monitors the effectiveness of school practices & their impact on student learning	.28	1071	30	.23-.34
Flexibility	adapts his or her leadership behavior to the needs of the current situation & is comfortable with dissent	.22	151	2	.05-.37
Situational awareness	is aware of the details & undercurrents in the running of the school & uses this information to address current & potential problems	.33	91	5	.11-.37
Intellectual stimulation	ensures that faculty & staff are aware of the most current theories & practices & makes the discussion of these a regular aspect of the school's culture	.32	321	5	.22-.42

Source: <https://www.mcrel.org/wp-content/uploads/2016/06/Balanced-Leadership%C2%AE-What-30-Years-of-Research-Tells-Us-about-the-Effect-of-Leadership-on-Student-Achievement.pdf>

RECOMMENDATION

Provide training, support, and set clear expectations for building principals in their role as instructional leaders.

CPS needs principals who understand the complex role of being instructional leaders and accept responsibility for being the primary change agent for driving school improvement. Across the district there are inconsistencies in instructional beliefs, skills, practices, and behaviors. To raise the level of student achievement, CPS principals need to be leaders with a strong knowledge base in curriculum and instruction. The district needs principals who will guide and support teachers to no longer teach in isolation with limited accountability. There is need for principals to coach teachers to tap into the power and momentum of corporate thinking, shared decision-making, and working as a team. CPS principals need expertise in knowing the behaviors and skills teachers need to implement for improved student achievement. The same teacher behaviors and skills are needed to set high expectations to engage in teaching strategies that raise the level of student engagement, interest, and improved learning. CPS principal leadership is needed to address curricular and instructional delivery ineffectiveness, grading inconsistencies, using data to inform instruction and remediation, monitoring and assisting teachers with curriculum alignment, and ensuring all teachers are appropriately preparing their students for a seamless transition to the next level of study and learning. The district needs principals who bring awareness and change to the beliefs, assumptions, and habits that are barriers to improvement.

The school board and superintendent should clearly define expectations for instructional leadership. The current CPS principals are at differing skill levels of instructional leadership. Each principal should commit to improving and cultivating the professional expertise needed as an instructional leader. One pathway to improvement is using the elements of their job to practice improving leadership is pragmatic and provides hands-on learning.

Below is one small, pragmatic step principals can use as instructional leaders. These daily practices need quality assurance criteria, a thorough understanding of the undergirding knowledge base and rationale for the behavior, and not just “I did it”. Nothing is more important than ensuring quality learning is taking place in all the classrooms. **Exhibit 2-29** provides strategies to improve individual instructional leadership.

Exhibit 2-29

Strategies to Improve Instructional Leadership

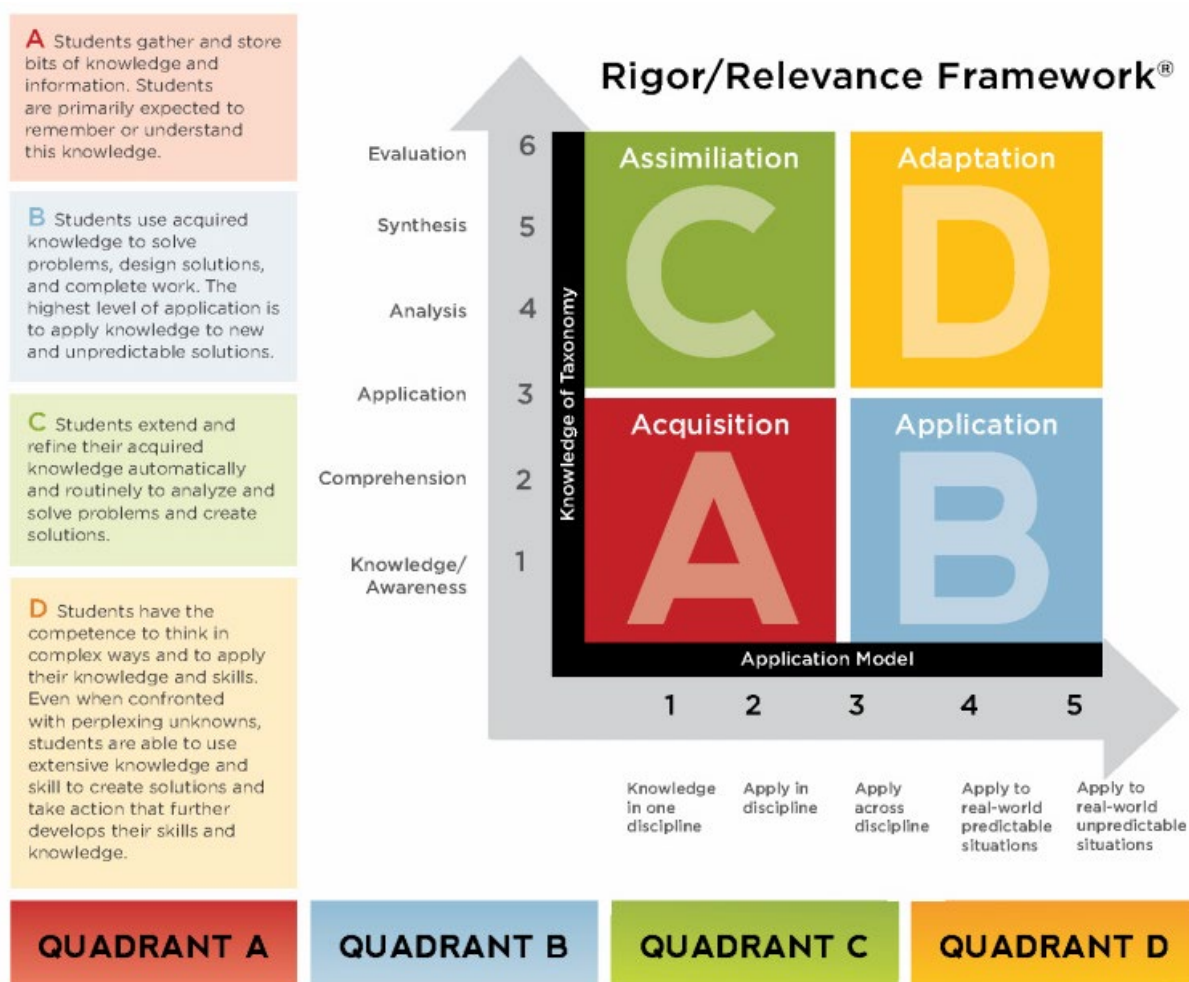
1. **Get in Classrooms More** - Develop an informal walk-through schedule with your leadership team. Use a color-coded Google Doc to keep track of classrooms visited and the specific improvement comments provided to each teacher.
2. **Streamline Expectations and Eliminate Ineffective Practices** - Establish a common vision and expectations for all teachers. Get rid of the dog and pony show ritual of announced observations and focus upon daily instructional best practice.
3. **Improve Feedback** - Praise what is going well and give suggestions for improvement. Provide clear, practical examples and strategies that a teacher can begin to implement immediately. Timely feedback is essential.
4. **Be a Scholar** – Reading research positions principals to have better conversations with teachers about their own improvement. Use research that supports the types of effective pedagogical techniques that need to be seen in classrooms.
5. **Model** – Do not ask teachers to do anything that principals are not willing to do. Know how technology integration in the classroom and professional learning improve practice. If a teacher is struggling with assessments, do not just say they need to work on building better ones. Either provide an example or co-create an assessment together.
6. **Teach a Class** - Co-teach with both struggling and distinguished teachers. Lead by example, an instructional leader who “walks the walk” builds better relationships with staff and is positioned to engage staff in conversations to improve instruction.
7. **Grow Professionally** - Attend conferences, read books, get out of your education silo. Social media provides a 24/7 pathway to ideas, strategies, feedback, resources, and support that every educator should take advantage of.
8. **Write in Order to Reflect** - Journaling helps to reflect and process teaching, learning, and leadership. Asking teachers to journal prior to the post-observation conference is a great strategy to promote a conversation that is not one-sided.
9. **Integrate Portfolios** - Portfolios provide more clarity and detail on instruction over the entire school year. Portfolios can include learning activities, assessments, unit plans, examples of student work, and other forms of evidence to improve instructional effectiveness.
10. **Co-Observe** - Co-observe lessons with other principals then discuss.

Source: <https://www.nassp.org/2019/08/07/10-strategies-to-improve-instructional-leadership/>

Exhibit 2-30 shows the Rigor Relevance Framework, which is an example of what instructional leaders can use to guide teachers through improved instructional delivery. Rigorous teaching strategies improve students’ higher level thinking skills by encouraging them to move from the lower levels toward the higher levels of thinking. The Rigor/Relevance Framework is a tool developed to examine curriculum, instruction, and assessment along the two dimensions of higher standards and student achievement. As the instructional leader, it should be used by principals in the development of both instruction and assessment. In addition, principals should have teachers use it to monitor their own progress.²⁹

²⁹ <https://leadered.com/rigor-relevance-and-relationships-frameworks/>

Exhibit 2-30
Rigor Relevance Framework



Source: <http://yokota21.weebly.com/rigor-and-relevance-framework.html>

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 2-9

The district lacks a written plan to guide teachers in effective classroom management, planning effective lessons, and delivering high impact instruction. No instructional parameters assist teachers in managing student-centered classrooms, setting high student expectations, daily implementing evidence-based instructional strategies, increasing student engagement and interest, and improving student academic performance. There are no common Pre-K-12 lesson planning and instructional delivery guidelines.

This link provides valuable research-based information and pragmatic steps to direct the BOE and superintendent in employing building principals who are strong instructional leaders: <https://files.eric.ed.gov/fulltext/ED556346.pdf>

Instructional delivery practices vary across the district. Teacher instructional delivery behaviors and classroom practices that promote student engagement and high achievement are inconsistent across the classrooms. The consulting team learned through interviews, observation, and focus group dialog that CPS teachers care about their students and realized the need to find ways to improve student performance. However, instruction was primarily whole group, lecture, and online instruction. Some classrooms were observed having small group activities: teacher moving throughout the room ensuring student engagement, guiding content practice, and learning with the students. Most questions were lower-level comprehension level questions. Other instructional practices observed included:

- a teacher sitting at the teacher desk requiring students to stand in line waiting for help;
- an elementary student working alone in the classroom with no adult supervision;
- content instruction being delivered while the teacher was seated at their desk;
- zooming instruction to the adjacent classroom rather than in person;
- providing instruction with classroom lights turned off for no apparent reason; and
- students disengaged and lined up at the door waiting for the bell several minutes ahead of the end of the class period.

Focus groups and interviews revealed sporadic, random efforts to design and plan instruction based on student assessment. Expectations for effective instruction differ among administrators. The district uses Teacher and Leader Effectiveness as the evaluation tool. There are inconsistencies among principals in measuring what merits ineffective, needs improvement, effective, highly effective, and superior teaching. There was no clear or consistent understanding among the teaching staff regarding how to design student-centered lesson plans.

Across the district, inconsistent, unproductive classroom management practices were observed. Varying levels of expectations and effectiveness were in place regarding:

- time on task;
- clearly established and practiced classroom routines procedures;
- learned and practiced discussion protocols;
- learned and practiced wait time during questioning;
- welcoming arriving students at the door;
- students entering and getting on task;
- starting classes promptly;

- assignments and routines posted;
- procedures for quieting a class;
- minimal wasted time and disruption; and
- maximized use of instructional time.

Research is clear that student engagement makes learning take place and engagement is squarely on the shoulders of the teacher. The pathway to learning is not the same for all students.³⁰

The role of teachers in developing cognitive and social-emotional development among students cannot be ignored. Effective classroom management sets the foundation for this development. It has been found that little learning occurs in disorganized and chaotic classrooms (Elias and Schwab, 2006). Numerous studies have focused on the role of teacher in shaping effective education. It is generally considered that the results of the learners at the school level is mainly related to the class practices of the related teachers with their students (Hattie, 2009).³¹ Effective teaching and positively functioning classrooms with low levels of disruptive behavior require planning and consistency. Factors which have been found to contribute to these outcomes are identified in a literature review by Kern and Clemens (2007). Establishing classroom rules help teachers in developing an environment conducive to student learning.³²

Lesson plan design is also an important element in an instructional plan. Historically, the state of Oklahoma has used Madeline Hunter's research. Her research showed that effective teachers follow a lesson plan. The elements of her lesson plan design have withstood the test of time and are still highly effective today. The design and methodology of her plan works for any teaching style, grade level, subject area, or student demographic background. Hunter's research organized instructional delivery around seven components. Hunter's plan design was not intended to be rigid; not all components need to be present in every lesson. The plan was designed to guide thinking about what is necessary for teaching a particular concept. Sometimes it takes several teaching segments to complete the lesson plan. Each component of the lesson has methods and techniques that can be incorporated into the plan (**Exhibit 2-31**).

³⁰ <https://www2.ed.gov/about/offices/list/oese/sst/evaluationmatters.pdf>

³¹ <https://files.eric.ed.gov/fulltext/EJ1266806.pdf>

³² <https://files.eric.ed.gov/fulltext/EJ976654.pdf>

Exhibit 2-31 Sample Lesson Plan Format

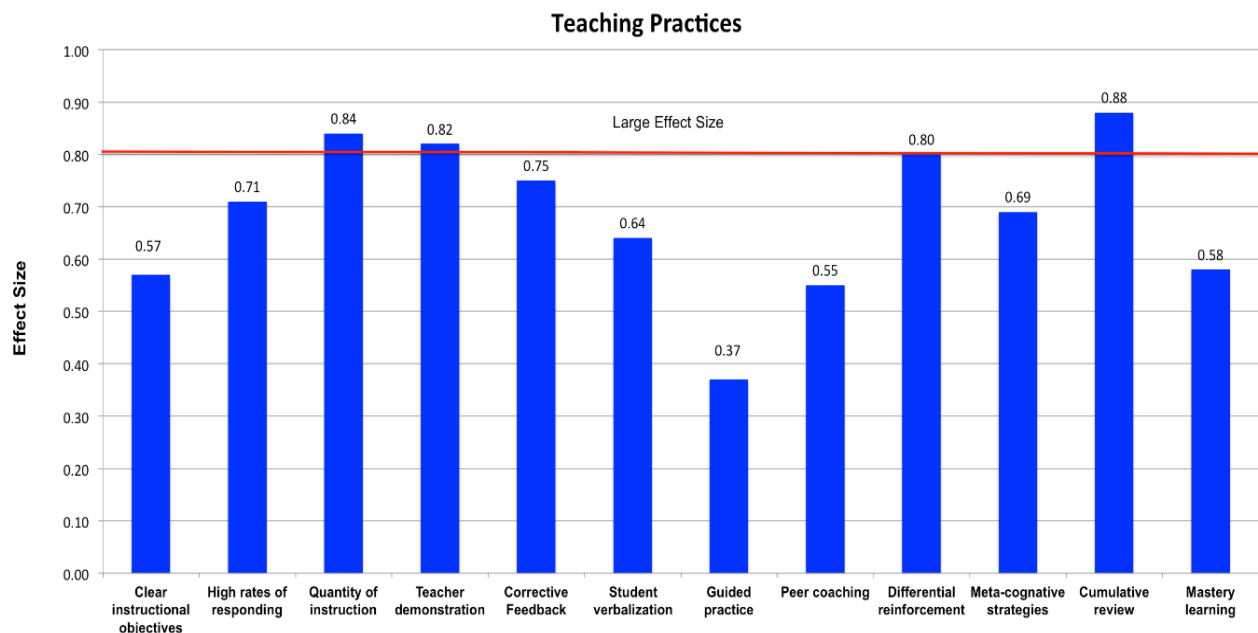
1. **Anticipatory Set** (In what way will you activate their prior knowledge and experience to help them relate to today's lesson.) Focus attention, brief practice on previous/related learning.
2. **Objective/Purpose** (The object is what students will be able to know/do by the end of this lesson. The overarching purpose/understanding is the broad goal/curriculum standard related to the discipline.)
3. **Instructional Input** (What knowledge will you communicate to the student-tell, lecture, stand up and deliver so that the student will understand the objective.) Disseminates new information and activities to achieve the stated objectives.
4. **Modeling** (How will you show/demonstrate the skill or competence so the student will also be able to do it?) Demonstration and/or example of the acceptable finished product or process.
5. **Checking for Understanding** (How will you check that the students have understood/learned the objectives?) Activities which examine the student's possession of central and essential information to achieve the stated.
6. **Guided Practice** (What activities will the students perform under your supervision to ensure that they are able to practice the material. If they make mistakes, you are able to show them how to do it correctly.) Close monitoring and direction of the students by the instructor as they practice the whole task for the first time independently of each other.
7. **Independent Practice** (List homework or seatwork assignments the students will be given to successfully practice the material/skill without teacher supervision.) Only after you know the students can proceed, the continued practice of the whole task by the students without the instructor's monitoring and guidance.

Source: <http://iicti-part1-fall2011.wikispaces.com/file/view/madeline+hunter%27s+lesson+plan+format.pdf>

Hattie's (2009) research describes what can be expected when a teacher implements instructional delivery strategies and practices proven to increase mastery of content into a well-planned lesson. Better learning happens in a dynamic classroom setting in which teachers guide and offer explicit instruction to learning and mastery of content. Less learning takes place in classrooms where teachers lecture and then turn control for learning and understanding content over to students.³³ **Exhibit 2-32** displays the implicit high impact instructional strategies that teachers practice which enables greater student master if skills and content.

³³ <https://www.winginstitute.org/effective-instruction-delivery>

Exhibit 2-32
Teaching Practices Recommended by Hattie (2009)



Source: <https://www.winginstitute.org/effective-instruction-delivery>

Hattie also concluded that learning is enhanced when:

- teaching is focused on and responsive to students learning needs;
- teachers are clear about what they want their students to learn and select teaching approaches in response;
- teachers explicitly explain what students need to understand;
- teachers demonstrate what students need to be able to do;
- teachers get students to mentally engage with the material the students need to learn;
- teachers give meaningful feedback to their students³⁴

RECOMMENDATION

Adopt and implement a district-wide instructional plan.

Traditional textbooks and whole group lectures are no longer best practices as the primary tools for teaching content and delivery of instruction. CPS teachers need strategies to engage in the content by loading higher level questions, small group discussions, and projects. Student engagement encourages students to bring their personal experiences and opinions to the content

³⁴ <https://www.evidencebasedteaching.org.au/hattie-his-high-impact-strategies/>

and reinforces learning and retention. The district needs consistent classroom management expectations, dynamic lesson planning with active learning opportunities for students, and instructional delivery strategies that promote mastery of content and skills. CPS teachers need an explicit focus on classroom management, and well-designed and sequenced standards-based lesson plans delivered through high impact evidence-based instructional strategies.

The BOE, superintendent, and principals should establish district-wide expectations for following a plan or instructional framework that creates Pre-K-12 continuity and consistency in effective classroom management procedures, lesson design, and instructional delivery. The plan should guide and support teachers to manage classrooms, plan lessons, and deliver instruction via research-based best practice. The plan or framework should identify the practices and behaviors that exemplify TLE's *effective*, *highly effective*, and *superior* categories and give consistency and common practice across the district's administration and staff.

The CPS instructional plan should be implemented in 2022-23 school year. Staff meetings, professional development days, PLC meetings, and grade level and content area meetings should be venues to set expectations for understanding and implementing the instructional plan. This should include pragmatic ideas and ways teachers can work together to integrate the plan into daily practice.

The next two exhibits provide additional research-based resources detailing classroom management procedures, effective lesson planning, and evidenced-based instructional strategies. **Exhibit 2-33** defines effective classroom management procedures. **Exhibit 2-34** provides an explanation of well-designed lesson plans and instruction.

Exhibit 2-33

Effective Classroom Management Procedures

1. **Nonverbal Cues:** A teacher can use subtle body movements (like proximity) or more explicit hand signals to cue self-regulation. One popular cue involves moving to the front of the room and making eye contact with the high schooler who is acting out, then pausing until you have the individual's attention. Younger students are less familiar with social cues and might require a verbal signal to accompany the nonverbal cues. Example: "What should you be doing right now?"
2. **Nonverbal Transition Cues:** Kids can become so immersed in an activity that they might not notice your attempts to shift them into the next learning event. Ringing a bell or turning lights on and off are unmistakable signals that shift attention to the teacher or a new task. Asking a class to collectively decide what signal to use can be a community builder.
3. **Timeouts:** Many studies support the timeout strategy, which is now considered an indispensable component of many evidence-based behavior management systems. Unlike the dunce cap punishment, which intentionally shames and stigmatizes students, a timeout is now used in progressive classrooms to provide an emotional breather in a less socially charged area of the room. It's also a way for students to decompress, reflect on and enhance their self-awareness, and then return to their seats with improved self-regulation.
4. **Over-Correction:** Younger students may find classroom routines foreign or overwhelming. Take the time to model the appropriate procedure and then rehearse it three times or more until each step of the routine becomes second nature. After these rehearsals, my second graders took pride in executing the required actions quickly and perfectly for the rest of the year.
5. **Notes of Praise:** A private note left on a student's desk praising improved classroom effort is a powerful reinforcement, especially when the note is heartfelt. Studies also show that sending positive letters home improves kids' self-management and decision making.
6. **Private Reminders:** When partnered with discreet praise, private reminders to students about how to act responsibly increase on-task behaviors. Researchers recommend using short and unemotional reminders.
7. **Greetings:** It might seem like an insignificant gesture but greeting students by name and making a positive statement enhances their self-regulation and increases class participation. Example: "Hey, Marcus. How is my brilliant student today?"
8. **On-the-Spot Corrections:** During a lesson, don't leave behavioral missteps unaddressed. Immediately, briefly, and without drama, cue students about responsible conduct. Example: "What should you be doing right now? Right. Let's see that happen."
9. **Mindfulness Practice:** Citing numerous studies, Emily Campbell writes that teaching a student to meditate or practice nasal breathing (inhale through the nose, exhale through the mouth) enhances emotional regulation. This animated gif helps students (and teachers) learn the technique.
10. **Notice and Comment:** The Peacebuilders website shares several "Minute Recipes for Building Peace," such as recognizing changes in student behavior and showing interest. Example: "I really like how you're acting today. Did something happen to make you feel better about your group?" Noticing and commenting sends an unmistakable and powerful message: I care.
11. **When-Then:** Intervention published by Peacebuilders, "When-Then" helps students make responsible decisions—but also leaves the choice in the students' hands: "When you start talking to me with a lowered voice, then we'll problem-solve this situation."

Source: <https://www.edutopia.org/article/11-research-based-classroom-management-strategies>

Exhibit 2-34
Features of Effective Explicit Instruction Practices

1. **Well-designed and planned instruction:** Instruction that is well planned moves students from their current level of competency toward explicit criteria for success.
 - Instructional design with clear instructional objectives: The teacher should present these objectives to students for each lesson.
 - Scope and sequencing: The teacher should teach the range of related skills and the order in which they should be learned.
2. **Instruction that offers sufficient opportunities for successful acquisition:**
 - High rates of responding for each student to practice the skill: The teacher should provide sufficient opportunities for unpunished errors and ample reinforcement for success.
 - Sufficient quantity of instruction: The teacher should allocate enough time to teach a topic.
3. **Teaching to mastery:** Students need to learn the knowledge/skills to criteria that are verified by teachers or students' peers.
4. **Teaching foundation knowledge/skills that become the basis for teaching big ideas:** Current lessons should be built on past knowledge to increase fluency and maintain mastery of material. The teacher should relate lessons to complex issues and big ideas that provide deeper meaning and give students better understanding of the content.

Source: <https://www.winginstitute.org/uploads/docs/Teacher%20Competencies%20PDF%20final.pdf>

Hattie and Marzano ranked the teaching strategies by the contribution they make to student learning which have shown to have a high impact on improving and evaluating learning outcomes. These reliable strategies can be either used in isolation or adopted school-wide or country-wide. An evidence-based approach to teaching and learning is supported by strong evidence, meta-analyses of extensive findings, crucial to maximizing student outcomes, and applicable and adaptable across subjects, students' abilities and grade levels. **Exhibit 2-35** displays the top ten teaching strategies.

Exhibit 2-35 Top Ten Evidence-Based Teaching Strategies



Source: <https://blog.edsense.in/high-impact-evidence-based-teaching-strategies/>

Hattie discovered that teachers are far more likely to have a large and positive impact on learning and achievement if they:

- are passionate about helping their students learn;
- forge strong relationships with their students;
- are clear about what they want their students to learn;

- are not afraid to be the sage on the stage;
- adopt evidence-based teaching strategies;
- monitor their impact on students' learning, and adjust their approaches accordingly; and
- seek to improve their own teaching.³⁵

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 2-10

The current CPS organizational culture is not ideal. In a quote attributed to renowned management guru Peter Drucker, “Culture eats strategy for breakfast,” so an organization with a poor culture will struggle to achieve any of its goals. Educational research strongly supports the pivotal role school culture plays in school success and improvement. Studies point to the multiple ways school culture fosters or inhibits improvement, collaborative decision-making, professional development, and staff and student learning. Many scholars agree that academic performance is closely related to school culture.³⁶ Some define school culture broadly as, “the norms within a school that can be influenced by a school’s teachers and principal.”³⁷

School culture generally refers to the way teachers and other staff members work together and the set of beliefs, values, and assumptions they share. However, it also involves establishing an environment where students feel supported, safe, and motivated.³⁸ According to Fullan (2007) school culture can be defined as the guiding beliefs and values evident in the way a school operates. ‘School culture’ can be used to encompass all the attitudes, expected behaviors and values that impact how the school operates.³⁹

Dialog and discussions in interviews and focus groups, observations, and surveys, provided the consulting team insight into the unwritten norms of CPS school culture. Some teachers/staff reported that students cannot achieve more because of historical demographics, local family history, and poverty. Teachers indicated strong adherence to some long-standing norms such as:

- “This is how we have always done things;”
- Accountability and innovative practices often wear the labels of “big city idea” that will not work in Crescent;
- “The curriculum is too hard and does not work in our small school;”

³⁵ <https://www.evidencebasedteaching.org.au/hattie-his-high-impact-strategies/>

³⁶ Deal and Peterson ‘Shaping School Culture’ Jossey-Bass e-book, Introduction ‘The research base and Impact’ p11

³⁷ <https://7mindsets.com/change-school-culture/> (Alsbury, 2008), which Short & Greer (2002)

³⁸ <https://www.jeremyanderson.org/-shop/professionaldevelopmentbundle-wwe3a-yatb>

³⁹ <https://www.ibo.org/contentassets/b53fa69a03d643b1a739d30543ca8d65/darlenefishermadrid.pdf>

- “A zero is a zero” (and reteaching is not a teacher’s responsibility); and
- “There are just a ‘few’ students who are not proficient,” despite years of low and declining student test scores.

Recent efforts to change and improve instructional practices have met resistance and push back due to the current organizational culture.

The school board and superintendent have launched expectations that CPS can be a better school and that more students are capable of improved academic achievement. The change in superintendency enabled the school board to take an objective look at the district’s culture, where it is currently functioning, and what improvements need to happen. The board and superintendent have made positive decisions and are looking at long-term goals for building on strengths and growing instructional practices. The superintendent and elementary principal are focused on improved communication by providing weekly newsletters and updates to teachers, parents, students, and community.

Some CPS teachers are committed and believe that increased accountability and continuity with curriculum and instruction are key components for instructional improvement, and that more students can score proficient and advanced on state tests. There are teachers on staff who believe all students can learn, achieve success, and are willing to put processes and procedures and adopt practices to support that belief. However, some teachers are finding it difficult to give up the cultural freedom and autonomy practiced historically. They fail to believe and understand that all students learn based on what teachers do, regardless of student background.

School cultures focus on strengths, collaboration, productivity, communication, relationships, improvement, and kindness (Peterson & Deal, 2009). Research cites a positive school culture provides a safe, supportive, encouraging, inviting, and challenging environment for students to learn and teachers to thrive. This allows Pre-K-12 student academic achievement to spiral upward. Relationships among faculty, staff, administrators, and students are founded on what is best for students and implementing best instructional behaviors and practices. It includes abandoning teaching in isolation, ineffective strategies, habits, practices, and behaviors. A healthy school culture embodies collaboration. The responsibility for the district’s success and improvement is shared by all.⁴⁰

Negative school cultures believe if students fail it is the student’s fault -- an “I taught them; they just did not learn” mentality. Anthony Muhammad (1998), a high school principal and the author of “Transforming School Culture: How to Overcome Staff” describes a toxic school culture as an environment where school staff “fails to figure out what is needed to cultivate the characteristics necessary for student growth and learning.” A toxic school culture has been described as a place where “staffs are extremely fragmented, where the purpose of serving students has been lost to the goal of serving the adults, where negative values and hopelessness reign.”⁴¹

⁴⁰ <https://www.wallacefoundation.org/knowledge-center/Documents/Three-Essentials-to-Improving-Schools.pdf>
<https://educationnorthwest.org/northwest-matters/district-s-role-school-improvement>
<https://files.eric.ed.gov/fulltext/ED556346.pdf>

⁴¹ <https://www.prodigygame.com/main-en/blog/school-culture/>

Understanding a school's culture is essential for successfully leading change. School leaders constantly search for the "silver bullet," the "reform/solution" that will solve major problems. On a rational level, school leaders understand that the ideal reform/solution does not exist. However, the excitement surrounding locating, embracing, and implementing a "silver bullet solution" may distract leaders from the important work focused on the school's underlying culture. Then, when the reform itself becomes the center of attention, failure will be blamed on the "reform initiative" and its implementation, rather than on norms and values embedded in the district's school culture. The staff will shrug it off as another failed program, while the poor culture remains.⁴² Meaningful school improvement begins with cultural change – and cultural change begins with the school leaders.⁴³

RECOMMENDATION

Implement district-wide professional development and feedback loops in order to improve the district's school culture.

Under the BOE and superintendent, along with building principals, teachers, and the community, CPS has potential for being a cutting edge, high performing school district. A critical look at the barriers and cultural norms that bind and hold the district from being their best is needed.

The BOE, superintendent, principals, teachers, students, and parents should continue to initiate awareness, opportunities for discussion and dialog regarding CPS school culture. The consulting team recommends the quarterly use of a cultural assessment survey as a starting point. It would include questions such as:

- *Communication between senior leaders and employees is good in my work area.*
- *I am able to make decisions affecting my work.*
- *CPS leaders recognize a job well done.*
- *Work expectations are clearly communicated here.*
- *Not everyone is held to the same high standard in my work area.*
- *My supervisor and I have a good working relationship.*
- *My coworkers and I have a good working relationship.*
- *Management and employees trust each other.*
- *Employees treat each other with respect.*
- *My department or work group meets regularly to plan and discuss work.*
- *I am inspired to meet my goals at work.*

⁴² <https://files.eric.ed.gov/fulltext/ED537415.pdf>

⁴³ <https://www.ascd.org/el/articles/how-do-you-change-school-culture>

- *I get excited about going to work.*
- *I am often so involved in my work that the day goes by very quickly.*
- *I am determined to give my best effort at work each day.*
- *In my area, employees adapt quickly to difficult situations.*
- *Employees here always keep going when the going gets tough.*
- *Employees proactively identify future challenges and opportunities.*
- *Employees in my area take the initiative to help other employees when the need arises.*
- *Employees here are willing to take on new tasks as needed.*
- *Employees in my department resist most types of change.*
- *I understand how my work supports the mission of CPS.*
- *I understand how my work supports the vision of CPS.*

To encourage high levels of honesty from CPS employees, the consulting team recommends that this survey be administered by an outside entity.

School leadership should take time to listen to feedback from both teachers and students to understand the experience that they are having at CPS. Leadership should stay informed of what is going on in the school and understand the attitudes and atmosphere that permeate the hallways and classrooms. Proven ways to build a positive school culture include:

- Create meaningful parent involvement.
- Model the behaviors you want to see in the school.
- Engage students in ways that benefit them.
- Encourage innovation in the classroom.
- Keep tabs on school culture and make adjustments when necessary.⁴⁴

School culture expert, Jeremy Anderson, offers one example of potentially useful professional development. He leads staff into learning how to contribute to improving overall school culture by shifting the focus to the learning culture in the classroom. He also explores the attitude and expectations of teachers and how that can help to enhance the culture within the classroom, and school.⁴⁵

⁴⁴ <https://www.prodigygame.com/main-en/blog/school-culture/>

⁴⁵ <https://www.jeremyanderson.org/-shop/professionaldevelopmentbundle-wwe3a-yatbl>
<https://www.kickboardforschools.com/school-culture-climate/5-ways-to-change-improve-school-climate-culture/>
<https://www.edtechdigest.com/2016/12/21/from-awareness-to-action-5-steps-to-change-your-school-culture/>
<https://www.weareteachers.com/8-ways-build-positive-school-culture-now/>
<https://givingcompass.org/article/the-key-to-school-culture-buy-in/>

FISCAL IMPACT

This recommendation can be implemented with existing professional development resources.

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. It also includes educational supports, such as library programming.

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

<https://www.k12dive.com/news/school-culture-change-more-effective-if-student-led/545882/>

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 substantially 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 Responsiveness to Instruction (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 the 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 2-36 shows comparison data on the percentage of special education students and the number of full-time equivalent (FTE) teachers in special education for 2019-20. CPS's identification rate, at 25.3 percent, was among the higher peer district rates, and was higher than the community group average and the state. CPS had a special education student-to-teacher ratio that was the highest of all the comparison groups except for the peer district of Empire.

Exhibit 2-36
Students and Teachers in Special Education Programs, 2019-20

Entity	ADM	Special Education Percentage of All Students	Special Education Teachers FTEs	# of Special Education Students per FTE
Crescent	557	25.3%	3.9	36.1
Cashion	632	14.6%	3.5	26.4
Comanche	924	15.8%	5.3	27.5
Empire	530	14.4%	2.0	38.2
Morrison	587	14.7%	3.7	23.3
Minco	547	14.6%	2.9	27.5
Community Group	707	15.2%	3.6	29.9
State	1,304	16.5%	8.5	25.3

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 2-37 compares district special education revenues and expenditures for 2019-20. At 93.8 percent, CPS had the third-lowest revenue-expenditure ratio among its peers, the community group, and the state. Of the districts shown, CPS was the closest in terms of spending all revenues received for special education on special education needs, without greatly exceeding those revenues. Any special education needs not addressed with special education revenues must be met with general funds, so it is important to try to keep special education spending in line with resources, when possible.

Exhibit 2-37
Comparison of Special Education Revenues and Expenditures, 2019-20

Entity	Total Revenues for Special Education	Total Expenditures for Special Education	Revenues as Percent of Expenditures
Crescent	\$432,169	\$460,539	93.8%
Cashion	\$144,464	\$637,076	22.7%
Comanche	\$605,272	\$652,829	92.7%
Empire	\$300,145	\$184,578	162.6%
Morrison	\$465,617	\$399,504	116.5%
Minco	\$243,216	\$320,272	75.9%
Peer Average	\$365,147	\$442,466	82.5%

Source: OCAS Impact Aid Letters and Prismatic Calculations, 2020

Exhibit 2-38 shows the trend in special education revenues and expenditures over time in CPS. As shown, CPS' special education revenues exceeded expenditures in 2016-17 and 2017-18. Overall, the district has kept special education spending fairly in line with special education revenues.

Exhibit 2-38
Trend in CPS Special Education Revenues and Expenditures

Year	Total Revenues for Special Education	Total Expenditures for Special Education	Revenues as Percent of Expenditures
2015-16	\$432,659	\$476,186	90.9%
2016-17	\$504,652	\$413,920	121.9%
2017-18	\$461,156	\$452,079	102.0%
2018-19	\$432,744	\$468,343	92.4%
2019-20	\$432,169	\$460,539	93.8%

Source: Office of Educational Quality and Accountability, Profiles Database

On the stakeholder survey conducted for this review, staff members were asked to assign a letter grade to various CPS functional areas. **Exhibit 2-39** provides the results for special education. As shown, most district educators (65 percent) gave special education an A or B.

Exhibit 2-39
Educator Survey Results Regarding CPS Education

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Special Education	25%	40%	15%	2%	2%	17%

Source: Prismatic Survey Results, January 2022

FINDING 2-11

The district has faced recent challenges in its special education program. Recently, the district was cited for over identification, primarily in speech. The district was also faulted for a lack of uniformity in its local identification process, lack of standardization in its screening, and for disproportionality identifying too many white students. The CPS special education director has made targeted and intentional efforts to bring the special education program into compliance with state and federal law.

In the past three years, standardized, written documents, and instructional delivery adjustments were required, and procedures and processes were implemented to meet requirements. The newly implemented program compliance procedures are working to improve, maintain, and sustain compliance and working to improve student services. The district is requiring accountability by implementing compliance procedures with fidelity. These best practice changes and streamlined procedures, are initially overwhelming. Yet, all teachers and staff are transitioning and learning to adhere to the new referral, identification, placement, instructional, and curricular and documentation processes and procedures.

COMMENDATION

CPS is commended for implementing standardized processes and procedures to support state and federal compliance and implementing visionary identification procedures and inclusionary practices.

FINDING 2-12

Although the special education director has made many recent programmatic improvements, challenges remain. CPS special education students must be taught and assessed on all OAS. Alongside implementing state and federal compliance procedures, curricula and instructional IEP modifications need continuous monitoring for progress.

As the district continues to monitor the processes and procedures that brought the district's program back into compliance, there is also a need to ensure all IEP modifications are followed and identified OAS are taught with fidelity. Even though some staff reported being overwhelmed, the new compliance procedures for documentation and fidelity for teaching standards are valid and much needed best practice improvements. The consulting team learned previously to these compliance improvements, there was ineffective monitoring, irregular documentation, and poorly implemented procedures for program oversight. There is need for implementing and improving communication processes and procedures among all stakeholders-administration, directors, regular classroom teachers, special education teachers, aides, students, and parents. This includes fine-tuning the new procedures and adjusting if needed.

CPS general education teachers, the special education teachers, and instructional aides collaborate randomly and informally. There is need for intentional dialog and discussion regarding best practices between teachers in the inclusionary classroom and the resource room. Dedicated time is needed across the district to address IEP updates, specific student performance struggles, remediation efforts, or overall instruction and learning issues. Intentional, focused, and

collaborative instructional planning between inclusionary classrooms and resource room teachers is limited. The district's special education resource rooms are available to IEP students.

Interviews and focus group dialog indicated the need for regular classroom teachers to more clearly identify the specific OAS that IEP students must master. Regular classroom teachers need to inform special education teachers and aides what sections of the daily textbook or digital assignment directly relate to and support OAS. If the IEP says to modify and complete 50 percent of the assignment, there is vague direction from the regular teacher which 50 percent of the assignment directly supports OAS. Daily and/or weekly coordination between all teachers is needed. There are district-wide inconsistencies between special education teachers, aides, and regular classroom teachers in communicating, monitoring, and coordinating student instructional and curricular needs.

Interview and focus group discussions revealed coordinated monitoring of students is needed by both regular classroom teachers and special education to determine if students legitimately need to continue in the resource room. There is need for continued growth to balance the mindset of pull out and resource room services over mainstreaming and inclusionary practices. Increased cooperation, meaningful collaboration, and fine tuning are needed with the district's movement to provide inclusionary classrooms. In some IEP cases, the resource room offers students a sheltered environment for learning. Going to the resource room also provides additional time for students to process content and a slower pace as they strive to become independent and self-directed learners. However, these instructional accommodations and supports need to be strategically and intentionally coordinated with both teachers. Continued progress is needed to ensure students are legitimately in their least restrictive environment (LRE). Creating inclusionary environments for CPS students needs improvements. Regularly scheduled times for intentional planning and collaboration are needed for both teachers to give input, direction, co-teach, or model adaptive instructional practices and ensure all OAS are taught and tested according to student IEP.⁴⁶

All school districts want to close the achievement gap and improve outcomes for special needs students. Best practices, implemented with a systems-thinking approach, help school districts of all sizes and types achieve dramatic gains in achievement and inclusion and expand services for students with disabilities.⁴⁷ **Exhibit 2-40** provides ten best practices that can improve outcomes for special education students.

⁴⁶ Research is clear that improving special education is challenging. <https://www.understood.org/en/learning-thinking-differences/treatments-approaches/educational-strategies/4-benefits-of-inclusive-classrooms>, <https://vittana.org/15-pros-and-cons-of-an-inclusion-classroom>

⁴⁷ <https://www.dmgrouphk12.com/blog/10-best-practices-for-improving-special-education>

Exhibit 2-40
Ten Best Practices to Improve Outcomes for Special Education Students

1. Focus on student outcomes, not inputs.
2. Effective general education instruction is key.
3. Ensure all students can read.
4. Provide extra instructional time every day for students who struggle.
5. Ensure that content-strong staff provide interventions and support.
6. Allow special educators to play to their strengths.
7. Focus paraprofessional support on health, safety, and behavior needs, rather than academic needs.
8. Expand the reach and impact of social, emotional, and behavioral supports.
9. Provide high-quality in-district programs for students with more severe needs.
10. Know how staff spend their time and provide guidance on the effective use of time.

Source: <https://www.dmgrouper12.com/blog/10-best-practices-for-improving-special-education>

RECOMMENDATION

Continue improving services to special education students by ensuring all receive the OAS taught and tested curricula and are supported by IEP modifications.

The CPS special education director has worked to get the program back in compliance and implemented processes and procedures for sustaining and maintaining compliance. General education teachers, paraprofessionals, and special education teachers need continued support, time for collaboration to plan instruction, and effectively and efficiently monitor and adjust efforts to maximize the LRE practices for all students.

The district should continue improving services to special education students by ensuring all receive the OAS taught and tested curricula and are supported by IEP modifications. The administration and special education director should continue to establish guidelines, expectations, processes, and procedures for sustaining and maintaining compliance and instructional improvements for students. All teachers and paraprofessionals should view continuous improvement as a priority and implement practices and procedures with fidelity.

CPS should implement ongoing, regularly scheduled time for all teachers, paraprofessionals, and instructional aides to cooperatively plan curriculum and instruction based on OAS with IEP accommodations. The curricular and instructional dialog should examine the best strategies for students, not teacher preference. The time should be spent developing lessons, reviewing resource materials and digital programs, and planning one-to-one remediation and instruction of OAS. Continuity among the rules and expectations in both classrooms should be clearly understood and enforced by all.

There should be clear criteria established as to when students need to transition back and forth between resource and regular classrooms. Both the teachers should work together closely to know the IEP student's strengths and equip the student with strategies to address their learning weaknesses. Together the teachers should engage in strategic planning and coordination in assisting the student to be independent, not dependent learners.

There should be a coordinated effort to seamlessly teach students and maximize the learning needs in the inclusionary classroom with nominal resource room support. Planning for middle and secondary students is more difficult as required courses may dictate which classrooms students must attend. Ideally, weekly planning times work best. However, a bi-weekly and monthly schedule can also serve the collaborative planning process. The purpose of teacher collaborative planning is to combine expertise and help students master OAS based on IEP requirements.

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 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 board of education 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 1st to 12th grade;
- 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 2-41 shows the trend in the gifted and talented identification rates over time. From 2015-16 to 2019-20, CPS' identification rate increased. The district's 2019-20 rate, 13.5 percent, was in line with most peers, the community group, and the state.

Exhibit 2-41
Trend in Percentage of Gifted and Talented Education Students

Entity	2015-16	2016-17	2017-18	2018-19	2019-20
Crescent	11.0%	10.2%	8.9%	11.8%	13.5%
Cashion	12.4%	10.1%	7.9%	6.4%	11.3%
Comanche	19.7%	26.8%	25.6%	31.5%	28.0%
Empire	15.2%	14.1%	12.4%	13.5%	11.2%
Morrison	13.7%	12.5%	12.1%	12.1%	10.6%
Minco	11.7%	10.4%	8.5%	9.1%	11.5%
Community Group	11.4%	11.2%	11.7%	11.2%	12.2%
State	14.2%	14.5%	13.9%	13.6%	13.4%

Source: Office of Educational Quality and Accountability, Profiles Database

According to the National Association for Gifted Children,⁴⁸ between six and ten percent of students are gifted.⁴⁹ Contrary to some common misconceptions, gifted students often need a different educational approach in order to be engaged and succeed in the classroom.⁵⁰ In 2018-19, Oklahoma allocated \$54.4 million to support gifted education.⁵¹

FINDING 2-13

The district has made some recent improvements in its Gifted and Talented program. This includes its identification process and the services offered.

This year, CPS 2nd to 8th grade students took the CogAT (Cognitive Abilities Test). Then, using the test results, staff created an updated program and initiated a pullout program for 2nd to 6th grades. The updated plan clearly details the methods CPS uses to identify gifted and talented students and describes how the students are served. The plan describes the way compliance with state statutes are met and how the program improves services to gifted and talented students, enabling them to reach their full potential.

Research supports the importance of gifted programs. Gifted and talented students and those with high abilities need gifted education programs that will challenge them in regular classroom

⁴⁸ www.nagc.org

⁴⁹ <https://www.k12dive.com/news/identifying-gifted-and-talented-students-with-equity-proves-difficult/413434/#:~:text=According%20to%20the%20National%20Association,organization%20collects%20these%20student%20statistics.>

⁵⁰ <https://www.nagc.org/myths-about-gifted-students>

⁵¹ <https://nagc.org/state-of-states>

settings and enrichment and accelerated programs to enable them to make continuous progress in school. According to one report on high-achieving students, more than seven in ten teachers of these students surveyed noted that their brightest students were not challenged or given a chance to “thrive” in their classrooms.⁵² Additionally, gifted students need gifted programming in many cases because the “general education program is not yet ready to meet the needs of gifted students” due to the lack of general educators’ training in gifted education and the pressure classroom teachers face to raise the performance of their struggling students.⁵³

Gifted programs have many benefits. Students who had participated in gifted programs maintained their interests over time and stayed involved in creative productive work after they finished college and graduate school.⁵⁴

COMMENDATION

CPS is commended for working to improve the Gifted Program by administering the CogAT in 2nd to 8th grade and starting a pullout program for gifted students.

Library Programming

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.⁵⁵ The American Library Association (ALA) has compiled a number of studies demonstrating a positive correlation between certified librarian staffing and student achievement, including a 2012 study that correlated higher Colorado reading scores in grades 3 to 10 with greater certified librarian staffing. Other organizations have also documented the positive impact of libraries and librarians on student learning.⁵⁶

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;

⁵² Loveless, T., Farkas, S., & Duffett, A. (2008). *High-achieving students in the era of NCLB*. Washington, DC: Thomas B. Fordham Institute.

⁵³ Hertberg-Davis, H. L., & Callahan, C. M. (2013). Introduction. In H. L. Hertberg-Davis & C. M. Callahan (Eds.), *Fundamentals of gifted education* (pp. 1–10). New York, NY: Routledge.

⁵⁴ Westberg, K. L. (1999, Summer). What happens to young, creative producers? NAGC: *Creativity and Curriculum Division Newsletter*, 3, 13–16.

⁵⁵ Will, M. (2016). As information landscape changes, school librarians take on new roles. *The Changing Face of Literacy*, 36(12), pp. 25-28. Below are a number of websites CPS can use to provide guidance to the staff for ensuring the library is an integral part of the curriculum.

<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> The following links are

examples of the new ideas for libraries of the 21st Century. https://www.huffpost.com/entry/8-awesome-ways-libraries-_b_7157462 <https://bookriot.com/2016/10/10/five-ways-to-have-fun-in-the-library-besides-reading/>

⁵⁶ https://www.scholastic.com/SLW2016/resources/documents/SLW_Booklet_Final_Lo.pdf

- 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.⁵⁷

According to the American Library Association, research suggests that school library programs staffed with qualified faculty members have a positive impact on students' academic success. This research shows education officials that librarians can, in fact, help students do better academically. Qualified school librarians can impact their schools in a number of ways that normally include the following:

- They are essential partners for teachers and can help students discover topics that interest them.
- They can help faculty members find current trends and resources to bring to their classrooms.
- Librarians can provide students with the information needed to improve their reading, writing, and academic growth as well.⁵⁸

FINDING 2-14

The CPS library is not yet a seamless part of the educational fabric of the district. This is a missed opportunity to support student learning and achievement.

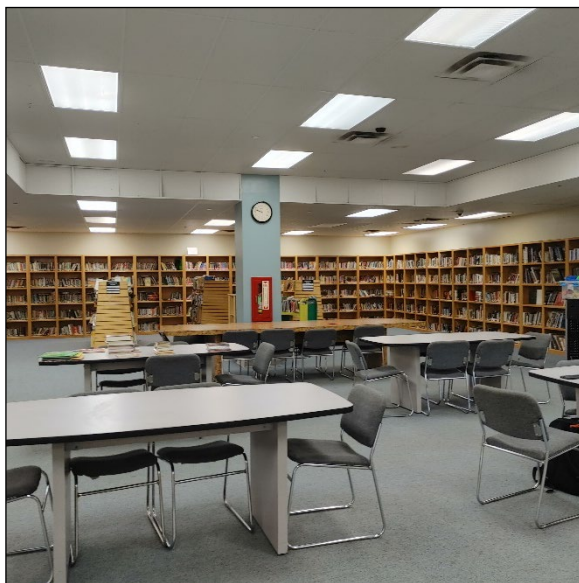
CPS employs a full time K-12 librarian who also serves as the technology director. The library also employs an instructional aide. The district recently moved to scheduled times for students and teachers visit the library rather than operating a flexible schedule. The district pairs with the local library to add and coordinate services for CPS students.

Limited curriculum coordination takes place among grade level and subject area teachers. The library media center is rather traditional in function and service (**Exhibit 2-42**). Elementary students frequent the library to check out Accelerated Reader books and recreational reading. The library offers support for reading skills from Open Court and Literacy First programs. At the time of the onsite visit, high school students were observed doing a Break-Out game in the library.

⁵⁷ <http://sde.ok.gov/sde/library-media>

⁵⁸ <http://teacherhabits.com/why-schools-still-need-libraries/>

Exhibit 2-42 CPS Library



Source: Prismatic, January 2022

Secondary students gave CPS library programming a rather lukewarm review (**Exhibit 2-43**). Only 14 percent strongly agreed that the library meets their needs. One-third (34 percent) had no opinion, which may indicate that they are not using library services at all.

Exhibit 2-43 Student Survey Results Regarding Library Services

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The school library meets my needs for books and other resources.	14%	39%	34%	8%	5%

Source: Prismatic Survey Results, January 2022

The consulting team found that the district is not fully leveraging potential library media services. This includes:

- a need to explore best practice options for more content related class and grade level library times;
- expanded opportunities for collaboration and coordinate with teachers in finding resources for OAS;
- technology integration with daily instruction;
- providing students and teachers need assistance in regularly partnering and blending science and social studies classroom assignments and activities with library resources; and

- more small group times in language arts and early childhood.

RECOMMENDATION

Continue exploring technology, instructional resources, and scheduling options that improve teacher collaboration, alignment with classroom content, student interest, integration of OAS standards.

The superintendent, principals, librarian, and teachers should work together to identify relevant, age-appropriate software and instructional materials that support and enrich OAS. The library staff should attend staff, grade level, and departmental meetings and make teachers aware of digital and hard copy library resources that can be linked to classroom content and state standards. Library resources and services should be essential components for teaching information literacy skills to students. The librarian and all classroom teachers should engage in collaborative planning. They should continuously seek options for delivering information that enables students to learn the foundations needed to become information literate.

The teachers and librarians should look for ways to implement flexible scheduling and always keep the library open to all students. The library staff should seek ways to intentionally connect the library with classroom curricula and use the AASL Framework as an initial resource to look for innovative learning opportunities to share with classroom teachers.⁵⁹

All CPS staff should understand that 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 should become instructional partners, innovation leaders, and digital-literacy scholars. They should be included in collaborative processes and contribute to innovative instructional strategies.

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;

⁵⁹ <http://sde.ok.gov/sde/sites/ok.gov.sde/files/webform/180205-AASL-frameworks-spreads-libraries.pdf>

- social services; and
- 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."⁶⁰

ASCA recommends that school counselors divide time between four components:

⁶⁰ <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 2-44 provides the trend in counselor staffing over time. CPS has doubled its counselor staffing over the last five years, while other districts have remained the same or declined.

Exhibit 2-44
Trend in Counselor Staffing Over Time

Entity	2015-16	2016-17	2017-18	2018-19	2020-21	Percent Change
Crescent	2.0	2.0	2.0	1.9	2.0	0.0% ●
Cashion	1.0	1.0	1.6	1.8	1.8	80.0% ▲
Comanche	2.0	2.0	2.0	2.0	2.0	0.0% ●
Empire	1.0	1.0	1.0	1.0	1.0	0.0% ●
Morrison	2.0	2.0	2.0	2.0	2.0	0.0% ●
Minco	1.0	1.0	1.0	1.0	1.0	0.0% ●
Community Group	1.4	1.3	1.4	1.6	1.5	7.1% ▲
State	3.1	2.9	2.9	3.0	3.1	0.0% ●

Source: Office of Educational Quality and Accountability, Profiles Database

FINDING 2-15

Although the district has made some recent improvements in its counseling programs, work remains. CPS is working to provide a comprehensive district-wide counseling program. To date, the district has not done a comprehensive assessment or review of the existing counseling services. Counselors and staff indicate there is both need and openness for improving the Pre-K-12 counseling program.

CPS employs counselors in elementary, middle, and high school. The high school counselor wrote the grant to fund the middle school counselor for three years. The counselors have initiated

discussions to improve and build a more comprehensive counseling program. The improvement dialog includes exploring social-emotional programs and seeking new ways to improve services to Pre-K-12 students.

Interview and focus group dialog indicated that counselors have added time to focus on the academic and social-emotional well-being for all students. Balancing testing coordinator responsibilities remains a time constraint issue for counselors. The counselors expressed a need to find ways to address the academic, social, and behavioral needs of CPS students. Suicide, drugs, and alcohol are reported issues students face. Interviews and focus group dialog with teaching staff revealed that the counseling staff has responsibilities and roles outside the realm of counseling, making it difficult to find time to work on social-emotional issues.

At the elementary and middle school, Second Step Curriculum is implemented. Once a month both elementary and middle school counselors present lessons in the classrooms. The curriculum offers social-emotional learning. Age-appropriate lessons teach students about school and family communications, appropriate response and behaviors, and life skills needed to succeed in the real world.

This year, the high school counselor facilitated an opportunity for students to attend a Build My Future Fair. The fair offered students hands-on opportunity to experience real jobs and skills and trades and the building industry. The high school counselor annually facilitates Individual Career Academic Plan (ICAP), which is a process that helps students engage in academic and career development activities and plan and track their personal academic, career, and personal advancement. This and testing responsibilities make it difficult to spend more time helping seniors with college scholarships. More guidance is needed in educating seniors about colleges and careers.

In focus groups, interviews, and surveys there were mixed messages regarding bullying. Some administrators and teachers do not believe that bullying is a problem. Parent and student surveys disagree with this assessment (**Exhibit 2-45**). While only six percent of staff *agree* or *strongly agree* that student bullying is a problem, 34 percent of students and 41 percent of parents believe that it is. A portion of parents (35 percent) also feel that poor student behavior is a problem in CPS. On the positive side, a large majority (79 percent) of students stated they have at least one adult on campus they can go to when they have a problem.

Exhibit 2-45
Staff, Parent, and Student Survey Responses Regarding Bullying and Counseling

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	Student bullying is a problem in this district.	2%	4%	18%	63%	12%
Staff	Sufficient student services are provided in this district (i.e., counseling, speech therapy, health).	8%	69%	14%	8%	0%
Student	Student bullying is a problem in this district.	13%	21%	25%	30%	11%
Student	There is at least one adult at school to whom I can go when I have a problem.	41%	38%	10%	4%	7%
Parent	Student bullying is a problem in this district.	21%	20%	24%	23%	10%
Parent	Poor student behavior is a problem in this district.	12%	23%	26%	35%	4%

Source: Prismatic Survey Results, January 2022

Research indicates school counseling programs have considerable influence on discipline problems. Baker and Gerler reported that students who participated in a school counseling program had substantially less inappropriate behaviors and more positive attitudes toward school than those students who did not participate in the program. Another study reported that group counseling provided by school counselors considerably decreased participants' aggressive and hostile behaviors.⁶¹ Two other studies found that elementary guidance activities have a positive influence on elementary students' academic achievement.⁶²

Comprehensive school counseling programs help provide equitable access to more educational opportunities. Through the counseling program, all students are guided to a rigorous curriculum, and can fully participate in the educational process.⁶³

⁶¹ Baker, S. B., & Gerler, E. R. (2001). Counseling in schools. In D. C. Locke, J. E. Myers, and E. L. Herr (Eds.), *The Handbook of Counseling*, Thousand Oaks, CA: Sage Publications. Omizo, M.M., Hershberger, J.M., & Omizo, S.A. (1988). Teaching children to cope with anger. *Elementary School Guidance & Counseling*, 22, 241-245. 37 Hadley, H.R. (1988).

⁶² Hadley, H.R. (1988). Improving reading scores through a self-esteem prevention program. *Elementary School Guidance & Counseling*, 22, 248-252. Lee, R.S. (1993). Effects of classroom guidance on student achievement. *Elementary School Guidance & Counseling*, 27, 163-171.

⁶³ <http://www.schoolcounselor.org/>

As defined by ASCA, a comprehensive curriculum consists of K-12 “structured lessons designed to help students attain the desired competencies and to provide all students with the knowledge, attitudes, and skills appropriate for their developmental level.”⁶⁴

RECOMMENDATION

Continue building and improving a comprehensive counseling program.

The superintendent, principals, and counselors should provide coordinated leadership for improvement. They should take the lead in the planning process, communicating the program details, and improving the overall services to students. They should ensure an improved comprehensive program is implemented across the district. They should consider the following program components when developing a counseling program:

- establishment of a teacher advisement program;
- adoption of research-based, federally approved curriculums for bullying and drug use prevention;
- creation of a district-wide personal safety, social, and academic skill development program;
- establishment of strands for crisis intervention and group and individual counseling for at-risk students; and
- adoption of a schedule for the principal and teachers to meet on a regular basis to evaluate and refine the comprehensive counseling program and services.

ASCA defines the school counselor’s primary role as to design and implement a comprehensive district-wide program that promotes student achievement and personnel well-being. The program is preventive in design and developmental in nature. The ASCA National Model guides school counselors in the development of school counseling programs that:

- are based on data-informed decision-making;
- are delivered to all students systematically;
- include a developmentally appropriate curriculum focused on the mindsets and behaviors all students need for postsecondary readiness and success;
- close achievement and opportunity gaps; and
- result in improved student achievement, attendance, and discipline.

⁶⁴ Bowers, J., & Hatch, T. (2005). The ASCA national model: a framework for school counseling programs (3rd ed.). Alexandria VA: American School Counselor Association.

The ASCA framework identifies the four key components of an effective program. They include foundations, delivery, management, and accountability.⁶⁵

CPS should clearly define program goals and develop a comprehensive district-wide plan for delivering counseling services to all students. The administrative staff and counselors should work with all stakeholders to implement comprehensive procedures and processes that drive the counseling program to enable counselors to increase their efficiency and effectiveness.

Effective district-wide counseling programs should have measurable data to analyze and determine how students are different because of counseling services. Student achievement in population subgroups and genders should have focus and attention. Student attendance patterns, discipline, and behavioral referrals also render data for program evaluation.

Board policy needs to articulate processes and procedures for the overall counseling plan. The plan's design should clearly outline the vision, scope, and job responsibilities of the district's counselors. The plan should be published, adopted by the board of education, and shared with all faculty, parents, and students. The basis and final product of the comprehensive plan should be driven by a focus to promote and enhance learning for students.⁶⁶

FISCAL IMPACT

This recommendation can be implemented with existing resources.

⁶⁵ <https://www.schoolcounselor.org/getmedia/bd376246-0b4f-413f-b3e0-1b9938f36e68/ANM-executive-summary-4th-ed.pdf>

⁶⁶ Bowers, J., & Hatch, T. (2005). *The ASCA national model: a framework for school counseling programs* (3rd ed.). Alexandria VA: American School Counselor Association.

Chapter 3:
Business Operations

Chapter 3

Business Operations

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

- A. Organization, Management, and Staffing
- B. Planning and Budgeting
- C. Accounting/Internal Control and Payroll
- D. Internal and External Auditing
- E. Fixed Asset Management
- F. Purchasing

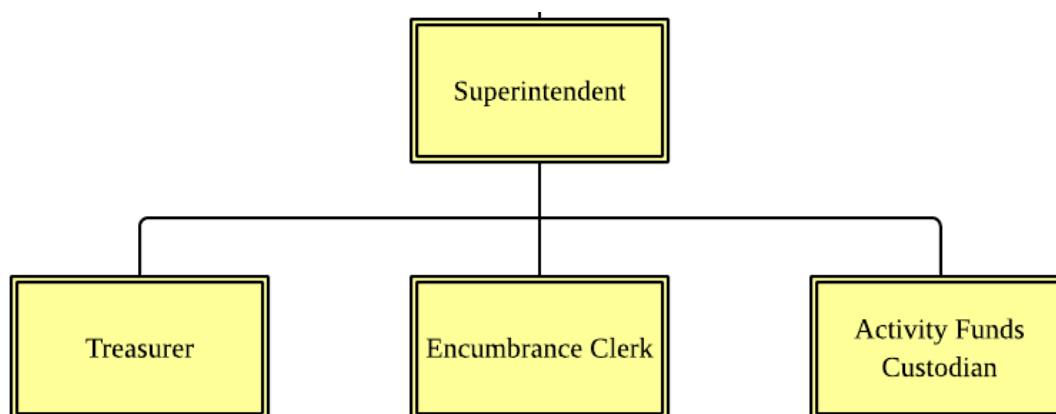
Financial, asset, and risk management in school districts require thoughtful planning and decision-making. Public school districts must meet or exceed increasingly rigorous academic standards without exceeding their budgetary resources. The superintendent and board of education must ensure that the district 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.

Exhibit 3-1 shows the organization of CPS's business operations. The CPS superintendent oversees business services and is assisted by three employees who perform various business operations. Business operation's primary duties include processing payrolls, purchase orders and payments to vendors, as well as managing the child nutrition funds. The treasurer is responsible for the general accounting and financial reporting of the district, ensuring adherence to state and federal financial regulations from the Oklahoma Cost Accounting System (OCAS). The encumbrance clerk is responsible for processing purchasing orders and the district payroll. The encumbrance clerk also serves as the administrative assistant to the superintendent. The activity funds custodian manages the district's activity funds and serves as the high school secretary.

Exhibit 3-1
CPS Business Operations Organization



Source: Created by Prismatic, January 2022

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS departments and functional areas. **Exhibit 3-2** provides the results for the business operations areas of Crescent.

Exhibit 3-2
Staff Survey Results Regarding Business Operations Functions

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Budgeting	15%	31%	8%	6%	2%	38%
Financial management	19%	29%	8%	2%	4%	38%

Source: Prismatic Survey Results, January 2022

Financial Statements

Financial statements for CPS 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. CPS prepares financial statements that include the fund types illustrated in **Exhibit 3-3**.

Exhibit 3-3
Funds Contained in the CPS 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: CPS Annual Financial Report, 2020

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 CPS district boundary had a net valuation of \$27,857,265 in 2021 and \$27,064,684 in 2020. The millage rate levied was 111.54 in 2021 and 111.62 in 2020.

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 2015-16 and 2019-20, the average assessed property value per student in CPS increased by 39.5 percent as shown in **Exhibit 3-4**. This was the second-largest increase among all the comparison groups, and more than double that of the state.

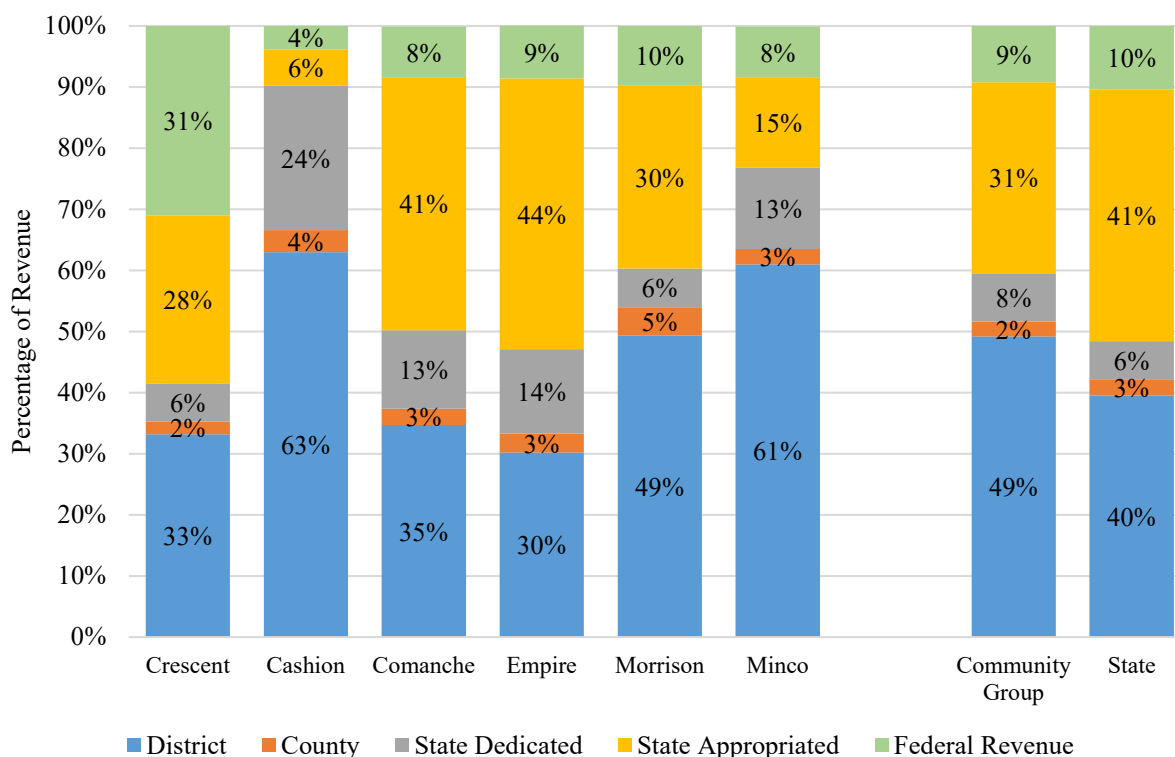
Exhibit 3-4
Trend in Assessed Property Value per Student

Entity	2015-16	2016-17	2017-18	2018-19	2019-20	Percent Change
Crescent	\$37,706	\$39,304	\$45,173	\$49,345	\$52,595	39.5% ▲
Cashion	\$123,602	\$122,272	\$151,677	\$185,464	\$175,115	41.7% ▲
Comanche	\$30,940	\$31,101	\$35,829	\$38,574	\$40,741	31.7% ▲
Empire	\$27,213	\$25,515	\$25,930	\$26,669	\$26,721	(1.8%) ▼
Morrison	\$66,729	\$65,162	\$59,713	\$66,214	\$67,176	0.7% ▲
Minco	\$114,376	\$83,669	\$83,907	\$104,227	\$102,483	(10.4%) ▼
State	\$49,623	\$49,471	\$52,219	\$55,097	\$57,746	16.4% ▲

Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 3-5 shows the percentages of district, county, state, and federal revenues for CPS and its peers. CPS had the highest percentage of revenue from federal sources among peers, community group, and state. CPS had the lowest percentage of revenue from state-dedicated, state-appropriated and county sources, and second lowest in district sources among all comparison groups.

Exhibit 3-5
Breakdown of Revenues by Source, All Funds, 2019-20



Source: Office of Educational Quality and Accountability, Profiles Database

Exhibit 3-6 shows the trend in revenue sources for CPS, the community group, and state. The CPS district and county revenue percentage was less than both the community group and the state most years. The state dedicated and appropriated percentage of revenue was generally higher than the community group, all years except for 2019-20, but lower or close to the state average. The percentage of federal funding was higher than the community group and the state nearly every year.

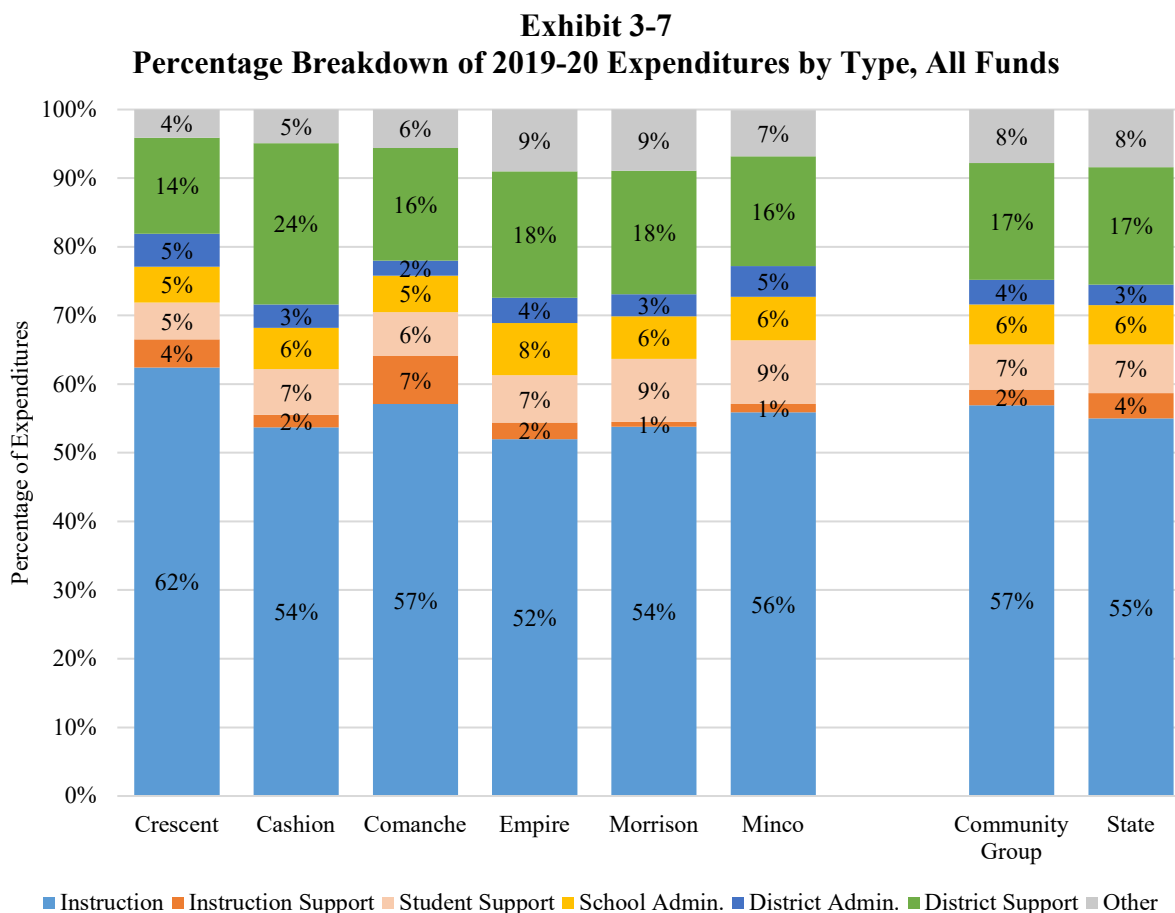
Exhibit 3-6
Sources of Revenue as a Percentage of Total Revenue, All Funds
Crescent, Community Group, and State

Source of Revenue	Entity	2015-16	2016-17	2017-18	2018-19	2019-20
District & County	Crescent	39.6%	35.2%	42.2%	41.2%	33.2%
	Community Group	48.3%	47.5%	49.2%	47.9%	49.2%
	State	42.1%	40.5%	41.5%	39.4%	39.5%
State Dedicated & Appropriated	Crescent	47.9%	37.3%	35.8%	35.1%	27.5%
	Community Group	41.6%	33.4%	29.8%	30.2%	31.3%
	State	46.3%	38.2%	37.6%	40.4%	41.2%
Federal	Crescent	12.6%	15.7%	9.9%	12.5%	31.0%
	Community Group	10.1%	8.6%	9.0%	8.6%	9.2%
	State	11.6%	11.3%	10.7%	10.6%	10.4%

Source: Office of Educational Quality and Accountability, Profiles Database

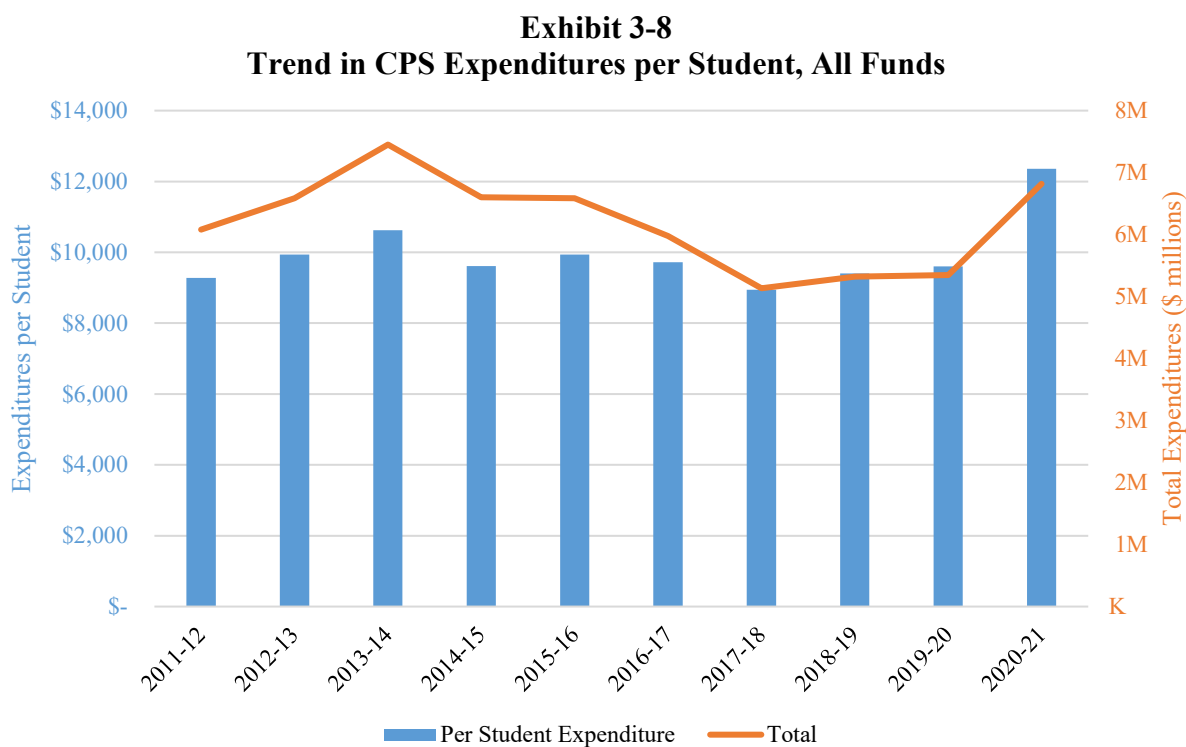
Exhibit 3-7 compares 2019-20 expenditures as a percentage of total expenditures. As shown:

- CPS spent the highest percentage among comparison groups for instruction and district administration.
- CPS spent the second-highest among peers and a higher percentage than the community group and state on instructional support.
- CPS spent the lowest percentage of all comparison groups for student support, school administration, district support, and other expenditures.



Source: OEQA, Profiles Database

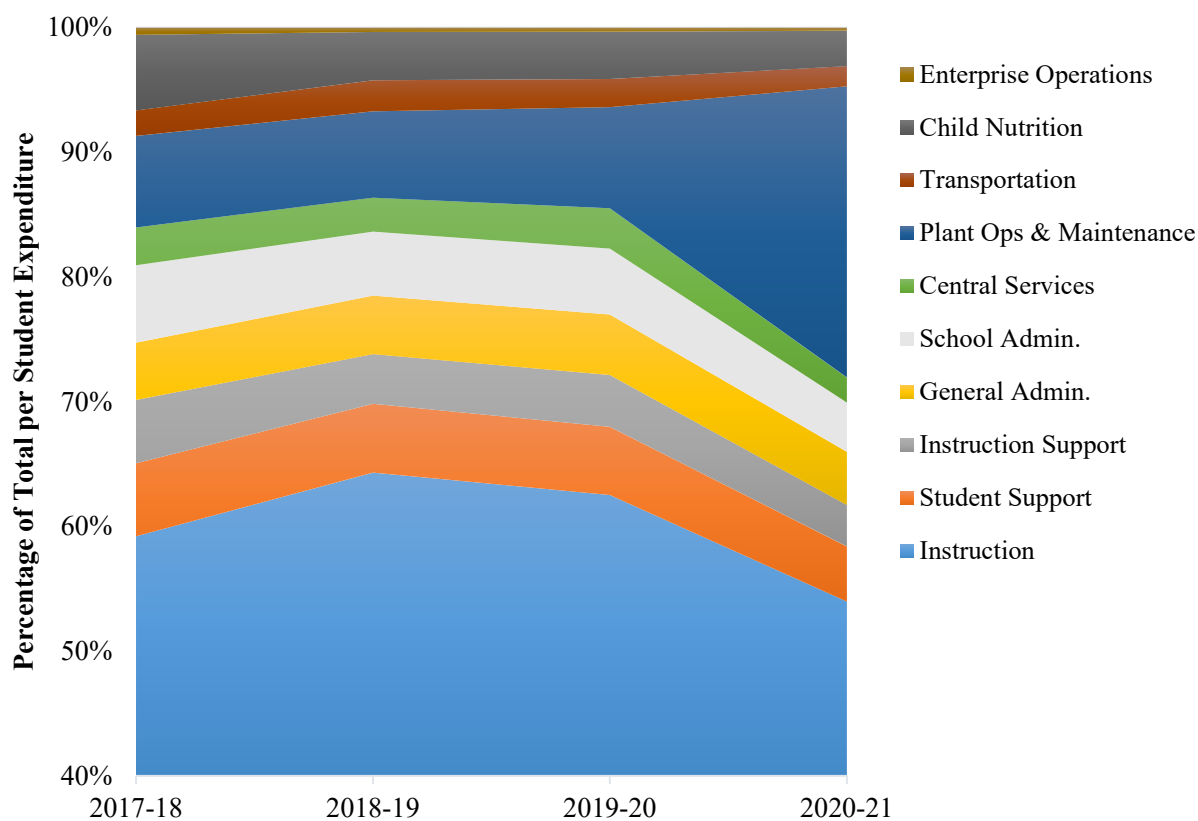
Exhibit 3-8 shows the trend in CPS expenditures per student and overall for the past ten years. While the total expenditures have fluctuated between \$5.1 million and \$7.4 million, the per student expenditures reached a maximum of \$12,355 in 2020-21.



Source: Oklahoma Cost Accounting System and Prismatic calculations

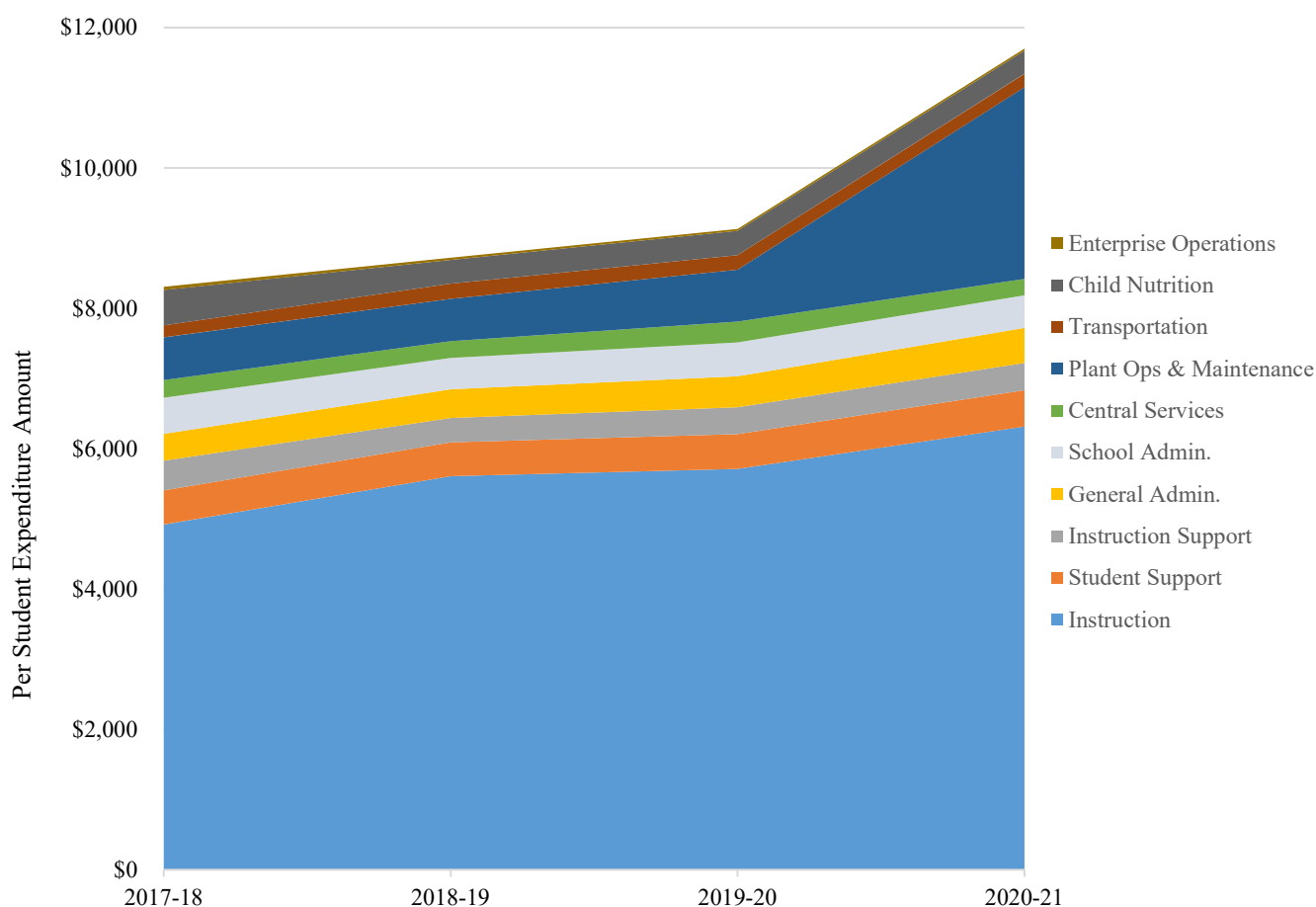
Exhibit 3-9 shows CPS expenditures per student for the past four years, disaggregated by function code as a proportion of the total expenditures per student. **Exhibit 3-10** shows the same expenditures in dollars, also per student by function code. The function code is a dimension used to describe the service or commodity obtained as a result of the expenditure. As shown, as a proportion of total per student expenditure, spending for instruction and plant operations and maintenance increased, while all other categories decreased or stayed the same. Across the time period shown, the total dollars spent per student increased in every category.

Exhibit 3-9
Proportional Trend in CPS Expenditures per Student, All Funds



Source: Oklahoma Cost Accounting System and Prismatic calculations, January 2022

Exhibit 3-10
Trend in CPS Expenditures per Student, All Funds



Source: Oklahoma Cost Accounting System and Prismatic calculations, January 2022

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 3-11** shows the table of maximum allowable balances expressed as a percentage of their general fund collections.

Exhibit 3-11
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 \$4 million for 2019-20, CPS would be able to reserve up to 25 percent as a fund balance. **Exhibit 3-12** provides the CPS fund balances for the last three years. For the last two fiscal periods shown, the fund balance remained around 8.0 percent of the general fund collections. Over the past three years, the fund balance has increased by 76.1 percent.

Exhibit 3-12
Trend in CPS General Fund Balances

	2016-17 Actual	2017-18 Actual	2018-19 Actual
General Fund Collections	\$4,572,156	\$4,967,452	\$4,697,515
Fund Balance	\$228,409	\$436,056	\$394,986
Percentage of General Fund Collections	4.8%	8.8%	8.4%
Fund Balance Year-Over-Year Change		83.8% ▲	(4.2%) ▼
Fund Balance Three-Year Change			76.1% ▲

Source: CPS Annual Audit Reports, 2016-17 through 2018-19, and Prismatic calculations

Bond Issuance and indebtedness

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 3-13** compares the district’s average daily membership (ADM), assessed property value, and bonding capacity for the last five years. As shown, ADM has decreased since 2015-16 by 11.7 percent while property value and bonding capacity have increased by 39.5 percent.

Exhibit 3-13
CPS Trends in ADM, Assessed Values, and Bonding Capacity

School Year	ADM	Assessed Property Valuation	Bonding Capacity
2015-16	631	\$37,706	\$3,771
2016-17	606	\$39,304	\$3,930
2017-18	566	\$45,173	\$4,517
2018-19	560	\$49,345	\$4,935
2019-20	557	\$52,595	\$5,260
Percent Change	(11.7%) ▼	39.5% ▲	

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 2019-20, CPS had the third-highest debt service expenditure per student of its peer districts and was higher than the community group and state. (Exhibit 3-14).

Exhibit 3-14
Debt Service Expenditures per Student, 2019-20

Entity	Debt Service per Student
Crescent	\$1,913
Cashion	\$2,042
Comanche	\$614
Empire	\$430
Morrison	\$1,823
Minco	\$5,102
Community Group	\$1,635
State	\$1,152

Source: Office of Educational Quality and Accountability, Profiles Database

A. ORGANIZATION, MANAGEMENT, AND STAFFING

School districts must practice sound financial management in order to maximize the effectiveness of limited resources and to plan for future needs. Effective financial management ensures that internal controls are in place and operating as intended, technology is maximized to increase productivity and that reports are generated that help management reach its goals.

Financial management includes the broad areas of organization, management and staffing of the financial management function, planning and budgeting, accounting/ internal control and payroll, internal and external auditing, and cash management. The district is required to manage its financial operations in conformity with the regulations and requirements of the Oklahoma State

Department of Education's (SDE) Oklahoma Cost Accounting System (OCAS) and to report their data to the SDE.

Financial management is most effective when a district properly aligns its business services functions, establishes strong systems of internal control, and properly allocates staff resources to achieve the best results. A department that is well defined in those areas is well positioned to succeed at its core functions.

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. **Exhibit 4-15** indicates that staff have a largely favorable opinion of district administrative processes.

Exhibit 4-15
Staff Survey Results Regarding CPS Administrative Processes

Survey Question	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Most district administrative processes (i.e. purchasing, travel requests, leave applications, personnel, etc.) are highly efficient.	6%	63%	22%	8%	0%

Source: Prismatic Survey Results, January 2022

FINDING 3-1

The district does not have a formal process to track the status of audit and other report recommendations to ensure that appropriate corrections are implemented. Various types of audits or reviews can occur at school districts. All types of audits, reviews, and consulting engagements include recommendations for improving operations or correcting errors. The reports recommend actions to be taken by the school district, however the district does not have a formal process to track the progress in implementing recommendations that the district concurs should be improved or changed.

The annual financial audits conducted by the district's outside auditor routinely contain recommendations. The 2016-17 through 2019-20 audits included a total of 29 recommendations. Comments were published in the reports pertaining to the actions the district planned to take to correct the reported deficiencies. However, they were general in nature, were not formally tracked to ensure the plans are completed, and occasionally the condition still existed when the subsequent year was audited.

The 2013 performance review contained more than 100 recommendations. The consulting team found that many recommendations had not been implemented and the condition still existed. As a result, similar recommendations are included in this report. Had the district rigorously tracked its work in implementing the 2013 recommendations it is likely that many of the problems those recommendations were designed to correct would not still be present.

The general public in all school districts routinely raises questions concerning the status of issues that have been identified in audits and reviews. The general public continually questions what actions are taking place and the status of recommendations made in various audits and reports. When corrective actions are taken by school districts that address the deficiencies identified in audits and reviews and are formally reported by the school district it provides assurances to the public that appropriate actions have been taken.

Without a system to track and report on the status of recommendations and explain corrections made and changes to processes to help ensure that the same errors are not continued, CPS runs the risk of failing to take needed actions in a timely manner. The board of education, superintendent, and department directors need periodic information on the current status of recommendations contained in audits and other reports in order to hold personnel accountable for implementing the recommendations. The general public needs information to have a high level of confidence that the district is taking necessary actions in a timely manner to improve operations and the education process.

Critical components of a tracking process include:

- assigning responsibility for initial identification of recommendations in reports;
- assigning specific responsibilities for addressing the recommendations;
- determining the frequency and format for reporting progress to the superintendent and the board; and
- receiving and responding to progress reports.

RECOMMENDATION

Develop and adopt a formal policy for tracking and periodically reporting on the status of audits and other report recommendations.

The superintendent should develop a process to track audits and other report recommendations and assign the responsibility to a staff member to manage the process and make periodic reports to the superintendent and board. The superintendent should assign the responsibility of addressing a recommendation to a specific staff member. The staff member may not be the sole individual that works on the recommendation but is the one that develops an action plan for implementation and is responsible for documenting progress.

Adopting a policy that requires formal tracking and reporting of corrective actions taken to address and correct deficiencies identified in audits and reviews conducted on district operations will help ensure that proper attention is given to the recommendations and that they are corrected timely and properly. Status reports will provide information not only to the board of education and superintendent, but also to the general public.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-2

The district does not have current and complete written job descriptions for the encumbrance clerk, treasurer, or activity funds custodian positions. Although the district does have job descriptions for both the encumbrance clerk and treasurer dated July 1st, 2016 they are general in nature and outdated. The district does not have any job description for the activity funds custodian.

Interviews with both the encumbrance clerk and treasurer revealed they were not knowledgeable of the items included in their job descriptions. A number of items included in the job descriptions identified functions that are not being performed nor were the encumbrance clerk or treasurer aware of the functions.

Even though no state or federal law requires job descriptions, there are practical reasons for having current job descriptions which include all responsibilities and expectations. Most importantly they present the work and expectations of the district staff but also help ensure:

- effective communication of role expectations;
- greater employee accountability;
- greater productivity;
- potential candidates' understanding of job duties;
- the ability to hire staff with needed skills and knowledge;
- timely completion of key tasks; and
- minimal duplication of effort among employees.

Failure to provide current and complete job descriptions can result in confusion as to expectations, frequent duplication of effort, and lack of performance accountability. Detailed job descriptions are the first step in planning for employees retiring or otherwise leaving the district without crippling the operations of the district.

RECOMMENDATION

Revise and update job descriptions for the encumbrance clerk and treasurer and create one for the activity funds custodian to clarify job expectations and responsibilities.

The superintendent should instruct the encumbrance clerk, treasurer, and activity funds custodian to revise or develop a new draft of job descriptions. The superintendent should then review and discuss the drafts with each employee and make revisions as necessary to ensure all required

work is identified and included in the job descriptions. These job descriptions should then be provided to each employee and incorporated into the staff evaluation process.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

B. PLANNING AND BUDGETING

An organization's budget development and management establish 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 3-3

A number of detailed financial schedules, listings, and documents are provided to the board of education by the treasurer, encumbrance clerk, and activity funds custodian. However, the reports provide limited information of the sort that enable board members to adequately monitor CPS spending and revenue collection. A set of standard reports is not provided to the board that contain budgeted revenue and expenditure information with comparative data.

Monthly listings or documents routinely provided to the CPS board include:

- treasurer's report;
- encumbrance report;
- activity fund report;
- fundraiser proposals;
- new activity fund accounts; and
- activity fund transfer requests.

It is difficult for most individuals, including board of education members, to understand financial reports unless the reports are formatted and presented in an easily understood manner. Without routine reports that present comparative financial data, board of education members and the public have limited information that would enable them to assess current year operations and compare it to previous months and years. Financial reports are also critical in keeping board of education members and the public informed on situations that impact the district's general fund balance.

As an example of monthly financial reporting, Broken Bow Public Schools, prepares monthly financial reports for the board of education that list revenues by source and expenditures by function for the period. Comparative totals are presented for the previous two years along with the budget for the current year. The monthly financial report also provides information on the district's cash and investment position. This presentation allows board members and administration to monitor the district's financial status and trends in relation to prior year's activity. It also assists the school board as they look forward to the budget adoption for the upcoming fiscal year.

RECOMMENDATION

Develop reports to the board of education that show actual revenues and expenditures compared to budgeted amounts.

A similar recommendation was included in the 2013 report. The superintendent and treasurer should develop reports that are more informative for the school board. Monthly financial reports should include types of revenues and expenditures, a comparison with the previous year's financial information, and the status of the general fund balance. A report should also be developed that shows the amount of relief funding that has been received and how the funds were expended.

Exhibit 3-16 illustrates a sample format that could be used for the general fund. Revenues and expenditures shown use the Oklahoma Cost Accounting System (OCAS) coding structure and can be expanded with more detail as needed. Similar reports using the sample format could be prepared for the building fund and child nutrition fund.

Exhibit 3-16
Example of Monthly Budget Document

Crescent Public Schools General Fund Budget Status Report Month Ended xx,xx,xx						
Description	Current Year				Previous Year	
	Estimated/ Budgeted	Current Month Received/ Expended	Year to Date Received/ Expended	Remaining Balance	Current Month Received/ Expended	Year to Date Received/ Expended
Revenues:						
Local	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Intermediate	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
State	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Federal	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Total Revenues	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Expenditures:						
Salaries	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Benefits	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Purchased Professional and Technical Services	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Purchased Property Services	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Other Purchased Services	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Supplies & Materials	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Property	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Other	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx
Total Expenditures	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx	\$x,xxx

Source: Created by Prismatic, May 2013

Exhibit 3-17 provides a sample of another report that could be prepared monthly. A report of this nature, along with charts and graphs, and a written analysis would provide the board of education and other stakeholders with the necessary financial information to understand the district's current financial position on an ongoing basis. Such an understanding of the district's financial position will help establish and maintain confidence in the CPS system of accountability.

Exhibit 3-17
Example Monthly Financial Report

Category	Previous Year Actual	Previous Year To Date	% YTD To Actual	Current Year Budget	Current Year To Date	% YTD To Budget
Beginning Balances	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
REVENUES						
Local	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Intermediate	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
State	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Federal	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Non-Revenue Receipts	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Total Revenues	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
EXPENDITURES						
Instructional Programs						
Salaries & Employee Benefits	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Professional Services	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Supplies and Materials	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Other Expenses	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Total Instructional	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Student Support Services						
Salaries & Employee Benefits	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Supplies and Materials	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Other Expenses	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Total Student Support Services	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Staff Support Services						
Salaries & Employee Benefits	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Professional Services	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Travel, Postage, Std Transp.	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Supplies and Materials	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Other Expenses	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Total Staff Support Services	\$xxx,xxx	\$xxx,xxx	xx%	\$xxx,xxx	\$xxx,xxx	xx%
Total Expenditures	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%
Ending Balances	\$x,xxx,xxx	\$x,xxx,xxx	xx%	\$x,xxx,xxx	\$x,xxx,xxx	xx%

Source: Created by Prismatic, May 2013

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-4

CPS has inadequate school and community involvement in budgetary processes. There is no public and limited (if any) staff involvement in the budget development process.

The budget is prepared by the superintendent based upon the estimates in the CPS Estimate of Needs. The public is not provided any means to be involved in the budget development process, nor are meetings held to obtain staff involvement. A calendar is not produced for the budget development process identifying dates important to the facilitation of stakeholder participation.

CPS lacks a formal process for involving community members and district employees in the budget development process. Interviews indicate the school staff is not involved or consulted for input on the budget process. A public hearing is not held prior to approving the budget. The practice has been that the board of education adopts the budget at a regular board meeting or at a special board meeting called for that purpose. As such, the budget is developed in isolation and has little support from these stakeholders. The survey results provided in **Exhibit 3-18** underscore the lack of collaboration in the current budget process.

Exhibit 3-18
Survey Results Regarding District Budgeting

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Parent	The district spends its money wisely.	15%	27%	40%	10%	8%
	The district needs to spend more of its budget on its facilities.	9%	22%	49%	17%	2%
	The district needs to spend more of its budget on classroom supplies.	18%	39%	35%	8%	0%
	The districts ask the community for input when developing its budget.	3%	10%	45%	29%	13%
Staff	Funds are managed wisely to support education in this district.	4%	55%	33%	6%	2%
	The budgeting process effectively involves administrators and staff.	8%	20%	43%	20%	8%
	My school/department allocates financial resources equitably and fairly.	6%	43%	43%	4%	4%

Source: Prismatic Survey Results, January 2022

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 other related information on their websites to ensure that all stakeholders are informed of budget processes and decisions that are being made.

Clinton Public Schools in Oklahoma has a transparent budget development process that has a commendable level of public input. The normal process for budget development in Clinton involves these steps:

1. Preliminary Budget – Prior to the end of the current fiscal year, the superintendent and other key administrators prioritize items for the following fiscal year. Many contributions for this process come from school employees and the public.
2. Preparation of Proposed Budget – After the school board approves the estimate of needs, proposed budgets are devised within the approved revenues and expenditures for the budget year.
3. Receipt of Public Comments – The school board conducts a public hearing to take all comments on financial matters, both past and future, in the district.
4. Adoption of a Final Budget – This includes any revisions due to public comments and potential program allocations received prior to this date.
5. Amending of Final Budget – Changes are made throughout the year to ensure that all expenditures have an appropriate amount of budgeted funds available and to adapt the current budget to reflect midterm allocation changes.

RECOMMENDATION

Establish a budget development process that provides for input from the public and school and department staffs.

A similar recommendation was included in the 2013 report. Involving stakeholders in budget development would help to ensure an understanding of and support for the adopted budget. Better involvement of more school and community individuals, groups, and associations will help ensure continued support and commitment to the district.

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 also facilitate better communication, understanding, and support of the adopted budget. A sample budget calendar, developed from one in use by a district of similar size to CPS, is provided in **Exhibit 3-19**. 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 3-19 Sample Budget Calendar

Date	Budget Activity
October 3	Introduction of budget process to principals and administrative staff
October 16	Submission of budget calendar to board of education (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 board of education 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 board of education on preliminary budget priorities (regular meeting)
	Invitation for board of education 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 board of education work session
January 22	Presentation of projected state revenues based on state proposed budget
	Invitation for further board of education 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 board of education approval of budget (regular meeting)
May TBD	Called meeting for board of education 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 a similarly sized district to CPS, January 2022

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-5

The district does not prepare an itemized budget. Instead, the CPS Estimate of Needs is used each year to establish the maximum expenditure limit for the district's general fund.

Although the estimate of needs includes the carryover balance, the amount of revenue the district expects to receive for the year, and expenditures for the previous year, it does not identify by type of expenditure how funds are anticipated to be expended. The consulting team was informed there were no other documents containing district budget information.

An effective budget is a financial plan that identifies revenues that are estimated to be received during the upcoming fiscal year and how funds are anticipated to be expended. Budget documents should provide the board and community with financial data in a concise manner that is easily understood and where actual revenues received and expenditures made can be compared back to the estimated amounts. To provide a reference for the estimated amounts in the budget, many budget documents provide the actual revenues received and expenditures made for the previous year or years.

There are many ways budgets can be developed. Some are elaborate and contain a great amount of data and information other than revenues and expenditures. However, all budgets need to clearly identify not only carryover funds and estimated revenues, but also identify estimated expenditures. Many small districts find that expenditures are more easily understood when identified by type of expenditure, such as salaries and supplies.

A school district's budget is most effective when it is useful to both district staff and the community-at-large in understanding the district's inner workings. A budget document has three major purposes. It serves as a communications device, a policy document, and a financial plan. School districts have an opportunity to 'tell their story' when their budgets communicate what is behind and beyond the numbers.

There is no standard for the specific data that districts should include in their budget document. The actual data that districts include in budget documents can cover many topics, not necessarily financial data. These topics can include:

- the district's mission and vision;
- a table of contents;
- an executive summary;
- a comprehensive budget calendar;

-
- average daily attendance for the last several years and growth projections for the next several years;
 - projected student enrollment by school and grade;
 - itemized requested increases from previous year;
 - revenue projections;
 - number of positions and salary cost by type and location for several years;
 - per pupil cost and comparison to peer and neighboring districts; and
 - charts and graphs in color when appropriate.

Many school district budgets include comparative data in easy-to-understand formats to provide additional information to readers. Schedules are included for each department that present budgeted amounts by summarized categories such as salaries, benefits, operating, and capital, with comparisons shown for the budget year to the previous two to three years. Also, budget documents contain schedules showing positions by department for the current year compared to the previous four or five years and comparative schedules for revenues by source.

Presenting detailed budget data provides district decision-making with information that helps them to make informed decisions. It further provides the public with information that helps them understand where funds for district education are expended. Presenting the budget on the district's website provides all individuals interested in obtaining information on the district's budget with an easily accessible location to obtain the data.

RECOMMENDATION

Develop a budget document that clearly identifies types of estimated revenues and types of expenditures.

The superintendent, with the assistance of the treasurer, should develop an annual budget that, at minimum, identifies the carryover amount from the previous year, the revenues estimated to be received, anticipated expenditures by the object of expense, and the carryover that should be available at the end of the year. The annual budget could be further enhanced by including appropriate non-financial data that helps stakeholders to understand budgeting decisions and likely future scenarios. The budget document should be presented to the board for approval.

Exhibit 3-20 shows an example of a simple budget format that uses OCAS revenue and expenditure classifications. This example could be used as a format for CPS. Should additional identification be desired, OCAS provides coding for a further breakdown for each of the major classifications shown in the example.

Exhibit 3-20
Example of Budget Document

Description	Current Year Budgeted		Prior Year Actual	
	Detail	Total	Detail	Total
Fund Balance, July 1, XXXX		\$x,xxx		\$x,xxx
Revenues:				
Local Sources	\$x,xxx		\$x,xxx	
Intermediate Sources	\$x,xxx		\$x,xxx	
State Sources	\$x,xxx		\$x,xxx	
Federal Sources	\$x,xxx		\$x,xxx	
Total Revenue		\$x,xxx		\$x,xxx
Expenditures				
Salaries	\$x,xxx		\$x,xxx	
Benefits	\$x,xxx		\$x,xxx	
Purchased Professional and Technical Services	\$x,xxx		\$x,xxx	
Purchased Property Services	\$x,xxx		\$x,xxx	
Other Purchased Services	\$x,xxx		\$x,xxx	
Supplies & Materials	\$x,xxx		\$x,xxx	
Property	\$x,xxx		\$x,xxx	
Other	\$x,xxx		\$x,xxx	
Total Expenditures		\$x,xxx		\$x,xxx
Estimated Fund Balance, June 30, XXXX		\$x,xxx		\$x,xxx

Source: Prismatic Services, May 2013

FISCAL IMPACT

This recommendation can be implemented with existing resources.

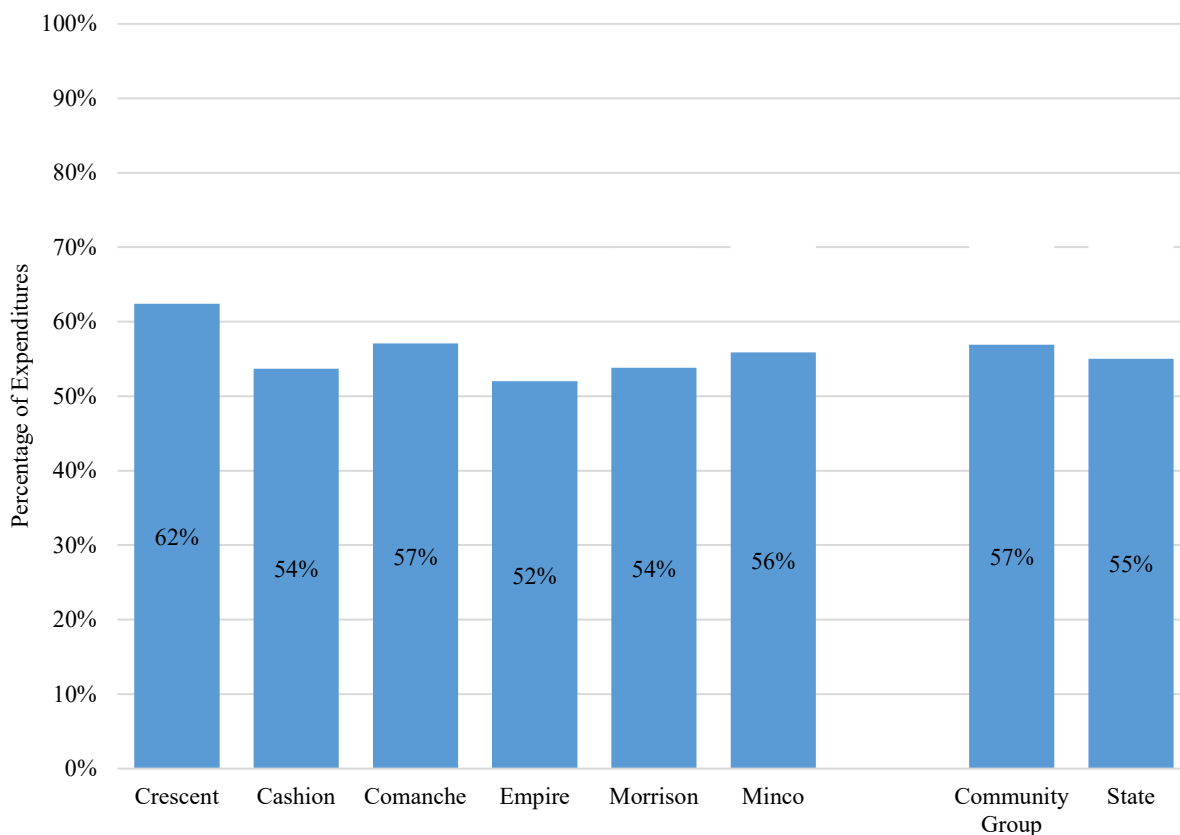
FINDING 3-6

The district consistently expends a higher percentage of funds on instruction than its peers. While the district does not have a specific process that it follows when developing its budget, CPS leaders try to include as much funding as possible in the instruction category. District policy CA states:

Because of resource limitations, there is sometimes a temptation to operate so the fiscal concerns overshadow the educational program. Recognizing this, it is essential that the district take specific action to make sure education remains central and that fiscal matters are ancillary and contribute to the educational program. This concept shall be incorporated into the board's operations and into all aspects of district management and operation.

As shown in **Exhibit 3-21**, this focus on instruction has resulted in a higher percentage of expenditures on instruction than was found in any of the peer districts, the community group, or the state as a whole. In 2018-19, CPS spent an even higher percentage, 65 percent, on instruction.

Exhibit 3-21
Percentage Spent on Instruction, 2019-20, All Funds



Source: OEQA, Profiles Database

COMMENDATION

CPS is commended for consistently expending a higher percentage of funds on instruction than peer districts and the state overall.

FINDING 3-7

The district does not have a general fund balance policy that provides guidance for the fund and routine status reports are not provided to the board. The state allows districts that have general fund revenues of \$4,000,000 to \$4,999,999 to maintain a fund balance that does not exceed 25 percent.

The district has historically had varying fund balances each year. **Exhibit 3-22** shows a summary of the financial activity and balances in the general fund for 2012-12 through 2019-20. At the end of 2015-16 the district's general fund balance was a negative \$429,963. Since the end of

2015-16, the district has been successful in eliminating the negative balance and as of the end of 2019-20, the district's general fund balance as shown in the audited financial report for June 30, 2020 was \$394,986 or 8.3 percent.

Exhibit 3-22
Trend in CPS General Fund Balances

Year	Beginning Balance	Revenues	Expenditures	Adjustments	Ending Balance
2012-13	\$859,549	\$4,850,876	\$5,291,099	\$11,074	\$430,400
2013-14	\$430,400	\$5,053,195	\$5,113,408	\$19,722	\$389,909
2014-15	\$389,909	\$4,650,268	\$4,955,768	\$3,773	\$88,182
2015-16	\$88,181	\$4,652,091	\$5,170,241	\$0	(\$429,963)
2016-17	(\$429,963)	\$4,586,313	\$4,138,272	\$0	\$18,078
2017-18	\$18,078	\$4,572,156	\$4,361,825	\$0	\$228,409
2018-19	\$228,409	\$4,759,805	\$4,552,158	\$0	\$436,056
2019-20	\$436,056	\$4,738,585	\$4,779,655	\$0	\$394,986
Percent Change	49.0% ▲	2.0% ▲	10.0% ▲	(100.0%) ▼	(8.0%) ▼

Source: Audited financial reports 2012-13 through 2019-20 and Prismatic calculations, February 2022

A formal policy on general fund balance provides specific guidance to district management regarding what the district's fund balance goal should be and what steps, within statutory limits, should be taken to reach and maintain that goal.

A district's general fund balance policy should outline what the board considers to be an adequate balance to maintain sufficient cash flow, cover emergency expenditures, adjust for revenue shortfalls, and avoid excess balance penalties or paying interest on non-payable warrants. Fund balance is a measure of the financial stability of a district and is an integral part of the budgeting process. Districts that are fortunate enough to achieve a substantial fund balance should also include policy guidance as to what priority needs should be funded.

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 is based on unique characteristics and needs.
- Unreserved balances are no less than 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.

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 percent). Should the general fund balance drop below a minimum level of eight percent (8 percent), 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 3-23** shows a sample of the data included in that report. This report is shared with the superintendent and the school board.

Exhibit 3-23
Example Fund Balance Projection Report

Expenditure Classification	2014-15 Activity	2015-16 Activity YTD Activity	2015-16 Projected Activity	2015-16 Total Activity	Increase/ (Decrease)
BEGINNING FUND BALANCE					
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
REVENUES					
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)
EXPENDITURES					
Total Expenditures	\$22,390,608	\$21,329,397	\$540,382	\$21,869,778	(\$520,830)
ENDING FUND BALANCE	\$2,776,000	(\$5,238,018)	\$7,041,424	\$1,803,405	(\$972,595)

Source: Guthrie Public Schools, February 2016

RECOMMENDATION

Establish a general fund balance policy to provide guidance on how to achieve the minimum required balance, provide a desired fund balance range, and require fund balance status reports to the board of education.

A similar recommendation was included in the 2013 report. The board of education should provide guidance through the fund balance policy that establishes a minimum balance, 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 board of education will help the members monitor the fund balance and better understand of the impact of actions that impact the balance.

The consulting team suggests that CPS aim to meet a standard of maintaining at least two months of regular general fund operating expenditures as recommended by the GFOA. In 2019-20, general fund expenditures totaled \$4,779,655 so the district should aim to maintain a balance of around \$800,000, which is approximately two months (or one-sixth) of total expenditures.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-8

Financial reports are not routinely prepared to show the operation and status of the child nutrition program. In addition, the district does not maintain a separate fund that accounts for financial data pertaining exclusively to the child nutrition program.

Almost no data are included in the monthly reports prepared for the board of education for the child nutrition fund. The only data provided are contained in the Revenue Analysis which shows the amounts received for lunches, breakfasts, and child and adult care. All other financial data are combined with other general revenue data. The district's annual audited financial statements do not include information for the child nutrition fund as it is combined with general fund data.

Without reports, the child nutrition director, district management, and board members do not have crucial financial data available. They lack the tools to readily determine if the child nutrition program is operating in a financially prudent manner.

Without a separate fund, it is more difficult to determine whether the program is operating on a break-even basis and to account for a fund balance from year to year. Staff were not aware if a separate child nutrition fund had ever been used. Financial data pertaining to the child nutrition program is recorded in the district's general revenue fund. Although it is not uncommon for districts in Oklahoma to include child nutrition revenues and expenditures in their general fund, most use a separate fund.

The SDE provides guidelines for accounting for child nutrition financial data in a separate fund and provides reports for data recorded by districts in a separate fund. Managing the program

using a separate fund is much easier than trying to manage it in the general fund where child nutrition revenues and expenditures are accounted for using only unique coding. A separate fund enables a district to more easily maintain a complete and accurate set of records for all revenues, expenditures, and transfers pertaining to the program.

RECOMMENDATION

Require the use of a separate fund for the child nutrition program and develop reports for the child nutrition fund that show fund balances, revenues, expenditures, and whether the program is making or losing money.

A similar recommendation was included in the 2013 report. **Exhibit 3-24** provides an example of a format that the superintendent and treasurer could use for monthly or quarterly reports. Summary reports prepared either monthly or quarterly that show a limited number of revenue and expense categories would provide staff, management, and board members with easily understood financial information for the child nutrition program.

Exhibit 3-24
Child Nutrition Program Financial Status for Period XX

	Current Period	Year-to- date	Previous Year Totals
Beginning Balance	\$x,xxx	\$x,xxx	\$x,xxx
Current Revenue			
Federal	\$x,xxx	\$xx,xxx	\$xx,xxx
State	\$xx	\$xx	\$xx
Local	\$xx	\$xx	\$xx
Total Current Revenue	\$x,xxx	\$xx,xxx	\$xx,xxx
Current Expenses			
Salaries	\$xx	\$xx	\$xx
Benefits	\$xx	\$xx	\$xx
Food Products	\$xx	\$xx	\$xx
Supplies	\$xx	\$xx	\$xx
Other	\$xx	\$xx	\$xx
Total Current Expenses	\$x,xxx	\$xx,xxx	\$xx,xxx
Revenue Over/(Under) Expenses	\$x,xxx	\$x,xxx	\$x,xxx
Adjustments to Prior Year			
Estopped Warrants	\$xx	\$xx	\$xx
Lapsed Encumbrances	\$xx	\$xx	\$xx
Total Adjustments	\$x,xxx	\$x,xxx	\$x,xxx
Revenues Over (Under) Expenses and Adjustments	\$x,xxx	\$x,xxx	\$x,xxx
Ending Balance	\$x,xxx	\$x, xxx	\$x,xxx

Source: Prepared by Prismatic, May 2013

FISCAL IMPACT

This recommendation can be implemented with existing resources.

C. ACCOUNTING/INTERNAL CONTROL AND PAYROLL

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 3-9

Although the encumbrance clerk's process for completing the district's monthly payroll has shown to produce accurate employee payments, it is difficult to identify what adjustments were made from the previous month's payroll. There is not a formal process to document changes made from previous month's payments, which makes it difficult for the superintendent to determine the changes and have confidence she approves of the changes.

The encumbrance clerk receives documents each month for employees absent from work, substitute teachers filling in for absent teachers, and employees doing extra work. After all the changes have been entered into the payroll system for the month, a payroll authorization report is run and given to the superintendent to review and approve. Although the payroll authorization report provided to the superintendent shows the amounts to be paid to each employee, changes made during the month including extra duty pay is difficult to determine.

Without a formal process that tracks changes to employee records and produces a listing of the changes including overtime and extra pay it is difficult for the superintendent to adequately review and approve specific changes. A process that reconciles changes to the previous month's payroll totals and produces a listing of changes helps ensure all necessary changes have been made in the payroll system and provides a means for the superintendent to approve changes.

An Oklahoma school district, Haworth Public Schools, completes a thorough balancing of the district's payroll each month to ensure that all employees are paid accurately. Prior to running the actual monthly payroll that produces employee pay and deduction warrants, the Haworth treasurer completes a process known as balancing. The balancing begins with totals from the previous month's payroll, recording any changes that occurred (such as changes to gross wages, net wages, or deductions) and arriving at new totals for the current payroll. This process provides the treasurer with totals for the current payroll that can be compared to totals produced from the payroll system. Preliminary payrolls are run from which totals are reconciled back to the totals that the payroll clerk/treasurer has compiled, and any corrections can be made prior to printing warrants. Reconciliations ensure that all changes that impact an employee's pay warrant have been accurately entered into the automated payroll system prior to completing the final payroll and submitting report to banks for direct deposit.

RECOMMENDATION

Develop a payroll reconciliation process to provide the superintendent with a listing of changes made from the previous month's payroll for easy approval.

The encumbrance clerk should develop a process for reconciling the district's payroll. The reconciliation process should use the totals from the previous payroll and then identify add or

deduct amounts for changes during the month using the calculated new totals to ensure the current payroll is correct. The added and deducted amounts should be sufficiently identified to enable the superintendent to easily review what the changes are for. The reconciliation should be reviewed and approved by the superintendent prior to the final payroll being processed. The process will not only provide the superintendent with information on overtime, extra work, and substitute payments but will provide an internal control step by having a second review of changes made to employees' pay.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-10

CPS does not have written desk procedures that document the important daily duties of the encumbrance clerk, treasurer, and activity funds custodian. The activity funds custodian has only a two-page document that identifies in limited detail her processes. In addition, the district does not have staff cross-trained to perform business operations duties. Should either the encumbrance clerk or treasurer be absent from work for an extended period of time, it would be difficult for CPS to complete its responsibilities.

For internal controls to operate effectively, all employees need a documented reference source detailing how they perform their assigned duties. An employee desk manual is much more detailed 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.

Districts must be mindful that separation of duties is important in daily processes but having staff cross-trained to perform critical processes in emergency situations is also critical. Written procedures increase internal control by helping to ensure processes are performed correctly. Without written directions, employees complete their duties based on verbal directions that were often received quite some time ago and have since likely become stale.

Additionally, without a written reference, employees often improvise and develop their own ways to complete tasks. Processing transactions in an unapproved manner can lead to errors. A desk procedures manual covers the activity steps with a sufficient degree of detail that enables an individual who uses it for the first time to perform the steps with little, if any, additional instruction. It is important to list specific forms used, computer screens accessed, fields on the screen in which information is entered, as well as identifying other positions that supply information for the procedure or to which it sends information. Many times, employees find the process is more understandable when a flowchart is included.

Some school district business offices have developed excellent detailed desk procedures to use when completing their assigned duties. Desk procedures are many times placed on the district's server with individual folders containing procedures for each staff member, but all employees of the office have access to them. Each staff member has detailed explanations on a step-by-step

basis of how to complete the numerous duties that must be completed accurately and timely. For example, a desk procedure for a payroll process called “cobra-changes” details 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 five to ten 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’s 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 the letter. One copy goes to xxx, one copy goes in individual’s file and the original is mailed.

RECOMMENDATION

Develop desk procedures for the important duties performed by the encumbrance clerk and treasurer and cross-train each in the other's critical processes for emergency situations.

The encumbrance clerk and treasurer should agree on a standard format to use for desk procedures. Each should then develop desk procedures for their duties. Once they have developed the desk procedures, the superintendent should approve and determine which staff members should be cross-trained on what duties. Staff being cross-trained should review the procedures to help ensure they are easily understandable and can provide sufficient guidance to whoever performs the duties. The activity funds custodian should use the standard format and revise her procedures accordingly.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-11

The district currently deposits child nutrition receipts into an activity fund account, then later transfers them into a child nutrition account within the general fund. This is an inefficient process and can lead to an untimely transfer of funds into the child nutrition funds.

Throughout the year cash collected for child nutrition is deposited into the district's activity fund. The funds collected are then transferred to the child nutrition account in the general fund monthly. Although the practice of initially depositing monies collected for the child nutrition into activity fund accounts and then transferring the money into the child nutrition account maintained in the general fund later is not extremely inefficient, it does create some additional work and makes determining the exact amount of funds received for the program at specific times during the month more difficult. During the month, the district's accounting system does not show the true total amount of funds received for the child nutrition program. It is not until the end of the month when the amount of money collected for the program is shown in the child nutrition account.

For automated financial systems to accurately show the funds collected for programs the money collected should be deposited to the appropriate funds in a timelier manner. In addition, depositing funds to one account and then making transfers at a later time is an unnecessary task.

RECOMMENDATION

Deposit child nutrition cash received directly into the child nutrition fund instead of into activity funds.

The child nutrition director should bring all monies received directly to the treasurer instead of the activity funds custodian. The monies should be deposited into the appropriate account by the treasurer. Depositing funds collected for the child nutrition program directly into the child nutrition fund will enable the district's financial management system to more accurately reflect

the amounts collected for the program. Depositing program funds in this way will also make the process more efficient and reduce the chance of errors.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-12

CPS is diligent in documenting the receipt of materials and services. A review of vendor payment files indicated that prior to the encumbrance clerk processing payments to vendors, either the invoice or packing slip was signed by the staff member who received the merchandise or services.

If an invoice is received and no matching packing slip has been signed, dated, and submitted, the invoice is sent to the employee who ordered the material or services, and they must sign and date the invoice before payment can be made. Requiring verification of the receipt of materials and services helps to ensure that the district does not inadvertently pay for materials or services that have not been received.

COMMENDATION

CPS is commended for a process that helps ensure that the receipt of materials and services is verified before processing payments to vendors.

FINDING 3-13

The district does not have a comprehensive activity fund manual. There is no written document detailing all standardized processes to be performed by staff involved with activity funds. Without a manual that provides detailed processes on how to manage the funds, the district is at risk of not fulfilling its responsibility to properly administer activity funds.

Prior to January 2022, the district used a three-page document titled “General Regulations of Activity Funds.” In January 2022, a document titled “Activity Fund Handbook” was developed. The two documents are similar. The latest document has three forms attached for activity fund transfers, explanation for improper expenditures, and deposit records. The absence of detailed written procedures for activity funds creates risks that are unnecessary. The Activity Fund Handbook is a good resource but lacks detailed processes and sufficient forms.

Although it was reported to the consulting team that the district discusses activity fund procedures and policies at the beginning of each year, except for the activity funds custodian’s two pages of desk procedures and Activity Fund Handbook, there are no detailed written activity fund guidelines or procedures. Sponsors have not been provided with a comprehensive manual for the proper management of activity funds.

Activity fund records for the district are managed by the activity funds custodian. As monies are received, the sponsor completes a receipt for the funds received and a copy is given to the person

providing the funds. Funds received are taken to the activity funds custodian where a deposit slip is prepared and the funds deposited. Although monies are supposed to be deposited daily, annual financial audits routinely showed violations of this requirement.

As a result of recent irregularities involving activity funds, the district has begun making some changes to some activity fund processes. The use of standing purchase orders that allow personnel to make purchases without proper oversight has been almost eliminated. School district activity funds have a high potential for risk due to the number of cash transactions and the number of different people handling money. Without written procedures approved by district management, the potential increases for sponsors to violate board policies and state statutes. Written procedures are essential to maintaining proper internal controls for an organization. Ideally, written procedures are provided to all activity fund sponsors in the form of a comprehensive handbook and all staff involved in activity fund transactions are required to be thoroughly trained.

A manual normally includes standard written guidance for all district activity funds on:

- what funds may be expended;
- how receipt and disbursement transactions are to be documented;
- how to reconcile gate receipts;
- who is required to approve various transactions; and
- when cash has to be submitted to the activity account custodian.

Lawton Public Schools publishes a comprehensive manual that provides guidance for managing school activity funds. The manual, titled “Administrative Procedures for School Activity Funds,” provides 40 pages of instructions and guidelines that cover a substantial number of topics, including site administrator responsibilities, writing receipts, making deposits, and processing expenditures. The manual also has appendices containing forms, board policies, and coding examples. An associated document titled “Administrative Accounts” is updated annually for board approval and contains a list of all activity funds, showing the account names, source of revenues for the account, and the approved expenditures for which the funds in the account may be used.

The manual containing policies and procedures for managing the district’s activity funds provides principals and sponsors with a written resource on how they should prepare the various documents related to activity funds. The annual document of activity funds approved by the board provides guidance on what revenues may be deposited to the activity accounts and the purposes for which funds may be expended.

The manual is on the district’s website for easy reference by anyone needing information on the district’s activity fund procedures. Having it on the website also ensures that the most up to date version is available. **Exhibit 3-25** provides the table of contents for Lawton’s activity funds manual.

Exhibit 3-25
Index for Lawton's Activity Fund Manual

Administrative Procedures For Student Activity Fund	
General Administrative Procedures	Pages
Administration	1 - 4
Site Administrator's Responsibilities	5 - 6
Budget Process	7 - 8
Revenue	9
Fund-Raising Activities	10 - 12
Receipts & Deposits	13 - 16
Collection of Fees-Tuition Extended Day	17
Expenditures	18 - 22
Miscellaneous	23 - 26
Transfer of Funds Between School Activity Accounts	27
School Activity Fund Reporting Process	
Site Custodian's Report	28 - 29
End of Year Reporting	30
School Activity Fund Profit/Loss Process	31 - 32
Student Store/Concession Inventory	33 - 35
Ticket Reconciliation Process	36 - 38
Request for Field Trip	39
Activity Fund "Hot Spots"	40
Appendix A - Forms	
Appendix B – Board Policies	
Appendix C – Coding Examples	
Appendix D – Forms and Examples	

Source: Lawton Public School's Website(February 2022) <https://www.lawtonps.org/browse/197807>

RECOMMENDATION

Enhance the CPS Activity Fund Manual by adding detailed procedures for all processes and additional forms, then ensure all personnel involved in activity fund transactions are properly trained.

A similar recommendation was included in the 2013 report. The activity funds custodian should develop a manual that clearly states how funds are to be administered for all activity funds. Once approved by the superintendent, it should be provided to principals, teachers, and sponsors involved with activity funds. The manual should be placed on the district's website and all staff with activity fund responsibilities should be adequately trained. A manual will also provide a good reference for new principals, teachers, and sponsors.

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 funds custodian 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 should be issued a receipt book only upon receipt of this affidavit.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

D. INTERNAL AND EXTERNAL AUDITING

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;
- adherence to applicable law and regulation; and

- efficiency and effectiveness of operations.

FINDING 3-14

CPS does not have a formal policy for rotating and competitively soliciting external auditors. Selecting an external auditor without using a competitive process does not provide CPS with assurance that they are selecting the best firm to provide auditing services.

CPS contracts with an external auditor to conduct an annual financial audit and prepare the annual estimate of needs. The current auditor is on Oklahoma's approved auditors list and has been providing audit services beginning with the June 30, 2016 audit. The district's practice has been to extend the audit arrangement with the auditor after the auditor submits its audit report.

GFOA recommends that "Governmental entities should undertake a full-scale competitive process for the selection of independent auditors." GFOA also recommends that governments choosing an external auditor actively seek the participation of all qualified audit firms including the current one, assuming its past performance was satisfactory. Although Oklahoma law requires that a selected auditor must be on an approved list, it does not require the competitive selection for auditing services. The cost of auditing services is not the sole determining factor when contracting for professional services; however, sound business practices and standards of independence indicate that periodic evaluation is prudent. Many school districts have established policies requiring periodic use of a competitive process for the procurement of external audit services.

RECOMMENDATION

Develop a policy requiring competitive proposals for professional independent financial auditing services at a designated interval of at least every five years.

A similar recommendation was included in the 2013 report. The superintendent should draft a policy requiring a competitive solicitation of financial audit services at least every five years and submit it to the board for review and approval. Rotation of audit services helps ensure that district financial practices and internal controls are periodically reviewed from a fresh perspective. Routinely soliciting proposals and qualifications from external auditing firms through a competitive process enables districts to obtain and review the qualifications from interested firms and to select the one that offers the best qualifications at a reasonable price.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

E. FIXED ASSET MANAGEMENT

Fixed asset management involves managing the district's physical assets in a cost effective and efficient manner. Effective fixed 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 3-15

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. CPS does not have any formal policies or guidelines to direct the 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 2015-16 through 2019-20 audited financial statements of CPS, 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. CPS does not have a complete listing of its fixed assets where additions and deletions are made as they occur, or a 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 theft occurs.

An itemized inventory is needed for insurance purposes. Should items be destroyed due to a fire or other disaster, the district would need some documentation to show what items were destroyed.

Performing inventories of items located in all offices and classrooms takes time. The inventories should also provide the information needed to fulfill the purpose for which the inventories are conducted and should not contain information that is not needed or include equipment that should not be inventoried.

Policies normally address many issues pertaining to an entity’s investment in fixed assets. Policies include guidelines for 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 the accounting;
- responsibility and 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 the inventory;
- receiving donated property; and

- transferring assets between schools and departments.

To protect investments 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 and 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 taken. Normally, the board of education 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.

A similar recommendation was included in the 2013 report. The board of education should adopt a detailed fixed asset policy to provide guidance on how district fixed assets are to be managed. The Oklahoma Cost Accounting System (OCAS) procedures manual differentiates coding for equipment at \$2,500. Therefore, the district should consider adopting a threshold of \$2,500 to remain in compliance with the OCAS requirements. Once the board of education approves the policy, the superintendent should communicate the new policy to staff and begin implementation. A physical inventory should be performed, and the results used to create a computerized inventory listing of all items over the established threshold.

A system to track fixed assets and a set of fixed asset policies should help ensure that the district's investment in fixed assets is being managed as desired by the board of education. The system should protect investments by assigning accountability and holding staff accountable for the proper care and protection of district assets.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

F. PURCHASING POLICIES, PROCEDURES, PLANNING, AND OPERATION

An effective purchasing system allows a school district to receive quality materials, supplies, and equipment in the right quantity in a timely, cost-effective manner. Purchasing includes those activities involved in the identification and purchase of supplies, equipment, and services needed by the district, as well as the storage and distribution of goods. Goods and services must be obtained according to the specifications, at the lowest responsible cost, and within state laws and regulations, including the state's purchasing and bid requirements and the School Laws of Oklahoma.

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 3-26** provides the results for purchasing. More than half of the staff (52 percent) gave purchasing an A or B, but one-third (33 percent) had no opinion.

Exhibit 3-26
Staff Survey Results Regarding Purchasing Functions

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Purchasing	21%	31%	8%	6%	0%	33%

Source: Prismatic Survey Results, January 2022

FINDING 3-16

The district requires all purchase orders from district funds to be approved by the superintendent; however, the process uses hard copy forms. Using hard copy documents for review and approval is inefficient.

When staff need to acquire services or materials, they normally prepare a purchase request/purchase order form. Sometimes an email is submitted to the encumbrance clerk providing information about what staff wants to purchase and the encumbrance clerk completes the form. The encumbrance clerk enters all purchase requests into the financial management system. The encumbrance clerk then prints a completed hard copy purchase request that is taken to the superintendent to approve.

The district's financial management system is capable of automating this process. When staff need services or materials the system is capable of allowing staff to access purchase orders, enter the information needed, then electronically submit the request to the encumbrance clerk. The encumbrance clerk can then review the information on the purchase order, ensure funds are available, make any needed corrections or add additional information, and then forward it be approved electronically by the superintendent. After the superintendent's approval the encumbrance clerk can finalize the purchase order and print the completed purchase order.

An efficient purchase order process automatically sends a purchase request to the appropriate staff member for review and approval. Once approved, the purchase order is automatically created, eliminating the need for data entry. Ultimately, it removes the requirement for people to physically route purchase orders for review and approvals using physical paper or email and streamlines the process.

RECOMMENDATION

Require use of the automated purchase order component of the district's financial management system.

The encumbrance clerk should develop procedures for the use of the automated purchase order process. Once the procedures are developed and approved by the superintendent they should be placed on the district's website and all staff trained on the process.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 3-17

The district requires board approval of all vendor payments prior to releasing the warrants to vendors. Requiring board approval delays the payment to vendors and creates an unneeded staff process.

Payments to CPS vendors are delayed until the board of education approves a list of warrants ready to be paid. All warrants have to be approved by the board of education at monthly meetings prior to the warrants being released to vendors. However, this is essentially duplicative, as the board has previously approved the encumbrances of funds for specific purposes in prior meetings.

Also problematic in the current process is that invoices received a few days prior to a board meeting do not get board approval until the following month, delaying payment to the vendor for well over a month. The delay in payments could impact the amount that the district has to pay for materials and services. Vendors could possibly be adding a higher price to their supplies or services to account for the time they are without their payments.

Warrants presented to the board of education for approval are for purchases of materials/supplies or services that have already been received by the district. Since the materials/services have already been received by the district, the district is legally bound to make a payment to the vendor and the approval by the board of education provides little if any value to the process.

Timely payments to vendors are an important component of a district's purchasing and payment program. When vendors know they are going to be paid in a timely manner after they provide materials/supplies and services in compliance with contract and purchase order provisions it improves relations with vendors and in many instances reduces cost.

RECOMMENDATION

Authorize the superintendent and encumbrance clerk to release payments to vendors without prior school board approval and provide the school board with listing of payments made for information purposes.

The board of education should delegate to the superintendent and encumbrance clerk the authority to release warrants in payment of materials and services without approval of the school board. Payments to vendors will be improved by delegating approval of warrants to the superintendent and encumbrance clerk. The board of education can still provide oversight of all warrants issued by the district by receiving the list of warrants.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

Chapter 4:

Facilities Use and Management

Chapter 4

Facilities Use and Management

This chapter addresses the facilities use and management of Crescent Public Schools (CPS) 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:

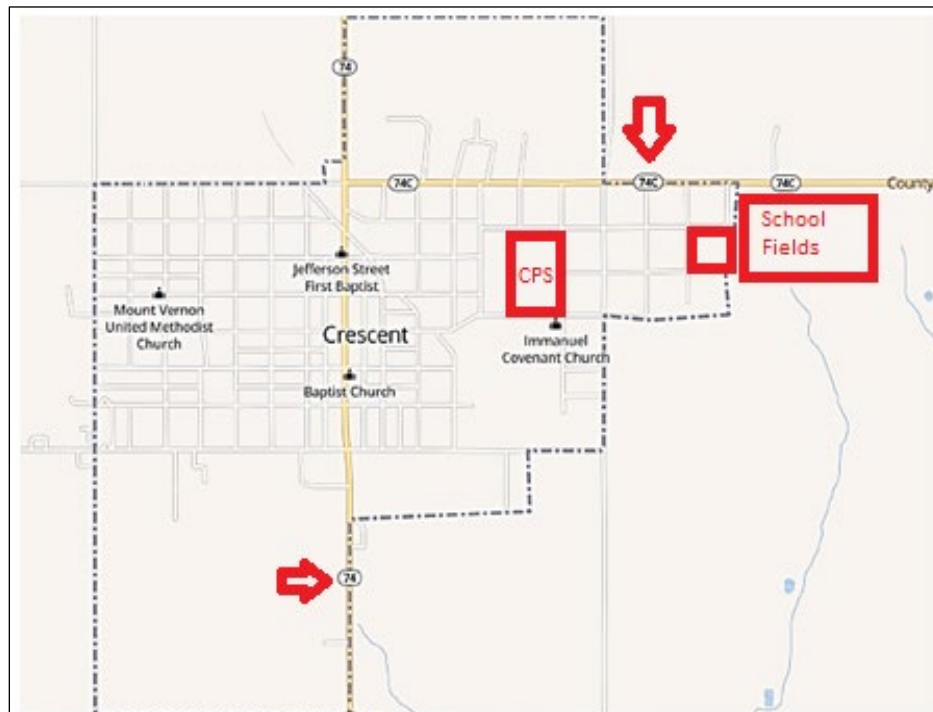
- planning and designing facilities to meet educational standards and to provide a physical framework that enhances learning conditions;
- properly maintaining and cleaning facilities so that teaching and learning can take place in a healthy and clean environment;
- providing regulated access to individuals and groups, and school and community organizations for use of the facilities after hours and on weekends;
- operating the facilities in a manner that uses all forms of energy in the most frugal manner possible;
- 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

CPS has three schools and serves the Town of Crescent and surrounding area in Logan County. The Town of Crescent's founding dates back to 1889 and the Oklahoma Land Run. In that year, William Brown opened a general merchandise operation consisting of a covered wagon and a tent. His neighbor, Benjamin Ryland, joined him a few months later as a business partner. They upgraded their enterprise to a log cabin. W. F. Mock built another log cabin opposite of theirs and operated it as a hotel, bakery, and restaurant. A post office was established on February 21, 1890, and christened Crescent City, in reference to the shape of the moon when the first commercial enterprises were established. In 1893, the town was incorporated and the 1900 Census counted 139 inhabitants.

Exhibit 4-1 shows the boundary enclosing one square mile of city land incorporated in 1893. Its shape remains essentially the same today. The location reference crossing of Oklahoma State Routes 74 and 74C is located slightly northwest at the boundary. Route 74 runs north-south, while 74C runs east-west.

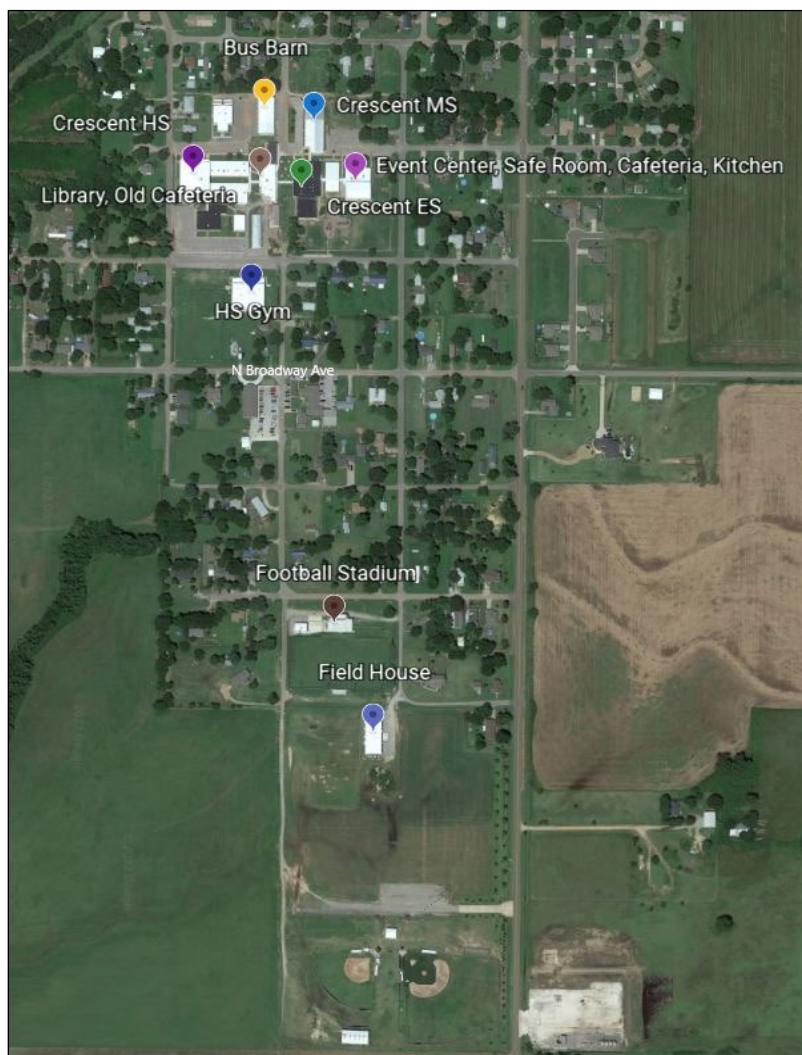
Exhibit 4-1
Crescent's Plat and Street Map at the Intersection of State Roads 74 and 74C



Source: Prismatic, January 2022

Exhibit 4-2 provides an aerial view of the CPS campus. The fields are in a separate location.

Exhibit 4-2
Aerial View of CPS Campus and Facilities



Source: Google Earth, March 2022

Exhibit 4-3 provides an inventory of CPS facilities and various pertinent data. In total, the district has approximately 186,395 square feet of facilities in the inventory.¹ The building inventory's replacement cost is \$29,886,905, and the contents are valued at \$2,712,119. The oldest roof is over the band room, installed in 1975. The new cafeteria/event room/storm shelter roof was built in 2021.

¹ These floor area figures are taken from July 2021 insurance policy documents provided by the school district.

Exhibit 4-3 CPS Facilities Inventory

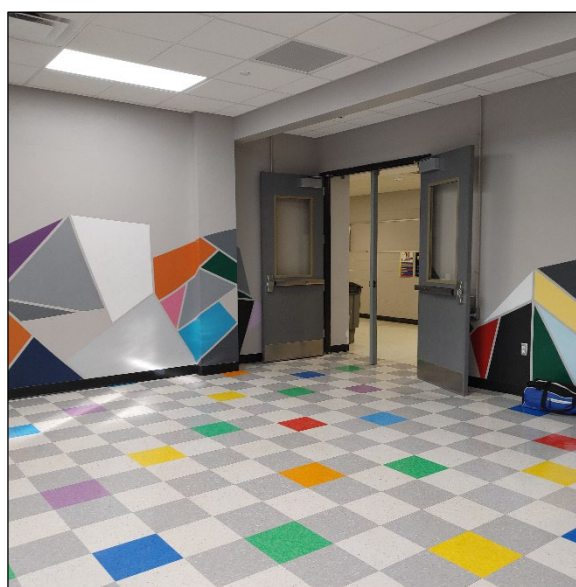
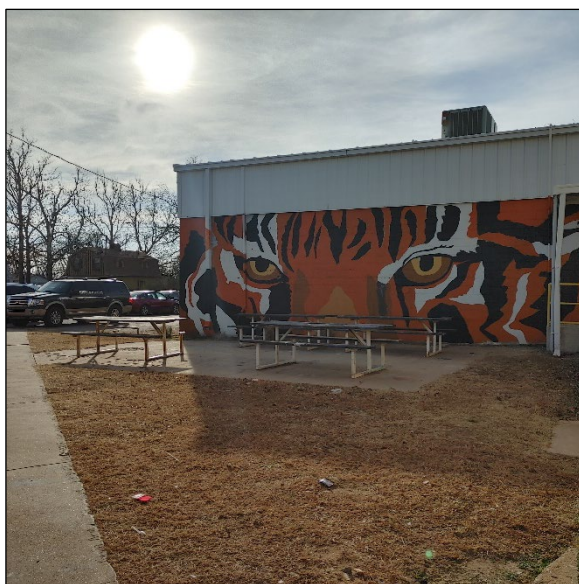
Facility Name	Address	Building Value	Contents Value	Roof Year	Floor Area (Sq. Ft)
Bus barn	105 N. Magnolia	\$661,005	\$66,101	2015	8,250
FFA Classrooms, Shop	105 N. Magnolia	\$912,843	\$94,140	2015	6,254
Early Learning Center	106 N. Magnolia	\$810,000	\$100,776	2015	6,000
ES Carpet Gymnasium	106 N. Magnolia	\$2,359,125	\$138,920	2015	17,475
Event Center, Safe Room, and Cafeteria	106 N. Magnolia	\$4,750,000	\$150,000	2021	14,824
HS, Administration	106 N. Magnolia	\$4,638,149	\$742,104	2015	30,903
Library	106 N. Magnolia	\$71,470	\$58,1393	2003	5,322
New ES	106 N Magnolia	\$5,235,828	\$138,920	2020	19,369
3 Flagpoles	106 N. Magnolia	\$6,956	\$0		
Brick Sign	107 N. Magnolia	\$5,217	\$0		
Grandstands & Press Box	200 N. Fir	\$299,115	\$0		5,865
8 Floodlights & Poles	201 N. Fir	\$59,034	\$0		
Scoreboard	202 N. Fir	\$14,748	\$0		
Visitor Bleachers	202 N. Fir	\$35,000	\$0		
Concession Stand / Restroom	203 N. Fir	\$294,456	\$11,591	1990	1,200
Flagpole	204 N. Fir	\$2,320	\$0		
Goal Posts	205 N. Fir	\$3,477	\$0		
New Football Field-Fencing	206 N. Fir	\$42,741	\$0		
Irrigation & Sodding	207 N. Fir	\$35,821	\$0		
Concession Stand and Restrooms	208 N. Fir	\$76,500	\$11,591	1990	1,500
Show Barn	3W, 1.5 N, Dover	\$665,550	\$23,184	1998	13,050
Wash Rack 3W, 1.5	3W, 1.5 N, Dover	\$6,150	\$1,156		
Scoreboards	911 E. Sanderson	\$38,209	\$0		
New SB, BB Field Fencing	912 E. Sanderson	\$19,697	\$0		
Softball, Baseball Lighting	913 E. Sanderson	\$143,286	\$0		
Concession Stand, Restrooms	914 E. Sanderson	\$85,680	\$12,750	2016	1,680
Baseball dugout	915 E. Sanderson	\$28,560	\$1,156	2016	560
Baseball dugout	916 E. Sanderson	\$20,400	\$0	2016	400
Softball dugout	917 E. Sanderson	\$24,480	\$1,156	2016	480
Softball dugout	918 E. Sanderson	\$21,420	\$0	2016	420
Hitting house	919 E. Sanderson	\$280,500	\$18,547	2016	5,500
Batting cage	920 E. Sanderson	\$11,593	\$0		
Bleachers, Awnings	921 E. Sanderson	\$11,593	\$0		
MS	E. Jefferson	\$1,822,500	\$247,935	2003	13,500
Band Room	N. Elm	\$1,048,410	\$75,350	1975	7,766
Covered Walkways District-Wide	N. Elm	\$11,593	\$0		
Field House	N. Elm	\$2,506,676	\$401,068	2015	11,712
Generator Building	N. Elm	\$30,240	\$6,000	2021	225
Gymnasium	N. Elm	\$1,878,951	\$300,632	2015	12,000
Storage Facility	N. Elm	\$92,241	\$11,938	1990	1,200
Weight Room	N. Elm	\$132,000	\$98,411	2015	1,200
Playground Equipment	N. Elm	\$46,371	\$0		30,903
Total		\$29,886,905	\$2,712,119		217,558

Source: Compiled by Prismatic from CPS data, March 2022 ²

² This table was created by Prismatic from the Property Schedule from CPS's current insurance policy. Some information has been consolidated but the total figures have not been changed from the original.

Exhibit 4-4 provides a look at some of the district's use of art and color to create inviting exteriors and interior spaces in CPS.

Exhibit 4-4
CPS Use of Art and Color



Source: Prismatic, January 2022

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 absolute 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 district leaders 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 providing 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).³ 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*.⁴ The guidelines were developed to assist the local board of education, 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 excellent resource for facility construction is *An Administrator's Guide to School Construction Projects*, also published by SDE.⁵

- **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.⁶

³ Council of Educational Facility Planners International. (2004). *Creating connections: The CEFPI guide for educational facility planning*. Can be purchased at <http://creatingconnections.a4le.org/>

⁴ <http://digitalprairie.ok.gov/cdm/singleitem/collection/stgovpub/id/9456/rec/4>

⁵ <http://sde.ok.gov/sde/sites/ok.gov.sde/files/CI-AdministratorsGuide.pdf>

⁶ A detailed, space-by-space inventory is not available from CPS.

- **Enrollment Projections:** Effective planning requires accurate enrollment projections at least five years into the future.⁷ 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.
- **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 improvements 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.
- **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.⁸

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 4-5** provides the results for facilities planning. Only 38 percent gave facilities planning an A or B; 8 percent gave it a D or F.

Exhibit 4-5
Staff Survey Results Regarding Facilities Planning

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Facilities planning	15%	23%	15%	6%	2%	38%

Source: Prismatic Survey Results, January 2022

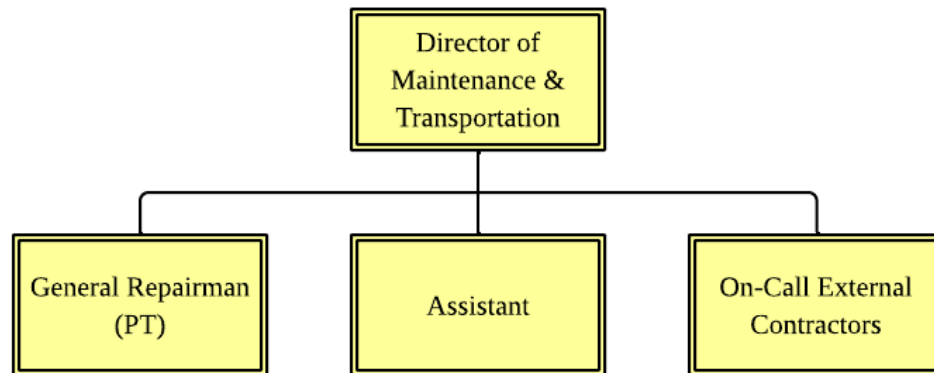
FINDING 4-1

The district has not invested sufficiently in maintenance staffing. Perhaps this is due to some past financial difficulties. The current maintenance director is not likely to continue working in his current position many more years.

The current organization of maintenance and transportation is shown below in **Exhibit 4-6**. The maintenance director is also the transportation director. He has a part-time general repairman and an assistant. The district relies upon external contractors for work beyond that of the in-house staff's capacity.

⁷ No official enrollment projections are available from any sources for CPS.

Exhibit 4-6
Organization Chart of CPS Maintenance



Source: Created by Prismatic, February 2022

The CPS maintenance director is technically a part-time employee. He is paid for four hours of work per day and volunteers the rest of his time typically amounting to an additional eight hours, for a total of 12 hours per day during a typical four-day work week. By his own description, he has always seen himself as an “interim solution,” who plans to retire for a second time “any time within 12 to 18 months.” The current director’s service in interim solution status reflects a selfless and loyal attitude that supported CPS during a period of great financial difficulty that caused the school district to shed all programs that Oklahoma public education law does not absolutely require to be offered. The current part-time repairman is not being groomed as the director’s successor because he has declared his intention to pursue an alternative career.

The current director is a retired superintendent, high school principal, and teacher. Despite his experience, he has never formally studied facilities maintenance. Perhaps due to a lack of background and likely due to recent financial constraints, the director practices basic facilities maintenance purely on a reactive basis. When a component requires repair or replacement, it is repaired/replaced, typically requiring the expertise of an outsourced contractor on an emergency procurement basis.

Succession planning is not often found in school districts, but it is a management best practice. Succession planning is especially valuable in circumstances where the district is rural and the pool of available applicants for jobs is small. Typical succession planning includes several elements:⁹

- anticipate the district needs, considering growth factors, the economy, community, age of staff, likely retirements, financial resources, and timing. Determine both the district’s short and long-range goals as an organization. Chart the district’s vision for the future (strategically plan). Identify the type of leaders needed to get the district there and develop a profile of what the district is looking for the position that will be open;

⁹ Hanover Research. (2014). *Best practices in succession planning*. Retrieved from <https://www.hanoverresearch.com/media/Best-Practices-in-Succession-Planning.pdf>

- adopt the attitude that the district will search for candidates proactively before a vacancy happens. Establish recruiting practices that help with this. These recruiting practices can range from seeking interns, partnerships with other organizations, sharing staff with another district, and outsourcing;
- provide for distributed leadership throughout the district's organization which recognizes and allows motivated individuals, no matter their position, to lead. Deepen the district's leadership pool by creating a deep bench of experienced staff who assume leadership;
- once potential leaders are identified, mentor/coach them and continue to give them opportunities to experience leadership;
- for specific positions, as existing staff departure approaches, provide for overlap of tenures to allow the new person to benefit from training next to the person that is leaving. The longer the time they have together, the better the outcome. Practical experience is the best training; and
- annually evaluate the district's planning for succession.

RECOMMENDATION

Transition from the current part-time maintenance and transportation director to an experienced, full-time maintenance and transportation director within the next 18 months.

This transition should include provision for fair and equitable compensation that includes a salary of \$50,000 to \$60,000 plus benefits for a full-time, state-of-the-art practitioner of facilities maintenance and student transportation.¹⁰ The ideal candidate will have:

- a demonstrated ability to structure preventive maintenance protocols;
- facilities master planning experience; and
- technology expertise to include work order creation and management as a part of the preventive maintenance protocol.

Ideally, the district will plan for one month of overlap work between the outgoing and the incoming directors.¹¹ The focus of this overlap should be on existing records and documents, keys, and the location of all system shut-off valves, circuit breakers and similar devices.

The new director will, by default, serve initially as a change agent. Straightforward discussion of concerns and issues should help mutual understanding and agreement.

¹⁰ <https://www.appa.org/facilities-manager/succession-planning/> This article is especially relevant to facilities maintenance because the APPA is a direct source of educational facilities management.

¹¹ While many articles and books on job succession planning advocate an overlap period, the role of overlap is typically to help the incoming person have a smooth transition. In this case, the overlap is as described above: for the person leaving to make sure a transfer of information is the sole focus.

FISCAL IMPACT

The incumbent director of maintenance and transportation works 12-hour days and is paid for four hours per day. Assuming a minimum of \$50,000 plus 32 percent benefits for the new director. The district will need to budget \$66,000 per year for the position. The transition would likely take place during the second half of 2023-24.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Transition to a new maintenance and transportation director.	\$0	(\$33,000)	(\$66,000)	(\$66,000)	(\$66,000)

FINDING 4-2

The district does not have a facilities master plan to guide the financial or facility management decisions of the district. Facilities master planning is an essential activity for any school district of any size. Without a master plan, the district runs the risk of overbuilding, underbuilding, or otherwise spending on facilities that do not meet district needs sufficiently.

CPS facilities planning is not guided by a regularly updated and ongoing facilities master planning document. Historically, facilities planning at CPS has instead been initiated only in preparation for a future bond issue and is returned to a state of dormancy once the scope of the bond issue has been completed.

CPS lacks processes and data for developing and maintaining a long-range, continuous facility plan that addresses issues from building maintenance to students' educational needs. Neither the school board nor the leadership team of CPS is engaged in active facilities master planning. This leaves unclear if board members are encouraged or expected to bring forward their own facilities planning proposals, or if their role is viewed more passively as one of approving or denying the proposals of others.

Facilities planning is not just about new construction or big projects. Rather it includes a broad spectrum of actions, including, but not limited to, the following:

- properly and realistically funded facility maintenance and operations activities, including preventive and reactive maintenance tasks, operational energy efficiency improvements, custodial services, and many other tasks aimed at keeping buildings safe, clean, healthy, and conducive to teaching and learning;
- major and minor capital improvement projects, such as additions, renovations, replacements, facility adaptive reuse projects, or upgrading of building systems or elements;
- proper staffing of maintenance and custodial functions, supplemented by outsourcing as needs may arise;
- land and facilities sales or acquisitions; and

- new construction.

Districts that engage in facilities master planning systematically identify and collect the data needed to inform decision-making in the facilities master planning process. Major data collection activities include:

- periodic building condition assessments;
- demographic, economic, and geographic development trends;
- building capacity and space use; and
- any other research or data collection efforts needed for decision-making, such as redistricting, building additions, building closures, and mobile classroom management.

There are additional best practices to consider for the components of the plan. The long-range facilities master plan for a school district is a compilation of district policies and statistical data that provide a basis for educational facilities to meet the changing needs of a community. As noted in resources developed by the Association for Learning Environments (A4LE), formerly CEFPI,¹² effective long-range school facilities master planning incorporates the elements previously described as lacking at CPS.

RECOMMENDATION

Adopt, implement, and use a continuous facilities master planning protocol.

A similar recommendation was made in the 2013 report. CPS should take the initiative to design and implement a protocol for a continuous, ongoing facilities master planning activity. As noted in one best practice resource for facilities master planning:

[Facilities Master Plans] should be developed with a wide range of community stakeholders to ensure that multiple perspectives are included. Many districts find community workshops to be beneficial in both understanding the facility needs of each school and in building support for the plan and any future financing efforts. Finally, approval by the Board of Education (BOE) demonstrates the significance of the Facilities Management Plan and that the plan has a high level of support.¹³

In this process, the district may find it necessary to keep specific details of the plan confidential until such time that they can be openly shared with the public, but it should use public workshops to discuss alternatives before deciding on the best course of action.

Additional implementation steps should include:

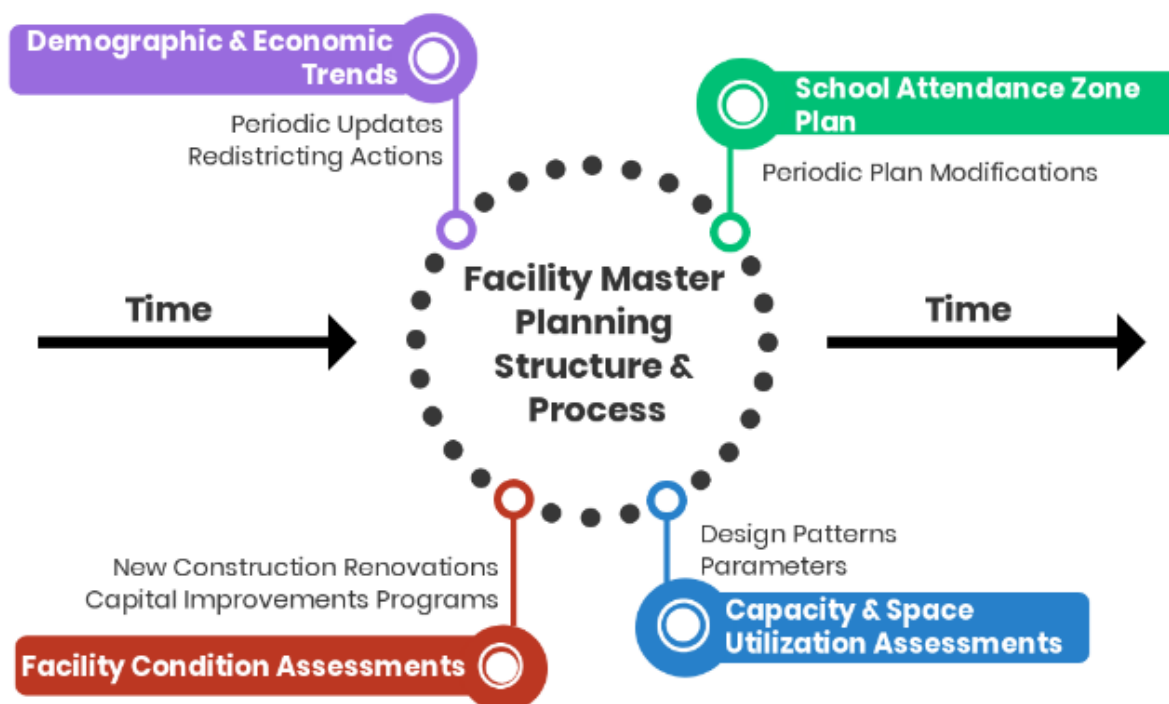
¹² Council of Educational Facility Planners International. (2004). *Creating connections: The CEFPI Guide for Educational Facility Planning*. Can be purchased at <http://creatingconnections.a4le.org/>

¹³ Ibid.

1. CPS should consider hiring a facilities master plan consulting team on a retainer basis. This will have a fiscal impact but may be desirable for the first few years of activity on continuous facilities master planning. The hired facilities master plan consulting team would serve as designated committee staff, and would be tasked with preparing all minutes, reports, or other committee records and correspondence. In addition, the consulting team would perform building condition assessments annually on four or five facilities, completing all buildings during a cycle of five to six years.
2. The district should form a permanent CPS Master Plan Committee, with committee membership determined by the BOE and district administrators. Broad community-wide stakeholder representation is desirable. The major purpose of this group would be to recommend the addition of new plan action items for approval by the BOE. The committee should meet quarterly on a standing basis, or more frequently should the need arise. Care should be taken not to overlook stakeholders from all walks of life.
3. The consulting team and the committee should operate under the purview of the superintendent.
4. A Facilities Master Plan update should be scheduled at the same time each year. This activity would require one full day, consisting of the following:
 - a. Full detailing of the Master Plan's current year, Year Zero, for full funding of all included projects and other activities, and recommendation by the CPS Master Plan Committee for approval of this year by the BOE.
 - b. Refinement of Years 1 to 9 and addition of Year 10 to complete the Master Plan's time horizon. Each year should be discussed individually, and the overall ten-year timespan also viewed as a continuum of increasingly likely plan actions. The completed time horizon should be recommended to the BOE for approval.

Exhibits 4-7 and **Exhibit 4-8** show in diagrammatic form how a continuous facilities master planning process should function.

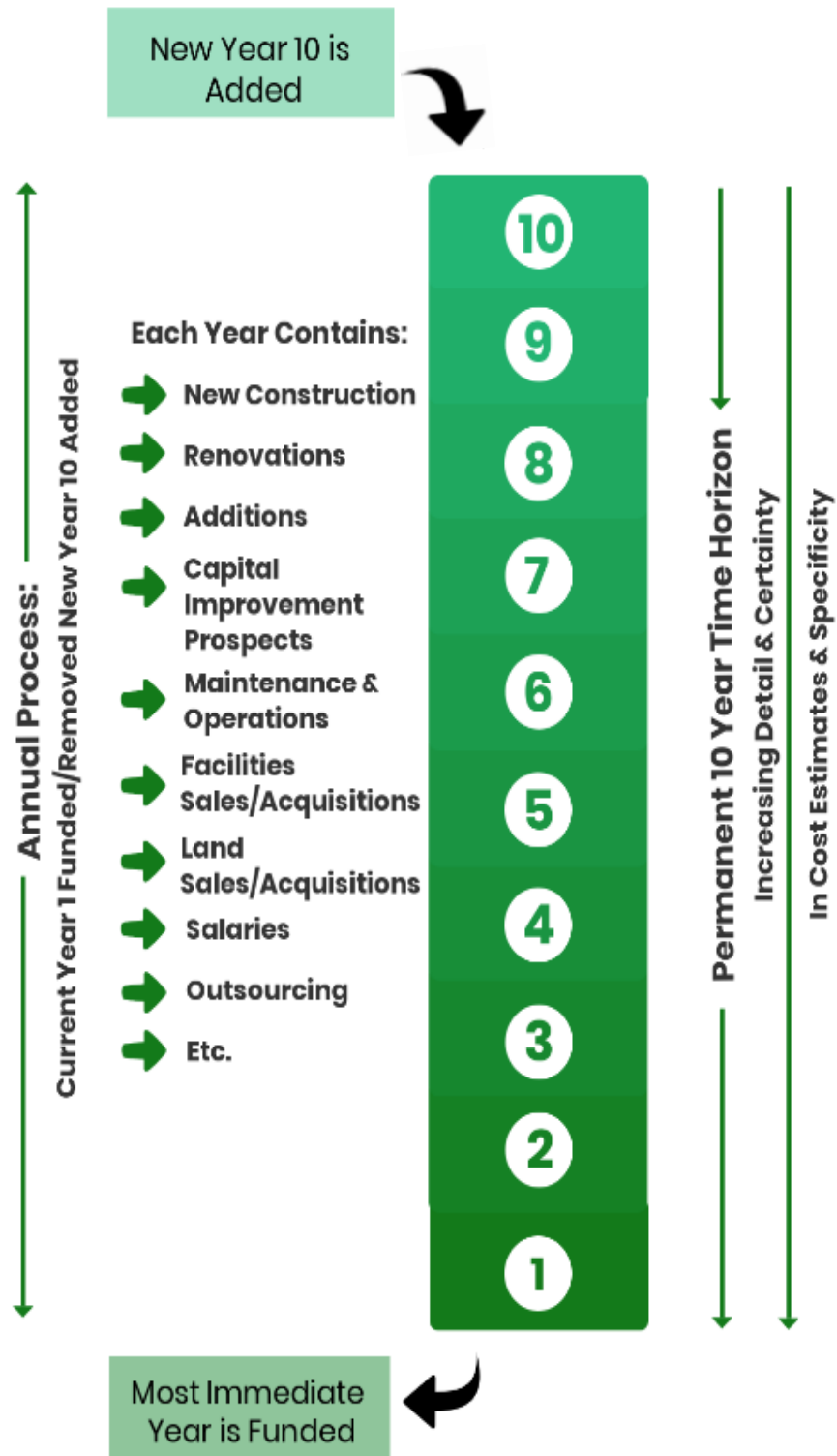
Exhibit 4-7
Facilities Master Planning Structure and Process



Source: Created by Prismatic, March 2021

Exhibit 4-8

Procedure for Maintaining a Continuous 10-Year Time Horizon



Source: Created by Prismatic, March 2021

FISCAL IMPACT

The consulting team estimates that hiring an outside qualified facility planning firm on retainer would require an annual cost of approximately \$15,000, possibly more in the initial year for that firm to reach a fuller understanding of existing conditions. The schedule is synced with the arrival of the new maintenance director. The firm hired may be a group of architects and engineers already familiar with the district, provided that the district's prior experience with the firm has been satisfactory, and facilities master planning is a service the firm provides. If such a firm is not available, the district should issue a Request for Qualifications (RFQ) to receive qualifications-based proposals. The remainder of this recommendation can be accomplished with existing resources.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Engage a consulting firm to assist with facilities master planning.	\$0	\$0	(\$20,000)	(\$15,000)	(\$15,000)

B. MAINTENANCE AND CUSTODIAL OPERATIONS

The objective of 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 of 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.

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 4-9** provides the results for facilities maintenance and custodial functional areas. As shown, somewhat higher percentages of staff gave the areas an A or B than gave it a D or F.

Exhibit 4-9
Staff Survey Results Regarding Maintenance and Custodial Functions

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Facilities maintenance	19%	33%	25%	13%	0%	10%
Custodial services	8%	38%	10%	33%	2%	8%

Source: Prismatic Survey Results, January 2022

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 can carry out their respective responsibilities.

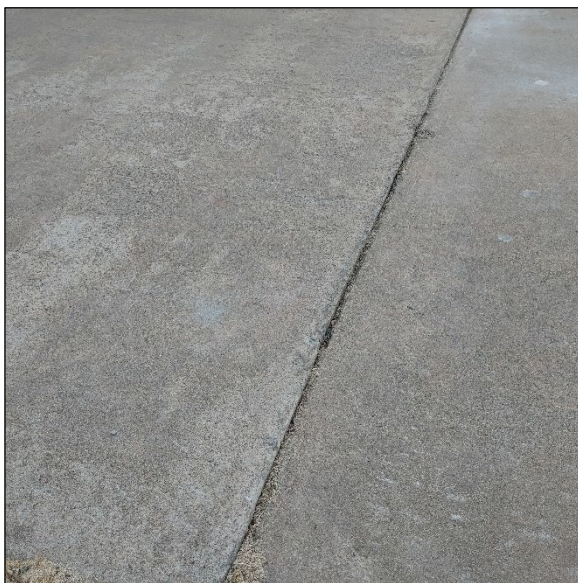
Ineffective or inadequate maintenance provisions have proven to lead to increased costs of facility operations by shortening the useful life span of equipment and buildings. Many school districts have adopted rigorous preventive maintenance programs. They maintain a record of the performance of equipment and the costs of regular maintenance to measure the effectiveness of these programs.

The current CPS maintenance staff consists of a two-person team in charge of buildings and school bus maintenance:

- A half-time (four-hour) director of maintenance and transportation works twelve hours each day in a four-day work week by donating an additional eight hours per day. He oversees facilities and bus operations and maintenance.
- A three-fourths time assistant in maintenance and transportation. He earns full-time pay because he also drives a bus route.

Exhibit 4-10 displays photographs of maintenance-related issues. Compared to many other districts with a history of reactive maintenance, only a few areas of apparent neglect and festering, unsafe conditions have been found. A glaring safety issue on the stoop to the main entrance of the high school (left photo) was recently repaired. This HVAC intake grating at the high school (right photo) is filled with dust at its openings. This indicates the presence of a clogged filter behind it. Filter replacement has been cited by the consulting team as the sole exception to the district's "no preventive maintenance" policy. Unfortunately, the lack of timely filter replacement indicates that reactive maintenance demands have taken precedence, at least in this instance.

Exhibit 4-10
CPS Maintenance Concerns



Source: Prismatic, January 2022

Overall, few ceiling/roof leaks were in evidence. The more noticeable stains on ceiling tile are in the new elementary school, where the district had to decide on a low slope roof instead of a sloped metal roof prevalent in most areas of the campus, where very few leaks have occurred. As shown in **Exhibit 4-11**, before the high school was retrofitted with its sloped standing seam metal roof, these ceiling recesses served as skylights. Based on ample experience with such roof penetrations, they brought in not only daylight, but also water. Three possible actions can be taken to complete a finished solution:

1. Install recessed electric downlighting at these locations.
2. Install light tunnels to bring daylight into the corridors. This may reintroduce greater leak potentials.
3. Remove the recesses.

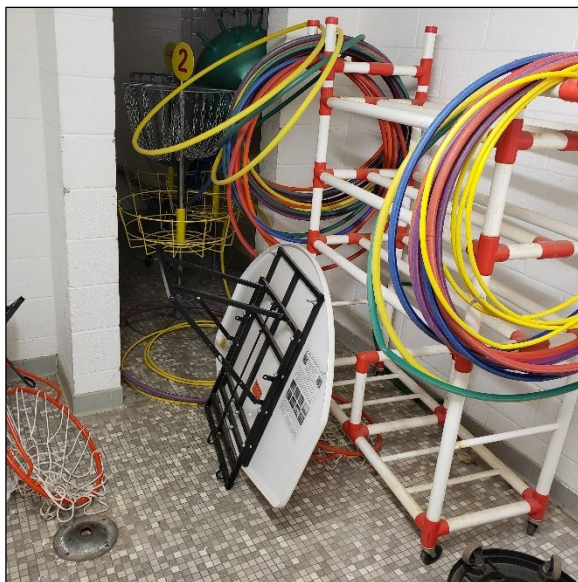
Exhibit 4-11
Incomplete Ceiling Refresh



Source: Prismatic, January 2022

Many unused spaces in the district contain a typical accumulation of surplus equipment, furniture, and textbooks (**Exhibit 4-12**). CPS does hold periodic surplus auctions.

Exhibit 4-12
CPS Facilities – Closet Space



Source: Prismatic, January 2022

FINDING 4-3

The district is not annually spending sufficiently on maintenance and repair. This puts the district at risk for the most costly, catastrophic building failures.

Exhibit 4-13 shows the trend CPS maintenance expenses over the past five years compared to the peer districts. In 2015-16 and 2016-17, CPS spent more than the peer average on maintenance. Following 2016-17, there was a decrease of over \$943,000 in spending; bringing it to a low of \$349,911 in 2017-18. The remaining three years have not shown extreme variations from before, but instead show a low level of spending overall. In each of the past three years, CPS has spent the least on maintenance among its peers.

Exhibit 4-13
Trend in Maintenance and Operations Expenditures

Entity	2015-16	2016-17	2017-18	2018-19	2019-20	Percent Change
Crescent	\$796,324	\$1,292,955	\$349,911	\$341,709	\$412,893	(48.2%) ▼
Cashion	\$495,383	\$528,573	\$1,392,755	\$1,650,919	\$1,254,039	153.1% ▲
Comanche	\$1,112,388	\$1,013,382	\$1,068,598	\$1,099,045	\$887,388	(20.2%) ▼
Empire	\$319,485	\$460,088	\$679,721	\$355,807	\$848,392	165.5% ▲
Morrison	\$424,397	\$405,719	\$513,787	\$494,351	\$530,487	25.0% ▲
Minco	\$683,473	\$647,173	\$618,493	\$711,401	\$680,830	(0.4%) ▼
Peer Average	\$607,025	\$610,987	\$854,671	\$862,305	\$840,227	38.4% ▲

Source: SDE, School District Expenditure Reports 2015-2020, and Prismatic calculations

Breaking down the past five years of maintenance spending by category, one sees that the bulk of the budget has been on purchased services each year (**Exhibit 4-14**). Spending on supplies has been fairly consistent across the years, while spending on personnel has decreased.

Exhibit 4-14
Trend in CPS Maintenance and Operations Expenditures, All Funds

Expenditure by Category	2015-16	2016-17	2017-18	2018-19	2019-20	Percent Change
Salaries	\$113,885	\$45,652	\$50,617	\$52,138	\$66,358	(41.7%) ▼
Benefits	\$31,073	\$15,322	\$15,490	\$16,517	\$25,527	(17.8%) ▼
Purchased Services	\$502,860	\$1,133,863	\$132,622	\$146,183	\$194,984	(61.2%) ▼
Supplies	\$115,857	\$97,615	\$150,766	\$126,872	\$125,574	8.4% ▲
Property	\$32,604	\$6,726	\$6,442	\$8,924	\$35,406	8.6% ▲
Other	\$45	\$503	\$416	\$0.00	\$450	900% ▲
Total	\$796,324	\$1,299,681	\$356,353	\$350,634	\$448,299	(43.7%) ▼

Source: SDE, School District Expenditure Reports 2015-2020, and Prismatic calculations

It is a best practice that maintenance expenses on an annual basis should be within two to four percent of the current replacement value (CRV) of the facilities inventory owned and operated by the organization responsible for the facilities management.¹⁴ The aggregate replacement value of the current CPS facilities inventory is \$30 million. The recommended two to four percent range

¹⁴ National Research Council 1990. *Committing to the Cost of Ownership: Maintenance and Repair of Public Buildings*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/9807> for pdf.

would require a maintenance and repair budget between \$600,000 and \$1,200,000 annually. CPS has not spent in that range since 2016-17 (**Exhibit 4-15**).

Exhibit 4-15
CPS Current Replacement Value (CRV) for Maintenance and Operations Expenditures

Entity	2015-16	2016-17	2017-18	2018-19	2019-20
Maintenance Expenditure	\$796,324	\$1,292,955	\$349,911	\$341,709	\$412,893
Current Replacement Value	\$29,886,905				
CRV Percentage	2.7%	4.3%	1.2%	1.1%	1.4%

Source: SDE, Insurance Papers, School District Expenditure Reports 2015-2020, and Prismatic calculations

The two to four percent best practice figure assumes that the facilities have been maintained in acceptable overall condition – a facilities condition index (FCI) indicating ten percent or less. Ten percent or less means that the required maintenance, or deferred maintenance, is not estimated to cost more than ten percent of the building’s CRV. This is referred to as a facilities condition index (FCI) of ten percent or less. An FCI of ten percent is acceptable, but an FCI of five percent or less is considered a best practice. As CPS has never completed a building condition assessment, it is not possible to calculate its FCI.

As noted by the Building Research Board – National Research Council:

An appropriate budget allocation for routine [maintenance and repair] M&R for a substantial inventory of facilities will typically be in the range of two to four 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. Where neglect of maintenance has caused a backlog of needed repairs to accumulate, spending must exceed this minimum level until the backlog has been eliminated.¹⁵

RECOMMENDATION

Complete building condition assessment and fund maintenance operations to achieve an FCI of 10 percent or below.

The completion of building condition assessments was also recommended in the 2013 report. The district should complete building condition assessments of all facilities in order to calculate a starting FCI. The consulting team believes it unlikely that the initial FCI will be below ten percent for two reasons:

1. The amount of deferred maintenance in many of the district’s older buildings might be larger than an FCI of ten percent – perhaps 20 to 30 percent or higher. This condition could be triggering a higher-than-normal occurrence of reactive maintenance calls,

¹⁵ <https://www.nap.edu/catalog/9807/committing-to-the-cost-of-ownership-maintenance-and-repair-of>

causing an overload on what would otherwise be a more-than-adequate staff and outsourcing need.

2. Because CPS engages in little to no PM, it is likely that a greater amount of deferred maintenance has built up over the years – especially during the financial crisis period when maintenance deferral may have become a default response for a time.

The initial FCI will likely indicate a need for increased maintenance expenditures for a period of a few years. Once the FCI has been lowered to ten or below, the district should resume maintenance funding in the best practice range of two to four percent of CRV.

FISCAL IMPACT

The consulting team estimates the engaging a local firm to complete the building condition assessments will require approximately \$6,000. Ideally, the district should obtain a new building condition assessment every five years.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Complete building condition assessments.	\$0	(\$6,000)	\$0	\$0	\$0

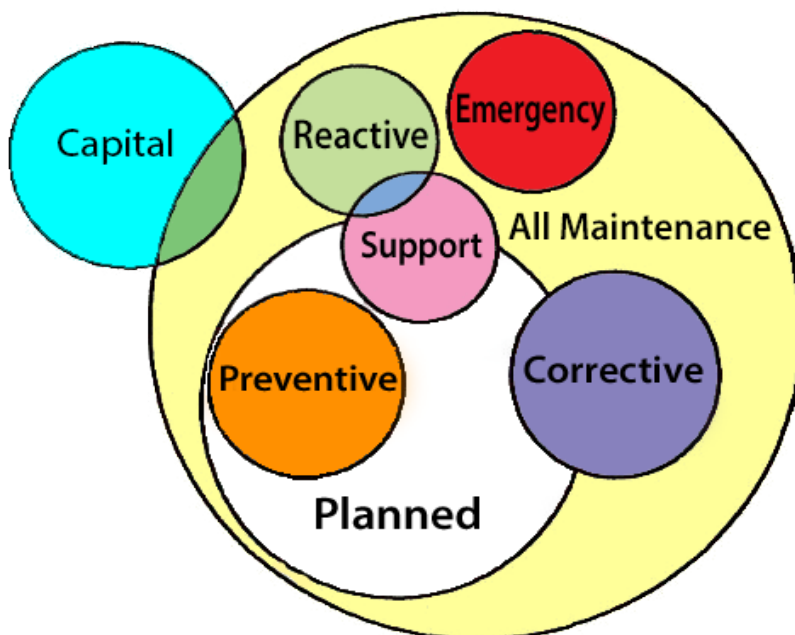
FINDING 4-4

The district engages in almost exclusively reactive maintenance. This leaves the district at risk for major mechanical and facility breakdowns.

According to interviews with members of the CPS leadership team and confirmed by the maintenance and transportation director, CPS maintenance engages almost exclusively in reactive maintenance. Preventive maintenance measures are not taken. Instead, steps are taken when a malfunction occurs to repair or replace the failed equipment, and to remove any collateral damages caused. Examples include damaged or destroyed computer equipment after a roof leak, or damaged/destroyed floors, walls and ceilings from a boiler explosion. Filter replacement has been cited as the only activity of a preventive nature carried out with regularity by CPS staff.

Maintenance in a school is not merely repairing or 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 types can be depicted using a Venn diagram (**Exhibit 4-16**).

Exhibit 4-16
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.¹⁶

The older a building, the more corrective maintenance it will require and all buildings, regardless of age, require regular preventive maintenance.

As shown in **Exhibit 4-17**, according to survey results of staff, 63 percent of staff responded *agree* and *strongly agree* to the “well maintained” question. The student response to the same question, while slightly more subdued, substantiates the overall agreement at 48 percent. During the consulting team walk-through, almost no egregious examples of maintenance neglect were discovered.¹⁷ In addition, the two new facilities (elementary school and event center/kitchen/safe room and cafeteria) and the refurbished high school and high school gymnasium give a psychological “new car smell” to the entire campus. This may be why the parent survey response

¹⁶ Becker, T. J., (2011) What constitutes maintenance? *Operational Guidelines for Educational Facilities: Maintenance*, second edition (July/August), pp.14-15.

¹⁷ The only exception to this was a dangerous misaligned concrete slab at the entrance to the high school that presented a strong trip hazard. This has been addressed since the onsite work as the district has repaired the area.

to “the district needs to spend more of its budget on its facilities” is 49 percent ambivalent, with only a small response more in favor than not.

Exhibit 4-17
Staff, Parent, and Student Survey Responses Regarding Facilities Maintenance

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	Our facilities are well maintained.	2%	61%	10%	24%	2%
Parent	My child’s school is well maintained.	23%	52%	12%	11%	1%
Parent	The district needs to spend more of its budget on its facilities.	9%	22%	49%	17%	2%
Student	My school building is well maintained.	9%	39%	28%	18%	6%
Student	My school building needs a lot of repairs.	21%	29%	32%	16%	2%

Source: Prismatic Survey Results, January 2022

However, these survey results do not mean that the district should continue to only perform reactive maintenance. Keeping up with maintenance and repair needs is a best practice. No one suggests that maintenance neglect saves money or costs nothing. Everyone instead agrees that maintenance neglect leads to added costs, but the magnitude of such costs is subject to debate. One source notes that the collateral damages of deferred maintenance may be subject to an “inverse square rule.”¹⁸ This means, for example, that damages in the billions of dollars from an oil refinery explosion can eventually be reduced to the cost of the original part that was not replaced before it failed. It is a reminder of the folk poem attributed to Benjamin Franklin:

For the want of a nail the shoe was lost, For the want of a shoe the horse was lost, For the want of a horse the rider was lost, For the want of a rider the kingdom was lost, And all for the want of a horseshoe-nail.¹⁹

Waiting until roofs leak, boilers explode, or other building components break typically incurs much greater costs than preventive maintenance. Just the appearance of maintenance neglect – an unrepaired broken window, a leaky toilet valve, unkempt grounds, stained ceiling tiles, graffiti – can lead building users to lose their respect for the institution contained within the building.

RECOMMENDATION

Prepare and begin a preventive maintenance protocol.

¹⁸ <http://www.geaslin.com>

¹⁹ [all for the want of a horseshoe nail poem - Bing](#)

A similar recommendation was made in the 2013 report. A complete maintenance program includes preventive maintenance. As an example, Spring Independent School District (SISD) in Texas developed a comprehensive preventive maintenance program that includes the maintenance schedules shown in **Exhibit 4-18**. This schedule could be modified to meet the needs of CPS.

Exhibit 4-18
Sample 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

A good guide for planning and designing a maintenance program is the *Planning Guide for Maintaining School Facilities* by the School Facilities Task Force, National Forum on Education Statistics and the Association of School Business Officials International.²⁰ Included in the guide

²⁰ Available for free at <http://nces.ed.gov/pubs2003/2003347.pdf>

are topics such as maintenance check lists, preventive maintenance, job descriptions, employee training, managing supplies, and employee evaluations.

To support preventive maintenance efforts, the district should decide whether to procure an off-the-shelf computerized maintenance management system (CMMS) or to develop a system in house. Data will be input into the system such as equipment type, manufacturer and location, preventive maintenance requirements and frequencies, and other details.

FISCAL IMPACT

This recommendation can be implemented only after the building condition assessments have been completed and the extent of deferred maintenance in all buildings is revealed. The purchase of CMMS would likely require only \$2,000-\$3,000 per year.

Eliminating existing deferred maintenance is a necessary first step to a robust preventive maintenance program. Without a building condition assessment, the consulting team can only estimate the level of existing deferred maintenance. Based on observations in the onsite work, the consulting team estimates that \$500,000 will be needed to the reduce the FCI rating to ten percent or below. This figure includes the cost of removing the deferred maintenance to at least an FCI of ten percent, minus any maintenance deferrals in buildings that may be scheduled for demolition or renovation with funding from a future bond issue. The real cost will be known when the building condition assessments have been completed. A bond may need to be floated if the amount is too large to be covered from budgetary resources.²¹

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Reduce deferred maintenance and implement PM.	\$0	\$0	(\$166,666)	(\$166,666)	(\$166,666)

FINDING 4-5

The district has recently completed a much-needed refresh of its high school gymnasium. The high school gymnasium is a free-standing building that receives frequent visitors from the community and the broader general public.

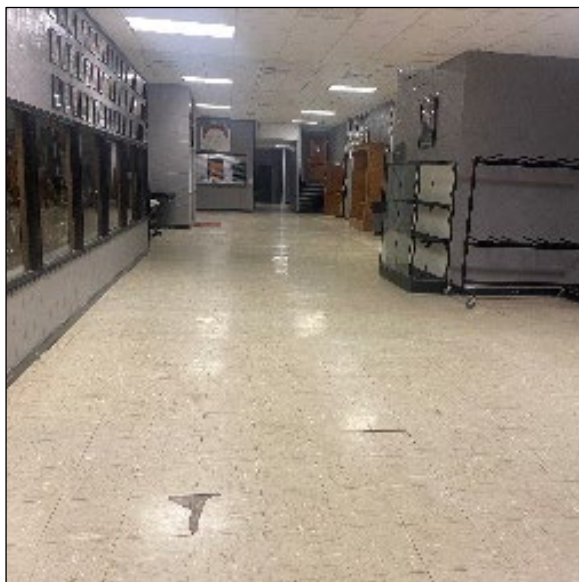
Coming out of the fiscal crisis, the district's showpiece gymnasium had lost considerable curb appeal. Its floors were especially in need of repair/refurbishment. The exterior also needed a refresher paint job and artwork, especially to enhance the main entrance. Volunteer work was used to accomplish the necessary floor repairs and exterior touch-ups.

Exhibit 4-19 and **Exhibit 4-20** show before and after views of the high school gymnasium, as well as the floors of the high school, which received similar rejuvenation. Extensive square yards of multi-decades old carpeting were removed, and new laminate flooring installed.

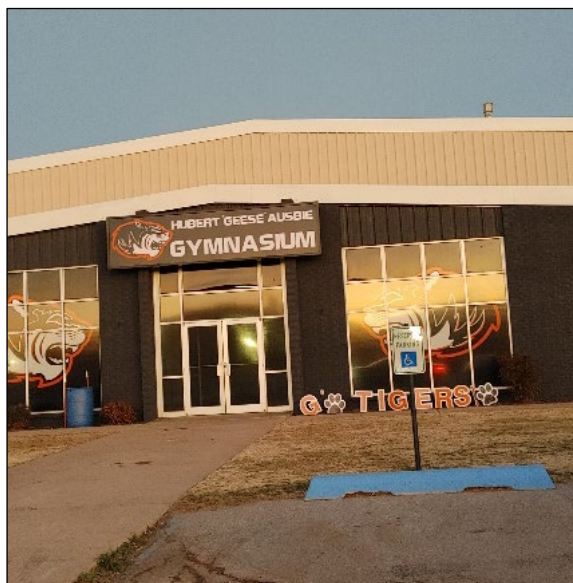
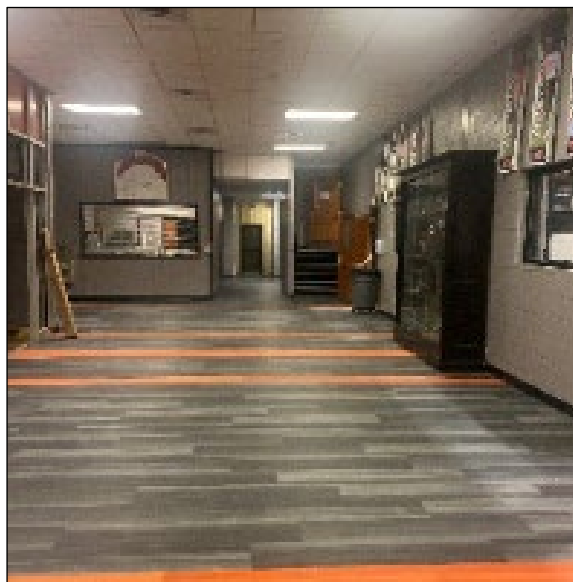
²¹ The consulting team emphatically does not recommend using bond funds routinely to retire deferred maintenance. This recommendation acknowledges only that a bond may need to be used to help retire deferred maintenance, but it should be acknowledged publicly by the district leadership that "this will be the only time."

Exhibit 4-19
Before and After Images of Cosmetic Renovations of CPS High School Gymnasium

Before

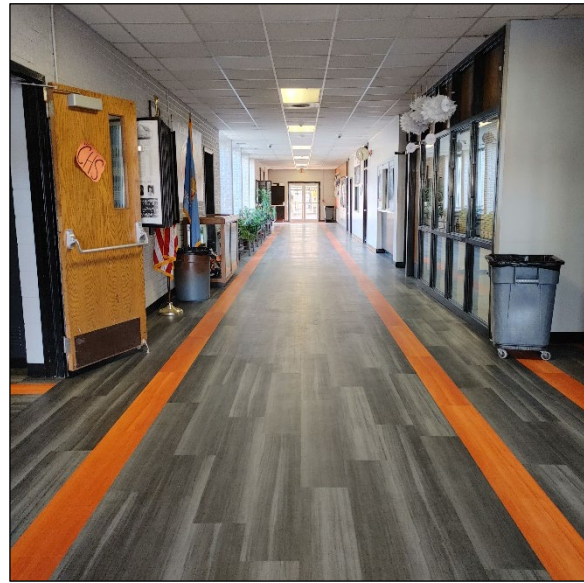
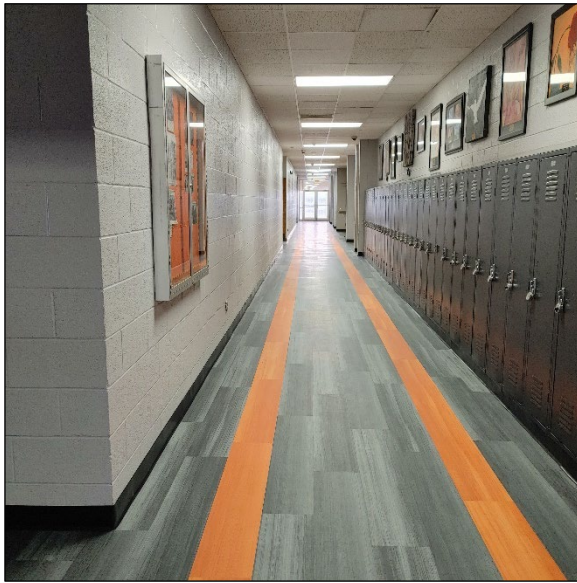


After



Source: Prismatic, January 2022

Exhibit 4-20
“After” Images of Cosmetic Renovations of CPS High School



Source: Prismatic, January 2022

COMMENDATION

CPS is commended for its volunteer initiative to rejuvenate the exterior and interior of the high school gymnasium, plus the high school’s interior renovation initiative.

FINDING 4-6

Most of the major buildings on the CPS campus have been retrofitted with metal roofs that are watertight and sloped. The only water leaks into the buildings with these roofs have been from leaky pipes or from condensation below the roofs and above the ceiling tiles. The only major building without such a roof is also one of the newest ones: the elementary school.

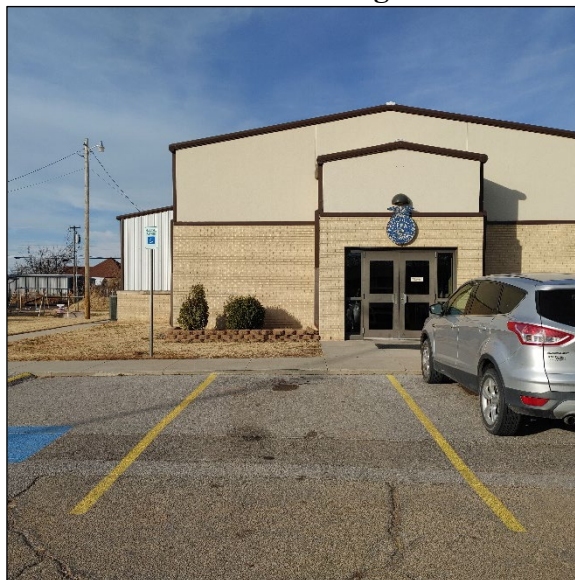
As shown in **Exhibit 4-21**, the bus barn, the FFA building, and district administration are all examples of sloped standing seam metal roofs. All major buildings on the campus and elsewhere have been built or retrofitted with sloped, standing seam metal roofs. One photograph shows a portion of the middle school to the right with a metal roof, and the new portion of the elementary school to the left. The new elementary school does not have a sloped metal roof, but due to budget constraints, was built with a low slope bitumen roof. While the metal roofs throughout most of the campus have provided nearly leak-proof performance, several leaks have already developed as punch list items on the low slope roof of the new elementary school. Whenever the district’s bonding capacity permits it, a low slope roof replacement with a sloped metal roof should become a facilities master plan bond-funded action item.

**Exhibit 4-21
CPS Facilities**

Bus Barn



FFA Building



Administration Building



Elementary School



Source: Prismatic, January 2022

COMMENDATION

CPS is commended for its choice of a nearly leakproof, low-maintenance metal roof retrofit on most of the campus buildings.

This action has saved the district large amounts of money required to fix many leaks and collateral damage that just never happened, as well damaged roof replacements that were not

necessary. Moving forward, the district should retrofit the elementary school roof whenever the next bond issue makes it feasible.

FINDING 4-7

The district has insufficient maintenance staffing. This can result in a lack of attention being paid to critical facilities issues.

In addition to the part-time maintenance director who works full-time, the CPS maintenance operation has a part-time assistant. Unfortunately, this position will become vacant within the next 12 to 18 months because the incumbent has declared that he will pursue other unrelated career options.

There is no single, universally accepted staffing standard for maintenance services, particularly since some routine and preventive maintenance can typically be easily completed in-house while other larger jobs (often requiring specialized expertise and tools) are typically outsourced as needed. The Florida Department of Education promotes the use of 45,000 square feet per Full Time Equivalent (FTE), while the Wyoming Department of Education uses a formula that includes 60,000 square feet per FTE, with adjustments upward for a number of schools, overall enrollment, and district revenue levels. The Association of Physical Plant Administrators (APPA) publishes a range of staffing levels as best practice. With ~1.75 FTE devoted to maintenance and 217,558 square feet of facilities to maintain, CPS is currently staffed at 124,319 square feet per FTE. This is well outside any commonly accepted staffing standard for this area.

The highest APPA standard for maintenance staffing is one maintenance FTE per 47,220 square feet of facilities to achieve a “showpiece” level of maintenance.²² With 217,558 square feet of facilities to maintain, the district should have 4.5 FTE maintenance staff for this highest showcase level. The actual count for both building and bus maintenance is ~1.75 FTE, less than half of the requirement for a “showpiece” rating. In addition, this available staffing FTE includes work addressing school bus operation and maintenance. In a small school district like CPS, the outsourced firms for electrical, plumbing, and HVAC services and repairs may be counted as the remaining needed FTE for the fulfillment of the required 4.5 FTE for the facilities’ maintenance activity alone.²³

RECOMMENDATION

Hire a full-time maintenance and transportation assistant.

²²At APPA, Showpiece Facility Maintenance activities appear highly focused. Typically, equipment and building components are fully functional and in excellent condition. Service and maintenance calls are responded to immediately. Buildings and equipment are regularly upgraded, keeping them current with modern standards and use.

²³ It should be noted that, according to the director of maintenance and transportation, the outsourced firms are on a “no bid call.” This means that most needs for their services are time-critical: they must be on standby and respond as quickly as possible without taking time to engage in competitive bidding. Such circumstances are symptomatic of a nearly total reliance on a reactive maintenance stance. This is likely to raise the cost of the outsourcing. However, this no bid arrangement is the only sensible one under the circumstances, as collateral damages or burdensome service disruptions might be the rule rather than the exception.

A similar recommendation to increase maintenance staffing was made in the 2013 report. New hires frequently inherit incumbents who may find it difficult to adapt to a new person in charge. Unless a candidate with the qualifications sought by the new maintenance and transportation director is already available as a CPS staff member, CPS should authorize the new director to make his or her own hiring decision. The position should be full-time, not the current part-time position.

FISCAL IMPACT

The consulting team estimates that \$30,000 in salary, plus 32 percent in benefits will be required. The total additional cost to the district will be \$39,600, less the current \$7,130 cost of the part-time assistant.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Hire a full-time maintenance assistant.	\$0	\$0	(\$32,470)	(\$32,470)	(\$32,470)

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 or 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 board of education.

Management responsibility, if the program is in-house, may reside partially or wholly with the central office, the individual school, or the 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 4-22**.

Exhibit 4-22

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.*

FINDING 4-8

After a period of unsatisfactory custodial service from a private contractor, the district contracted with a new firm, Oklahoma Commercial Cleaning (OCC). This change has resonated positively with stakeholders.

Stakeholder responses to the survey indicate that OCC has improved district cleanliness and is responsive when areas needing better cleaning are identified. As shown in **Exhibit 4-23**, a majority of staff and parents agreed that facilities are clean. Students were less enthusiastic, but the largest proportion concurred that their school is clean. In observations during the onsite work, the consulting team largely found the spaces to be at acceptable levels of cleanliness.

Exhibit 4-23
Staff, Parent, and Student Survey Responses Regarding Facilities Cleanliness

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	Our facilities are clean.	2%	63%	12%	20%	2%
Parent	My child's school is clean.	29%	48%	11%	11%	1%
Student	My school building is clean.	9%	32%	23%	25%	11%

Source: Prismatic Survey Results, January 2022

COMMENDATION

CPS is commended for its success in finding a conscientious and responsive custodial contractor.

FINDING 4-9

The current custodial outsourcing contract does not provide for daytime custodial work, which is a source of dissatisfaction for district stakeholders.

Custodial services are provided under contract to CPS by OCC, a private vendor. The custodial contractor provides five custodians who work after school hours. The contract does not specify hours to be worked, but instead requires work to be done until all areas specified are thoroughly cleaned to Level 2 in kitchen and bathroom areas, and Level 3 elsewhere.

Stakeholders expressed some dissatisfaction with this arrangement, as it results in non-custodial having to address minor cleaning issues, such as bathroom accidents or hallway spills. In addition, the cafeteria is without custodial assistance during the lunch period, so kitchen staff must also perform custodial work.

RECOMMENDATION

Modify the custodial contract to provide one of the five custodians as a day porter.

Day porter duties should occur during school hours at the elementary school and the cafeteria during lunch periods. In discussions with the consulting team, OCC representatives declared themselves open to working with CPS to renegotiate the scope of work to establish one of the five current custodians as a day porter.

The superintendent should work with the cafeteria manager to define the scope of work for one day porter. The superintendent should then invite the owner of the custodial services contractor to propose a contract amendment for negotiations.

FISCAL IMPACT

This recommendation can be implemented with existing resources. During interviews with owner representatives of the custodial contractor, it was noted that this personnel shift may have only a slight cost impact because the cleaning work done by a day porter may not need to be repeated after school hours. The assignment of one day porter to the cafeteria is done expressly to eliminate the assignment of kitchen staff to custodial duties in the cafeteria.

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 before 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, in their publication *Planning Guide for Maintaining School Facilities*,²⁴ suggests that the following guidelines will help a school system accomplish more efficient energy management:

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.

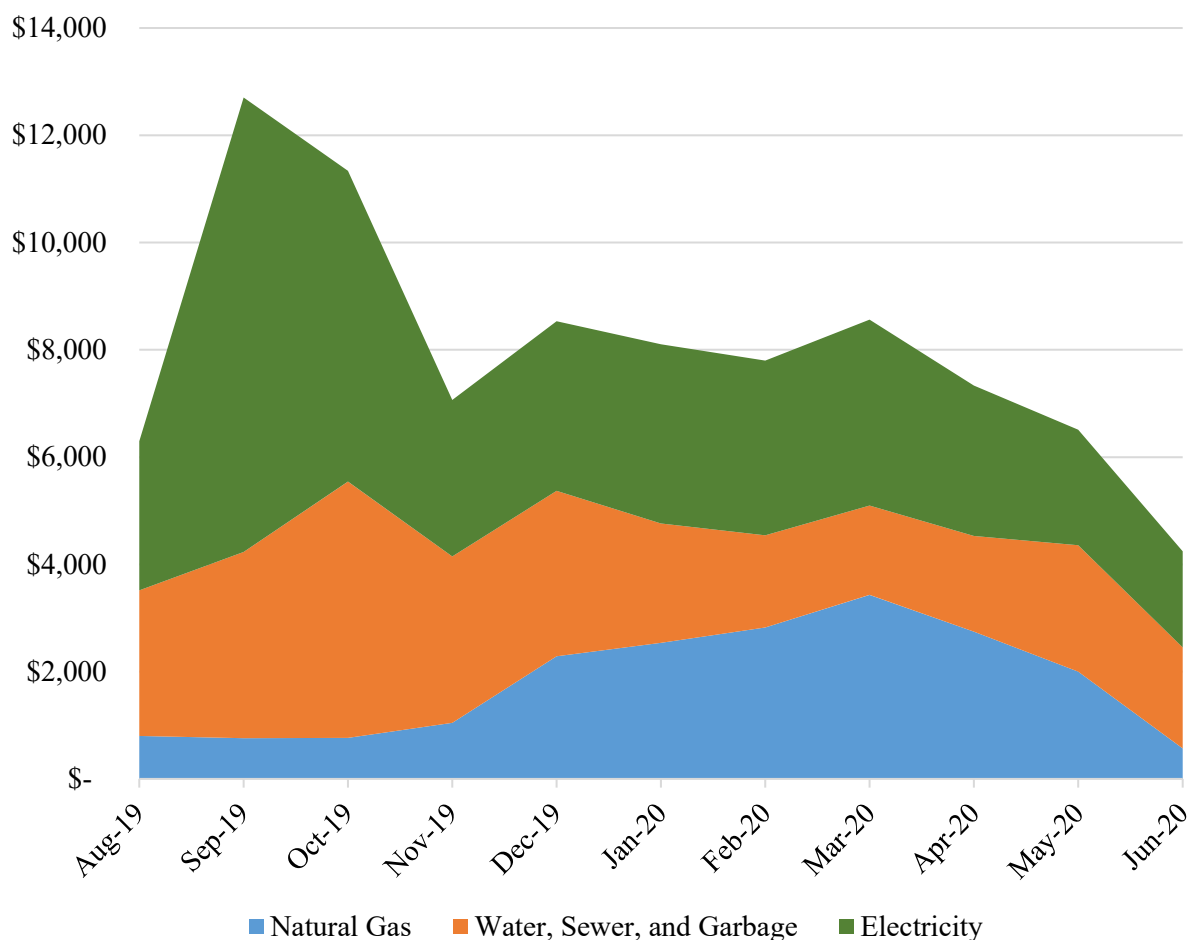
Additional information about energy management can be found through the National Clearinghouse for Educational Facilities' Energy Page²⁵ which provides a list of links, books, and journal articles on various methods of heating, cooling, and maintaining new and retrofitted K-12 school buildings and grounds.

Energy consumption at CPS is low compared to industry metrics. **Exhibits 4-24** and **4-25** show the district's consumption of water, sewer, garbage, electricity, and natural gas for 2019-20. At \$0.40 per square foot, CPS enjoys low energy costs.

²⁴<http://nces.ed.gov/pubs2003/2003347.pdf>

²⁵ <http://www.ncef.org/search/node/energy%20management>

Exhibit 4-24
CPS Cost in U.S. Dollars for Water, Sewer, Garbage, Electricity, and Natural Gas 2019-20



Source: CPS, Prismatic calculations, March 2022

Exhibit 4-25
CPS Energy Cost per Square Foot

Unit	Cost
CPS Energy/Utility Costs for 2019-20	\$86,049
Floor area of all facilities	217,558 sq.ft.
\$/sq.ft. over all facilities	$\$86,049 / 217,558 \text{ sq.ft.} = \$0.40/\text{sq.ft.}$

Source: Prismatic Calculations, March 2022

FINDING 4-10

CPS does not have an accountable person serving as the designated champion of energy management. This has led to energy management having a low priority in recent years. The seriousness of CPS' recent fiscal crisis has also placed energy conservation in the category of "to be pursued after the financial picture has improved."

Energy conservation behavior is an important contributor to low energy utility bills. It is easy for building users to fall back on lax behavior, such as forgetting to turn off power users overnight and on weekends. A periodic campaign to re-energize energy conservative attitudes and actions will have the desired effect.

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.²⁶

The search for more energy saving opportunities – and for more sources of energy – is never abandoned in high performing districts. One of the best sources of this attitude is Dr. Daniel Yergin’s book *The Quest – Energy, Security, and the Remaking of the Modern World*.

RECOMMENDATION

Add “experience with energy management programs and initiatives preferred” to the job qualifications for the next hire of a director of maintenance and transportation.

Most experienced facilities managers have such qualifications. If an otherwise good candidate does not have this experience, they should be given a lower ranking than another candidate that does. The district should expect the next maintenance director to proactively focus on energy management.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 4-10

The district has only thus far engaged in a few energy-saving measures. A more focused approach could yield savings.

CPS has, over the years, installed a smattering of light emitting diode lamps. The freestanding high school gymnasium is one of these locations. That same building has a remotely controlled energy management system allowing the athletic director to adjust heating and cooling before an event remotely from a laptop. This system also identifies any HVAC components that require

²⁶ See http://www.stratenergy.ca/phantom_loads.htm for a detailed explanation.

inspection because they may be entering potential failure mode. Many other energy conservation opportunities remain to be considered and possibly implemented.

RECOMMENDATION

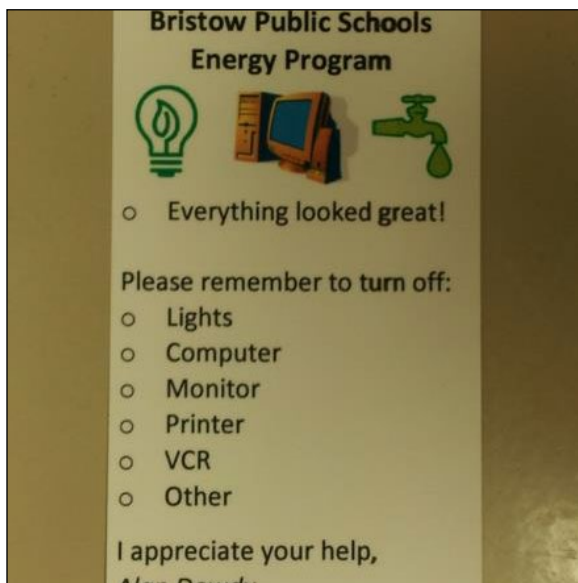
Pursue energy conservation opportunities.

Once the new maintenance and transportation director has been hired, he or she should continue to pursue prudently and yet aggressively energy conservation opportunities in LED re-lamping, enhanced energy-saving behavior among building users, renewable energy sources, and other viable energy cost-savings.

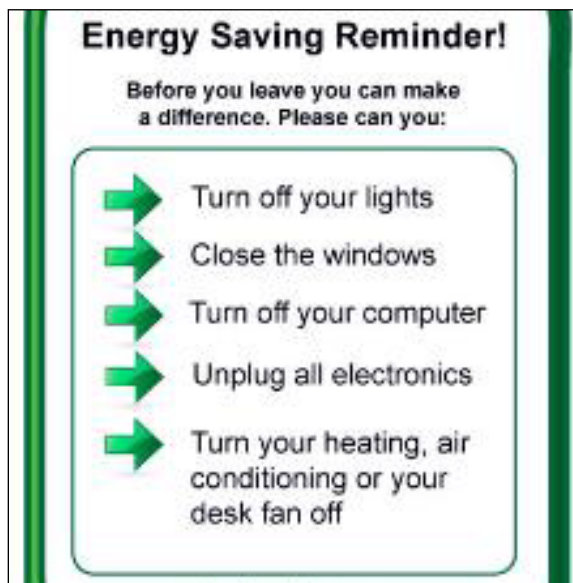
In addition to the LED re-lamping, the district should pursue enhanced energy-saving behavior among building users, investigate renewable energy sources, and seek other viable energy cost-savings as they arise. An active energy awareness program is a best practice for school districts and should be considered by CPS. The following are some examples of these conservation efforts:

- creating low utilities usage competitions among the schools, with a portion of saved dollars being given to student organizations, or to staff and faculty for their proven contribution to energy savings;
- 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 4-25**, if problems are found during building checks;

Exhibit 4-26 Examples of Energy Saving Reminder Stickers



Source: Prismatic Archives, April 2012



Source: BusinessHelpZone.com, December 2015

- enforcing set points for thermostats at 76 degrees in the summer and 69 degrees in the winter; 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.

Other potential energy saving opportunities will increasingly come from renewable resources.²⁷ Energy sources that could displace fossil fuels are potentially counter-culture choices in Oklahoma. Yet the consulting team has recently worked in two of this state's school districts who operated windmills or geothermal heating and cooling installations.

One financing alternative to bonds is energy performance contracting. It seems to be a consensus on the CPS leadership team that bonding capacity has been exhausted and will not open again until 2027 at the earliest. Energy Savings Performance Contracting is often viewed not only as an alternative to bond financing, but also as a vehicle for increasing the availability of capital for making energy savings improvements not by simply borrowing money, but by using the projected energy savings as acceptable collateral for the loan. Moreover, the Energy Service Company (ESCO) that arranges the financing will guarantee that it will make up any shortfall in energy savings to pay off the loan.²⁸

FISCAL IMPACT

This recommendation can be implemented with existing resources.

²⁷ <https://www.nationalgeographic.org/encyclopedia/renewable-resources/>

²⁸ <https://www.energy.gov/eere/slsc/energy-savings-performance-contracting>

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 the Federal Emergency Management Agency, 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 and the need for an all-hazard approach. As such, the mission of school districts in an emergency/disaster is to:

- **Prevent** a threatened or actual incident from occurring.
- **Protect** students, teachers, staff, visitors, networks, and property from a threat or hazard
- **Mitigate** to eliminate or reduce the loss of life and property damage by lessening the impact of an event or emergency.
- **Respond** to stabilize an emergency once it has already happened or is certain to happen in an unpreventable way; establish a safe and secure environment; save lives and property; and facilitate the transition to recovery.
- **Recover** to assist schools affected by an event or emergency in restoring the learning environment (**Exhibit 4-27**).

Exhibit 4-27
Continuous Process of Emergency Management



Source: <https://blog.ed.gov/2014/04/join-americas-prepareathon/>

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 (OSSI) to help schools keep their policies up to date.

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.²⁹

According to **Exhibit 4-28**, all staff feel prepared to appropriately respond in a crisis or emergency. Most parents report that their child feels safe and secure at school. More than half of students reported they feel safe and secure in school.

²⁹ [https://www.ok.gov/OEM/Programs & Services/Preparedness/Preparedness - Earthquakes.html](https://www.ok.gov/OEM/Programs_%20Services/Preparedness/Preparedness_-_Earthquakes.html)

Exhibit 4-28
CPS Survey Results Regarding School Safety

Survey Group	Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Staff	I know what to do during a crisis or emergency on campus.	51%	49%	0%	0%	0%
Parent	My child feels safe and secure at school.	30%	52%	4%	13%	1%
Student	I feel safe and secure at school.	15%	44%	23%	13%	4%

Source: Prismatic Survey Results, January 2022

FINDING 4-11

The district has historically not engaged pro-actively in pursuit of a comprehensive security program focused on monitoring, secure checkpoint lobbies at all main entrances, fenced sites, badge-activated entries, strategically placed interior and exterior cameras in recording mode, etc.

This attitude began to change when the district had two major new buildings constructed on its campus: a new elementary school, and an event center (including a safe room, cafeteria, and kitchen with a backup generator). These two new buildings comply with not only all energy code provisions, but also with all codified security and safety measures. One of the district leaders recalled that representatives of OSSI came to CPS to review the new buildings, but did not complete a full review of all buildings and grounds. The consensus among district leaders now appears to be that more attention needs to be paid to shoring up security and safety measures at the remaining CPS facilities, plus consideration of having the services of a resource officer on the campus, with actively updating emergency management plans with which all leaders must be actively familiar.

In many older schools, classroom door locks cannot be activated from inside, but require a person to come into the corridor to lock the door. Neither the campus nor individual schools are protectively fenced.

RECOMMENDATION

Contact OSSI to arrange a free consultancy and follow through on report recommendations.

1. Once the report has been received from OSSI, prepare an action plan of security and safety initiatives and projects to enhance, improve, or remedy current conditions.
2. Add related capital improvements to the facilities master plan.
3. Add policy-related items for action by the board of education.
4. Give items for direct implementation in schools to the principals.

5. Identify all OSSI recommendations the district does not intend to implement and provide reasons for not implementing them.
6. Send item (5.) to OSSI for information.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

Chapter 5:
Support Services

Chapter 5

Support Services

This chapter reviews several areas of support services in Crescent Public Schools (CPS). 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 and dinners 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 childcare institutions.

CPS participates in the NSLP, the SBP, 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 2020-21 and 2021-22 federal reimbursement rates for breakfast and lunch. CPS also receives an additional \$0.07 per meal for meeting the meal pattern requirements. A USDA waiver allows for free meals for all students for last year as well as the current year. Effective in January 2022, USDA increased reimbursement rates for breakfast and lunch, which is reflected in the two rates in the chart.

Exhibit 5-1
School Meals: Federal per Meal Reimbursement Rates
2020-21 and 2021-22

	School Breakfast Program - Severe Need¹			National School Lunch Program (with 7 cents)		
Meal Type	2020-21	2021-22²		2020-21	2021-22³	
Free	\$2.26	\$2.4625	\$2.6050	\$3.53	\$4.3175	\$4.5625
Reduced Price	NA	NA		NA	NA	
Paid	NA	NA		NA	NA	

Source: <https://www.fns.usda.gov/school-meals/rates-reimbursement>

Pre-COVID-19, the *Healthy, Hunger-Free Kids Act of 2010 (HHFKA)* provided sweeping modifications to the school nutrition programs and made substantial 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 campus 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 the *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 year, 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.

Effective in February 2022, USDA issued temporary standards for three items which will supersede the requirements for 2022-23 and 2023-24. They are:

- Milk – can offer flavored low-fat one percent milk in addition to non-fat flavored and non-fat or low fat unflavored;
- Grains – items must be at least 80 percent whole grain rich; and
- Sodium – will remain at Target 1 for 2022-23 and will be reduced by 10 percent for lunch in 2023-24.

Meeting nutritional requirements continues to be challenging for school meal program operators while USDA responds to COVID-19 challenges as well as changing viewpoints on optimal nutritional targets for meals in schools.

¹CPS 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.

² Rates noted reflect first semester and changes in second semester.

³ Rates noted are for first semester and changes in second semester.

Exhibit 5-2
Summary of Nutritional Requirements for Breakfast and Lunch
(Pre-COVID-19)

	Breakfast		Lunch	
Fruits 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	All must be whole grain rich unless exemption granted.		All must be whole grain rich unless exemption granted.	
Milk	1 cup, 1% (unflavored) or fat-free (unflavored/flavored)		1 cup, 1% (unflavored) or fat-free (unflavored/flavored)	
Sodium*	Target 2 (2017-18): K-5: ≤ 485 mg 6-8: ≤ 535 mg 9-12: ≤ 570 mg	Target 3 (2022-23): K-5: ≤ 430 mg 6-8: ≤ 470 mg 9-12: ≤ 500 mg	Target 2 (2017-18): K-5: ≤ 935 mg 6-8: ≤ 1035 mg 9-12: ≤ 1080 mg	Target 3 (2022-23): K-5: ≤ 640 mg 6-8: ≤ 710 mg 9-12: ≤ 740 mg
Trans Fat	Zero grams per serving (nutrition label)		Zero grams per serving (nutrition label)	

Source: USDA, January 2012

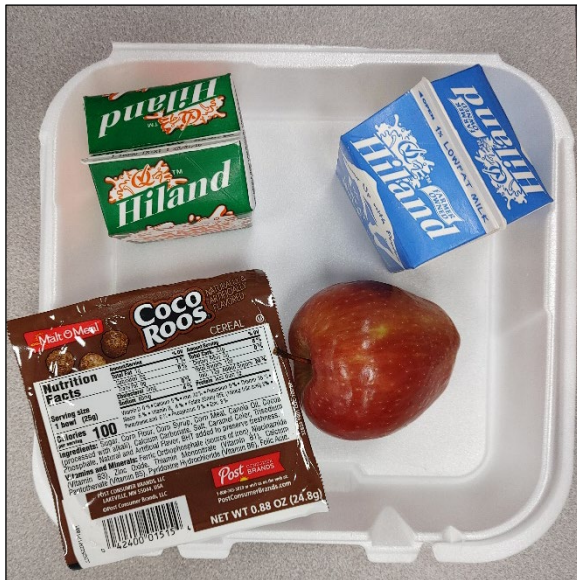
**Target 1 was set to be implemented by 2014-15*

As a result of the COVID-19 pandemic, meal programs in schools have been substantially modified. USDA has issued various waivers to accommodate the special challenges around serving meals to children attending both in-person and virtually as well as supply chain issues. These waivers began in March 2020 and were extended for the entire 2021-22 school year. The waivers received by the Oklahoma State Department of Education (SDE) cover several topics:

- Location – meals can be served in schools, as take-home meals, as pick-up meals by parents or students, or delivered to pick-up sites;
- Multiple meals – schools can provide more than one day's worth of meals to eligible children via a single meal pick-up;
- Meal times – meals can be served outside the standard meal times;
- Meal Pattern – allows for flexibility in the requirements of the meal pattern; and
- Cost – allows free meals to be served to all students.

Exhibit 5-3 provides photos of a sampling of CPS trays selected by students during the onsite period. Trays for breakfast and lunch are shown.

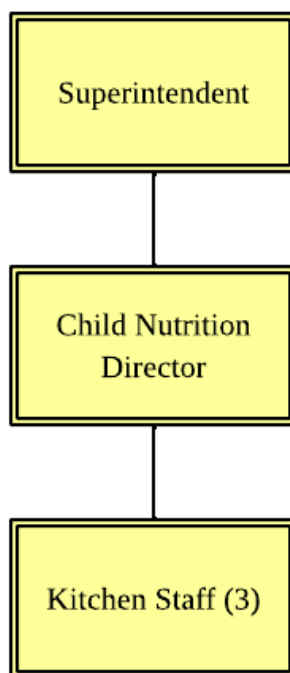
Exhibit 5-3
Breakfast and Lunch Sample Trays



Source: Prismatic, January 2022

Exhibit 5-4 shows the organization of staff within the CPS child nutrition department. All employees report to the director who reports to the superintendent.

Exhibit 5-4
CPS Child Nutrition Organization



Source: Created by Prismatic, January 2022

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 5-5** provides the results for child nutrition. More than half, 59 percent, gave child nutrition an A or B, which indicates staff is positive about the program and its staff.

Exhibit 5-5
Staff Survey Results Regarding Child Nutrition

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Child Nutrition	21%	38%	13%	13%	2%	13%

Source: Prismatic Survey Results, January 2022

FINDING 5-1

There are no vending machines in any building in the district. It is district policy to not allow students access to competitive foods through vending machines.

The superintendent stated in their interview that there are no vending machines in the district. Both the secondary and elementary principals confirmed there are no vending machines in their buildings. The consulting team did not find any vending machines in the district.

If food and beverage vending machines are accessible to students, there are several potential concerns. One is a monitoring issue to ensure all items in the machines meet the federal Smart Snacks in Schools guidelines. As of 2014-15, any competitive foods sold in school vending machines must meet or exceed the federal nutrition standards, which include limits on fat, sugar, sodium, and calorie content. Another monitoring issue is to ensure machines are on timers to prevent sales to students during non-allowed times per state regulations. In many districts these two concerns pose a question as to who monitors and often results in a struggle between the school and the child nutrition department.

Another concern is if vending machines are available to students during mealtimes it can result in students choosing to bypass the meals program in favor of consuming snacks that can be a less healthy option. Students can consume almost half of their daily calories when they are at school. Although school vending machines can be a convenient source of food and beverages throughout the day, consuming items from them on a regular basis can potentially lead to obesity and health issues. The district sends a mixed message by providing such items while also promoting healthy eating habits.

COMMENDATION

CPS makes the conscious decision to not allow vending machines in school buildings, which supports student health.

FINDING 5-2

The district is a closed campus for all students. Closed campus policies can encourage increased meal participation and healthier eating habits. Although a commendable policy, implementation could be improved.

Page 28 in the *CPS High School and Middle School Student Handbook* addresses the topic of closed campus. It states, “Any student, who leaves the campus during school hours, must check out through the office. Any student who does not check out will be considered truant!”

During their interview, the high school principal stated parents are able to call the office and give permission for their student to be checked out during lunchtime. In the past, parents were able to just leave a message, but the principal now requires parents to speak to him personally. He stated he receives approximately 30 calls every day and it is difficult to know if the caller is indeed the parent or guardian of the student. The closed campus policy could be improved upon by discontinuing the practice of allowing parents to call the principal to verbally sign their student out during lunchtime. The problem could be alleviated by requiring parents to physically come to the school to sign out their student.

Students have instituted another practice to get around the closed campus policy. They congregate in the parking lot and in their cars during lunchtime. Since this area is considered school grounds and on campus, they are technically not breaking the closed campus policy. However, this custom has become troublesome due to the large numbers of students who gather and an inability to closely monitor students’ behavior leading to potential safety and security

issues. The principal stated he has asked the board to develop a policy prohibiting this practice, but they are not willing to take this step.

Off the Map: Extracurricular School Food Open Campus Lunch published by the Public Health Advocacy Institute⁴ addresses open campus policies in schools. It states that open and closed campus policies have the potential to affect students' health, safety, and security, as well as to influence the school environment itself. It goes on to note that the 2006 School Health Policies and Programs Study showed that nationwide 71.1 percent of high school districts have a closed campus policy. The nationwide trend is moving toward more closed campuses as in 2000 there were 65.9 percent nationwide. The publication states that the school environment is an important sphere in the development of dietary behavior and recommends for policymakers to craft school food laws that encourage healthier options while restricting unhealthier options. Student input and support are noted as critical to the success of a closed school policy.

COMMENDATION

CPS has a closed campus policy that contributes to student health and safety.

Moving forward, the district should change the practice of allowing parents to call in to allow students to leave at lunchtime, as well as end student congregation in the parking lot during lunchtime.

FINDING 5-3

Adult supervision in the cafeteria during breakfast meal service is not available on a consistent basis. Adults are present during lunch meal service but are not actively interacting with students and actually providing supervision for some grades.

The superintendent stated there are staff assigned to supervise during breakfast, but this does not appear to be consistent. The consulting team observed breakfast meal service on both days of the onsite review. On the first day, one adult arrived at 7:48 and left at 8:01. Breakfast is served from 7:30 to 8:00 so there were 18 minutes of no adult supervision. On the second day there were no adults present during breakfast serving. The child nutrition staff stated that the lack of adult supervision during breakfast meal service is a frequent occurrence. Due to the layout of the buildings, child nutrition staff is not able to observe/monitor students in the lunchroom.

The consulting team observed adults in the cafeteria during lunch meal service. Adequate and appropriate supervision was observed during Pre-K-3rd grade. The same was not true during the 4th-5th grade mealtime. Most adults were sitting together and eating their lunch. They were not interacting with students, nor were they observing and monitoring student behavior.

Parents expect their children will be safe during the entire school day and students have a right to a safe school environment. Teachers and administrators have an obligation to keep children safe while in school and that means not leaving a group of students without adult supervision. Adults

⁴ <https://www.phaionline.org/2009/04/06/off-the-map-extracurricular-school-food/>

must be present to observe, conduct, and ensure inappropriate behavior is immediately addressed. In addition, districts may be liable for the non-supervision of students.

Adult interaction with students during mealtimes can be a powerful tool and an extension of the classroom. Informal teaching of appropriate social skills, healthy food choices, reinforcement of good behavior, and personal responsibility for keeping the eating area clean are all lessons adults can provide to students as they eat.

RECOMMENDATION

Ensure an adult teacher or administrator is present and providing supervision in the cafeteria during the entirety of both breakfast and lunch meal service.

District administrators should assign an appropriate number of staff to supervise students during both breakfast and lunch meal service. They should monitor to ensure staff is fulfilling their assignments due to the current practice of noncompliance. Assigned staff should be expected to interact with students and monitor and supervise instead of sitting and eating their lunch. If necessary, work schedules should be adjusted so the staff members are not expected to supervise lunchrooms during their lunch break. The superintendent should consult with the district's legal services to determine the requirements of adult supervision of a group of students and provide training to teaching staff regarding the ramifications of their noncompliance.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-4

The child nutrition program is not adequately managing its staff. The current Meals per Labor Hour (MPLH) is below industry standards. The child nutrition director stated she has calculated the MPLH and is aware of the standards.

The district is not using the SDE 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 manager 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 \$4.43⁵ 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 meals. The SDE guidelines for MPLH staffing are shown in **Exhibit 5-6**. The SDE provides MPLH guidelines for both conventional and convenience systems of food preparation. The consulting team found CPS menus to be a mix of conventional and convenience food preparation. Therefore, their productivity in labor hours should be at the low end of the recommended total hours for the conventional system.

Exhibit 5-6
Oklahoma Staffing Guidelines for Onsite Production

Number of Daily Meal Equivalents	Recommended for Conventional Systems ⁶		Recommended for Convenience Systems ⁷	
	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 2021

Exhibit 5-7 shows the 2021-22 monthly MPLH for the CPS cafeteria. The director works 8.0 hours per day and three staff each work 7.5 hours for a total of 30.5 hours. SDE allows a deduction of two and a half hours for paperwork duties so 28 daily hours is used in the calculations. Productivity (MPLH) was lower than the recommended standards. Using the average daily meal equivalents range of 201-250, total labor hours should be in the range of 14-17 hours. CPS labor hours were in excess of SDE recommendations by 14 hours per day.

⁵ Current free lunch reimbursement rate + USDA Foods value per plate

⁶ A system where meals are generally prepared from scratch onsite.

⁷ A system where meals are generally only re-heated from frozen prepared items onsite.

Exhibit 5-7
CPS Cafeteria Meals per Labor Hour
2021-22

Month	Lunches Served	Breakfasts Served	Meal Equivalents	School Days	Daily Meal Equiv.	Daily Labor Hours	MPLH
August	3,475	1,037	3,994	18	222	28	7.92
September	3,823	1,181	4,413	18	245	28	8.76
October	3,240	955	3,718	15	248	28	8.85
November	3,354	988	3,848	15	257	28	9.16
December	2,891	873	3,328	14	238	28	8.49
Average	3,357	1,007	3,860	16	242	28	8.62

Source: CPS and Prismatic calculations, January 2022

The child nutrition director stated the staff perform 6.5 hours per day doing custodial duties in the cafeteria. These include putting down tables for breakfast, washing tables, sweeping, and mopping floors during and after breakfast, doing the same during and after lunch, putting up the tables after lunch, sweeping and mopping all floors in the lunchroom as well as the two hallways between the kitchen and the cafeteria. Removing these hours from the MPLH calculation still results in an excess of 7.5 labor hours per day. **Exhibit 5-8** shows the 2021-22 monthly MPLH for the CPS cafeteria if staff was reduced by one person.

Exhibit 5-8
CPS Cafeteria Meals per Labor Hour – Reduced by One Employee
2021-22

Month	Lunches Served	Breakfasts Served	Meal Equivalents	School Days	Daily Meal Equiv.	Daily Labor Hours	MPLH
August	3,475	1,037	3,994	18	222	20.5	10.8
September	3,823	1,181	4,413	18	245	20.5	12.0
October	3,240	955	3,718	15	248	20.5	12.1
November	3,354	988	3,848	15	257	20.5	12.5
December	2,891	873	3,328	14	238	20.5	11.6
Average	3,357	1,007	3,860	16	242	20.5	11.8

Source: BCPS and Prismatic calculations, January 2022

Costs for labor and benefits are a major expenditure 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 the kitchen has adequate labor hours but is not overstaffed.

RECOMMENDATION

Implement a combination of a reduction in labor hours and make efforts to increase meal equivalents to yield higher productivity rates.

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 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.

CPS should implement a combination of decreasing labor hours as well as make efforts to increase meal equivalents. Staff should be decreased by one person and the remaining staff should remain at their current hours. The child nutrition director should perform a MPLH analysis every month. If warranted, due to increases in meal equivalents, additional labor hours can be assigned, or a part-time staff person can be hired. This recommendation should be feasible if the child nutrition staff does not have to perform custodial duties. Since an à la carte program of items besides menu components is not available, offering à la carte to all students will help increase meal equivalents. These actions combined will serve to improve productivity levels in the meals program.

FISCAL IMPACT

This recommendation can be implemented with existing resources. Eliminating one staff position would result in an annual savings of approximately \$19,514 (base salary, \$12,022; plus benefits of \$7,494). In addition to improving the productivity rate, this recommendation will also result in an improvement to the financial position of the program.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Reduce kitchen staffing.	\$19,514	\$19,514	\$19,514	\$19,514	\$19,514

FINDING 5-5

Child nutrition staff are performing all custodial duties in the cafeteria before, during, and after breakfast and lunch mealtimes. Performing custodial duties is not typically a responsibility of child nutrition staff and has resulted in lower financial performance of the program.

The district contracts with an outside vendor to provide custodial services. Personnel provided by the vendor work in the buildings after the school day, resulting in no services provided during mealtimes. As a result, the child nutrition staff assumed the duties typically performed by a custodian. These duties include putting the tables down at the beginning of the day and folding them up at the end of the day.

During both meal services, child nutrition staff have a constant presence in the cafeteria and are responsible for cleaning tables and sweeping floors. At the end of the day, they sweep and mop all floors in the cafeteria as well as the common areas in the two hallways outside the kitchen. The *2013 School Performance Review* also noted six hours per day of custodial duties were being performed by the child nutrition staff and recommended the district hire an additional six-hour employee as a custodian.

Total time spent by child nutrition staff doing custodial duties is estimated to be 6.5 hours per day. The consulting team observed the child nutrition staff to be extremely attentive to keeping the cafeteria clean during lunch. When asked why they spent so much time wiping down the tables, they replied how important it was for them to ensure students did not sit at a dirty table. While the child nutrition department is able to fit these duties into their current staffing hours, the program is not serving enough meals for the total hours assigned. In addition, overstaffing results in a negative impact on the financial status of the program.

RECOMMENDATION

Rearrange custodial work schedules to provide support during meal periods.

A similar recommendation was made in the 2013 report. The superintendent should work with the contract custodial firm to have a custodian assigned during the day at mealtimes to provide support.

FISCAL IMPACT

This recommendation can be implemented with existing resources and will have a positive impact on the financial operations of the child nutrition program.

FINDING 5-6

The financial status of the child nutrition program is problematic. The program operated at a loss and required general fund assistance for the past four years to cover expenses. This has reduced the amount of general fund dollars available for other district programs, including instruction. The child nutrition director does not receive any financial reports and is therefore not aware of the exact financial status of the program.

Exhibit 5-9 shows the CPS child nutrition program revenues and expenditures for the past five years. Several unusual circumstances impacted the financial position over this time frame. The program was managed by Keystone, a Food Service Management Company (FSMC) in 2016-17. The high school principal stated the district was unable to pay the total fees owed to the FSMC during this year and paid the remaining balance in 2017-18, which skewed the expenditures of both time frames. COVID-19 caused the district to close in the spring of 2019-20 and impacted meal service in 2020-21, resulting in a substantial reduction in revenues.

Exhibit 5-9
CPS Child Nutrition Revenues and Expenditures Over Time

	2016-17	2017-18	2018-19	2019-20	2020-21	Percent Change
Revenues						
District Sources	\$30,808	\$27,385	\$26,537	\$23,844	\$7,336	(0.8%) ▼
State Sources	\$2,191	\$1,764	\$1,371	\$1,521	\$1,519	(0.3%) ▼
Federal Sources	\$138,107	\$138,550	\$132,337	\$136,844	\$127,393	(0.1%) ▼
Total Revenues	\$171,105	\$167,700	\$160,245	\$161,467	\$136,248	(0.2%) ▼
Expenses						
Salaries and Benefits	\$80,955	\$87,321	\$94,980	\$99,848	\$102,779	0.3% ▲
Food and Supplies	\$28,070	\$198,481	\$92,124	\$87,836	\$73,129	1.6% ▲
Other Expenses	\$11,798	\$3,387	\$3,863	\$5,989	\$6,612	(0.4%) ▼
Total Expenses	\$120,823	\$289,189	\$190,967	\$193,673	\$182,520	0.5% ▲
Revenues - Expenses	\$50,282	(\$121,489)	(\$30,722)	(\$32,206)	(\$46,272)	(1.9%) ▼

Source: SDE, School District Revenue and Expenditure Reports 2017-21

Note: Totals may not reconcile completely due to rounding

When a child nutrition program loses money every year, in addition to requiring support from the general fund, it does not build up a fund balance. Ending the year with an overage makes it possible to pay for beginning of year expenses before federal reimbursement is received and ensures it can pay cost increases in categories such as food and labor/benefits. Industry experts advise maintaining a two-to three-month operating balance. USDA regulations limit net cash resources to an amount that does not exceed three months' average expenditures.

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. 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.

Revenue generated by the CPS child nutrition program was \$161,467 for 2020-21. **Exhibit 5-10** shows each amount expended by category and the percentage of total revenue for each expenditure. As shown, all operating ratios are out of line with industry recommendations.

Exhibit 5-10
CPS Child Nutrition Operating Ratios, 2020-21

Category	CPS Expenditures	CPS Percentage of Revenue	Industry Standard
Labor/Benefits	\$102,779	75.00%	40-45%
Food/Supplies	\$73,129	54.00%	40-45%
Other	\$6,612	0.04%	15-20%
Total Expenditures	\$182,520	129.04%	N/A

Source: OCAS and Prismatic calculations, January 2022

There are several factors contributing to the overall negative financial status of the program. They include:

- The department is overstaffed in comparison to best practices.
- There are no à la carte items available. This could provide a sizeable increase in revenue.
- Participation rates for both breakfast and lunch for all grades are below industry standards.
- 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.

School Food & Nutrition Service Management for the 21st Century, sixth edition, states the following regarding school child nutrition programs operating as an enterprise system:

The school food and nutrition service fund is one of the most challenging school district accounts to manage because of the many variables. A good accounting system is essential. It should follow generally accepted governmental accounting principles. The school food and nutrition service fund is an enterprise fund. An “enterprise fund” generates its own income and is different from a “budgetary fund.” The program fund parallels an enterprise account in that it produces goods, provides services, and charges for those goods and services.

School meal programs are unique in a school district because they have both revenue and expenditure accounts. If the programs do not operate with fiscal soundness, they are dependent upon the general fund for subsidization.

RECOMMENDATION

Implement changes that will result in a more cost-effective child nutrition program.

There are several other findings in this chapter that if implemented will result in a more positive overall financial picture for the child nutrition program.

- improve implementation of the closed campus policy;
- improve MPLH and productivity rate;
- improve breakfast participation rates;
- improve lunch participation rates;
- improve number of students approved for free meals; and
- provide director with financial reports.

FISCAL IMPACT

This recommendation can be implemented with existing resources and should decrease program costs while increasing program revenues. Using the 2020-21 data, at a minimum the child nutrition program needs to improve its bottom line by \$45,000 per year. This can be achieved by implementing the recommendations of this report.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Improve financial results of child nutrition program.	\$45,000	\$45,000	\$45,000	\$45,000	\$45,000

FINDING 5-7

There are no financial reports developed specifically for the child nutrition program. Without such reports, the child nutrition director, administrators, and the board are not able to assess the financial status of the program.

The program director keeps a tabulation by month of revenues and expenditures, which is commendable. This indicates she has a desire to know how the program is doing. She stated it looks to her like many months there is more revenue than expenses. However, her tabulation does not include all charges such as the various employee fringe/benefits so it is not an accurate picture of the financial status of the program. The only useful reports that are currently generated are the summary reports from the point-of service (POS) software that are used to prepare the claims. She stated no one in the district meets with her regarding financial matters.

The superintendent stated they do not know the financial status of the program. When asked about the Estimate of Needs, which is the budget, they stated the auditor develops it and their intent is to do it in house. The auditor does not consult with the child nutrition director so

estimates for revenue and expenditures for the program are not based on projections or historical trends.

The encumbrance clerk stated there is no monitoring of the child nutrition program. She does not prepare any statements specifically for the program. She does not meet with the child nutrition director. She is not aware of the financial status of the program.

The lack of financial data has resulted in no regular assessment being performed. Decisions are made regarding menus, purchasing food and supply items, salaries, and assigning labor hours with no knowledge of how these costs are impacting the overall financial health of the program. As long as the district has sufficient funds to support the program there is no effort made to determine if improvements could be made for greater effectiveness.

Standard business practice dictates the development of a well-defined set of reports that can be used for data analysis and program improvement. *Managing Child Nutrition Programs: Leadership for Excellence*⁸ states, “One of the most important aspects of financial management involves the preparation of financial statements that can be used to analyze program operations.” The only way to ensure a fiscally solvent program is to prepare reports and then use this information for making decisions.

The Institute for Child Nutrition (ICN) recommends preparing and distributing site-level performance reports in their class *Financial Management: A Course for School Nutrition Directors*.⁹ School Nutrition Association’s (SNA) self-assessment tool, *Keys to Excellence*, includes the following best practices and indicators:

- A Statement of Revenue and Expenditures (Profit and Loss Statement) is prepared monthly for the department level and for each serving site.
- School nutrition site-level Statement of Revenue and Expenditures is distributed.
- School nutrition personnel at the school site level receive training on controlling costs and revenue generation.
- School nutrition personnel at the school site level are encouraged to develop and implement practices to increase revenue and control costs.¹⁰

Exhibit 5-11 shows a listing of reports typically used in school districts to monitor the child nutrition operation. Samples of these reports can be found in *Financial Management: A Course for School Nutrition Directors 2nd Edition* from the ICN.¹¹

⁸ Martin, J. (2008). *Managing child nutrition programs: Leadership for excellence* (2nd ed.). Sudbury, Mass.: Jones and Bartlett.

⁹ <https://theicn.org/icn-resources-a-z/financial-management-a-course-for-school-nutrition-directors/>

¹⁰ <https://schoolnutrition.org/learning-center/usda-professional-standards/keys-to-excellence/>

¹¹ Institute of Child Nutrition. (2017). *Financial management: A course for school nutrition directors* (2nd Ed). University, MS: Author.

Exhibit 5-11
Sample Financial Management Reports Used to Monitor Child Nutrition Operations

Report	Data	Uses	Frequency
Budget	<ul style="list-style-type: none"> Forecasted revenue by source based upon estimates of participation, reimbursement, meal prices, and new revenue sources Forecasted expenditures based upon a determination of increases or decreases in each category 	<ul style="list-style-type: none"> Allow for a projection of financial performance for the next school year Allow for comparisons between actual and forecasted performance 	Once a year with monthly monitoring and adjustments as necessary
Statement of Revenue and Expenditures (Profit and Loss Statement)	<ul style="list-style-type: none"> All revenues by source and expenditures by category Net gain/loss for the time period Comparison of current month to previous month and year to date Reflects activity over one month 	<ul style="list-style-type: none"> Determine if revenues are sufficient to cover expenditures Identify sites needing adjustments to reduce loss 	End of each month
Statement of Net Position (Balance Sheet)	<ul style="list-style-type: none"> Assets, liabilities, fund balance Reflects financial position at a point in time 	<ul style="list-style-type: none"> Determine amount of fund balance available for expenditures Verify if program has no more than three months average operating costs in reserve Determine financial status of program 	End of each month
Key Operating Ratios	<ul style="list-style-type: none"> An analysis of expenditures to revenue Calculated by dividing each expenditure category by total revenue generated during the same time period 	<ul style="list-style-type: none"> Determine the percentage of revenue that is used for food, labor, benefits, supplies, overhead, capital expenditures, and indirect costs Compare actual ratios to goals set and industry standards Determine if the program is operating at break-even or experiencing a profit or loss 	Monthly or quarterly
Meals Per Labor Hour	<ul style="list-style-type: none"> Calculated by dividing total number of meals/meal equivalents by total number of labor hours for each site Meal equivalents are determined by converting all meals and à la carte revenue to a standard unit (lunches) 	<ul style="list-style-type: none"> Analyze staffing patterns by site and compare to goals set Identify sites needing adjustments to labor hours Allow comparison to industry standards 	Monthly
Participation Reports	<ul style="list-style-type: none"> Average daily attendance (ADA), number and percentage of students eligible by category (free, reduced, paid), average number of breakfast and lunch meals served by category, daily participation percentage by eligibility category District level and site level data 	<ul style="list-style-type: none"> Determine what percentage of eligible students are participating in each program Identify eligibility categories to target for participation improvement Identify sites not meeting participation goals Allow comparison to industry standards 	Monthly and at end of year
Pre and Post Menu-Costing	<ul style="list-style-type: none"> Menu items Forecasted and actual amounts used Food cost per menu item Total cost per menu Cost per serving Average food cost per meal District and site level data 	<ul style="list-style-type: none"> Allow for comparison of actual cost per meal to revenue per meal (reimbursement, commodity value, payment) Determine menus needing adjustments for cost effectiveness Assist in purchasing and evaluation of new products 	Monthly

Source: Created by Prismatic, February 2015

The monthly cafeteria-level report distributed by another school district is shown in **Exhibit 5-12**. This sample provides a variety of data, including financial and performance data, in a format that is easy to read and understand. Additional sample reports can be found in the ICN financial management class materials.

Exhibit 5-12
Sample Monthly Cafeteria Report

Revenue:		Current Month	Year to Date
Meal Revenue	\$2,411.40		
Supplemental Sales	\$1,648.90		
Other Revenue	\$75.34		
Total Reimbursement	\$15,061.75		
TOTAL REVENUE:	\$19,197.39		\$139,903.44

Expenses:		Current Month	Year to Date
<i>Inventory/Food Cost</i>			
Beginning Inventory	\$5,973.00		
Purchases	\$7,167.00		
Transfers	(\$70.00)		
Ending Inventory	\$5,932.00		
<i>Total Food Usage:</i>	<i>\$7,138.00</i>		<i>\$51,686.00</i>
<i>Inventory/Supply Cost</i>			
Beginning Inventory	\$1,413.00		
Purchases	\$753.00		
Transfers	\$311.00		
Ending Inventory	\$1,564.00		
<i>Total Supply Usage:</i>	<i>\$913.00</i>		<i>\$6,618.00</i>
<i>Labor Costs</i>			
School Staff	\$8,186.19		
Temporary Labor	\$0.00		
<i>Total Labor:</i>	<i>\$8,186.19</i>		<i>\$67,638.24</i>
Overhead	(\$108.37)		\$6,207.11
TOTAL EXPENSES:	\$16,128.82		\$132,149.35
GAIN or (LOSS):	\$3,068.57		\$7,754.09
% GAIN or (LOSS):	15.98%		5.54%

Supervisor Comments/Suggestions:

Percent of Revenue			
	Total Cost	% of Total Revenue	Goal Less Than
Food	\$7,138.00	37.18%	40%
Supplies	\$913.00	4.76%	5%
Labor	\$8,186.19	42.64%	40%
Overhead	(\$108.37)	-0.56%	7%
Total Cost	\$16,128.82	84.02%	92%

Total Meal Equivalents Per Day	
Total Breakfasts:	56
Total Lunches:	264
Supplemental Sales:	36
Total Meal Equivalents:	357

% of Eligible Meals Served			
Average Daily Attendance:		426	
	# Eligible	% Served	Goal
Free	223	85.67%	
Reduced	14	88.72%	
Paid	219	26.56%	

Current Month Plate Cost			
	Total School Cost	Cost Per ME	Goal
Food	\$7,138.00	\$1.05	\$1.08
Supplies	\$913.00	\$0.13	\$.13
Labor	\$8,186.19	\$1.38	\$1.08
Overhead	(\$108.37)	(\$0.02)	\$.19
Total Cost	\$16,128.82	\$2.55	\$2.48

YTD Plate Cost			
	Total School Cost	Cost Per ME	Goal
Food	\$51,686.00	\$1.05	\$1.08
Supplies	\$6,618.00	\$0.13	\$.13
Labor	\$67,638.24	\$1.37	\$1.08
Overhead	\$6,207.11	\$0.12	\$.19
Total Cost	\$132,149.35	\$2.67	\$2.48

Source: Prismatic files, December 2013

CPS has the data to develop such a report for the cafeteria. Revenue and expenditure data are accessible. Participation and sales data are available from the POS software. Orders are placed with vendors who provide an invoice upon delivery. These can be used to determine food and supplies costs. An inventory of food and supplies is taken on a monthly basis. Staff are paid on a contract basis so labor and benefits costs are readily available.

RECOMMENDATION

Develop child nutrition program reports that provide meaningful data in a format that can be used for analysis and decision-making.

The child nutrition director, superintendent, treasurer, activity funds custodian, and encumbrance clerk should meet and discuss the reports that are needed for program analysis, how to collect the data needed for these reports, the format necessary to present the data so they can be used for evaluation and analysis, and who will assume responsibility for preparation of the reports. The child nutrition director should receive at a minimum a monthly revenue and expenditure report for the child nutrition program. Developing a Monthly Cafeteria Report, such as that shown in the previous exhibit, would provide an even better picture that the director could use for program evaluation and improvement. A budget should be developed for the child nutrition program using sound analysis of projected revenue and expenditures and with input from child nutrition staff. The child nutrition director should meet with the encumbrance clerk on a regular basis to discuss the financial picture of the program.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-8

CPS's rate of students approved as eligible for free and reduced meals is in the bottom half among peer districts. It is also the lowest of all districts in the county and lower than the state average. In CPS, 50.3 percent of students are approved for free and reduced meals, compared to the state average of 59.6 percent. The approval rate is lower than three peer districts as shown in **Exhibit 5-13**.

Exhibit 5-13
CPS and Peer District Approval Rates, 2020

Entity	Approval Rate
Crescent	50.3%
Cashion	29.2%
Comanche	53.7%
Empire	56.1%
Morrison	56.6%
Minco	47.1%
Peer Average	48.8%
State Average	59.6%

Source: Office of Education Quality and Accountability, District Socioeconomic Data 2020

The high school principal stated they think the eligibility rate should be 60 percent. The elementary principal said it should be at least 60 percent. The superintendent also felt it should be higher and stated CPS is a lower income district in the county. These statements are supported by data (**Exhibit 5-14**) which show how CPS compares to the other school districts in the county. CPS has the lowest household income and the highest percent of population below the poverty rate yet their approval rate is the lowest in the county.

Exhibit 5-14
CPS and Logan County Household Income, Poverty Rate, and Approval Rate, 2020

Entity	Average Household Income	Percent Population Below Poverty	Approval Rate
Crescent	\$62,163	22.5%	50.3%
Coyle	\$64,907	20.6%	72.2%
Guthrie	\$71,661	16.8%	58.2%
Mulhall-Orlando	\$69,786	11.1%	53.5%
County Average	\$67,129	17.8%	58.5%

Source: Office of Education Quality and Accountability, District Socioeconomic Data 2020

The Free and Reduced-Price Meals application is included in CPS student packets at the beginning of the school year. Parents return the completed applications to the schools. During interviews, when asked how the process could be improved to get more parents to apply, the superintendent and principals suggested opening the cafeteria on back-to-school night for parents to fill out the applications on available Chromebooks. The child nutrition director would be

present to help with the process and would provide refreshments as an incentive to get parents to come to the cafeteria. Previously, parents have not been able to apply online. Implementing this technology should also help to improve the application rate.

Data from the meal applications is used for more than just certifying students for free or reduced-price meals. It also helps with linking families to other benefits such as waiving certain school fees and Pandemic EBT (P-EBT) benefits. Districts benefit from the data as it helps determine which additional funding programs, they are eligible for. Return rates can be improved by emphasizing these additional benefits to parents.

Some parents may not fill out an application due to fears of perceived stigma or confidentiality. The district needs to assure parents that applications are completely confidential and secure, do not require a Social Security number, and have no effect on the public charge rule as it relates to immigration status. The Food Research and Action Center (FRAC) has published an excellent toolkit *Strategies to Increase Applications for School Meals*¹² that contains numerous strategies districts can use to encourage parents to apply and increase their approval rate.

RECOMMENDATION

Develop strategies to improve the rate of parents submitting the Free and Reduced School Meals Application.

The district should:

- implement the available technology to allow parents to fill out the application online;
- organize a process to assist parents to apply online during the back-to-school night event by setting up Chromebooks in the cafeteria; and
- develop messaging for parents using social media emphasizing the importance of submitting applications as a benefit to both them and the district.

These measures should be set up for the beginning of 2022-23.

FISCAL IMPACT

This recommendation can be implemented with existing resources. By increasing approval rates to 61 percent, the average of the approval rates of the remaining school districts in Logan County (Coyle, Guthrie, and Muhall-Orlando), CPS could receive an additional \$45, 931 in federal reimbursements for free or reduced-price lunch, assuming that the USDA returns to pre-COVID reimbursement methodology..

¹² <https://frac.org/research/resource-library/strategies-to-increase-applications-for-school-meals>

FINDING 5-9

Student participation in breakfast has been extremely low at all levels for the past four years. This negatively impacts the financial health of the program and potentially student health, if students do not have an opportunity to eat breakfast at home.

One of the basic measures of child nutrition operations is student meal participation. All meals served according to federal guidelines receive some level of reimbursement, including those served to students who pay full price. Student participation in a district's meal programs is directly impacted by a variety of operational factors, including student access to food, food quality and variety, alternatives to the school meal, and cafeteria environment.

Because participation rates are highly variable across the nation and depend greatly on local circumstances and management, only a few rules of thumb exist for assessing student participation. The Healthier US School Challenge (HUSC) was established by USDA and included basic criteria and goals for participation. These goals provide a best practice for schools to use to compare a district's participation rates to those established as a benchmark.

Exhibit 5-15 shows best practice rates for breakfast. These benchmarks are the recommended percentage of participation of student enrollment.

Exhibit 5-15
Best Practice Breakfast Participation Rates

School Level	Best Practice
Elementary	35%
Middle	35%
High	25%

Source: Healthier US School Challenge Criteria, 2014

In comparison, **Exhibit 5-16** shows average participation rates in CPS over four years. Breakfast participation among secondary students is practically non-existent.

Exhibit 5-16
CPS Breakfast Participation Rates Over Time

Grade	Breakfast Participation			
	2018-19	2019-20	2020-21	2021-22
Elementary	16%	15%	14%	17%
Middle	11%	1%	1%	1%
High	3%	1%	1%	1%
District Average	10%	15%	14%	17%

Source: CPS and Prismatic calculations, January 2022

The 2013 School Performance Review also noted a very low breakfast participation rate. The report stated fewer than half of all elementary students ate breakfast, middle school was even lower, and high school participation was almost nonexistent. The reviewers indicated the time

needed to eat breakfast in the cafeteria before school begins was the major obstacle. Their recommendation was to implement a breakfast in the classroom initiative.

This recommendation was discussed with the superintendent, the elementary principal, and the child nutrition director during their interviews. All showed a positive response, and the principal indicated a desire to start as soon as possible.

The consulting team found several practices in CPS contributing to breakfast rates lower than industry best practices:

- Only one entrée and fruit offered daily – no choices;
- Fresh fruit not offered daily;
- Cold cereal only offered 3 times in the 6-week (24 days) cycle. Observations in other districts noted this is a favorite among elementary students;
- Yogurt, another student favorite, offered only two times in the 6 week cycle;
- Only self-serve option on the line is juice;
- Posting the 1st and 2nd semester breakfast menus on the website is not user friendly;
- Some buses do not arrive to school before the start of breakfast service; and
- There are no alternative breakfast service approaches used (such as breakfast in the classroom or breakfast after the first bell).

Several alternative meal service models for breakfast have resulted in increased participation. These include:

- Breakfast in the classroom after the first bell is an approach that brings meal components to students in hallways or in their classroom. Students eat in their classrooms during first period. Meals are either served off carts in the hallway with students making selections or portioned out by classroom attendance in containers – one per classroom.
- Second Chance Breakfast is a model where breakfast is served during a break in the morning usually after first period. It is served in the cafeteria or from kiosks outside the cafeteria.
- Grab and Go Breakfast meal packages can be served from kiosks or carts inside or outside the cafeteria.

In its *2018 Operations Report*, the School Nutrition Association stated that nearly half of school districts offer an alternative service venue other than the traditional cafeteria line:

- 44.0 percent offer breakfast through direct delivery to classrooms;

- 61.8 percent offer breakfast through grab and go kiosks outside the cafeteria;
- 48.8 percent offer breakfast using grab and go kiosks inside the cafeteria; and
- 4.0 percent offer breakfast through reimbursable vending machines.

RECOMMENDATION

Develop strategies for increasing breakfast participation.

The 2013 report included a similar recommendation. The district should:

- organize student focus groups at all three grade levels to determine why they are not participating in breakfast and solicit ways to increase participation.
- survey parents to determine why their child does not eat breakfast at school and what changes could be made to encourage participation.
- adjust menus to provide choices. Provide a variety of fresh as well as canned fruit daily along with assorted juices. Offer yogurt and cold cereal as daily choices as well as additional items such as breakfast burritos, and sausage biscuits.
- post a breakfast menu for the current month on the website instead of the 1st and 2nd semester menu.
- implement self-serve for all items.
- ensure all buses arrive five minutes prior to start of breakfast service.
- evaluate alternative service models and determine which would best service each of the three grade levels. A different approach may be needed for each level.

Once a specific service model is selected by grade level, the child nutrition director should purchase appropriate carts, kiosks, or delivery bags and implement as quickly as possible. Explore the availability of grants for the purpose of breakfast expansion. The child nutrition department should develop training for teachers on the new service models and demonstrate to parents at enrollment day and communicate on the district website.

FISCAL IMPACT

Any fiscal impact will be dependent upon changes to service models and cannot be determined until those decisions are made. All other strategies can be implemented without a fiscal impact.

FINDING 5-10

Student lunch participation rates the past four years are extremely low at all levels and considerably lower than industry standards. This negatively impacts the financial health of the program and potentially student health, if students are skipping lunch meals.

Exhibit 5-17 shows best practice rates for lunch. These benchmarks are the recommended percentage of participation of student enrollment. In addition to the HUSSC goals, another expert in the industry recommends goals for lunch participation as noted.

Exhibit 5-17
Best Practice Lunch Participation Rates

School Level	Best Practice HUSSC	Best Practice Pannell-Martin
Elementary	75%	70%
Middle	75%	60%
High	65%	50%

Source: HealthierUS School Challenge Criteria, 2014; Pannell-Martin, School Foodservice Management, 4th Edition, 2000¹³

In comparison, **Exhibit 5-18** shows average participation rates in CPS over four years. When comparing CPS lunch participation rates to best practices all three levels were substantially below best practices, with high school students participating at a notably lower rate when compared to the other two levels. There was relatively little change from year to year, which indicates the program needs some major changes in order for student customers to develop new interest.

Exhibit 5-18
CPS Lunch Participation Rates Over Time

Grade	Participation			
	2018-19	2019-20	2020-21	2021-22
Elementary	44%	47%	45%	46%
Middle	39%	38%	37%	40%
High	14%	21%	14%	18%
District Average	32%	35%	33%	35%

Source: CPS and Prismatic calculations, January 2022

Results from student surveys indicated only 17 percent like the food served in the cafeteria. Only 25 percent think there is a good variety of food. **Exhibit 5-19** shows the responses about the cafeteria from the 207 secondary students who responded. The high scores in the “No Opinion” column reflect the large number of students who do not participate in the program. These survey data substantiate the need for major improvements to the meal program to achieve best practices participation levels.

¹³ Pannell-Martin, D. (2000). *School Food and Nutrition Management for the 21st Century* (4th ed.). School Nutrition Association

Exhibit 5-19
Student Survey Results Regarding Child Nutrition

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Discipline and order are maintained in the school cafeteria.	9%	34%	45%	8%	4%
I have enough time to eat my lunch each day.	11%	42%	18%	21%	9%
I usually have to wait in line longer than five minutes to get a school lunch.	9%	14%	53%	20%	5%
I like the food served in the cafeteria.	3%	14%	38%	20%	26%
The cafeteria serves a good variety of food for breakfast.	4%	12%	68%	7%	9%
The cafeteria serves a good variety of food for lunch.	5%	20%	47%	15%	13%

Source: Prismatic Survey Results, January 2022

The 2013 School Performance Review also noted a low participation rate for lunch. Interviews with district administrators yielded several ideas for changes to improve participation:

- Some thought the negative opinions were due to program emphasis on nutrition.
- Some thought à la carte and new menu items would be a good idea.
- Some thought more variety would be important in improving participation.
- Some thought grab and go items would be popular.
- Some thought that perhaps parents are not aware of the changes to school meals since when they were students.

The consulting team talked to students who brought their lunch and, when asked why, one student said she would like to eat some school lunches but her mother packs her a lunch every day. When asked if any looked at the menu and talked about it with their parents, all said no.

The consulting team found several practices contributing to rates lower than industry best practices:

- The same menu is used for all grade levels. Different age groups have different food preferences and menus need to accommodate the more developed palates of the older students.
- There is only one entrée offered and limited fruit and vegetable choices.

- There is no ability for students to select what items they want through a self-serve process. Servers ask every student, for each item offered, whether they would like it to be put on their trays. When a student makes a selection themselves from several options, they feel a sense of control and are more inclined to consume what they have selected. **Exhibit 5-20** shows an example of how proportioned items can be presented.

Exhibit 5-20
Example of Pre-Portioned Vegetable Servings at Another School



Source: Prismatic, January 2022

- There are no à la carte items available for sale other than additional menu items. An à la carte program has the potential of increased revenue and higher student satisfaction and participation.
- Students are not being fully utilized to provide input on menus and the overall meals program.
- There are no pre-wrapped grab and go items such as hot and cold sandwiches, wraps, burritos, prepackaged meal salads, and pizza in boxes which are popular with secondary students.
- Posted menus lack color, marketing, and messaging. Use of wording such as whole grain and whole wheat may be perceived as not tasty.
- The cafeteria walls are drab and lack color and attractive artwork.
- Little advertising to parents on a continual basis that all meals are free this year.
- Menu is not posted in the cafeteria before students enter the serving line. **Exhibit 5-21** is an example of a menu board that could be used in the cafeteria.

Exhibit 5-21 Sample Menu Board



Source: Prismatic, December 2014

There are a variety of resources and training materials available to assist child nutrition programs to increase participation. The Smarter Lunchrooms Movement at the Cornell Center for Behavioral Economics in Child Nutrition Programs has an assortment of training materials, best practices, research articles, and self-assessment forms. The SNA has a self-assessment section on menu planning and marketing in their *Keys to Excellence*¹⁴. The Institute of Child Nutrition (ICN) has a publication, *Best Practices for Marketing the School Nutrition Program*, as well as training courses for staff such as *Focus on the Customer*. USDA's Team Nutrition has a toolkit *Fruits and Vegetables Galore* which contains a workbook titled *Meal Appeal Attracting Customers*. The ICN *Best Practice Guide for Increasing Middle/Junior High School Student Participation and Satisfaction in the National School Lunch Program*¹⁵ is an excellent toolkit that helps an operator assess the best practice areas of choice, customer service, and food quality.

SNA's *Keys to Excellence* self-assessment program¹⁶ indicates the following are best practices when planning menus:

- student preferences are considered when planning menus;

¹⁴ *Keys to Excellence: Standards of Practice for Nutrition Integrity*. (2014). Retrieved from https://schoolnutrition.org/uploadedFiles/4_Certification_Education_and_Professional_development/3_Keys_to_Excellence/2014%20Keys%20to%20Excellence%20Standards%20April%202014.pdf

¹⁵ Rushing, K. (2015). *ICN best practice guide for increasing middle/junior high school student participation and satisfaction in the National School Lunch Program*. (Resource Item No. GY 2012 #2). Hattiesburg, MS: Institute of Child Nutrition, Applied Research Division.

¹⁶ *Keys to Excellence: Standards of Practice for Nutrition Integrity*. (2014). Retrieved from https://schoolnutrition.org/uploadedFiles/4_Certification_Education_and_Professional_development/3_Keys_to_Excellence/2014%20Keys%20to%20Excellence%20Standards%20April%202014.pdf

-
- 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;
 - school nutrition personnel are trained to monitor plate waste;
 - the “offer versus serve” option is available to students at all grade levels; and
 - students, parents, and other stakeholders are encouraged to provide feedback on the menu (i.e., via email, suggestion boxes, comment cards, surveys, website, and social media).

RECOMMENDATION

Develop strategies for increasing student lunch participation rates.

There are several areas where the child nutrition director should make changes to increase participation levels:

- The director should organize an elementary and 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 menus.
- Two menus should be developed – an elementary and secondary. Menu planning should include multiple entrée and side choices at all grade levels as well as pre-wrapped grab and go items at the secondary level.
- New colorful menus should be developed each month with changing messages and information. There are several free school menu templates available online. Technology students in the district should be used to help the director create the new menu template.
- Menu items should be pre-portioned on the serving line so students can self-select items for their meal. Staff should be used to supply the lines instead of asking students what items they want. Meal service lines will need to be reorganized to accommodate proportioned items and à la carte items.
- À la carte items should be available for purchase with a limited number at elementary and a greater variety for secondary students. Marketing and communication materials will need to be developed for students and parents and disseminated using social media. The manager should assess results of changes on a regular basis and make changes as needed.
- Art students in the district should create colorful artwork for the cafeteria walls.
- The district should post the menu in the cafeteria using a colorful template.

- District website and other social media sites should be used on a frequent basis to communicate with parents as to changes, announcements, menus etc.

FISCAL IMPACT

This recommendation can be implemented with existing resources and should have a positive impact on program participation.

FINDING 5-11

There is no formalized opportunity for students to provide feedback about the meal programs. They have no involvement in testing/evaluation of recipes or new food items.

The child nutrition director stated that they generally do a survey at the beginning of the school year in August. The purpose of this survey is to ask what students would like to see on the menu and what are their favorite foods. That is the only current effort to solicit feedback from students.

The School Nutrition Association (SNA)¹⁷ recommends several best practices regarding student feedback in its self-assessment tool, Keys to Excellence:

- School nutrition personnel solicit feedback from students about meal choices and report feedback to the manager.
- Students are included in panels and/or committees used to select products and/or plan menus.
- Students, parents, and other stakeholders are encouraged to provide feedback on the menu (i.e., via email, suggestion boxes, comment cards, surveys, Website, social media).

SNA's 2015 School Nutrition Trends Report discussed several programs or initiatives to promote healthier school food choices. They stated the most prevalent program implemented is student taste tests and sampling as cited by nearly 75 percent of districts overall.

In *School Food & Nutrition Service Management*,¹⁸ Pannell-Martin recommends getting feedback from students, as it is more definite than using production records to determine student preferences. She goes on to indicate the following as good techniques for gathering feedback from students:

- formal questionnaires and surveys;
- informal interviews;
- small-group discussions;

¹⁷ <http://www.schoolnutrition.org/Content.aspx?id=20206>

¹⁸ Pannell-Martin, D., & Boettger, J. (2014). *School Food and Nutrition Management for the 21st Century* (6th ed.). School Nutrition Association

- suggestion boxes;
- asking for immediate feedback using texts from mobile devices; and
- tasting parties and sampling.

RECOMMENDATION

Organize and implement a program using a variety of methods, such as advisory groups, testing and evaluation, and surveys to collect student feedback at the elementary and secondary levels.

The 2013 review included a similar recommendation, to organize tasting panels to evaluate menu items for the next school year. All current district leaders support the idea of involving students more directly in food and menu development.

CPS should develop a formalized program to solicit feedback from student customers on a regular basis. Activities should be tailored to both the elementary and secondary levels. The director should work with principals to organize advisory panels at all schools. Meetings should be scheduled on a regular basis to solicit feedback on the current program and menus, as well as test new food items and recipes. In addition to in person meetings, surveys and sampling should be used. Social media should be used to inform parents and students of the process, as well as the results and any changes that are made as a result.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-12

The child nutrition department is not maximizing the use of technology. Parents are not able to apply online to complete the Free and Reduced School Meals application. Using readily available technology would reduce the current manual labor needed to process the application.

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 the child nutrition director using the Wen-GAGE application processing software which the district started using this year.

The superintendent stated the application needs to be online. The child nutrition director said they input the data from the paper application into the Wen-GAGE system. They hope parents will be able to apply online to save her time in the processing of applications.

The consulting team observed the Free and Reduced School Meals application was on the district's website, however it was the form used for the 2019 school year. The application stated, "You are encouraged to complete an online application instead of a paper application." However, an attempt to pull up this site was not successful. When brought to the attention of the child nutrition director, they worked with the district staff person who maintains the district website to post the application for the current year (2021-22). The consulting team observed during the

onsite review that the correct form was posted, however an attempt to click on the link to apply online yielded the same negative result.

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 86 percent of them *agreed* or *strongly agreed* that they regularly access information via the district website and 88 percent of them *agreed* or *strongly agreed* that they regularly use technology to keep up to date on their child's education (**Exhibit 5-22**). 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 which should be completed more quickly.

Exhibit 5-22
Parent Survey Results Regarding Technology

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I regularly access information via the district website.	28%	58%	7%	5%	2%
I regularly use technology to keep up-to-date on my child's education (emailing teachers, online gradebook, etc.).	39%	49%	6%	6%	0%

Source: Prismatic Survey, January 2022

RECOMMENDATION

Implement the available component of the current software provider to automate the process of online meal applications.

CPS should ensure the correct application for Free and Reduced School Meals is posted on the district website and is updated every year. The child nutrition director should work with the technology department to ensure the link to apply online is functional. This should be implemented for the beginning of the 2022-23 school year.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

B. TECHNOLOGY

The International Society for Technology in Education (ISTE) created standards for the use of technology to enhance education. Part of preparing students for the digital age includes helping them become responsible consumers and curators of online content. For this reason, digital citizenship is a benchmark integrated into the ISTE Standards for Students, ISTE Standards for

Education Leaders, and ISTE Standards for Coaches. Oklahoma has adopted the International Society for Technology in Education's Student Standards for the Oklahoma Academic Standards.¹⁹ These standards are designed to empower student voice and promote learning as a student-driven process and have evolved from just using technology to learn to transformative learning with technology. **Exhibit 5-23** displays the seven key standards for students to follow.

Exhibit 5-23
ISTE Standards for Students



Source: <https://www.iste.org/standards/for-students>

¹⁹ <https://www.iste.org/standards/for-students>

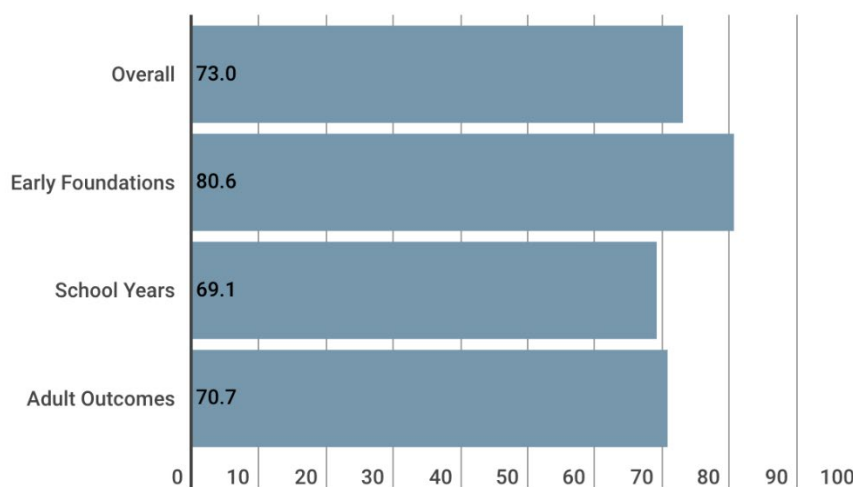
The implementation of technology in schools follows a broader societal trend – teens’ technology use is creeping up. In 2015, 29 percent of teens said they used a computer for homework, but by 2019, 59 percent of teens said the same, according to a media census from Common Sense Media.²⁰ Since the 2010 report card, on which Oklahoma earned a C+, Oklahoma has worked to develop various aspects of education to improve these areas of concern and to emphasize the role of technology in digital citizenship. In 2019, there were 163 districts with a one-to-one program in which at least one grade at one school has Internet-connected device for each student.²¹ Oklahoma continues to make advances in online assessment practices and in the use of instructional technology in the PK-12 classroom. Despite the heavy focus the state has placed on transformational learning with technology, Oklahoma’s overall score earned on the Chance-for-Success Index in Quality Counts 2020 was a C²² (**Exhibit 5-24**). The purpose of this report card is to rank states on educational opportunities and performance.

²⁰ https://www.common Sense Media.org/sites/default/files/uploads/research/census_researchreport.pdf

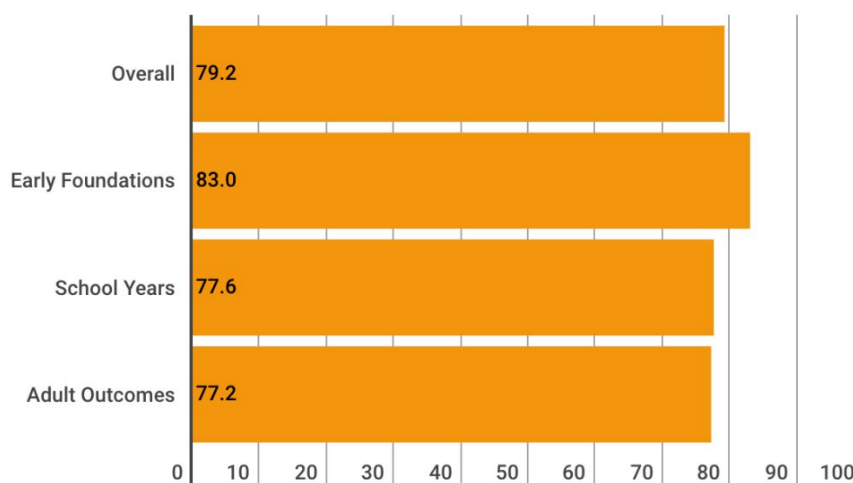
²¹ <https://sde.ok.gov/sites/default/files/documents/files/Fast%20Facts%20July%202019.pdf>

²² <https://www.edweek.org/ew/collections/quality-counts-2020/state-grades-on-chance-for-success-2020.html>

Exhibit 5-24
Chance-for-Success Results by State



U.S. Score



Source: <https://www.edweek.org/ew/collections/quality-counts-2020/state-grades-on-chance-for-success-2020.html>

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).²³ A major impact of PARCC's Common Core assessments, and a concern of many Oklahoma school districts, involved technology. Oklahoma transitioned to a new vendor, Measured Progress, now called Cognia, 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 for the

²³ <http://www.parcconline.org/>

Cognia assessments for schools so they will be properly equipped and ready to administer the tests.²⁴

Exhibit 5-25 illustrates the most current assessment technology specifications that districts in Oklahoma must consider as they administer assessments in 2019-20 and beyond. 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. Android devices will not be supported.

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.

²⁴ <https://oklahoma.onlinehelp.cognia.org/>

Exhibit 5-25
Oklahoma Spring 2020 Assessment Technology Specifications²⁵

System Requirements – All Hardware	
Connectivity	Student devices must be able to connect to the Internet via wired or wireless networks
Screen Size	9.7” screen size or larger 10-inch class” tablets or larger
Screen Resolution	1024 x 768
Browsers ^{26,27} (used for practice test only)	Chrome™ 79 or newer Firefox® 70 or newer Microsoft Edge™ 44.18 or newer Safari® 13 or newer
Headphone/Earphone/ Ear Buds	Required for students who have a text-to-speech accommodation
Desktop and Laptop Specific Requirements	
CPU	1.3 Ghz
Memory	2 GB 4 GB is strongly recommended for best performance
Input Device	Keyboard – wired or wireless Bluetooth® enabled mouse or touchpad
Windows®	Windows® 8.1, and 10 (32-bit and 64-bit)
macOS®	10.13 – 10.15 (64-bit only)
Linux®	Ubuntu® 16.04.3 LTS (64-bit only) Fedora™ 27 (64-bit only)
Tablet/Netbook/2-in-1 Specific Requirements	
iOS®	12.4, 13.1 - 13.3
Chromebook™ notebook computer	Chrome OS™ 74 - 79
Windows®-based tablets/netbooks/2-in-1	Windows® 10 (32-bit and 64-bit) ²⁸

Source: <https://oklahoma.onlinehelp.cognia.org/guides/>

CPS has an Internet Use Policy in place, as well as backup system servers. The district has server maintenance outsourced to Pioneer. CPS utilized E-rate funding for wireless. The district has electronic whiteboards in place. Staff has received initial training on the whiteboards. The current technology organization for CPS is shown in **Exhibit 5-26**.

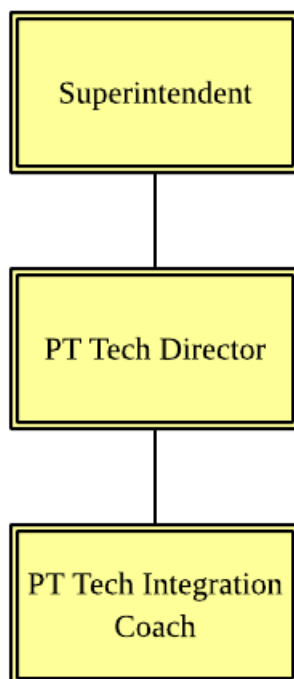
²⁵ Windows is a registered trademark of Microsoft Corporation. Firefox is a registered trademark of the Mozilla Foundation. Safari, Mac, and iPad are registered trademarks of Apple Inc. Chrome and Chromebook are registered trademarks of Google Inc. Fedora is a trademark of Red Hat, Inc. Linux is the registered trademark of Linus Torvalds in the U.S. and other countries. The Bluetooth is a registered trademark owned by Bluetooth SIG, Inc.

²⁶ Text-to-speech on browsers is partially supported.

²⁷ As new operating system and browser versions are released, eMetric will update technology guidelines following successful compatibility testing.

²⁸ Windows 10 S is not supported.

Exhibit 5-26
Crescent Technology Services Organizational Chart



Source: Created by Prismatic, January 2022

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 5-27** provides the results for technology. More than half gave each technology area an A or B.

Exhibit 5-27
Staff Survey Results Regarding Technology

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Administrative technology	23%	44%	6%	2%	0%	25%
Instructional technology	25%	52%	8%	2%	0%	13%
Technology management and support	44%	35%	8%	0%	0%	13%

Source: Prismatic Survey Results, January 2022

FINDING 5-13

CPS lacks an explicit technology budget. CPS draws on several sources to fund technology expenditures, including grants, E-rate monies, state and federal funds, Title programs, and the General Fund. However, there is no clear information on the total amount spent on technology or from which various sources components of technology are funded. Moreover, the district lacks a replacement cycle plan.

In staff surveys, when asked about the lifespan of district technology equipment, 41 percent

agreed or *strongly agreed* that equipment was operated past its useful lifespan (**Exhibit 5-28**). In onsite interviews, staff indicated a four-year replacement cycle as a district goal, although no documentation supports this goal. 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. Generally, computers at CPS are not surplus, which is not a best practice.

Exhibit 5-28
Staff Survey Results on Technology Equipment Lifespan

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
The district's technology equipment is often used past its useful lifespan.	6%	35%	37%	22%	0%

Source: Prismatic Survey, January 2022

To achieve satisfactory efficiency status on the 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. Additionally, the ISTE Index indicates that lacking a computer replacement schedule of any kind falls into the low efficiency category. Failing to surplus equipment until it is no longer usable and continuing to service obsolete equipment, also falls in the low efficiency category.

Technology can no longer be an afterthought or add-on in today's classrooms. It must be purposely integrated into instructional strategies and practices. 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 budgets for technology. There are no established best practices or standards in this area for K-12 schools.

RECOMMENDATION

Establish a district technology budget that is realistic, supportive of classroom needs, and included a replacement cycle.

The superintendent should work with a technology committee and the technology staff to develop guidelines for an annual technology budget. The technology budget should be closely tied to district strategic and technology plans.

According to CPS documentation, there are currently 557 students and 65 certified and support staff, including 32.6 teachers. Enrollment for high school is listed as 168 students and middle school as 90 students. The cost of iPads and/or Chromebooks is estimated at \$350 each. Given the budgetary constraints, the consulting team recommends CPS initially budget \$50,000 per year. A suggested breakdown is shown in **Exhibit 5-29**.

Exhibit 5-29
Example Technology Budget

Topic	Notes	Cost
Student Replacement Cycle	Replace iPads and Chromebooks with 4-5+ years	\$30,000
Teacher Replacement Cycle	Replace classroom computers, equipment with 5+ years	\$13,000
Staff Replacement Cycle	Replace staff computers, equipment with 5+ years	\$7,000

Source: Prismatic Services Consulting Team, 2022

Using updated inventory information, the instructional technology director should establish a priority list of which type of computers are to be replaced first (e.g., student use and then in what order others will be replaced) and with what type of device. IT director should also establish an initial expected life and replacement target for each computer category.

Once the district has established these replacement cycles, the superintendent should annually link district general funds designated for computer replacement to the number of computers to be replaced. The same process can be used for other computer-related equipment such as printers, servers, etc.

FISCAL IMPACT

This recommendation can be implemented with existing resources. There is no fiscal impact because the money for technology is currently being spent. However, no documentation exists to show how much, or from which fund the technology expenditures are made.

FINDING 5-14

CPS employs two staff members to manage the district's technology resources and service needs. A part-time instructional technology director and a part-time technology integration coach serve as the technology department for CPS.

The instructional technology director answers directly to the superintendent. The director is responsible for technology implementation throughout the district, oversees the maintenance and repair of all equipment, provides leadership to identify strategic technology direction, evaluates new and emerging technologies, and leads the technology planning for the district. Additionally, they serve as the media center director.

The newly hired technology integration coach answers to the instructional technology director. For two hours each day, plans are for the coach to work with administration and staff to support the implementation of instructional practices through technology integration. They are to provide ongoing professional learning experiences for teachers and staff, troubleshoot help tickets and technology issues related to student and teacher devices. Currently, according to staff interviews, the technology integration coach focuses on troubleshooting district computer equipment.

COMMENDATION

CPS is commended for employing two staff members to manage the district's technology resources and service needs.

FINDING 5-15

CPS lacks a disaster recovery plan. In the event of a natural disaster or severe power surge, the district does not have procedures in place to ensure that its critical data, systems, and programs can be brought back to pre-disaster status.

The limited district procedures currently in practice have not been formalized and are inadequate considering the large amounts of data and equipment that could be lost. Lost data could include administrative work, emails, student data and work, and data from instructional applications. The district has not established policies and procedures adequate to mitigate the damage. No written plans are in place for documenting cloud-based back-ups, putting district data at-risk.

A disaster recovery plan would aid the district in reloading district data, programs, and systems, as well as recovery of hardware and software, in the event of a loss. **Exhibit 5-30** defines the process of developing an effective disaster recovery plan.

Exhibit 5-30
Key Elements of a Disaster Recovery Plan

Step	Details
Build the disaster recovery team.	Identify a disaster recovery team that includes key policymakers, building management, end-users, key outside contractors, and technical staff.
Obtain and/or approximate key information.	Develop an exhaustive list of critical activities performed within the system.
	Develop an estimate of the minimum space and equipment necessary for restoring essential operations.
	Develop a timeframe for starting initial operations after a security incident.
	Develop a list of key personnel and their responsibilities.
Perform and/or delegate key duties.	Develop an inventory of all computer technology assets, including data, software, hardware, documentation, and supplies.
	Set up a reciprocal agreement with comparable organizations to share each other's equipment or lease backup equipment to allow the system to operate critical functions in the event of a disaster.
	Make plans to procure hardware, software, and other equipment as necessary to ensure that critical operations are resumed as soon as possible.
	Establish procedures for obtaining off-site backup records.
	Locate support resources that might be needed, such as equipment repair, trucking, and cleaning companies.
	Arrange with vendors to provide priority delivery for emergency orders.
	Identify data recovery specialists and establish emergency agreements.
Specify details within the plan.	Identify individual roles and responsibilities by name and job title so that everyone knows exactly what needs to be done.
	Define actions to be taken in advance of an occurrence or undesirable event.
	Define actions to be taken at the onset of an undesirable event to limit damage, loss, and compromised data integrity.
	Identify actions to be taken to restore critical functions.
	Define actions to be taken to re-establish normal operations.
Test the plan.	Test the plan frequently and completely.
	Analyze the results to improve the plan and identify further needs.
Deal with damage appropriately.	If a disaster actually occurs, document all costs and videotape the damage.
	Be prepared to overcome downtime on your own; insurance settlements can take time to resolve.
Give consideration to other substantial issues.	Do not make a plan unnecessarily complicated.
	Make one individual responsible for maintaining the plan, but have it structured so that others are authorized and prepared to implement if it is needed.
	Update the plan regularly and whenever changes are made to your system.

Source: National Center for Education Statistics, "Safeguarding Your Technology," April 2003

RECOMMENDATION

Develop and test a disaster recovery plan that includes the district's critical data, systems, and programs.

A similar recommendation was made in the 2013 report. The district should address this problem

immediately. The district should develop and test a disaster recovery plan that includes critical data, systems, and programs through cloud-based storage. The district technology director can lead the process of developing a plan adequate to meet the needs of CPS. 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 5-16

CPS teachers are generally using technology at a basic introductory level. There is no staff development plan to improve teachers' skills. 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 interactive whiteboards or touchscreen panels were purchased but limited follow-up training has been made available. Teachers new to the district have not received whiteboard training. Some sessions were offered on Google Classroom during its roll-out at the beginning of the school year. Currently, staff development sessions are held at the start of school and one day in January. Start of school sessions focus on state requirements, such as school security and classroom management. Additionally, some software specific training has been offered.

The impact of technology on student achievement revolves around how well technology is integrated into everyday activities that support student instructional objectives. This requires not only placing computers and other devices in schools and classrooms but also providing the resources needed to incorporate technology into lesson plans and other educational activities. Substantial professional development emphasizing both technology applications and its integration into curriculum and classroom instruction is necessary in CPS.

While staff members indicated an understanding of technology and its utilization generally, the consulting team found in onsite observations, interviews, and focus groups that this knowledge is at a basic level. This is compounded by the continued purchase of new and varied equipment and software. Implementing technology effectively into classroom instruction requires a teacher to have a higher level of understanding, redirected teaching methodology, much practice, and continuous training.

CPS instructors and administrators indicated a need for additional professional development or training focused on the use of existing technology and software. During focus groups, surveys, and interviews, a need for practical and tiered sessions was highlighted, as well as specific training and communication on new initiatives. Staff noted that Fridays are available for professional development sessions as students are not in attendance.

CPS staff survey results indicate a need for additional professional development or training focused on the use of existing technology and software. Only slightly more than half of

respondents, who were all educators, *agreed* or *strongly agreed* that there is adequate high quality professional development and that the district provides adequate technology training. (**Exhibit 5-31**). In addition, 10 percent indicated a lack of technology skill among their ranks and 15 percent indicated a lack of instructional technology. While more than half of staff members felt that CPS teachers use student data to improve instruction, 12 percent *disagreed*.

Exhibit 5-31
Educator Survey Results Regarding Professional Development

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
There is adequate high quality professional development for principals and teachers.	6%	57%	22%	12%	2%
Our district provides adequate technology training.	14%	49%	20%	16%	0%
Teachers know how to use the technology they have for teaching.	20%	55%	14%	10%	0%
The district lacks sufficient instructional technology.	0%	15%	17%	67%	2%
Teachers effectively use student data to improve instructional practices.	10%	51%	27%	10%	2%

Source: Prismatic Survey Results, January 2022

Some students noted that some teachers do not effectively use technology for teaching (**Exhibit 5-32**). Only 72 percent felt that their teachers know how to use technology for teaching.

Exhibit 5-32
Student Survey Results Regarding Teacher Technology Competency

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Teachers know how to use the technology they have for teaching.	22%	50%	20%	6%	3%

Source: Prismatic Survey Results, January 2022

In a 2020 report by Project Tomorrow and Blackboard, *90 Days That Changed K-12 Teaching and Learning: The Shift to Digital Learning*²⁹, highlights several changing views on digital learning and the need for teacher professional development:

- The pandemic and resulting school closures has resulted in a new awareness and appreciation for the value of digital tools, content, and resources to support more personalized learning.

²⁹ <https://content.blackboard.com/90DaySeriesBrief1>

- The shift to digital learning also revealed that despite prior investments in technology training, most of our K-12 teachers were not comfortable with new instructional practices that leveraged digital tools.
- While unintended, the school closures resulted in new discoveries about what is needed to transform education and opened our collective eyes to new potential solutions.

RECOMMENDATION

Develop and implement a tiered professional development plan to include offerings at all skill levels to ensure teachers move beyond the basic use of the equipment.

The district should move beyond mere technology acquisition and ensure that the hardware and software tools are being used in ways that result in continuous improvement of classroom instruction and practices, as well as higher student achievement. Ongoing opportunities for professional development should be made available to teachers and administrators at all skill and development levels.

The technology integration coach, a technology committee, and a cross-section of teachers should work to develop a district-wide program for teacher training and technology integration. Consideration should also be given to providing training opportunities for all staff in their specific job needs. This technology-training program should be part of an overall professional development plan. A first step should be for each staff member to complete a needs assessment. The committee might consider developing an assessment to gather, analyze, and report information about how technology is used for teaching and learning in their schools. Additionally, ISTE provides the National Education Technology Standards for Teachers.³⁰

A second step should be to discuss and define technology integration for CPS classrooms. Based upon this definition and interview results, the program should seek to increase teacher competencies and levels of technology integration. The plan should also identify software and hardware needs necessary for successful integration. The plan should be submitted to the superintendent and school board for approval.

A number of online professional development resources should be considered including:

- TED: Ideas Worth Spreading;³¹
- Classroom 2.0 Live;³²
- the K12 Online Conference;³³
- the Global Education Conference;³⁴

³⁰ <https://www.iste.org/standards/iste-standards-for-teachers>

³¹ <http://www.ted.com/>

³² <http://live.classroom20.com/index.html>

³³ <http://k12onlineconference.org/>

³⁴ <http://globaleducation.ning.com/>

- Simple K12 Webinars; and³⁵
- Online Technology and Instructional Sessions (OTIS) for Educators.³⁶

The district should also consider tapping into resources offered through the University of Oklahoma K20 Center, the Oklahoma State Department of Education (SDE), and the Oklahoma Department of Career and Technology Education. Additionally, area colleges and universities, and vendors provide customized training, continuing education, professional development, and other resources for K-12 teachers and administrators.³⁷ CPS should also consider forming partnerships with neighboring school districts and formalize the implementation of a shared professional development initiative.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-17

CPS staff operate in silos and lack processes for knowledge sharing. Plans or procedures for cross-training do not exist.

The district has only two part-time staff members to support technology, supplemented by outsourced network maintenance. While CPS is commended for hiring two part-time technology staff members, no other district staff member is trained to assist or take over duties.

ISTE developed a Technology Support Index rubric in 2008 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.”³⁸ With the ISTE Essential Conditions Inventory, school districts can appraise the quality and efficiency of their current technology support program and learn about possible improvements they can employ. The tool generates a free report with data to guide technology planning and implementation decisions.

In one 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;

³⁵ <http://simplek12.com/tlc/webinars/>

³⁶ <http://otis.teq.com/about/otis>

³⁷ <http://www.okhighered.org/econ-dev/business-services/>

³⁸ <https://www.iste.org/standards/essential-conditions/assessment-and-evaluation>

- 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 5-33 shows the ISTE Technology Support Index for technician staffing. With its current technology staffing, CPS falls into the low category.

Exhibit 5-33
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, 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.”³⁹

RECOMMENDATION

Implement a cross-training program that would ensure critical processes can be performed by multiple staff members.

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

³⁹ <https://www.edutopia.org/technology-integration-research-avoiding-pitfalls>

program. The consulting team recommends three teacher technicians which would allow for assignments to elementary, middle, and high school. A \$500 stipend is recommended for the teacher technicians.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Develop a teacher technician program.	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)	(\$1,500)

FINDING 5-18

CPS lacks standards, procedures, and processes for most administrative technology areas. There is currently no district standard for hardware or software and no system for tracking data.

Because no standard exists, equipment with inadequate memory and specifications has been purchased or remains in use. No framework for equipment replacement or lifecycle exists, resulting in equipment in classrooms that is past its usefulness or kept in storage. A partial inventory of existing technology in the district listed iPods and iPads purchased in 2014. Both Apple devices are out of date and fail to work with new applications.

In the district, there are no minimum technology (network, hardware, or software) standards or protocols in place. A lack of coordination and guidelines results in equipment and software that no longer meet user needs or are obsolete and unusable for the designated purpose. While the initial tendency may be to hold onto technology as long as it has any functionality, that typically leads to more user frustration than high quality learning experiences. This absence of processes and procedures leads to additional costs and an increased backlog of support issues.

RECOMMENDATION

Develop district technology standards, procedures, and processes for administrative tasks, equipment and software purchases, implementation, and upgrades.

The responsibility and technical expertise needed to meet user demands can no longer be performed in a fragmented fashion. All district technology needs should be prioritized and addressed in a systematic manner beginning with the development of standards.

The district should develop district standards for all hardware, software, and network purchases. The Oklahoma Technology Guidelines for 2019 should be the starting point of the discussion on district needs and standards.

The next step is to use the current inventory. Using the existing partial inventory, the technology director or other designated staff member should establish a priority list of which types of computers/devices are to be replaced first and with what type of device. The technology director should also establish the expected longevity and scheduled replacement for each computer category.

Once the replacement schedules have been established, the superintendent should link district general funds designated for computer replacement to the number of computers to be replaced.

The same process can be used for other computer-related equipment, such as printers. CPS may consider selling surplus equipment in an online auction and utilizing a complete surplus management system. One option to consider is Public Surplus.⁴⁰ The company:

- provides a detailed audit record of all activity;
- automatically reallocates surplus items internally; and
- provides a dynamic bid auction for those items not internally reallocated.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-19

CPS lacks a technology plan and has not engaged in strategic planning around technology. While a document, “Technology Policies and Procedures” exists, it is an acceptable use policy, not a technology plan.

The district has not formalized a process for including multiple stakeholders on a technology committee or the development of a current technology plan. Multiple stakeholders would include parents, teachers, students, community members, and businesses. Community and business partnerships could provide additional perspective in planning, implementation, and evaluation. There is no evidence of committee participation by parents or community members and currently no such committee exists.

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

⁴⁰ <http://www.publicsurplus.com/sms/browse/home>

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 no evidence that CPS has a technology plan in place, although many goals have been achieved. 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, or a technology plan having been developed.

RECOMMENDATION

Improve the technology planning process and create a long-term strategic plan for technology.

Establishing a committee that includes staff and outside stakeholders should provide additional perspectives in planning, implementation, and evaluation of technology. Such stakeholders should 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 CPS 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 on the current state of the district. By incorporating a clearly articulated vision and mission statements, followed by specific goals, measurable objectives, adequate funding, and a 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 the 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 5-20

CPS does not have a work order system for reporting problems with technology. Currently, staff text, email, or call technology personnel with problems.

The district would benefit from developing and implementing procedures for submitting and tracking technology issues and resolutions. Currently, no formal process or procedure exists. 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. As a result, teachers, support staff, and administrators call, text, or email 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 task.

The time and manpower needed to provide appropriate responses to technology-based problems at CPS are limited. Additionally, the absence of support procedures and criteria, incident requests and completion data, communication, and follow-up make the existing staff members less effective in supporting technology.

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 could speed response times and provide a database for identifying and analyzing systemic problems.

RECOMMENDATION

Complete and implement support procedures and a technology work order system that includes features such as logging, priority assignment, and completion.

CPS 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 a task.

One solution that CPS should consider is Zoho Desk, a cloud-based help desk ticketing software.⁴¹ 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, as well as the number of tickets opened and closed. Zoho Desk has a free version available that allows for three technicians or agents. Another free solution is Spiceworks, a cloud-based help desk and ticket management system.⁴²

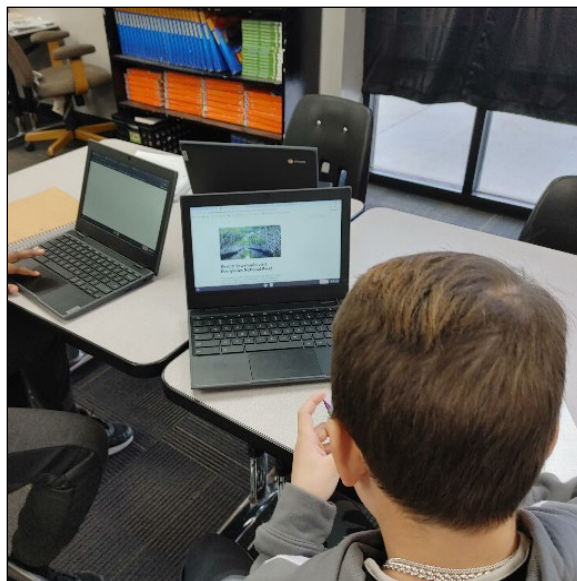
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-21

CPS has implemented a district-wide wireless access system to increase Internet access. Access points are positioned in all buildings. CPS has made wireless access available throughout the district. Students and staff access the network and internet by utilizing district owned technology including laptops, iPads, iPods, Smartphones, etc. Students were observed utilizing the network in classrooms (**Exhibit 5-34**). Additional access points and increased infrastructure have been added as needed.

Exhibit 5-34
Use of Wireless Network in Elementary Classroom



Source: Prismatic, January 2022

A question of how to provide hands-on access with limited resources continues to plague schools. One solution is to use students' personal technology on the district network through wireless access or incorporate the use of inexpensive tablets. Schools reap benefits through the

⁴¹ <https://www.zoho.com/desk/>

⁴² <https://www.spiceworks.com/free-help-desk-software/#features>

use of wireless networks in addition to increased student access. Those benefits include limitless connectivity. Everyone with a wireless device and password permission can access email, the Internet, and district servers through a high-speed connection. The cost of setting up a wireless network is much less expensive than wired. Additionally, the maintenance costs are minimal. Security is built-in because the network resides within the school networking system.

COMMENDATION

CPS has implemented a district-wide wireless access system to increase Internet access.

Moving forward, numerous publications about the use of mobile devices are available and should be considered for incorporation into students' learning. The district might consider Blackboard's "Embracing the Inevitable: How to Create K-12 Acceptable Use Policies that Harness the Power of Mobility."⁴³

FINDING 5-22

The district has extensive technology available for use but lacks processes to determine whether it is being fully used. Information on effective use is not available to assist in new purchases.

The district is not ensuring that it is spending dollars wisely by regularly assessing the use of technology available to students and staff. As a result, the district is not maximizing its technology use or expenditures.

The district has no structured procedures in place to evaluate staff, student, or parent use of, and satisfaction with technology available in the district. There is no formal process in place for evaluating technology implementation and use. CPS has made technology investments in infrastructure, hardware, and software and continues to invest in technology. However, by not following up after the initial purchase and set up to determine the use of technology or the problems preventing its use, the district lacks the kind of information that leads to sound decision-making and improvement.

With the onset of online assessments, web-based textbooks, and college and workplace requirements, students must be comfortable and adept at using computers, the Internet, and other technology resources. In order for students to develop and build the necessary skills and comfort level, students must have reliable, consistent access and integrated use of technology. In addition to providing access to students, it is critical that the district identify what technologies are being used, provide teachers with the tools and training to integrate those technologies into instruction, and evaluate whether or not these strategies result in student achievement gains.

⁴³ <http://bbbb.blackboard.com/AUP>

RECOMMENDATION

Develop procedures to assess technology use and satisfaction with the goal of establishing higher use.

The district should track and analyze technology use in classrooms to ensure it has used its technology resources most effectively. This will also identify whether additional supports, such as training or improved infrastructure, are needed. The district could also implement a method to assess staff, student, and community satisfaction with technology-integrated classes and instruction. This knowledge could help inform future planning in technology acquisition and implementation.

A number of survey instruments and checklists are available free of charge. Survey examples may be found at the Wufoo Form Gallery,⁴⁴ including technology support surveys, website content surveys, and student satisfaction surveys. Additionally, ISTE has developed a Classroom Observation Tool that provides districts with a mechanism to record and analyze technology use in classrooms. This free tool utilizes Microsoft Excel and allows district personnel to record information on classroom groupings, teacher roles, time, types of technology used, and compliance with the ISTE. Once the information is gathered, district personnel should discuss the findings with staff and make needed adjustments.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-23

CPS has acquired interactive whiteboards for classroom use and provided initial professional development for teachers using the equipment. However, not all teachers have reached an expert level in their use.

In initial applications, interactive whiteboard use can be as simple as having a standard whiteboard, which students and teachers can use for simple, multicolored board work. Beyond this, however, interactive whiteboards are useful as instructional tools because they have many applications for engaging student learning:

- skill demonstrations;
- accommodating different learning styles;
- increasing computer access;
- the opportunity to use student response systems and incorporate ongoing formative assessment;

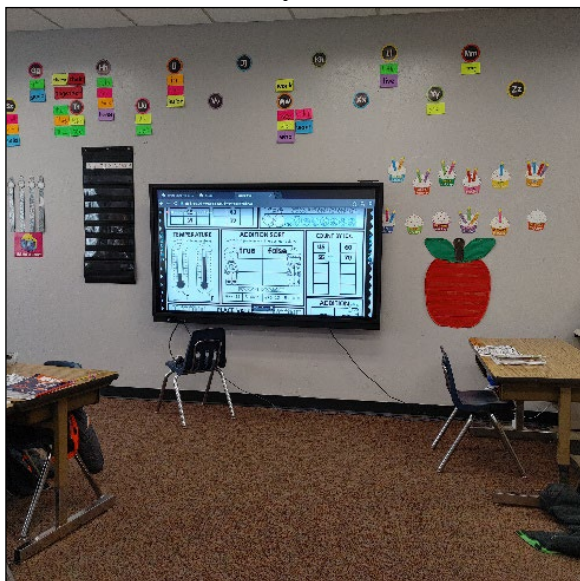
⁴⁴ <http://www.wufoo.com/gallery/>

- using multimedia resources and the Internet in a whole class setting;
- the ability to save and print board work; and
- educational software that is specifically designed for the interactive whiteboard.

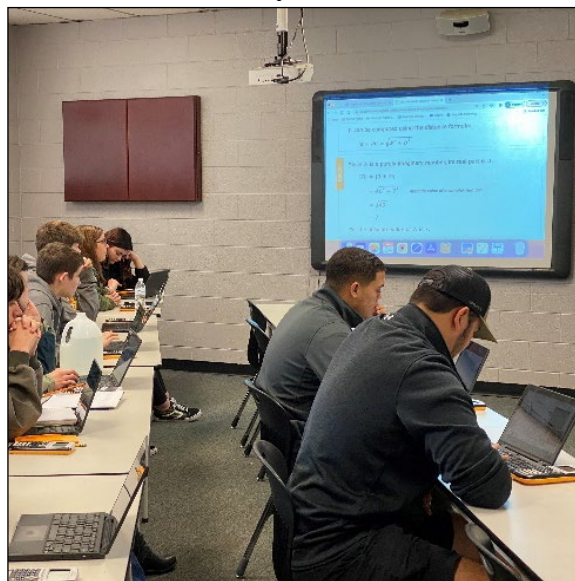
During the onsite visit, the consulting team observed interactive whiteboards in use in classrooms throughout the district. Elementary classrooms used interactive whiteboards for math instruction and high school math classes were equipped with student laptops in addition to a teacher's station and interactive whiteboard (**Exhibit 5-35**).

Exhibit 5-35 CPS Interactive Whiteboard and Laptop Use

Elementary Classroom



Secondary Classroom



Source: Prismatic, January 2022

Interviews and focus groups conducted during the onsite visit revealed satisfaction with the purchase of interactive whiteboards. Staff expressed a desire and need for professional development related to interactive whiteboard use beyond the basic level and as a follow-up.

RECOMMENDATION

Ensure all teachers have the skills to maximize the use of the interactive whiteboard.

The district should ensure teachers have all the skills they need to maximize the value of this resource for student learning. Follow-up training and support should be made available, as well as an assessment to ensure the technology is being used.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-24

There is a lack of electives for students and a lack of training opportunities for staff. Available resources to expand curriculum and staff training are not being used. According to **Exhibit 5-36**, almost a quarter of CPS students surveyed do not think they have enough choices for elective courses. The district has not sufficiently considered online options to address these gaps.

Exhibit 5-36
Student Survey Results Regarding Course Options

Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
I have plenty of choices when selecting academic and elective courses.	13%	42%	19%	19%	8%

Source: Prismatic Survey Results, January 2022

CPS has not capitalized on online learning opportunities for professional development, curriculum expansion, or student courses. Currently, professional development at CPS is limited or non-existent. Given the lack of district dollars for professional development, few teachers and administrators choose to personally absorb the expense of attending, thus missing valuable information and classroom improvement strategies and trends. Requests for additional professional development were noted in staff survey comments, during focus groups, and onsite interviews.

Additionally, students are currently restricted in course choices and are missing opportunities to use technology and collaborate with others. A need for expanded course offerings, specifically electives, was expressed in the parent and student comments section of the surveys. Staff indicated Spanish was offered online last year but was not offered this year. No other online classes were offered.

According to a 2009 report from Sloan-C, online student enrollments in higher education are growing faster than overall enrollments (17.0 percent for online versus 1.2 percent overall). Additionally, “more than one in four higher education students now take at least one course online.”⁴⁵

The growth seen in the K-12 market is even more dramatic according to the International Association for K-12 Online Learning (iNACOL). In 2008, 30 states and over half the U.S. school districts provided online offerings for students with an estimated annual growth of 30 percent expected.

Project Tomorrow, a nonprofit organization, publishes a national annual research project, “Speak

⁴⁵ <https://files.eric.ed.gov/fulltext/ED529931.pdf>

Up.” The purpose of “Speak Up” is to collect and report feedback from students, parents, and teachers on key educational issues and raise awareness of those issues. The research report, *Learning in the 21st Century: 2010 Trends Update*, points to online learning as the center of students’ vision for 21st Century education. Project Tomorrow cited four key statistics:

- the number of students taking online courses for credit since the 2008 report;
- almost double an increase in teachers teaching online;
- almost triple an administrative shift from teacher professional development to student online courses; and
- growth in parents’ personal and professional experiences with online learning.

One of Project Tomorrow’s Speak Up publications, *Learning in the 21st Century: A 5-Year Retrospective on the Growth of Online Learning*⁴⁶, notes the increase and growth of online learning over a five-year period. Two key findings are important when looking at educator professional development. First, a majority of teachers and administrators report participation in professional development through an online class, a 148 percent increase for teachers since 2007. Second, 30 percent of teachers prefer online professional development for their continuing education with one in five teachers taking online classes on their own.

Online learning is an accepted delivery system for education, teaching, and learning. Learner demands for offerings that are collaborative, flexible, and that appropriately use new technologies will continue to grow. In order to be successful, schools must continue to prepare and equip staff to meet the demands while providing and supporting students with opportunities to learn online.

As previously noted, CPS survey results indicate that 92 percent of students use computers regularly at school, but these are largely not online educational experiences. Additionally, 89 percent of students have internet access at home. CPS is not taking advantage of the access and experience a majority of students have with technology or the opportunities provided by online learning.

RECOMMENDATION

Expand and utilize online learning opportunities for staff development, curriculum expansion, and student courses.

Though online classes and internet access are viable opportunities, these resources are not being used in CPS. The growth of internet use and widespread access make providing increased and varied learning options for students not only possible but also expected.

⁴⁶ http://www.tomorrow.org/speakup/learning21Report_2012_Update.html

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-25

CPS has implemented Google Classroom to increase communication and classroom collaboration throughout the district. Some initial staff training has been provided.

The district has implemented Google for Education which provides the ability for teachers to post lesson plans and classroom resources, and email. Google for Education is a free online integrated solution for schools and includes a suite of productivity tools for communication, classroom connectivity, and collaboration. Google for Education provides district-wide core services including email through Gmail for students and staff, Calendar, Classroom, Contacts, Drive, Docs, Forms, Groups, Google Hangouts, and more. An advantage is that use of Google Classroom Suite complies with *The Children's Online Privacy Protection Act* of 1988 (COPPA) and *The Family Educational Rights and Privacy Act* (FERPA). No advertising is posted, and student data are protected.

COMMENDATION

CPS is commended for implementing Google Classroom to increase communication and classroom collaboration throughout the district.

FINDING 5-26

CPS has implemented a one-to-one technology initiative for students in grades 3rd to 12th. Students in Pre-K to 2nd grade use classroom sets of iPads and iPods.

Each student is issued a digital device for learning a standards-based curriculum. The district has implemented one-to-one over the past ten years according to interviews. Pre-K and young elementary students have classroom iPads and iPods available, and older students have Chromebooks. Every teacher has an interactive whiteboard in their classroom.

One-to-one technology in the classroom allows all students full participation and collaboration and enhances the interaction with what they are learning. Loss of instructional time and passive learning is prevented because students do not wait for access to or share devices.⁴⁷

More and more studies show that technology integration in the curriculum improves students' learning processes and outcomes. Teachers who recognize computers as problem-solving tools change the way they teach. They move from a behavioral approach to a more constructivist approach.⁴⁸

Integrating technology into classroom instruction means more than teaching basic computer skills and software programs in a separate computer class. Effective tech integration must happen

⁴⁷ <https://www.spectrumfurniture.com/en/blog/480-5-benefits-of-1-1-technology-in-the-classroom>

⁴⁸ <https://www.eutopia.org/technology-integration-guide-importance>

across the curriculum in ways that research shows deepen and enhance the learning process. It must support four key components of learning: active engagement, participation in groups, frequent interaction and feedback, and connection to real-world experts.⁴⁹

COMMENDATION

CPS is commended for implementing a one-to-one technology initiative for students in grades 3rd to 12th.

FINDING 5-27

An inventory of all technology resources does not exist. A partial inventory is available in an Excel spreadsheet.

The district does not maintain a current technology inventory. Little or no documentation or estimate exists for the number of administrative computers, printers, or other technology in the district. Because CPS does not have a systematic fixed asset inventory for technology equipment, the numbers of available and updated technology equipment cannot be easily obtained or verified. Current inventory procedures are paper-based or housed in an Excel spreadsheet and are inadequate and incomplete or do not exist.

As a general practice, districts should maintain records of what they have purchased and where items are. Items should be recorded in a digital file by serial number, tagged, and have their location and person of primary responsibility noted, as well as 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 equipment should be conducted.

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.

Procedures for developing the whole school inventory should include specific steps regarding existing computers and other technology as well as subsequent purchases. The inventory should be periodically and systematically updated.

When equipment from future purchases is delivered, it should be received by the responsible technology designee and then processed into the inventory system. Physical inventories should be taken, and status reports should be generated according to the adopted school board policy. Having the receiving, tagging, assignment, and inventory processes standardized will prevent confusion about the count, value, age, and location of district technology assets.

⁴⁹ <https://www.edutopia.org/video/introduction-technology-integration>

FISCAL IMPACT

This recommendation can be implemented with existing resources.

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.

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 on 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 and training and to pass a license history review. CPS 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 CPS transportation department provides route and extracurricular transportation for its students. With approximately 137 square miles to cover, the district uses five regular buses, only four of which are in regular use. One of the CPS vehicles is a wheelchair van which is out of service but kept because it might be needed. Special needs transportation is currently provided by the four regular routes. In addition to the four daily in-district bus routes, CPS operates a daily van route to the regional vo-tech campus. The district owns all vehicles in its fleet and does not lease any.

Currently, the district has 17 Oklahoma Commercial Driver's License (CDL) certified drivers to operate school buses. The number of bus drivers fluctuates as they enter and leave CPS employment. Of the 17, four are regular route drivers while the other 13 are utilized on an as-needed basis. Drivers maintain a current Oklahoma CDL, with the proper endorsements. Before the start of each school year and before any drivers are permitted to drive a school bus, drivers must submit to a full license review. CPS then reviews the licenses for proper endorsement and infraction history. CPS transportation policy mandates that any traffic infraction must be reported to the transportation director immediately. The district maintains and files driving records that comply with the ODPS. The department maintains these records for the duration of the school year.

Exhibit 5-37 provides an aerial view of the bus barn. It is located in between the elementary, middle, and high schools.

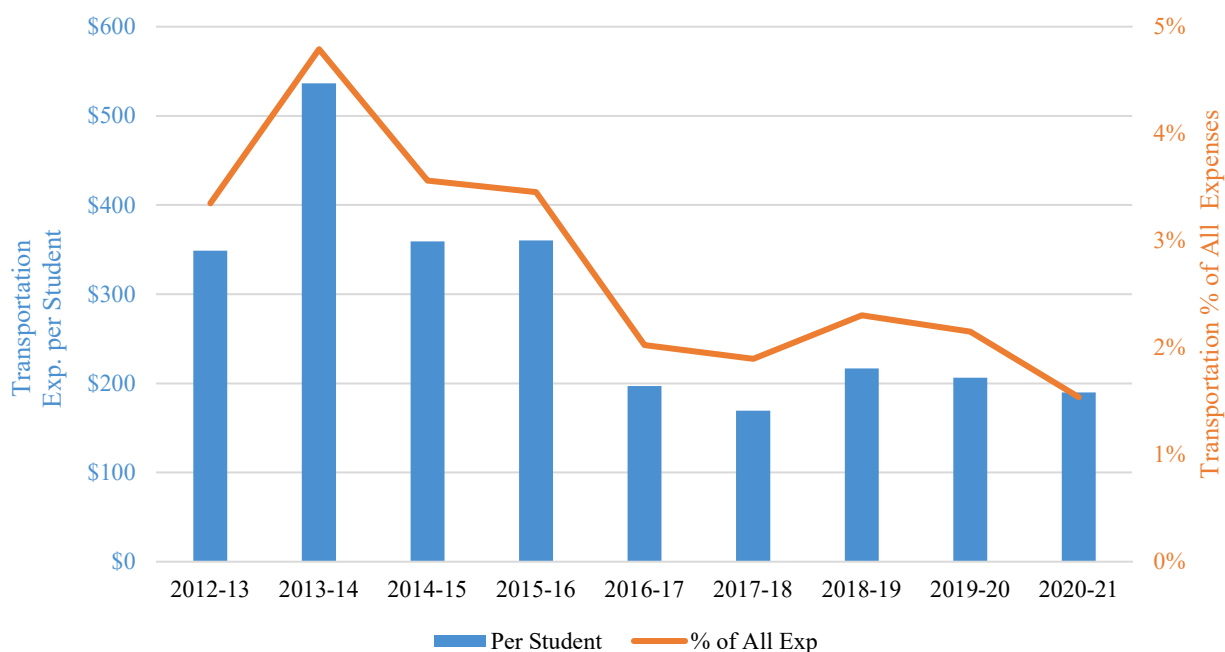
Exhibit 5-37
CPS Aerial View Bus Barn



Source: Google Earth, March 2022

Exhibit 5-38 provides a nine-year comparison of CPS transportation expenditures as a percent of total expenditures as well as the annual transportation expenditures per student. Over that time, transportation expenses have never accounted for more than 2.5 percent of all expenditures. Transportation dollars per student have varied from \$160 to \$326 per student.

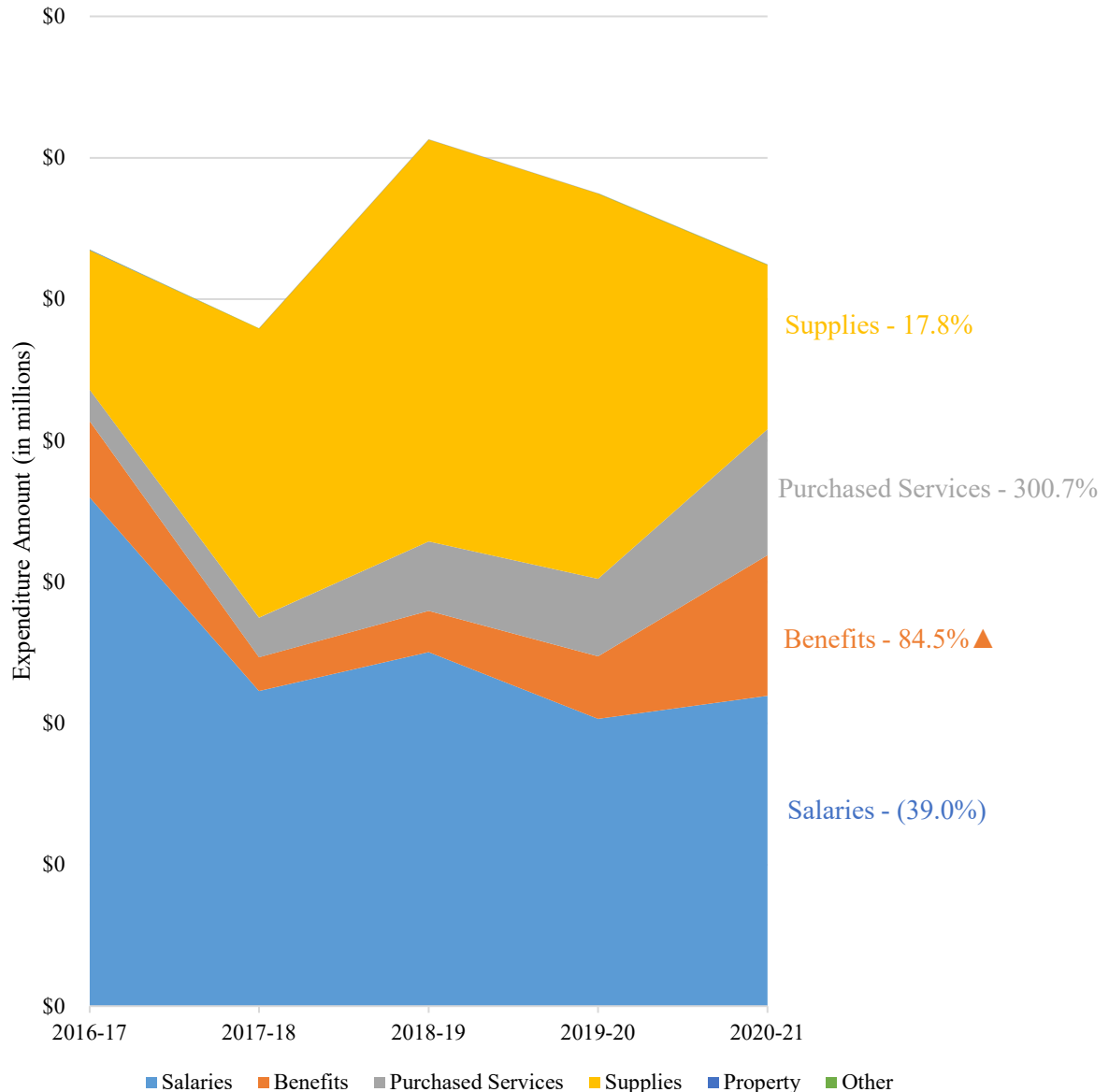
Exhibit 5-38
Trend in CPS Transportation Expenses



Source: SDE, OCAS, and Prismatic calculations

Exhibit 5-39 compares CPS' transportation costs over time. The exhibit includes all transportation expenses by category. In the past five years, transportation salaries and benefits have had the largest increases, but supplies costs have increased as well. Property costs had a single year spike in 2016-17, but otherwise remained at zero. The district reduced its spending on purchased services. Overall, transportation operating costs increased by 2.0 percent.

Exhibit 5-39
Trend in CPS Transportation Operating Costs



Source: SDE, OCAS, School District Expenditures 2017 through 2021, and Prismatic calculations

Exhibits 5-40 and 5-41 compare the change in CPS and the peer districts' transportation costs over time, with and without property expenses, respectively. The second exhibit provides a better ongoing expenditure comparison due to the removal of large, single year expenses (typically school buses). In every year, CPS spent substantially less than the peer average.

Exhibit 5-40
Comparison of Transportation Costs Over Time (Including Property Expenses)

Entity	2016-17	2017-18	2018-19	2019-20	2020-21	Percent Change
Crescent	\$121,145	\$97,314	\$122,643	\$114,937	\$104,857	(13.4%) ▼
Cashion	\$312,276	\$792,203	\$790,862	\$353,990	\$304,300	(2.6%) ▼
Comanche	\$227,444	\$1,347,014	\$290,683	\$253,246	\$183,134	(19.5%) ▼
Empire	\$113,521	\$118,629	\$280,881	\$156,452	\$109,576	(3.5%) ▼
Morrison	\$142,612	\$160,016	\$169,539	\$256,370	\$183,867	28.9% ▲
Minco	\$81,491	\$98,160	\$569,313	\$47,975	\$72,110	(11.5%) ▼
Peer Average	\$175,469	\$503,204	\$420,256	\$213,607	\$170,597	(2.8%) ▼

Source: SDE, OCAS, School District Expenditures, All Funds, 2017 through 2021, and Prismatic calculations

Exhibit 5-41
Comparison of Transportation Over Time (Excluding Property Expenses)

Entity	2016-17	2017-18	2018-19	2019-20	2020-21	Percent Change
Crescent	\$121,061	\$97,314	\$122,643	\$114,937	\$104,857	(13.4%) ▼
Cashion	\$184,635	\$200,424	\$253,972	\$243,240	\$253,601	37.4% ▲
Comanche	\$227,444	\$216,045	\$262,666	\$253,246	\$183,134	(19.5%) ▼
Empire	\$113,521	\$118,629	\$125,844	\$125,132	\$109,576	(3.5%) ▼
Morrison	\$142,612	\$160,016	\$169,539	\$169,566	\$156,522	9.8% ▲
Minco	\$81,491	\$98,160	\$54,996	\$47,975	\$48,110	(41.0%) ▼
Peer Average	\$149,941	\$158,655	\$173,403	\$167,832	\$150,189	0.2% ▲

Source: SDE, OCAS, School District Expenditures, All Funds, 2017 through 2021, and Prismatic calculations

Exhibit 5-42 provides a comparison of cost per rider per day in CPS and the peers for 2020-21. As shown, CPS had one of the lowest daily costs per student and a cost substantially below the peer average.

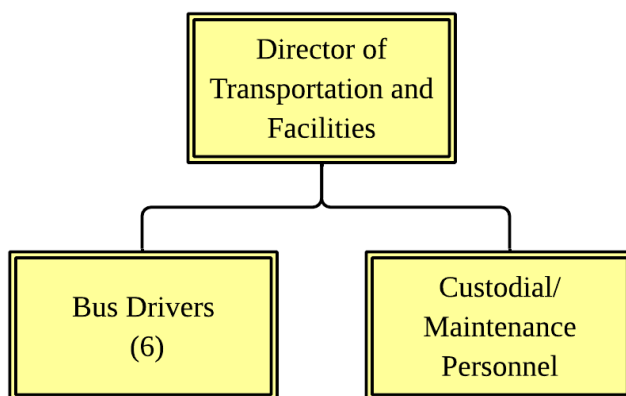
Exhibit 5-42
Comparison of Cost per Rider per Day, 2020-21⁵⁰

Entity	Total Annual Operating Cost ⁵¹	ADH	Overall Cost per Rider per Day
Crescent	\$104,857	423	\$1.50
Cashion	\$253,601	404	\$3.80
Comanche	\$183,134	314	\$3.53
Empire	\$109,576	477	\$1.39
Morrison	\$156,522	458	\$2.07
Minco	\$48,110	289	\$1.01
Peer Average	\$150,189	388	\$2.35

Source: SDE, OCAS, School District Expenditures, All Funds, 2020-21, and Prismatic calculations

The organization of the CPS transportation function is shown in **Exhibit 5-43**. The transportation director reports to the superintendent and is also the director of facilities. Although paid for a part-time position, the transportation director typically works full-time.

Exhibit 5-43
CPS Transportation Organization



Source: Created by Prismatic, January 2022

⁵⁰ The consulting team was unable to obtain the number of school days of each district and has therefore assumed them to be an equal 165 days.

⁵¹ Excluding property expenses.

On the stakeholder survey conducted for this review, staff was asked to assign a letter grade to various CPS functional areas. **Exhibit 5-44** provides the results for transportation. Just over half (53 percent) of the staff gave transportation an A or B, but 29 percent had no opinion about it.

Exhibit 5-44
Staff Survey Results Regarding Transportation

Department/Functional Area	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Transportation	13%	40%	4%	10%	4%	29%

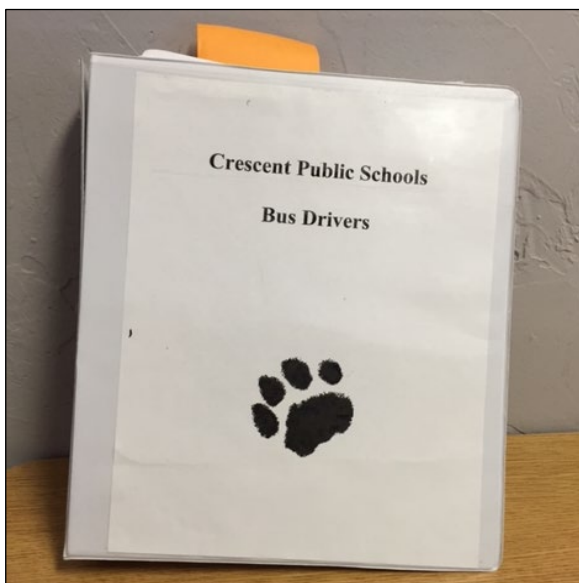
Source: Prismatic Survey Results, January 2022

FINDING 5-28

CPS employs several commendable practices in its transportation operations. These include:

- Requiring all students to participate in bi-annual bus drills, not just those who regularly ride a route bus. This practice exceeds SDE requirements that only those students assigned to daily home to school bus routes participate in bus drills. CPS realizes that since most students ride a sports, activity, or field trip bus, every student would benefit from bus safety instruction.
- Maintaining driver records including MVR, annual physical, drug test documentation, re-certification, and training documents in one notebook in the superintendent's office (**Exhibit 5-45**). Many documents have to be kept for each driver because of the testing and training requirements. These documents are subject to inspection by the Regional Accreditation Officer and others, especially in the event of an accident. Since CPS is a small district and employs fewer than 20 drivers, it is possible to keep all their vital records in one notebook.

Exhibit 5-45
CPS Bus Drivers' Notebook and Course Completion Certificate



Source: Prismatic, January 2022

- Maintaining a student handbook that includes bus safety rules for conduct, a progressive discipline plan for addressing violations, and emergency preparedness plans. SDE expects districts to make their bus rules and emergency plans known and available to parents and students.
- Providing a seven-bay bus garage capable of storing all daily route buses indoors. The CPS transportation program operates with limited resources but is fortunate to have a large garage able to store all vehicles needed for daily routes plus a couple of additional, smaller vehicles, and maintenance machinery. Storing buses indoors keeps them more secure, helps inhibit rust, and keeps them cleaner and warmer.

COMMENDATION

CPS employs several commendable practices in its transportation operations, including emergency drills and driver recordkeeping.

FINDING 5-29

CPS relies upon employees driving a bus as an additional duty. CPS employs a part-time transportation director and six drivers, at least four of whom have other primary duties, who cover five daily routes, and eight to ten more “spare” drivers who can drive some runs and trips.

While it is common in smaller school districts that employees wear many hats, having the transportation director and other district administrators assume daily responsibility for a driving a route bus distracts them from their more important leadership roles. To reduce the amount of

time that drivers are taken away from their other duties, daily pre-trip bus inspections are done by the transportation director and regular bus interior cleaning tasks are put off.

The transportation director has been donating full-time work for part-time pay for a number of years. He plans to retire soon. It is unlikely that the district will be able to replace the level of services he provides with a true part-time director.

RECOMMENDATION

Hire only non-administrators as route drivers and seek to hire at least two whose primary district role is bus driver.

Transportation in CPS is a small but critical function. The district should not plan for the transportation director or other district administrators to regularly drive route buses. Instead, the district should hire two bus drivers whose primary role is bus driving. They can be assigned to complete daily pre-trip inspections and other routine transportation duties in addition to driving a route daily.

FISCAL IMPACT

Based on the 2020-21 CPS transportation salaries and benefits costs, divided by the five daily routes to determine the cost per driver, the consulting team estimates an annual cost of \$26,437 for the two driver positions. It may be more cost effective for CPS to hire two new bus drivers who can also be employed in other areas of need, for example, maintenance and food services, thereby providing the new bus drivers with full-time employment.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Hire two new bus drivers.	(\$26,437)	(\$26,437)	(\$26,437)	(\$26,437)	(\$26,437)

FINDING 5-30

Bus drivers everywhere have a special set of duties and expectations as CDL license holders and transporters of children. As a result, there is a lack of adherence to bus safety rules.

The consulting team observed a number of issues in regular transportation operations:

- Buses are not cleaned often enough.
- Daily pre-trip bus inspections are not completed daily and by the bus driver as SDE intends.
- Buses are left unattended by an adult with students on board and the key in the ignition.

Developing a handbook that clarifies expectations and procedures in each of these and additional operational areas would bring CPS into better compliance with SDE regulations and provide a safer transportation program.

Each school district has its own particular set of procedures to ensure safety and efficiency. Having procedures, duties, and expectations in writing affords the employee the opportunity to become fully aware of them and affords the employer the reasonable expectation that drivers know what is expected of them and a basis for holding drivers accountable for completing their duties and meeting expectations.

All employees benefit from clearly written duties and expectations. Written expectations and duties inform employees of what they should do, how and when they should do it, and in some cases why they should do it. As an example, Edmond Public Schools 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 5-46 provides the table of contents for the Edmond Handbook.

Exhibit 5-46 EPS Transportation SOP 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
Information You Really Need to Know!!! A Practical Guide for the Edmond Public Schools Transportation 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
POLICY ON ALCOHOL AND DRUG TESTING FOR DRIVERS	45
Notes	55

Source: EPS Transportation, October 2013

RECOMMENDATION

Develop a transportation department handbook.

As a small district, CPS may be able to add a portion to their general district employees' handbook that speaks specifically of bus driver duties and expectations, rather than creating a

separate handbook for transportation employees. This makes sense in that most, if not all current CPS bus drivers perform other duties for CPS.

Professional development time should be spent with drivers reviewing Table of Contents topics, gathering input and noting differences in operations and expectations in CPS. SDE requires four hours of professional development each year for bus drivers. Notes from this meeting of transportation personnel could then readily be turned into a draft transportation handbook.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-31

CPS is not adhering to standard practices regarding bus pre-trip inspections. Instead of requiring the assigned bus driver to complete a pre-trip inspection daily, the transportation director completes the daily pre-trip bus inspections for drivers and inspection documentation, sometimes on a weekly rather than daily basis.

SDE provides a pre-trip bus inspection form which CPS uses. This form includes a table for noting the condition of mirrors, lights, brakes, and many other safety-related components on each day of the week. However, pre-trip inspections are expected to be completed before each trip or run daily, and to be completed by the bus driver, not by someone other than the bus driver. In CPS the transportation director completes the pre-trip inspections for the drivers. Some weeks daily inspection results are not noted. Instead, a weeklong summary “Good” or weeklong slash through the inspection item or day of the week column is recorded on the inspection form. (Exhibit 5-47).

Exhibit 5-47 CPS Pre-Trip Bus Inspection Form

SOE Pre-Trip form OAC 210-30-5-6
5/2016 Chapter 2 of the Oklahoma School Bus Driver's Manual has thorough Pre-Trip instructions

District Crescent
 Dates Jan (18-21) 2022 Bus 1120
 Starting Mileage 90,792
 Ending Mileage 90,969
 Driver Melomir

☒ - satisfactory condition
☐ - repair needed
☐ - Repair completed

Exterior		Cross through days for weekend trips				
		17	18	19	20	21
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 (C/I)						
Rims/Lugs						
Hubs						

Inside

Step well					
Emergency Equipment					
Driver's Seat					
Mirrors					
Windshield					
Wipers					
Switches and gauges					
Lights (dome)					
Exits					
Seats					
Aides					

Air Brake Test:

Pressure Retention					
Low pressure warning					
Spring brake test					
Pressure build					
Parking brake hold					
Snatch test					

Hydraulic Brake Test

Brake hold test (Emergency/Warning)					
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: CPS Transportation Office, January 2022

The transportation director is qualified to conduct the pre-trip inspections. The current practice is done to save time for the drivers, especially before the afternoon runs when the drivers are coming from their classrooms or school office. However, it is inconsistent with SDE expectations and best practices to have pre-trip inspections completed by someone other than the bus driver and do not have inspections recorded daily.

RECOMMENDATION

Require bus drivers to complete their own daily pre-trip inspections.

CPS bus drivers should be expected to complete their own bus inspections daily before each morning and afternoon run and record their inspection results twice every day on the pre-trip inspection form. The pre-trip inspection process will take the drivers several added minutes, requiring them to come into work a little earlier in the morning and delay the start of their afternoon runs also by several minutes. Employing bus drivers who do not have other pressing duties for CPS will reduce the time pressures on the drivers to properly complete the pre-trip inspections.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-32

The transportation director lacks certification in drug and alcohol abuse recognition as required by SDE. This puts the district at risk of allowing an impaired driver to operate a bus.

The SDE website lists several of the primary requirements for a transportation director, including obtaining certification in drug and alcohol abuse recognition. SDE notes that this certification is a federal requirement.⁵² It is in place to ensure that a transportation director and others in school transportation who interact with drivers before they start their morning or afternoon run have the training to recognize if a driver is under the influence or impaired, or otherwise unfit for bus driving duties.

In CPS, the transportation director regularly interacts with drivers before and after their daily runs. During these interactions, the director can assess a driver's condition, if only to see, for example, that the driver has recovered from a recent sick day.

RECOMMENDATION

Obtain drug and alcohol abuse recognition for the transportation director and at least one alternate district administrator.

To meet the SDE requirement, the director should attend a drug and alcohol recognition training class and receive certification. These classes usually take approximately three to four hours.

⁵² sde.ok.gov

They may be available through the agency that conducts the drug and alcohol testing program for CPS or available on-line.

The Oklahoma Association for Pupil Transportation (OAPT), located nearby in Guthrie, may be able to direct CPS to the most convenient and affordable training class. Coming into compliance with this SDE transportation requirement will be an easy, but important step.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-33

CPS lacks an anti-idling procedure for its buses. The consulting team found that CPS does not follow an anti-idling procedure as recommended by SDE. An anti-idling policy and program were not seen in CPS transportation documents. SDE set a goal for Oklahoma school districts to limit diesel bus idling to five minutes or less (ten minutes or less when the temperature is below freezing) over a decade ago.

In a 23-page booklet, “Bus Idling Reduction Plan,” on the SDE Student Transportation website under the District Forms and Information, SDE argues for a reduction in bus idling for two main reasons – to save fuel and money and reduce harmful emissions that children and others nearby would breathe. The intentions behind idling are to warm up the engine and the bus interior for passengers are usually good, but misguided.⁵³

Diesel engine engineers and mechanics have explained that diesel engines do not warm up effectively unless the vehicle is being driven, not just sitting. With regards to passenger comfort, school buses are not well insulated and the duration and frequency with which the bus door is open means that what little heat is inside the bus escapes quickly. If idling buses are parked near air input HVAC equipment at school, diesel exhaust is drawn into the school.

The Association of Central Oklahoma Governments, Choctaw-Nicoma Park Public Schools and the Oklahoma Department of Environmental Quality completed a two-year study in 2010 to determine the extent of fuel and emissions savings that Oklahoma school districts might expect by instituting a maximum five-minute bus idling policy. The study found that implementing a five-minute idling policy substantially reduced fuel usage and increased fuel efficiency (an idling bus is still consuming fuel, but getting zero miles per gallon). Overall, the buses that did not idle beyond five minutes used 15 percent less fuel over the course of the year.

RECOMMENDATION

Develop and follow an anti-idling policy as required by SDE.

This recommendation was also made in the 2013 study. The SDE booklet, “Bus Idling Reduction Plan,” is an available, recommended guide for CPS to implement and follow an anti-idling

⁵³ <https://sde.ok.gov/sites/ok.gov.sde/files/documents/files/BusIdlingReduction.pdf>

program. School staff and students can be involved in the study and implementation of an anti-idling program that will show benefits for the entire school community.

FISCAL IMPACT

This recommendation can be implemented with existing resources. In fact, reducing idling will reduce fuel use and costs.

FINDING 5-34

CPS has begun new morning drop-off and afternoon pick-up traffic patterns for students who are driven to or from school. This has improved safety and efficiency, but further safety improvements are possible.

As described and diagrammed on the CPS website page, new drop-off, and pick-up traffic patterns for students in grades K-1 and 2nd to 12th have recently been devised to improve safety and traffic flow. The elementary school is seeking to further improve its drop-off and pick-up procedures through a school site safety program called “School Dismissal.”

In the afternoons, the consulting team observed several unsafe practices:

- There are periods when no adults are present to supervise the bus loading area.
- Bus keys are often left in the ignition without a driver present, sometimes with the engine running, and students on board with no driver present.
- Buses routinely park too closely behind each other, making it impossible for occupants to use the rear emergency exit if needed.

At CPS class dismissal is at 3:35 p.m. and buses are lined up beforehand, in order by route, 1 to 4, usually by the transportation director. Shortly before 3:35 p.m., the consulting team observed a few students coming to the buses unaccompanied by staff. Buses were idling as students began to load and the bus drivers were not yet present. The transportation director was in the area, but not on a bus. The bus drivers generally do not arrive until approximately 3:40 p.m., five minutes after class dismissal. This leaves five minutes when students are left unsupervised on or near their buses.

There are approximately a dozen parking spaces, most with parked cars, a few feet from the bus passenger doors. This could result in a person absentmindedly backing up while bus loading is underway.

In the afternoon, buses are parked too closely together (**Exhibit 5-48**). There is insufficient room for the rear emergency bus door to be opened in the event of a fire.

Exhibit 5-48 CPS Afternoon Bus Line-Up



Source: Prismatic, January 2022

Adults that are present during afternoon bus loading should be mindful of the risks of parked cars backing into the bus loading area. School site safety in the mornings and afternoons depends upon keeping school buses, students and other pedestrians, and personal vehicles separated as widely as possible.

RECOMMENDATION

Continue to refine drop-off and pick-up procedures to enhance safety and traffic flow by ensuring that afternoon bus loading is continuously supervised, that buses are not left running unattended, and that buses are not parked too close together.

Afternoon bus loading safety would be greatly improved if there were at least two adult staff members assigned to the bus loading area, beginning promptly at 3:35 p.m., or earlier if some students continue to come to the buses before 3:35 p.m. Buses should not be left idling without the driver or other adult on board. Afternoon buses should be parked a couple of feet farther apart so that rear emergency doors can be opened if necessary.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-35

CPS bus drivers do not always enforce good safety practices with students. This puts students at risk for injury.

The consulting team observed bus operations during three ride-alongs. Each time, students were frequently seen walking in the bus aisle while the bus was moving, standing up in their seat while the bus was moving, and putting their arms and heads out of the bus window. These unsafe behaviors were especially likely to occur in the afternoon. Each of these behaviors poses an unnecessary risk to students. Students can easily fall and hurt themselves if the bus stops unexpectedly or goes over a bump.

The CPS student handbook clearly lays out a standard of bus safety rules and consequences for not following bus rules. CPS bus drivers were observed monitoring passenger behavior in the interior rear-view mirror but only addressing some misbehavior, such as excessive standing and movement about the bus while it is moving.

Bus passengers are safest when they are seated and facing front. Sitting in high backed, padded bus seats provides “compartmentalization” for students that raises safety levels, especially in the absence of seat belts.

RECOMMENDATION

Enforce bus safety rules with students.

The bus drivers should raise their level of expectation for passenger behavior to reduce the instances when students are out of their seats or standing in their seating area. This can entail adopting a “broken record” approach to bus safety, repeating every day, sometimes several times each day, basic bus safety rules. Youngest students may be the ones who need bus rules repeated most often. Bus accident history shows that the youngest students are most vulnerable.⁵⁴

Without undermining their rapport with students and making their bus riding experience an unpleasant one to be avoided, bus drivers should remind students more often and more emphatically that they should follow bus safety rules. This is a clear way to make it known to students that they are cared about in their welfare. Adults know how quickly and easily accidents happen and people get hurt.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-36

CPS lacks a certified bus driver instructor. All Oklahoma school bus drivers must undergo basic bus driver training during their first year of employment. This basic driver training is either acquired through in-person instruction or online, but in either case from a certified bus driver instructor/trainer. A certified bus driver instructor can not only teach the basic training class but can serve as a further instructional and safety resource for drivers and school districts.

Bus driver instructors undergo further refresher training to keep them abreast of bus safety developments. News about bus safety can be shared with drivers to supplement their basic

⁵⁴ School Bus Safety Is One Bus Stop At a Time (SBSIOBSAAT), NY SED, 2020.

training, making them safer drivers. Bus accident history shows that safety improves when training occurs.⁵⁵

RECOMMENDATION

Certify the transportation director or a bus driver as a bus driver instructor or gain access to one for assistance with training.

CPS is not required to have their own certified bus driver instructor, but would benefit from having one on staff, or at least have regular access to one. OAPT, headquartered in Guthrie, should be able to assist CPS with either getting one of its transportation staff certified or linking up regularly with a certified bus instructor/trainer.⁵⁶

FISCAL IMPACT

This recommendation can be implemented with existing resources. The OAPT website shows an annual, one year subscription to their instructional materials for \$45 per year.⁵⁷

FINDING 5-37

The district's Vo-Tech bus drivers are insufficiently trained in supporting regular bus runs. The consulting team found that the two CPS Vo-Tech bus route drivers are not able to assist with coverage of any of the four in-district bus routes. This is a missed opportunity to provide backup support for regular bus routes.

CPS employs two drivers to conduct the daily route to the Vo-Tech Center, approximately 30 miles away. One driver takes the morning group at approximately 7:00 a.m., stays at the Vo-Tech Center, and returns with the morning group to CPS by approximately 11:30 a.m. A second driver takes the afternoon group there at 11:30 a.m., stays with the group, and returns to CPS at approximately 4:00 p.m. If CPS needs a spare bus driver, one driver will cover both the morning and afternoon runs of the Vo-Tech route. At the time of the onsite work, neither Vo-Tech driver was sufficiently familiar with one or more of the in-district bus routes to a level where they could competently and safely complete an in-district run.

Cross-training the Vo-Tech drivers to cover one or more of the in-district routes will increase the transportation department's capacity to resolve its driver shortage and expand the capacity of each Vo-Tech driver and provide them a means to earn extra income.

RECOMMENDATION

Train the Vo-Tech bus drivers to cover one or more of the in-district routes.

Unless the Vo-Tech drivers have other responsibilities that would prohibit them from helping, the morning Vo-Tech driver should cover an afternoon in-district run between 3:30 and 4:30

⁵⁵ SBSIOBSAAT

⁵⁶ oaptonline.org

⁵⁷ oaptonline.org

p.m., and the afternoon Vo-Tech driver should cover a morning run between 6:30 and 7:30 a.m. Clearly written run directions with a map of the run would help a Vo-Tech driver, and any spare driver, become familiar with a run. A couple of “dry run” practice sessions without students on the bus with a knowledgeable guide would help.

FISCAL IMPACT

This recommendation can be implemented with existing resources. Since CPS pays a flat rate to drivers for coverage of in-district runs, this will not affect the cost of covering the run.

FINDING 5-38

CPS has made some recent improvements to bus runs, but work remains. Several years ago, the district reduced the number of daily, in-district runs from five to four, which saved district funds. However, challenges that remain regarding the bus runs include:

- Buses are currently running well less than full each day.
- Current bus runs require buses to back up often or complete turnarounds on private property.
- CPS relies on handwritten bus run sheets with directions and bus rosters.
- CPS lacks procedures to annually review bus stops and runs for safety and efficiency.
- Buses arrive in the morning after the start of breakfast service.
- Despite its small geographic size, district leadership has not assessed the potential of providing courtesy transportation for students who live within 1.5 miles of school.

Between 2015 to 2016, CPS reduced the number of its in-district bus routes from five to four. This was a major reduction. It reduced the district’s need for bus drivers, buses, fuel, supplies, insurance, and maintenance for the fifth bus route. Since then, the district has not explored options for further reductions. As **Exhibit 5-49** shows, CPS route roster sheets show that the district has approximately 131 eligible bus riders. Each of the four buses has a manufacturer rating of 72 students. Assuming an industry standard of planning for two students per seat (which is lower than the manufacturer rating of 72 students), CPS is only filling its buses to 68 percent of capacity. Often, districts assume 2.0 secondary students per student, but 2.5 elementary students per seat. Using those assumptions would further reduce the district’s bus fill rate. Using the 2.0 rate, CPS could operate with just three daily route buses.

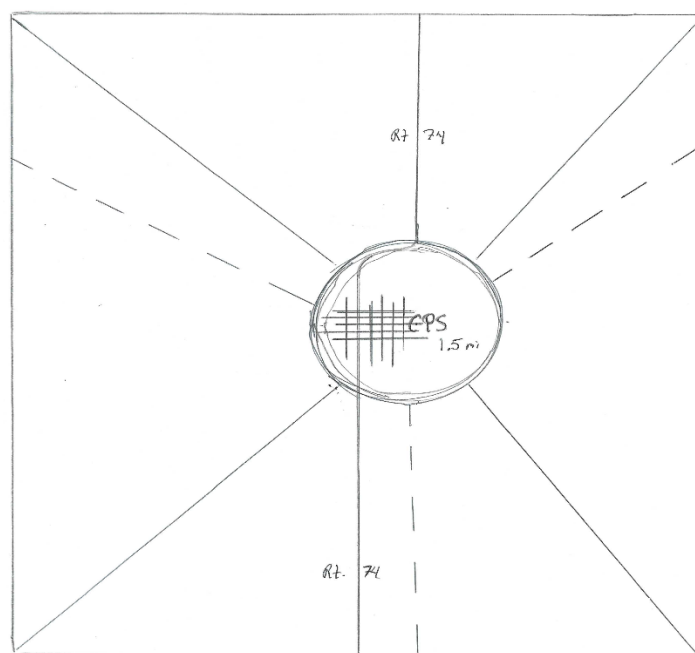
Exhibit 5-49
CPS Load Numbers

In-District Route	Assigned Load	Bus Seating Capacity, Assuming 2.0 per Seat	Percent Occupancy, Assuming 2.0 Per Seat
Route 1	37	48	77%
Route 2	27	48	56%
Route 3	26	48	54%
Route 4	41	48	85%
Total	131	192	68%

Source: CPS and Prismatic calculations

In the three instances in which the consulting team observed bus runs, about half or fewer of assigned students rode the bus, creating additional empty seats. It would be worthwhile for CPS to review the question of in-district route reduction by studying the district's transportation needs as depicted in the map sketch in **Exhibit 5-50**.

Exhibit 5-50
CPS Route Map Sketch



Divide CPS into 3 bus route areas, instead of 4.

Source: Prismatic, January 2022

The sketch divides CPS into three zones for busing and identifies a circle with a 1.5-mile radius from CPS in which circle students are not required to be bused. CPS lacks a transportation software program to analyze busing options in a computer and may not need a transportation software program because of its size. Instead of using software, CPS can manually locate all eligible students on a map with pins, the old-fashioned way of planning bus routes. By expecting students to walk farther to corner bus stops and minimizing back-ups and turn-arounds, CPS

might be able to devise three bus routes of reasonable length. Currently, several of the in-district routes take about 45 minutes to pick up and deliver or drop off all students, counting just “live hours” time with students on the bus. CPS in-district runs cover ~25 miles each, for a total of about 100 miles of bus route service. If three bus routes could each do ~33 miles of service and be assigned ~44 students, CPS might be able to reap savings.

On days when three different bus runs were observed, ridership was approximately half of the assigned load. The consulting team observed:

- 22 of 41 students assigned to Route 4 rode the morning bus.
- 12 out of 27 assigned students in Route 2 rode the bus to school.
- The percentage of afternoon bus riders was similar to the morning.

These figures indicate that consolidating to three runs would likely still result in buses not operating at capacity. The district does not regularly collect bus ridership data. Week-long bus ridership surveys would be helpful to establish an accurate number of the students who are actually riding CPS buses.

Another area where CPS bus operations are not optimal is in bus turnarounds. The use of turn-around sites where a bus backs up to reverse direction is done primarily to drop off or pick up a student close to home, or in some instances to avoid having to travel farther down a road. On each of the three bus runs that the consulting team observed, there were at least two turnarounds, and in one case, four. In some cases, the bus driver acknowledged that the property on which the bus was turning around was private property. In one case, it was evident from signage and physical property at the turn-around site that the site belonged to an oil or gas pumping company. In the case of some CPS bus backups, they occur on narrow dirt roads with barely enough space for completion of the turn-around, particularly when snowbanks are present. CPS’s narrow dirt roads have ditches along their sides. Some turnarounds might be eliminated if students whose stop is at or near the turnaround site were expected to walk farther to their bus stop.

In some cases, a turn-around on private property is the safest method. None of the stops appear to violate SDE regulations. Nevertheless, turnarounds take additional time and increase the risk of property damage.

Turnaround agreements between the district and the respective landowners limit the liability of the district while turning around on private property. A sample turnaround agreement is shown in **Exhibit 5-51**.

Exhibit 5-51 Sample Turn-Around Agreement Form

[] 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.

SCHOOL BUS TURN-AROUND AGREEMENT FORM

I/We, _____ and _____, acknowledge that we are the owner(s) of the property hereinafter described: _____
(LEGAL LAND DESCRIPTION)

(ADDRESS/ BOX) (TOWN) (STATE) (POSTAL CODE)

I/We, 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.

WHEREAS 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.

WITNESSEED that the Parent/Guardian/Owner agree as follows:

1. To sign a school Bus Yard Turn-Around Agreement on a yearly basis;
2. To ensure that the private road is developed and maintained to a standard to accommodate regular school bus travel;
3. To ensure that a proper turn-around exists;
4. Failure to maintain the road and turn-around in an acceptable condition can result in withdrawal of service;

IN CONSIDERATION 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.

Signed this _____ day of _____, A.D. 20 _____.

Parent/Guardian Witness Owner if different from Parent/Guardian

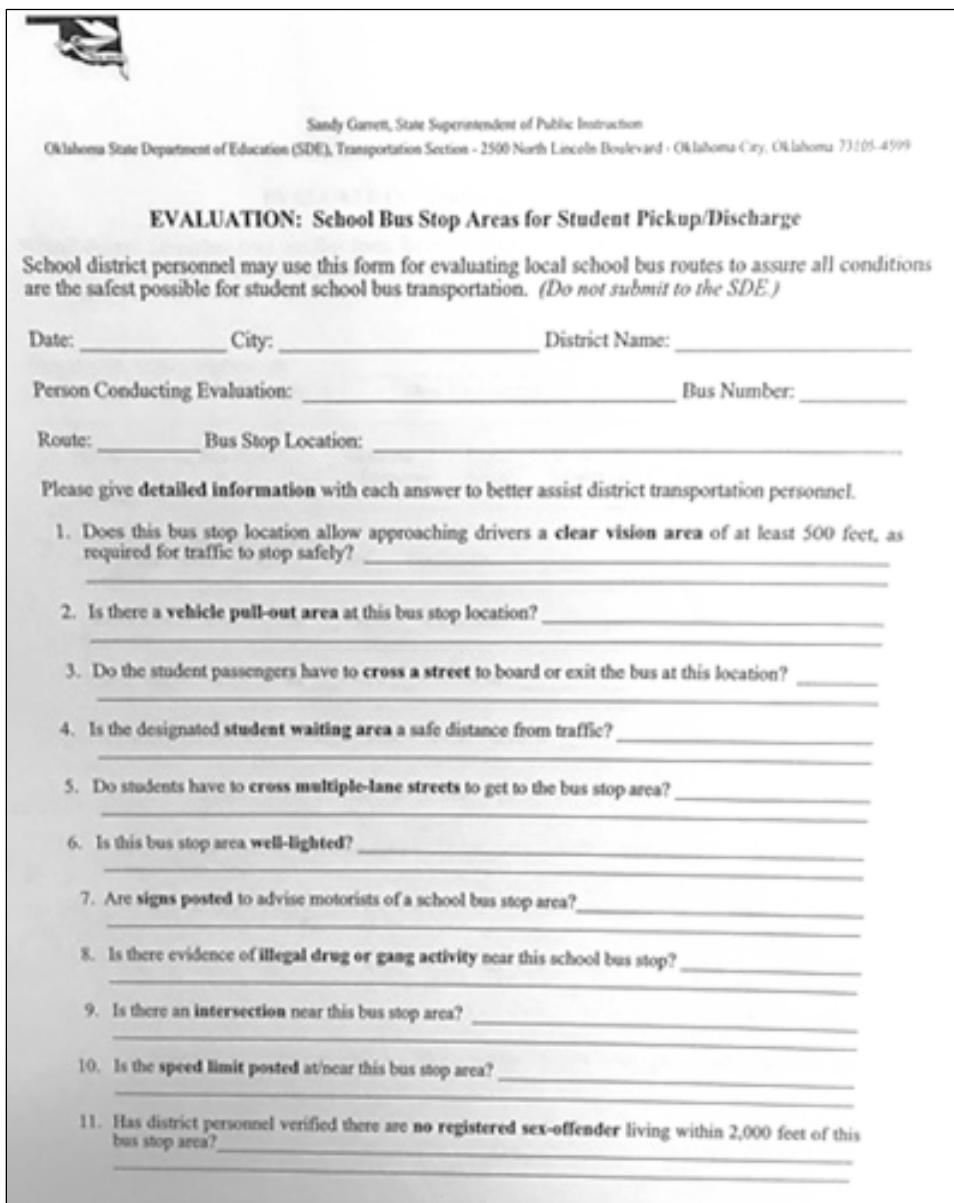
Source: Prismatic, January 2022

Depending on CPS standards and student age, a student might be expected to travel a 0.25-0.5 miles to their bus stop in view of the fact that CPS students who live less than 1.5 miles from school are ineligible for busing. Eliminating turnarounds will reduce the risks for CPS buses and their passengers, and the mileage and travel time for CPS buses. A review of the turnaround sites can be part of the district's review of all bus stops and bus runs that are expected by SDE. The form shown in **Exhibit 5-52**, found in the Bus Driver's Notebook in the superintendent's office, can be used to document review of bus stops and bus runs on a formal basis.

The consulting team found per interviews that CPS bus drivers and the transportation director assess bus stop and bus run safety daily. When a new student is added to a route or there is a change in the circumstances of a route, for example, a weather-related detour, the CPS drivers, and busing director consider the best available options. SDE expects districts to annually review and document bus stop and bus run safety and efficiency. CPS has the SDE forms for evaluation and has full knowledge of its bus stops and runs

Exhibit 5-52

SDE Bus Driver's Notebook



Sandy Garrett, State Superintendent of Public Instruction
Oklahoma State Department of Education (SDE), Transportation Section - 2500 North Lincoln Boulevard - Oklahoma City, Oklahoma 73105-4599

EVALUATION: School Bus Stop Areas for Student Pickup/Discharge

School district personnel may use this form for evaluating local school bus routes to assure all conditions are the safest possible for student school bus transportation. *(Do not submit to the SDE.)*

Date: _____ City: _____ District Name: _____

Person Conducting Evaluation: _____ Bus Number: _____

Route: _____ Bus Stop Location: _____

Please give **detailed information** with each answer to better assist district transportation personnel.

1. Does this bus stop location allow approaching drivers a **clear vision area** of at least 500 feet, as required for traffic to stop safely? _____
2. Is there a **vehicle pull-out area** at this bus stop location? _____
3. Do the student passengers have to **cross a street** to board or exit the bus at this location? _____
4. Is the designated **student waiting area** a safe distance from traffic? _____
5. Do students have to **cross multiple-lane streets** to get to the bus stop area? _____
6. Is this bus stop area **well-lighted**? _____
7. Are **signs posted** to advise motorists of a school bus stop area? _____
8. Is there evidence of **illegal drug or gang activity** near this school bus stop? _____
9. Is there an **intersection** near this bus stop area? _____
10. Is the **speed limit posted** at/near this bus stop area? _____
11. Has district personnel verified there are **no registered sex-offender** living within 2,000 feet of this bus stop area? _____

Source: Prismatic, January 2022

CPS does not use any transportation routing software, nor does the district use any computer capability for writing bus run directions or making lists of students assigned to each bus run. Instead, CPS relies on handwritten run directions and bus rosters as shown in **Exhibit 5-53**.

in additional state funding for transportation, it could reduce vehicle congestion around the schools and increase community support for the district. CPS is already providing “courtesy busing” to some students who live less than 1.5 miles from school. These students live west of Rt. 74. It has been the past practice to provide these students with busing, so they do not have to cross Rt. 74 while walking to and from school.

RECOMMENDATION

Improve CPS bus routing.

The district should:

- consolidate from four to three daily bus runs;
- obtain written permission for all instances of use of private property;
- review bus runs to minimize backing up;
- document runs and bus rosters in a computerized system so that they can be more explicitly communicated when there is a substitute driver;
- use forms provided by SDE to document evaluation of bus stops and bus runs for safety and efficiency;
- time morning runs so that buses arrive to the cafeteria at 7:25 a.m.; and
- assess operational capacity to provide courtesy transportation.

There is no question that there is space on each bus route for more students. The district should computerize bus data in order to more easily be able to examine possibilities for consolidating the existing four runs into three, to identify and address instances where buses are completing turnarounds on private property or backing up, to evaluate bus stops/runs.

Further, CPS should examine the possibility of offering transportation to some students who live less than 1.5 miles from school. A new eligibility distance might be set at 1.2 or 1.3 miles, depending on the study. The transportation director and bus drivers probably already have a good sense of which students live just under the 1.5-mile limit. If CPS chooses to add more students to its bus rosters, it will have to be careful not to add much more travel time or mileage to the existing bus runs. New bus stops that are created for some students who live less than 1.5 miles from school could be situated on through streets that the buses already pass and spaced apart at a reasonable distance so the bus does not have to stop too often.

FISCAL IMPACT

These recommendations can be implemented with existing resources.

FINDING 5-39

CPS has a contract for purchasing tires but not for other bus parts, supplies, or repairs. The CPS bus maintenance program operates with open purchase orders at local stores, such as the NAPA auto parts store and relies on school bus dealerships near Oklahoma City to complete more complex, extensive repairs. The one exception to this practice was reported to be the purchase of bus tires off a state purchasing contract.

A state contract for school bus supplies is typically more inclusive and includes fluids, filters, hoses, brake parts, exhaust parts, and fuel. Most or all supplies would be provided by a regional vendor who has been awarded the state contract for bus supplies and parts. Since CPS buses are older vehicles and travel over many miles of bumpy, dirt roads, their bus repair needs are greater than they would otherwise be.

RECOMMENDATION**Establish contracts for the purchase of bus parts, supplies, and repairs.**

CPS should investigate the option of using state contracts for the purchasing of bus supplies and parts. As an alternative, there may exist a regional purchasing consortium for school bus parts, made up of surrounding school districts or other governmental bodies. OAPT may be able to assist CPS with state or regional contracts. Exploring the option of state purchasing contracts will assure the tax-paying public that CPS is making the best use of its resources. Sometimes, the state contract price is not the lowest price available. A lower price may be negotiated with a local vendor. Having the purchase price in writing for bus parts and supplies will provide the documentation needed to show that CPS has been a wise shopper for bus supplies and parts.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-40

The district has limited in-house capacity to complete preventive and minor maintenance on its fleet. Nearly 75 percent of the daily CPS bus run mileage is completed over bumpy dirt roads. Travel on dirt roads causes excessive vibration throughout the bus, leading to premature maintenance issues. In addition, CPS owns a wheelchair van that is currently out of service, limiting the district's ability to serve students in wheelchairs, if the need arises.

The CPS transportation department completes as many repairs and preventive maintenance tasks as they can, but the extent of such repairs and other work is limited to relatively simple tasks. These include changing light bulbs, replacing hoses, changing the oil, and swapping out easily accessed parts. The district relies upon one maintenance employee who also works in transportation for these tasks.

The CPS bus garage does not have any lifts, though it does have jacks for lighter weight vehicles. CPS does not have tire changing equipment. Its bus tires are changed at a local tire repair shop. On occasion a more skilled bus mechanic is brought into the CPS garage to help

with more complex tasks, but without heavy-duty, hydraulic floor jacks the range of work that can be completed on the buses is limited. In one respect, CPS is fortunate to have older buses because they are simpler to work on. Newer buses of more recent vintage have become much more reliant on computer sensors and require computer hardware and software to complete diagnostic and repair work.

When CPS is unable to complete needed repairs in house, they send their buses to bus dealerships in the Oklahoma City area. This requires extra time, perhaps towing expenses, and loss of use of the vehicle while the bus is in the shop. With limited resources, CPS is not able to afford these added bus repair costs.

RECOMMENDATION

Seek a cooperative agreement with a nearby district for skilled maintenance services.

CPS should more often utilize a more skilled and experienced school bus mechanic to complete preventive maintenance and repair tasks in the CPS garage. This mechanic may be available from a neighboring school district. OAPT may be able to help with locating a mechanic or with starting a cooperative agreement among CPS and other districts. Ideally, this mechanic would be ASE certified and certified as an Oklahoma school bus inspector, authorized to complete the required, annual bus inspections. Currently, CPS uses the same individual who performs the in-house bus repairs to annually certify the CPS buses meet safety standards.

The cost of using a more skilled bus mechanic will not be small. It may be reasonable in view of the escalating costs of outsourcing bus repair work, especially as new buses are so much more complex.

FISCAL IMPACT

This cost estimate is based upon a \$75 per hour fee for the mechanic, eight hours per day, one day per week for 50 weeks. The cost estimate does not include the cost of needed, additional tools or bus parts and supplies that the mechanic will need. It is probably that a substantial portion of this expense will result in reduced bus maintenance expenses, such as towing to a dealership in the Oklahoma City area. However, district documentation was insufficiently organized for the consulting team to be able to develop an estimate of costs that might be reduced/eliminated by contracting for a shared mechanic.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Contract for a shared bus mechanic.	(\$30,000)	(\$30,000)	(\$30,000)	(\$30,000)	(\$30,000)

FINDING 5-41

CPS occasionally rents a non-conforming 15-passenger van that does not meet federal safety standards for pupil transportation. It is for small activity and sports group transportation.

In a few instances when small teams or activity groups (less than 14 people) travel to distant sites and there is no CPS school bus, van, or Suburban available to transport them, CPS has resorted to renting a 15-passenger van. These 15-passenger vans, often used by church groups, private schools, and colleges, are known as “non-conforming vans” because they do not meet federal motor vehicle safety standards as a school bus or school van does. Non-conforming vans are subject to roll-over accidents. **Exhibit 5-54** shows a 15-passenger non-conforming van rented by CPS during the consulting team’s observation.

Exhibit 5-54
CPS 15-Passenger Non-Conforming Van



Source: Prismatic, January 2022

The National Association of State Directors of Pupil Transportation Services (NASDPTS) issued a position paper in December 2017, that reminded school districts that it is illegal for them to buy or lease new non-conforming vans, due to the higher risks discovered in its use.⁵⁸ Loopholes in the law allow the purchase of a used non-conforming van, and do not address renting one on a short-term basis. In a February 2004 position paper, “Survey of State Laws on 12 and 15 Passenger Vans for Pupil Transportation,” NASDPTS noted that Oklahoma law does not permit the use of non-conforming vans for either home to school or student activity pupil transportation.⁵⁹ Their continued use by many groups is evidence that information about the safety of non-conforming vans has not spread widely or is not followed as intended. In the event of an accident with a non-conforming van, a school district’s liability can be greater.

RECOMMENDATION

Discontinue the use of non-conforming vans.

Whenever small CPS groups need a vehicle for transportation to a site, a school bus or school van should be used whenever possible. Instead of renting a non-conforming van, CPS should

⁵⁸ [nasdpts.org/vans](https://www.nasdpts.org/vans)

⁵⁹ <https://www.nasdpts.org/resources/Documents/PaperVansSurveyFeb04.pdf>

seek out a vehicle, perhaps a school van from a private bus contractor, that meets federal motor vehicle safety standards.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-42

There is no bus fleet replacement schedule. CPS has an aging, battered fleet of buses. Two of the four buses are used regularly for in-district routes and have over 100,000 miles on the odometer. The route bus with the fewest miles has 55,500 miles on it. Two of the activity buses have over 100,000 miles and a third activity bus has over 94,000 miles. The Tigers sports bus has over 90,000 miles and is reported to lack engine power.

According to staff survey responses in **Exhibit 5-55**, there were slightly more than a quarter, or 28 percent of respondents who *disagreed* or *strongly disagreed* that there are enough working buses to meet the needs of the district. This further shows the need for more buses.

Exhibit 5-55
Staff Survey Results Regarding the Need for Buses

Survey Statement	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
There are enough working buses to meet the needs of the district.	2%	31%	39%	24%	4%

Source: Prismatic Survey Results, January 2022

All buses that perform in-district routes take a beating over the miles of bumpy, dirt roads. The red clay dust that swirls about and into the buses on dry days causes air filters to clog prematurely. CPS does its best to maintain the vehicles it has. It has been creative in the past with fleet replacement efforts as shown in their purchasing two refurbished buses.

CPS is currently seeking a grant for the purchase of two new buses. Without grant assistance or lower cost options such as a refurbished bus, the cost of a new bus is daunting, often over \$100,000, depending on its options.

With a daily need for four in-district route buses, a Vo-Tech center van and a contingent of activity and sports buses large enough to handle expected needs, CPS could operate with a fleet of approximately ten buses and vans, not including its smaller vehicles for student transport.

With a fleet replacement schedule that calls for buses to be replaced every ten years, CPS would have to replace one of its ten buses each year. As buses age, they become more expensive to maintain and pass annual bus safety inspections, until it reaches the point where it no longer makes good financial sense to invest more into an old bus. More often these days, districts expect to get 15 years or 150,000 miles out of each bus.

The NASDPTS recommended in their January 2002 position paper, “School Bus Replacement Considerations,” that full-sized conventional and transit buses be replaced every 12 to 15 years.⁶⁰ Smaller school vans that often have longer, out-of-district routes and accumulate more mileage more quickly, should be replaced every eight to ten years.

Rough road conditions will shorten the life of a bus. Having accurate records on bus maintenance costs is necessary to complete an informed cost-benefit analysis of whether to keep an old bus or replace it. If CPS follows a 15-year fleet replacement schedule, it will have to replace approximately one bus each year. A critical element in adopting a fleet replacement schedule is acquiring the funding for new buses. If fleet replacement is not already part of the general fund budget, it is difficult to add \$100,000 or more without a large, negative impact on the budget, especially one as small as CPS’s.

Borrowing for bus purchases is the usual route school districts take instead, provided they have the ability to do so. What is equally important to securing funding for bus purchases is adhering to the bus replacement schedule, and not putting off bus purchases for a year or two. This “kick the can down the road” approach can lead to a year when four or five buses must be replaced at once resulting in a cost of nearly half a million dollars.

RECOMMENDATION

Establish and follow a bus fleet replacement schedule that is appropriate to the resources of CPS and the size of its busing program.

Expensive or not, CPS must maintain a transportation program for students that live more than 1.5 miles from school. Purchasing a big bus with a capacity of 72 passengers for \$100,000 or more is a better bargain than buying a school van with 20 to 24 seating capacity for \$60,000 to \$70,000.

CPS should continue to consider less expensive refurbished buses and explore whether a lease/purchase option for new buses fits the district’s operational and financial conditions. Otherwise, CPS needs to devote ample resources to buy at least one bus soon and, each year, thereafter for several years until the district is on course for fleet replacement that should occur every year or every other year.

FISCAL IMPACT

Purchasing a new bus on an appropriate replacement schedule will cost the district ~\$100,000 per year for at least the next five years. Bus purchase costs would be less if a school van is bought, rather than a full-sized bus, or if the district pursues lease-purchase options.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Adhere to a bus replacement schedule.	(\$100,000)	(\$100,000)	(\$100,000)	(\$100,000)	(\$100,000)

⁶⁰ <https://www.nasdpts.org/resources/Documents/Paper-BusReplacement.pdf>

FINDING 5-43

CPS buses lack radios. This limits drivers' ability to communicate during emergency situations.

CPS relies on its drivers to use their personal cell phones, instead of having radios installed on the buses. The district does not compensate drivers for use of their personal cell phones.

Years ago, CPS did have radios installed on their buses. Some of the radio hardware is still present on bus dashboards and in the transportation director's office. When bus radios were in use on CPS buses, they had a partnership with the Town of Crescent for sharing of a radio tower and/or other radio equipment. When the city changed its radio operations years ago, CPS was not able to sustain a bus radio system on its own or in a revised partnership.

RECOMMENDATION**Purchase and install radios on all CPS buses.**

A similar recommendation was made in the 2013 study. Bus radios should be considered an important part of bus safety equipment. In bus safety drills, students are taught how to use the bus radio in the event of an emergency in which the driver is incapacitated. Two-way radios provide the most assured means of communication between bus drivers and the transportation and school offices. Personal cell phones can be forgotten or provide unreliable service. Bus radios are typically hard-wired into the bus dash and to a radio antenna to ensure they are always present.

Modern digital radios provide superior range and clarity, if there is a digital radio service in the area. School offices and the transportation director should be able to instantaneously reach one or all drivers in the event of an emergency, and vice versa. Personal cell phones may lack this capability.

To keep costs down, CPS may be able to once again arrange for sharing of radio equipment, namely, a transmission tower, with the city, the local public works department, or ambulance corps. There is a variety of bus radio technologies available, including analog and digital, from which to choose from.

FISCAL IMPACT

Cost estimate for bus radios is based upon price quote from Two Way Direct for ten Motorola TLK mobile phones, wired into bus dash, for purchase price of \$100 each plus \$35 per month per radio for service charges.⁶¹ These radios would operate off the Verizon/ T Mobile cell phone network.

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Bus radios for all CPS buses.	(\$5,200)	(\$4,200)	(\$4,200)	(\$4,200)	(\$4,200)

⁶¹ twowaydirect.com

FINDING 5-44

CPS does not keep its buses reasonably clean on a regular basis. Buses are covered with red clay dust, inside and out (**Exhibit 5-56**). CPS already has a wash bay but has not been using it due to an improper drain size.

Exhibit 5-56
Red Dust on CPS Buses



Source: Prismatic, January 2022

Dirty buses can give the appearance that they are not mechanically well maintained and can also send a signal that there is a lack of pride in school district property. The CPS garage has a wash bay, but it was poorly constructed and is not currently used to wash buses. The drain in the wash bay was reportedly built too small or shallow to handle the flow of water from bus washing. Secondly, there is not a safe and convenient means of washing the top of a bus in the wash bay without the washer becoming soaked. Having a bus wash bay is fortunate. Not being able to use it should be correctable without great expense. Jack hammering out the old wash bay drain from the concrete floor and replacing it with a larger drain along with a tall, rolling ladder with brakes to access the top of a bus should be within the resources of CPS.

RECOMMENDATION

Reconfigure the wash bay with a deeper drainage pit and wash system, then require buses to be washed weekly.

The district should restore its wash bay to operational use. CPS already has a wash bay; all it needs is a bigger drain and a weekly wash schedule to keep its buses looking much better. Drain repair costs should be just a small fraction of the cost of a new wash bay.

Besides the red clay dust on the outside of the CPS buses, there is quite a bit of dust inside the buses. This dust should be cleaned and vacuumed regularly as it soils clothing and can convey a message to some students that a messy bus is acceptable, resulting in even more trash and possible vandalism on the bus. The consulting team observed on an afternoon bus run on a mild January day, many bus windows were open, resulting in much dust blowing into the bus. CPS should explore options to reduce the inflow of dust, perhaps by closing rear windows, or by opening the bus roof hatch instead of so many windows. More expensive options would include operating only air-conditioned buses and not allowing students to open windows.

FISCAL IMPACT

Because CPS already has a wash bay, repairing the wash bay drain and using existing power washing equipment appears to be the most sensible option. The consulting team estimates that will cost no more than \$10,000. More expensive options include:

- Wash-bot offers bus washing units that range in price from \$21,000 to \$34,000.⁶²
- Ross and White provides a drive-through bus washing system for \$25,000 plus installation.⁶³

Recommendation	2022-23	2023-24	2024-25	2025-26	2026-27
Restore bus washing capability.	(\$10,000)	\$0	\$0	\$0	\$0

FINDING 5-45

The CPS transportation department has several problems in maintenance:

- CPS lacks work orders to document the repair of buses and their costs.
- A bus parts and supplies inventory is not kept.
- CPS employs a maintenance person to assist with bus repairs, but his work is limited to rudimentary tasks.

School bus defects that need repair, such as a cracked mirror or broken light, are noted by drivers or the transportation director on the pre-trip bus inspection form (**Exhibit 5-57**). When the repair of the defect is completed, it is noted by the repairer on the same pre-trip inspection form. In some cases, it was found that listed defects on a pre-trip inspection form were not noted as having been completed.

⁶² wash-bots.com

⁶³ RossandWhite.com

Exhibit 5-57
CPS Pre-Trip Bus Inspection Form

SOE Pre-Trip form OAC 210-30-5-6
 5/2015 Chapter 2 of the Oklahoma School Bus Driver's Manual has thorough Pre-Trip instructions

District Crescent
 Dates Aug 23-26, 2021 Bus # 142
 Starting Mileage 160,556
 Ending Mileage Same
 Driver Melony
☒ - satisfactory condition
☐ - repair needed
☐ - Repair completed

Exterior Cross Check days for wash and tire

Lights, turn and	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Reflective material	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Windshield	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Windows	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Wipers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Service Door	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Mirrors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Bumpers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fuel Cap/Door	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Drive Shaft	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Exhaust	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Frame	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Suspension	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Brakes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Stop Arm	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Battery Box	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Optional equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Engine Compartment

Fluids	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Belts and Hoses	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Fuses	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Wiring	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Air compressor	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Alternator	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Water pump	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Steering assembly	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Suspension	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Wheels	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Tires (C/I)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rims/Hub	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Hubs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Inside

Step well	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Emergency Equipment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Driver's Seat	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Mirrors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Windshield	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Wipers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Switches and gauges	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Lights (dome)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Exits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Seats	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Aisles	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Air Brake Test

Pressure Retention	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Low pressure warning	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Spring brake test	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Pressure build	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Parking brake hold	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Smph test	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Hydraulic Brake Test

Brake hold test (Emergency/Pre-Eng)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Pedal pressure test	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Reserve system test (if equipped)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other/Items (if equipped)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Lift

Securement Equipment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Crossing Gates	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
A/C	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Comments on defects
Light Bulb out - left rear light - no brake light

Repairs complete by Tell Cotton
 Date 8-23-21

POST Trip Child Check ☒ ☒ ☒ ☒ ☒ ☒

Source: Prismatic, January 2022

Best practices require that repair of all defects noted on a pre-trip inspection form are documented on a work order to provide a “paper trail” of repair costs. Work order forms also track preventive maintenance work. School busing programs often use computer software to track work orders. Since CPS is a small operation, such software is not needed but there should still be a comprehensive system tracking the hours of repair work, which mechanic performed the repairs, and what parts and supplies were used in the repair. Transitioning to a work order system and away from relying on just the pre-trip inspection forms can start with an inventory of currently available bus parts and supplies. The transition will include also greater use of purchasing contracts for bus parts and supplies as discussed previously.

RECOMMENDATION**Improve maintenance recordkeeping.**

The district should:

- begin use of bus maintenance work orders to document repairs and maintenance;
- inventory bus parts and supplies; and
- hire a more skilled bus mechanic to complete more repair and maintenance tasks at the CPS bus garage – this was covered in a previous recommendation.

A computerized bus maintenance management system or a simpler Excel spreadsheet could be used to document repairs, maintenance, and parts/supplies.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING 5-46

During observations, 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.

During the onsite visit the consulting team conducted a sampling of bus inspections (**Exhibit 5-58**). Several buses were found to have missing or damaged equipment.

Exhibit 5-58
CPS Fleet Inspection

Bus #	11	3	8	4	12	10	5	2
Mirrors	✓	✓	NR	✓	✓	✓	✓	✓
Glass	NR	✓	✓	✓	✓	✓	✓	✓
Tires	✓	✓	✓	✓	✓	✓	✓	✓
Body Damage	✓	NR	✓	✓	✓	✓	✓	✓
Seats	✓	NR	NR	✓	✓	✓	NR	✓
Flooring	✓	✓	NR	✓	✓	✓	✓	✓
Emergency Door	✓	✓	✓	✓	✓	✓	✓	✓
Clean Inside	✓	NR	NR	✓	✓	✓	✓	✓
Clean Outside	✓	NR	NR	✓	✓	✓	✓	✓
Fire Ext.	✓	✓	✓	✓	✓	✓	✓	✓
First Aid	✓	✓	✓	✓	✓	✓	✓	✓
Body Fluid Kit	✓	✓	✓	✓	✓	NR	✓	✓
Triangles	✓	✓	✓	✓	✓	✓	✓	✓
Alarm (Sleeping Kids)	✓	NR	✓	NR	NR	NR	NR	NR
Lights	✓	✓	✓	NR	NR	✓	✓	✓

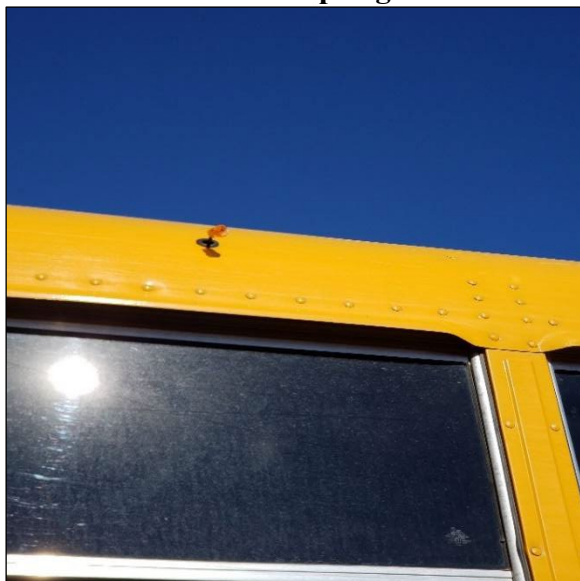
Source: Prismatic, January 2022

Index: ✓ = OK, NR = Needs Review

Exhibit 5-59 shows the deficiencies the consulting team found. As shown, several repairs are needed to prevent future safety issues.

Exhibit 5-59
Observed Bus Deficiencies

Broken Clip Light



Broken License Plate Light



Cracked Windshield



Trash, Cut Seat and Clay Dust in Bus



Source: Prismatic, January 2022

RECOMMENDATION**Address the conditions of buses as needed.**

The CPS transportation director should 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.⁶⁴ 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.

⁶⁴ <https://sde.ok.gov/sites/default/files/documents/files/2019%20Oklahoma%20School%20Bus%20Driver%20Manual.pdf>

Appendix A:
Staff Survey Results

Staff Survey

Surveys Completed: 49

Totals may not add to 100 percent due to rounding.

Statistical Data

How long have you been employed by the school district?	
5 years or less	46%
6 – 10 years	8%
11 – 15 years	10%
16 – 20 years	8%
21 years or more	27%
What is your role in the school district?	
School Administrator	6%
Classroom Teacher	61%
Other Certified (Librarian, Guidance Counselor)	8%
School Aide/Nurse	0%
Instructional Aide	8%
Other Support Staff (Cafeteria, Office, Custodial)	16%

Survey Questions

Survey Questions		Strongly Agree	Agree	Don't Know/No Opinion	Disagree	Strongly Disagree
1	Most administrative practices in our district are highly effective and efficient.	8%	57%	12%	20%	2%
2	Administrative decisions are made promptly and decisively.	13%	56%	19%	13%	0%
3	Central office administrators are easily accessible and open to input.	27%	49%	12%	8%	4%
4	Authority for administrative decisions is delegated to the lowest possible level.	2%	22%	63%	10%	2%
5	The district ensures adequate input from teachers and staff on most important decisions.	10%	44%	19%	17%	10%

	Survey Questions	Strongly Agree	Agree	Don't Know/No Opinion	Disagree	Strongly Disagree
6	The district gives student needs a high priority when making major decisions.	20%	47%	20%	10%	2%
7	Our district has too many layers of administrators.	2%	2%	24%	63%	8%
8	Most district administrative processes (e.g., purchasing, travel requests, leave applications, personnel, etc.) are highly efficient.	6%	63%	22%	8%	0%
9	Central office administrators are responsive to school needs.	15%	64%	15%	4%	2%
10	School-based personnel play an important role in making decisions that affect schools in our district.	12%	43%	24%	18%	2%
11	Parents/families play an active role in decision making in our schools.	0%	44%	31%	19%	6%
12	School-based personnel value parent/family input and engagement.	10%	69%	14%	4%	2%
13	Our district works with local businesses and groups in the community to help improve education.	22%	53%	16%	8%	0%
14	Parents/families participate in school activities and organizations.	24%	63%	8%	4%	0%
15	Parents/families receive regular communications from the district.	39%	51%	4%	6%	0%
16	The curriculum is broad and appropriately challenging for most students.	4%	57%	18%	20%	0%
17	The district's curriculum is aligned from grade to grade and from class to class.	2%	51%	29%	18%	0%
18	Teachers in our schools know the material they teach.	22%	63%	12%	2%	0%

Survey Questions		Strongly Agree	Agree	Don't Know/No Opinion	Disagree	Strongly Disagree
19	Teachers have adequate supplies and equipment needed to perform their jobs effectively.	4%	58%	19%	19%	0%
20	Teachers know how to use the technology they have for teaching.	20%	55%	14%	10%	0%
21	The district lacks sufficient instructional technology.	0%	15%	17%	67%	2%
22	Test data from district-adopted benchmarks and mandated end-of-year tests are used to improve the district's curriculum.	4%	33%	43%	20%	0%
23	Teachers effectively use student data to improve instructional practices.	10%	51%	27%	10%	2%
24	Sufficient student services are provided in this district (e.g., counseling, speech therapy, health).	8%	69%	14%	8%	0%
25	The district adequately implements policies and procedures for the administration and coordination of special education.	4%	65%	22%	6%	2%
26	There is generally cooperation and collaboration regarding special education issues in our district.	6%	69%	16%	6%	2%
27	The district adequately implements policies and procedures for the administration and coordination of the English Language Learner Program.	4%	29%	58%	8%	0%
28	The district provides documents to parents in their native language.	4%	37%	55%	2%	2%

Survey Questions		Strongly Agree	Agree	Don't Know/No Opinion	Disagree	Strongly Disagree
29	Most staff in our school/department are intentional in honoring the cultural differences within our student body.	12%	65%	16%	2%	4%
30	Most staff in our school/department treat student diversity as an asset and not a deficit.	14%	63%	18%	4%	0%
31	Most staff in our school/department have high expectations for all students regardless of their race, ethnicity, or language.	31%	55%	8%	4%	2%
32	Salary levels in this district are competitive.	0%	27%	24%	39%	10%
33	This district values diversity in its employees.	2%	58%	23%	13%	4%
34	I have an accurate, written job description to guide me in my work.	8%	57%	24%	8%	2%
35	My supervisor evaluates my job performance annually.	14%	71%	12%	2%	0%
36	My salary level is adequate for my level of work and experience.	0%	33%	20%	39%	8%
37	I am actively looking for a job outside of this district.	2%	4%	33%	43%	18%
38	I am very satisfied with my job in this district.	17%	49%	23%	2%	9%
39	District leaders enforce high work standards.	10%	59%	22%	2%	6%
40	I feel that my work is appreciated by my supervisor.	24%	47%	12%	6%	10%
41	Teachers who do not meet expected work standards are disciplined.	6%	27%	49%	12%	6%
42	Staff (excluding teachers) who do not meet expected work standards are disciplined.	4%	31%	52%	8%	4%
43	I feel that I am an integral part of team here.	17%	54%	10%	15%	4%

Survey Questions		Strongly Agree	Agree	Don't Know/No Opinion	Disagree	Strongly Disagree
44	The work standards and expectations in this district are equal to or above those of most other school districts.	6%	35%	45%	6%	8%
45	There is adequate high quality professional development for principals and teachers.	6%	57%	22%	12%	2%
46	Non-teaching staff has opportunities for professional development relevant to their responsibilities.	4%	29%	54%	8%	4%
47	At least some of the required annual professional development is offered online.	24%	55%	18%	0%	2%
48	Our district has an effective teacher recruitment plan.	0%	8%	73%	16%	2%
49	Funds are managed wisely to support education in this district.	4%	55%	33%	6%	2%
50	The budgeting process effectively involves administrators and staff.	8%	20%	43%	20%	8%
51	My school/department allocates financial resources equitably and fairly.	6%	43%	43%	4%	4%
52	The purchasing process takes too long.	0%	10%	43%	43%	4%
53	Our schools have sufficient space and facilities to support the instructional programs.	4%	76%	14%	6%	0%
54	Our facilities are clean.	2%	63%	12%	20%	2%
55	Our facilities are well maintained.	2%	61%	10%	24%	2%
56	Parents, citizens, students, faculty, and staff have opportunities to provide input into facility planning.	2%	29%	47%	16%	6%
57	The district effectively encourages staff to minimize utilities use.	6%	53%	29%	10%	2%

	Survey Questions	Strongly Agree	Agree	Don't Know/No Opinion	Disagree	Strongly Disagree
58	The process for requesting a facility repair is inefficient.	0%	20%	35%	43%	2%
59	There are facility concerns throughout the campus.	4%	35%	31%	29%	0%
60	I know what to do during a crisis or an emergency on campus.	51%	49%	0%	0%	0%
61	Students in this district are accepting of other students who are different.	16%	73%	6%	4%	0%
62	Student bullying is a problem in this district.	2%	4%	18%	63%	12%
63	Adult bullying is a problem in this district.	6%	12%	22%	37%	22%
64	Poor student behavior is a problem in this district.	2%	18%	14%	59%	6%
65	The food services department provides nutritious and appealing meals.	6%	48%	29%	13%	4%
66	I often purchase the school lunch meal.	4%	18%	4%	49%	24%
67	Cafeteria staff are helpful and friendly.	27%	63%	8%	2%	0%
68	Cafeteria facilities are clean and neat.	31%	63%	6%	0%	0%
69	School cafeterias are calm environments in which to eat.	8%	47%	31%	14%	0%
70	Many students bring their lunch from home every day.	10%	53%	35%	2%	0%
71	Buses arrive and depart on time each day.	29%	55%	16%	0%	0%
72	There are enough working buses to meet the needs of the district.	2%	31%	39%	24%	4%
73	Bus drivers maintain adequate discipline on the buses.	10%	43%	45%	2%	0%
74	Buses arrive early enough for students to eat breakfast at school.	12%	67%	20%	0%	0%
75	Our district provides adequate technology training.	14%	49%	20%	16%	0%
76	Our district provides adequate technical support.	27%	59%	14%	0%	0%

Survey Questions		Strongly Agree	Agree	Don't Know/No Opinion	Disagree	Strongly Disagree
77	I have adequate equipment and computer support to conduct my work.	29%	59%	6%	4%	2%
78	Administrative computer systems are easy to use.	8%	63%	27%	2%	0%
79	Instructional computer systems are easy to use.	8%	80%	12%	0%	0%
80	The district's technology equipment is often used past its useful lifespan.	6%	35%	37%	22%	0%
81	Many administrative processes are still paper based.	0%	12%	33%	49%	6%

Department/Topic	Grade A	Grade B	Grade C	Grade D	Grade F	No Opinion
Strategic planning	13%	31%	29%	6%	0%	21%
Community relations and communication	40%	38%	8%	6%	0%	8%
Internal communications	27%	27%	15%	21%	4%	6%
Budgeting	15%	31%	8%	6%	2%	38%
Financial management	19%	29%	8%	2%	4%	38%
Purchasing	21%	31%	8%	6%	0%	33%
Personnel recruitment	10%	23%	15%	19%	2%	31%
Personnel selection	15%	31%	19%	13%	4%	19%
Personnel evaluation	17%	36%	11%	17%	2%	17%
Staff development	23%	42%	13%	6%	2%	15%
Special education	25%	40%	15%	2%	2%	17%
Elementary education	29%	44%	6%	2%	2%	17%
Middle school education	23%	42%	10%	2%	2%	21%
High school education	17%	35%	13%	15%	4%	17%
Alternative education	10%	8%	4%	6%	6%	65%
Facilities planning	15%	23%	15%	6%	2%	38%
Facilities maintenance	19%	33%	25%	13%	0%	10%
Custodial services	8%	38%	10%	33%	2%	8%
Food services	21%	38%	13%	13%	2%	13%
Administrative technology	23%	44%	6%	2%	0%	25%
Instructional technology	25%	52%	8%	2%	0%	13%
Technology management and support	44%	35%	8%	0%	0%	13%
Transportation	13%	40%	4%	10%	4%	29%
Central office administration	38%	40%	4%	4%	0%	13%
School-level administration	29%	31%	15%	4%	6%	15%
School Board members' knowledge of educational needs of students	13%	21%	15%	17%	6%	29%
School Board members' knowledge of operational needs in the district	13%	21%	21%	10%	8%	27%
Superintendent's work as the educational leader of the district	38%	40%	4%	2%	2%	15%
Superintendent's work as the chief administrator of the district	38%	38%	6%	2%	2%	15%
Principals' work as instructional leaders	27%	25%	19%	4%	10%	15%
Principals' work as managers of the staff and teachers	28%	30%	11%	6%	13%	13%
Overall quality of education in this district, compared to other districts in Oklahoma	13%	46%	21%	8%	4%	8%

Written Responses

If you would like to provide any additional comments about the district, please do so here.
Where is the district doing well? In what areas could it be improved?

- The staff is very knowledgeable and does a great job with the students. Teachers need to feel appreciated like they once were.
- Many of the processes and procedures need to fit in line with rules and laws. We need to quit doing things just because it's how it's always been done, if we want to grow as a district, we need to make changes.
- The district is working to improve the playgrounds and building facilities for the students. The district has had a great change this school year. The change could have been beneficial to the staff, students and community. However, this has not been the situation that has occurred. We have a community that supports and cares deeply about the students and staff. Unfortunately, the superintendent and elementary principal came to the district with an agenda of change that has not been beneficial to staff, parents, guardians, students or the people in the community. I was receptive to change and looked forward to fresh ideas, supportive administrators, and hopefully providing band, music and a nurse in our district to meet the needs of our students. The areas that need improvement is the administrative leadership for the district. Unfortunately, the Superintendent has allowed the elementary principal to create a work environment that is not effective or conducive for teachers and paraprofessionals. The superintendent has allowed the principal to not allow some parents and community members into the elementary buildings. However, there are some parents and community members that are allowed free access into the building whenever the parents choose. The principal said this was COVID protocol. If this was COVID protocol it should apply to all parents and community members. The Administrators have allowed school board members, PTO parents and a few other parents access to the elementary building during the school day, while others are not allowed. The principal clearly shows favoritism to certain staff- several teachers have had written reprimands or plan of improvement for supervising a classroom outside the classroom doorway when the classroom teacher was able to supervise the students from the open doorway. A teacher was reprimanded for unprofessional conduct when the teacher did not agree with the principal. The principal has not reprimanded a teacher that she is friends with that the superintendent and principal created a teaching position in the district. The teacher has displayed unprofessional conduct on many occasions. At the beginning of the school year, the teacher wore shorts on recess duty that were an inch below her hips. The teacher would sit in a chair under the tree on the elementary playground and scroll through her cell phone while she was supposed to be supervising students on the playground. In December, 2021 the same teacher wore a blanket wrapped around herself with students inside the blanket with her. The same teacher showed a student her middle finger during class to make the rest of the students laugh. When it was reported to the principal, she did not follow through with a reprimand. The incident was ignored. The principal has brought her 7-month-old baby to school and on Friday, January 7, 2022 brought the baby into the cafeteria during lunch and left her duty early to take the principals baby back to the office, which was lack of supervision while she was on duty. The principal does not allow any one into the office, however, the teacher that the superintendent and principal brought from Piedmont spends her plan time and any time she has available in the

elementary office. The superintendent is not available to discuss the difficulties that the staff is experiencing with the principal as she does not acknowledge the chain of command and appears to follow the lead of the elementary principal. I sincerely hope that the superintendent and principal will use the information from the survey to begin to create a supportive and more tolerant environment.

- I do not feel comfortable going into detail about the problems our school is currently facing with the leadership in the elementary. Two employees have resigned, and more are set to retire or resign at the end of this school year. Highly qualified teachers and staff members are leaving our district and our school board is showing zero concern. They state they have a vision, yet they have failed to share that vision with the community, or better yet, the staff that can carry out that vision.
- This is only my second year here. I have seen lots of changes for the better within the district but I believe there is lots of room for improvement
- Some staff are used to little accountability and certain ones receiving information depending on who they know. I know we are working to change this, and with increased accountability will come more complaints from some. Some of those people need to move on to something else if they are unwilling to get on board and do what's best for kids and our district.
- We have a wonderful teaching staff that have been in place for several years, unfortunately many veteran teachers, who are highly qualified are now looking to retire earlier than planned or looking at other districts due to an environment that lacks respect for staff and high percentage of staff are unhappy and have no trust or faith in administration.
- High school principal and his ability to manage staff and students is highly efficient. Cannot say the same for the elementary principal. Many problems with her ability to communicate and treat teachers fairly. We will lose staff over this.
- Questions related to Principals should be separated by level ELEM, MS, HS
- I feel as if the school appearance and functionality has dramatically improved over the few years. I would like to see more intervention opportunities incorporated into the elementary schedule.
- I would like to say a lot has changed in the past year for the better. It was hard to establish if the information wanted was for the school year 2021-2022 or for what has happened in the last 15 years. I do feel a lot of effort has been taken within this last year to right some of the issues with building cleanliness, maintenance, financial responsibility, and accountability. More accountability for teachers needs to happen in the high school.
- Safety in the High School.
- Salary scale needs to be extended beyond its current cap to cover yearly increases for those on the 90-year plan until retirement age.
- Crescent Schools is a team school we all take it seriously that we are one team for our students. Communication and accountability are not the strong areas of Crescent Schools.

Appendix B:
Parent Survey Results

Parent Survey

Surveys Completed: 98

Totals may not add to 100 percent due to rounding.

Grades and Modality

Grade	Percentage
Kindergarten	15%
1	14%
2	18%
3	7%
4	16%
5	14%
6	11%
7	14%
8	15%
9	17%
10	10%
11	19%
12	7%
Other	12%

Survey Questions

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
1	School board members listen to the opinions and desires of parents and community members.	14%	28%	31%	19%	8%
2	School board members know and understand the educational needs of students in the district.	18%	28%	27%	22%	6%
3	The Superintendent is a respected and effective leader.	30%	30%	30%	6%	3%
4	District and school staffs are accessible to parents.	30%	48%	8%	11%	3%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
5	Parents play an active role in decision-making in our schools.	12%	31%	16%	30%	11%
6	Education is the main priority in our school district.	15%	44%	12%	21%	7%
7	In this district, students learn the necessary material to be prepared for the next grade.	12%	55%	9%	16%	7%
8	I receive enough information from the district regarding academic expectations for my child (i.e., student testing, retention, etc.).	16%	48%	12%	14%	9%
9	Teachers are held accountable for ensuring that students learn.	17%	33%	19%	23%	7%
10	Students are treated equitably in this district.	17%	31%	19%	23%	9%
11	Our school can be described as a “good place to learn.”	14%	50%	15%	12%	8%
12	The district spends its money wisely.	15%	27%	40%	10%	8%
13	The district needs to spend more of its budget on its facilities.	9%	22%	49%	17%	2%
14	The district needs to spend more of its budget on classroom supplies.	18%	39%	35%	8%	0%
15	The districts ask the community for input when developing its budget.	3%	10%	45%	29%	13%
16	District facilities are open for community use.	13%	34%	35%	12%	6%
17	Students in this district are accepting of other students who are different.	15%	46%	9%	16%	13%
18	Student bullying is a problem in this district.	21%	20%	24%	23%	10%
19	Poor student behavior is a problem in this district.	12%	23%	26%	35%	4%

	Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
20	Drugs are a problem in this district.	13%	10%	39%	28%	10%
21	The school buildings and grounds are safe and secure.	17%	53%	6%	19%	4%
22	I regularly access information via the district website.	28%	58%	7%	5%	2%
23	I regularly use technology to keep up to date on my child's education (emailing teachers, online gradebook, etc.).	39%	49%	6%	6%	0%
24	Teachers know how to use technology in the classroom.	29%	45%	22%	4%	0%
25	Discipline and order are maintained in school cafeterias.	14%	23%	56%	2%	4%
26	I feel welcome at my child's school.	36%	47%	3%	11%	3%
27	My child feels welcome and accepted at school.	36%	47%	5%	10%	2%
28	I receive timely communications from my child's teachers regarding his/her progress in school.	24%	36%	10%	19%	10%
29	My child's school encourages parents to be involved in the school and offers a variety of ways to do so.	15%	33%	20%	24%	7%
30	Teachers have high expectations for my child.	15%	47%	15%	18%	4%
31	My child is appropriately challenged by his/her schoolwork.	14%	46%	13%	22%	4%
32	I am satisfied with the education my child is receiving.	16%	49%	16%	13%	5%
33	My child's school is clean.	29%	48%	11%	11%	1%
34	My child's school is attractive and welcoming.	29%	53%	6%	12%	0%
35	My child's school is well maintained.	23%	52%	12%	11%	1%

	Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
36	My child feels safe and secure at school.	30%	52%	4%	13%	1%
37	Discipline is fairly and equitably administered in my child's school.	17%	40%	21%	13%	8%
38	My child regularly uses technology at school.	38%	53%	7%	2%	0%
39	My child has regular internet access at home.	67%	29%	3%	1%	0%
40	The school lunch period is long enough for my child to eat.	8%	41%	14%	29%	8%
41	My child often waits longer than five minutes in the lunch line.	5%	8%	78%	6%	3%
42	My child likes the food served in the cafeteria.	4%	24%	28%	22%	23%

	Survey Question	Yes	No
43	Does your oldest child regularly ride the bus?	19%	81%

If child rides the bus:

	Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
44	My oldest child's school bus runs on time nearly every day.	14%	13%	71%	0%	3%
45	My oldest child feels safe riding the bus.	8%	18%	73%	0%	0%
45	Bus drivers effectively handle discipline issues on the bus.	7%	10%	79%	1%	3%
46	The length of my oldest child's bus ride is reasonable	10%	18%	72%	0%	0%

Written Responses

If you would like to provide any additional comments about the district, please do so here.
Where is the district doing well? In what areas could it be improved?

- Testing exemption needs to be standard. The rules should be the same all the way around. Teachers should have to communicate with parents.
- I feel the school is moving in a better direction and has a positive movement. The elementary principal is making progress but was not a welcoming individual for the school amongst all the changes we were facing at the beginning of the year. I believe some middle school teachers are not interested in the best for my child, but rather collecting a paycheck. Some male teachers are more focused on athletics than classroom success and inaccessible through email and other forms of technology. As a parent who regularly checks Gradebook and holds my child responsible for their grades, the untimely and inaccurately reporting of grades causes unjust punishment for my child. A policy for grade reporting (if not already in place) would be a great addition. I believe the superintendent is a great addition to our school and brings much needed new perspectives and forward-thinking progress. The school board needs to learn to keep their personal opinions regarding faculty and staff to themselves in social settings as they are more influential in the opinions of other parents than they recognize.
- I feel as though some parents get “special” treatment compared to others. We were told due to Covid no parents were allowed to attend parties, into the school, etc., and my 6th grader had a pancake breakfast and certain parents were able to attend. When emailing the principal, I never received an email back. My children are biracial, and my sixth grader has been made fun of, called vulgar names, and nothing is done about it.
- You all are doing great. It would be nice to be able to go to the kids classroom parties.
- With covid running rapid. The school needs to shut down and get proper cleaning! Make masks mandatory so those that wear them are not picked on for wearing one.
- The girls basketball coach is awful. The bullying is disappointing, drug dogs need to check cars and lockers frequently. Thankful you have stayed open during the pandemic. You do a great job at community and student involvement.
- The only comments I have is for there to be a little more time in the lunchroom for them to eat. Also, bullying is a big issue at this school.
- Bullying is still a problem in the school. Students know when no adults are around and they can get away with verbally or physically bullying other students. Students that come forward and say they are being bullied need to be taken seriously so that all students feel safe while attending school.
- It was hard to answer because I answered thinking about this year. Prior to this year, my answers would be different because we received no communication from the previous administration. I am so glad things are changing for the better. I still feel like our teachers need to do a better job of actually teaching and not leaving kids on their own or expecting them to just know things. In the past years, there was no accountability for staff and things were not done fairly with kids. I still don't receive communication directly from the teachers. I do from the elementary principal and superintendent, which is great. But I would like to hear from the teachers also. I also want to see report cards every quarter and progress reports every 4-5 weeks in between the report cards.

- The teachers' email addresses need to be clearly posted on the school website. One of my son's email addresses is posted with the grade book. All of them should be. Also, the kids are not inclusive here. There are cliques and the teachers should mix the kids up more frequently to promote that all kids have to work with each other. School playgrounds should be monitored more for this also.
- Crescent needs to bring band and choir back to its curriculum. Those are two very impactful programs.
- Would like more information on sports offered for all grades.
- A safe and clean environment for learning is provided. Teachers should never allow bullying, especially in regard to whether a child identifies with a political party, religion or religious views, vaccination status, or sexual orientation.
- Drug Use: my child has reported to me that students use the bathrooms and parking lots to vape and smoke. Students have been seen high in class by my child. Art: It is our opinion that a full-time art teacher is not necessary, and that position could be split half and half between music and art. Volunteers: A volunteer panel established to come in and read to the kids who are struggling or are behind. We have community moms and grandmas that would be willing to step up and help if the opportunity was presented. Staff: Students notice the lack of care and effort from teaching staff. The teaching staff needs to be accountable for the days they are late to work and the burden they put on other staff for calling in short notice. High School principal doesn't take parents' concerns seriously. Certain Staff members have been heard talking bad and or snarky comments about other teachers and staff while in the classroom. Some teachers are very complacent in their jobs and need to have their passion for our kids refreshed or they need to be replaced.
- Many of my responses are agree but only because this year there has been a big shift in the overall wellness of the school. The grants that have been submitted to make improvements to the school were imperative and the new superintendent has identified this. It is definitely going in the right direction in order to get the school district back on track financially and to offer more opportunities for the students.
- Bullying is an issue and IS NOT ADDRESSED. Teachers aren't treated well by Principal and Superintendent. The BULLY is still in school, never disciplined. The child bullied physically sick was taken out of school. I WILL NOT REENROLL next year. We will home school until the [deleted] and [deleted] are FIRED. As well as ENCOURAGE every Parent to do so. Hopefully losing Federal Funds.
- Getting a handle on bullying by older kids, working to keep grades separate and not allowing too many older kids with younger kids. Being more diligent dealing with racism
- Discipline seems to be really lacking this year. I'm guessing substitutes are at an all-time low because of it. Vaping/weed pens on school property and in classrooms is a huge issue. Throw a drug test in there and see what happens or let a drug dog take a walk around the middle school and high school. Cleanliness in the bathrooms, especially high school, is disappointing. Lack of college preparation/discussion is astounding so far for us. The importance of sports and the sports facilities are taking way too much precedence over classroom needs/upgrades, and I have kids in sports. School safety at the high school feels nonexistent and unimportant. Positives are our teachers. They are trying their best with what they are given. I know they love my kids as their own. High school/middle school administrators are really good about being present. Communication seems to be lacking and I

fear that we will lose good teachers because of it. When elementary kids mention tension at school, there's a major issue.

- We switched to Crescent Elementary last year. We absolutely love it! The teachers are so caring and strive to help the kids with every need!
- I feel like overall we have a great district. I'm not one to complain though. I have heard many rumors about the tension in the Elementary and vapes & drugs being a big problem.
- Needs more diversity activities and education on different cultures. Would like to see at least a few minority staff members and more diversity on the school board. The appearance of the school is wonderful, but it still doesn't feel like an atmosphere of inclusion. Attractive but not welcoming.
- I do not feel that the high school students are challenged to a level that will prepare them for the next step in life. The lack of homework and instruction are horrifying. There is also no guidance regarding college for the children seeking higher education.
- I feel as if our school board really needs to a better job in all areas. I feel this is not a position of power, it is a duty taken on to help the parents of the students voices be heard. I do not like how this current school board and administration have taken it upon themselves to make decisions for this school district based on their views and theirs alone. There is a lack of community interest in our school system nowadays...
- Need different Elementary Principal that wants to join our community and not control it.
- We have had some new updates in flooring which now look fantastic. We need more accountability in the high school. Are teachers actually in the room? Are the correct students in the class? Are other students allowed to come to a class that they are not in that hour just to hang out with friends? Are teachers taking grades.. more than just the final?
- The only issue concerning, and it seems to be an overwhelming consensus, is the new Elementary principal. Bullying behavior towards other teachers, does not like to communicate other than email with people. I fear we will be losing many staff and educators due to her behavior.
- Improve your police presents from 7:30 to 8:30,. And from 3 to 4:30!!!!
- School employees and board need to be very careful what they post in social media. Although possibly innocent not everyone will view as that. I feel we are headed in a positive direction. School employees: coaches included should be full time employees this of course is my opinion. We have too many "religious" leaders hired just because of who they are. They are great people, but I feel like we need to take a good look at this.
- I feel that the student who are good students don't get enough attention. The resources are all directed toward those students who struggle or who are behavior problems. The good students just float through without being challenged. There definitely need to be more activities for students. Music and band!
- I love our teachers and support staff. I am so sad we have lost some due to our inexperienced school board and new leadership that has come from very large schools. I am bothered by things I have heard the new superintendent and new principal have done/do/said to our teachers. Especially in the Elementary School. I feel like the school board is out of touch with the needs of the school and their desire "for change" is just for "change" sake. The things they are "changing" are not things that are necessarily for the betterment of the school. It is difficult to get new school board members elected because we live in a small community, and it turns into a popularity contest verses the best person for the job. Several of our board members have no qualifications to make them qualified for the position. Personal

feelings are behind major decisions being made that affect our school . I would like to see a complete overhaul of our current school board. They totally disregard opinions that are not in line with their “vision”, a word they use A LOT but no one outside of the board seems to know what that “vision” is. I am concerned about the future of our school and the ability to retain our good teachers and staff in the hands of our current board due to the decisions and changes that have been made so far.

- The district recently hired a new superintendent that seems to be much needed for the district and she is doing a great job! We recently moved our kids to the district and are hoping that music and arts will eventually be added to the district. Although my kids love athletics and plan to take part in sports, we would also like to have the opportunity to have are kids involved in choir, band, music, art and theatre. Another area that needs to be improved is teacher communication with parents and district communication regarding parent teacher conferences. Families that live outside the district struggle with communication and knowing what’s happening with student performance and student activities.
- School lunches are neither attractive nor appetizing. They should want to eat lunch and they don't.
- The changes being made by our new administration are great. [deleted] and [deleted]are both great. Teachers publicly posting political ideologies that represent hate should not be tolerated. Students continually using racial slurs has improved but still an ongoing issue. It shouldn't matter who you are, rules should apply to everyone the same. The “better than you” attitude by some teachers and board members needs improvement. The special education program needs improvement and accountability. Every student deserves a quality education, regardless of ability. Religious leaders should not automatically be designated as coaches. Major conflict of interests, we are a public school, not a church. Huge detriment as far as attracting athletic students to our district.
- Instead of spending money on new flooring and on the playgrounds, you should probably use it to provide help to the kids who are struggling instead of telling parents there’s basically nothing you can do to help their child learn how to read better because you don’t have a reading interventionist.
- The elementary school doors need to be opened at 7:45 on the dot and not at 7:50 especially on extreme cold days
- There are several families in this district whose children are a constant problem and because of past administration, nothing ever gets done about them. They are disruptive, get away with bullying, some constantly spout racial slurs to our students of color. Their parents either aren't privy to their behavior problems or think they will get away with it because of their name. I believe the new administration has come in blind to the issues and are learning and doing their best to fix problems. Also, the new elementary doors being locked past [deleted]’s office is a good thing, but often times, other outside doors are unlocked, creating an easily accessible building for outsiders to infiltrate, not safe at all! District IS improving, I am just hoping all areas are covered in a timely manner
- Bullying is a topic that needs to be reviewed and more standards put into place. This has been a huge problem especially this school year. SOMETHING NEEDS DONE FAST!!!
- High School- Our teachers are kind and caring. Although, I feel like there are very few who are teaching and setting expectations for their students that are comparable to other high schools. I think this is because discipline is nonexistent for the students. It seems to be acceptable for students to be disruptive and disrespectful during class. I feel like many of our

teachers are in survival mode and are letting students get by with the bare minimum because that's all they can squeeze out of them. Also, zero security measures for the high school. Easy for anyone to come & go as they please. We are very appreciative of the new administration. Already seen huge improvements happening at the school as far as funding and improvement of the facilities.

- Regular emails and updates regarding my students (from their teachers) would be awesome
- I feel that the new members of the administrative team are more interested in PR and what the community thinks of them, than the education of the students and support of the teachers. We have tried to speak directly with our school board members about concerns for our school and was immediately shut down, saying that it is not their job to be concerned with such things. I am very disappointed in the direction the school is taking and my youngest will not be returning next year.
- I think we are headed in the right direction, and I am excited about it!
- I hear there is lots of vaping around school (restrooms) and bullying on social media (ie. taking pics of people unknowingly and posting on garbage apps like TikTok and Snapchat). Not sure how the school can control or manage either issue, but maybe they need to be aware of both.
- Our district is making huge stride in campus improvement. Overall, we are impressed and hope these improvements continue in all areas.
- I think it would be beneficial to see more communication with parents of Pre K students who are new to public schools. Perhaps a map of where the classroom is located, information on signing up for bus route or school lunch program and offering tours of the school over the summer or a week prior to school starting. I'm happy with the regular communication from the Principal and Superintendent.
- The parents aren't allowed in the school and I haven't received any communication from my oldest child's teacher over anything. I missed our parent teacher conferences because I wasn't told about them. I was told that I could find out about the conferences via Facebook or the school website. Communication is something that desperately needs to be worked on.
- For a long time here, things have been status quo and there was little accountability for the teachers and staff. Too much of a good old boy system. I see things changing this year, and it is such a great atmosphere now. I enjoy the communications and the way district leadership celebrates our students and staff while they work on the areas that need improvement.

Appendix C:
Students Survey Results

Student Survey

Surveys Completed: 207

Totals may not add to 100 percent due to rounding.

Grades and Modality

Grade	Percentage
7	16%
8	11%
9	19%
10	20%
11	24%
12	10%
Other	0%

Survey Questions

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
1	Education is the main priority in our school district.	16%	48%	17%	16%	3%
2	Students learn the necessary material to be prepared for the next grade.	12%	57%	17%	12%	2%
3	I have plenty of choices when selecting academic and elective courses.	13%	42%	19%	19%	8%
4	My school can be described as a “good place to learn.”	8%	43%	25%	18%	6%
5	I feel that I am challenged in my classes.	16%	40%	20%	18%	6%
6	My teachers have high expectations for me.	25%	42%	26%	5%	3%
7	Most staff in our school have high expectations for all students regardless of their race, ethnicity, or language.	30%	39%	25%	2%	4%
8	All students have equitable access to courses offered at my school.	19%	47%	25%	6%	2%

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
9	Most adults in my school treat student diversity as a good thing, not a bad thing.	18%	47%	27%	4%	4%
10	I knew what to expect on the state tests.	13%	45%	24%	16%	3%
11	There is at least one adult at school to whom I can go when I have a problem.	41%	38%	10%	4%	7%
12	I have at least one adult in this school who cares about me.	41%	33%	18%	3%	4%
13	I have at least one adult in this school who mentors me.	30%	33%	23%	8%	6%
14	I feel welcomed and accepted by other students in this school.	18%	44%	18%	13%	7%
15	I feel welcomed and accepted by the adults in this school.	22%	47%	22%	5%	4%
16	The school library meets my needs for books and other resources.	14%	39%	34%	8%	5%
17	I have access to good college counseling at this school.	8%	24%	51%	10%	7%
18	I have access to good career counseling at this school.	8%	30%	43%	12%	7%
19	My school connects me to real-world issues and experiences.	8%	37%	27%	19%	9%
20	My teachers communicate regularly with me about my academic progress.	9%	34%	28%	20%	9%
21	My school is clean.	9%	32%	23%	25%	11%
22	My school is attractive and welcoming.	10%	40%	24%	17%	9%
23	My school building is well maintained.	9%	39%	28%	18%	6%
24	My school building needs a lot of repairs.	21%	29%	32%	16%	2%
25	I feel safe and secure at school.	15%	44%	23%	13%	4%

	Survey Questions	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
26	Student bullying is a problem in this school.	13%	21%	25%	30%	11%
27	Students in this school accept each other's differences.	11%	32%	26%	23%	9%
28	The school buildings and grounds are safe and secure.	13%	47%	24%	13%	3%
29	Discipline is fairly and equitably administered in this school.	11%	43%	28%	11%	8%
30	Teachers and staff respect students in this school.	16%	45%	27%	8%	4%
31	Drugs are a problem in this school.	16%	18%	34%	16%	16%
32	Discipline and order are maintained in the school cafeteria.	9%	34%	45%	8%	4%
33	I have enough time to eat my lunch each day.	11%	42%	18%	21%	9%
34	I usually have to wait in line longer than five minutes to get a school lunch.	9%	14%	53%	20%	5%
35	I like the food served in the cafeteria.	3%	14%	38%	20%	26%
36	The cafeteria serves a good variety of food for breakfast.	4%	12%	68%	7%	9%
37	The cafeteria serves a good variety of food for lunch.	5%	20%	47%	15%	13%
38	I regularly use technology to keep up-to-date on schoolwork (emailing teachers, using online gradebook, etc.).	37%	47%	11%	2%	3%
39	I regularly use computers or other technology at school.	46%	46%	6%	0%	1%
40	The technology available to me at my school is new enough to be useful.	34%	54%	7%	2%	2%
41	Teachers know how to use the technology they have for teaching.	22%	50%	20%	6%	3%
42	I have regular Internet access at home.	50%	39%	8%	3%	1%

Survey Question		Yes	No
43	Do you regularly ride the bus?	17%	83%

If student rides the bus

Survey Questions		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
44	My bus runs on time nearly every day.	25%	44%	25%	3%	3%
45	Students feel safe riding the bus.	25%	47%	25%	0%	3%
46	Bus drivers effectively handle discipline issues on the bus.	28%	50%	14%	6%	3%
47	The length of my bus ride is reasonable.	28%	47%	11%	8%	6%

Written Responses

If you would like to provide any additional comments about the district, please do so here.
Where is the district doing well? In what areas could it be improved?

- The food sucks.
- Bullying is an issue. Especially from groups who have different ideas on what boys and girls are. Bullied because I'm a GIRL and they want me to be SOMETHING I AM NOT. Boys in girl's bathroom is wrong. It's not SAFE
- Teachers need to care more
- Paint the walls grey it looks better
- My school rebuilt the cafe which was just fine the way it was, and they need to rebuild the middle school near the vents it is black on the roof and some of the teacher's heat don't work
- High school and middle school are in bad shape
- The food could be better so people actually want to eat it, the building is older and needs repairs around, the lunch time is short, and I can barely finish with enough time left.
- The areas that could use improvement would be the school bathrooms
- Well, not everyone is treated the same by all students (I am fine by the way).
- I feel CPS could use more focus on extracurricular activities besides football.
- The teachers treat us like we're stupid
- I think the main thing is making drugs and fights lessen down. I think we also need maybe better choices of foods to eat. Also, maybe our safety plans could be better
- Control bullying/drama as much as possible
- Add a band pleaseeeeeeeeeeeeeee, and teach it with music theory

-
- I think we are improving dramatically as a school the improvements could be when we hire new teachers make sure they can coach and then for say football we can have extra coaches instead of wasting that teachers spot (better school board)
 - The district is doing well at keeping the students safe, but it could be improved in the area of students vaping during school.
 - The bathrooms need to be cleaned and repaired.
 - The disciplinary actions in this school are weak sauce. Stop being lazy with problems and actually take care of stuff that's wrong in the school.
 - I think and know people that dislike the food served at the school
 - We could improve by getting more track equipment. Everything else seems fine
 - Doing well at keeping students disciplined. Doing poorly at helping students know about colleges
 - The teaching is good but the middle school girl's bathrooms are awful.
 - The things we are taught are good but bullying and the cafeteria food should be improved
 - For one of the language classes, we should do sign language
 - Most of it is good we just need band and other classes
 - They need to stop focusing so much on sports and pay attention to how well other extracurricular activities are doing!
 - The district is using computer to teach the kids.
 - It could be improved in the cafeteria area; the food is not very good, nor do I think sometimes it is edible. I do not enjoy eating it and I think it should be improved a lot because I go home hungry because I don't eat the food served in the cafeteria.
 - The teachers are racists
 - School is fun(ny) you guys are doing great
 - We need a band, and a music teacher who teaches music theory
 - Could be improved by unblocking YouTube so students could watch videos given to them by teachers so they could do their assignments....speaking from experience
 - Some students need a little more help than others. We need teachers who have more similarity with their students. The district is doing well by making sure the students have what they need.
 - My only complaint is the water tastes like coins
 - Moving from a 6A school to Crescent was a really welcoming experience and like a breath of fresh air
 - Please add band and get someone who can teach music theory not just how to play.
 - The education is pretty good but bullying and cafeteria food could be improved
 - Although most teachers, and some administrators clearly care about the students at Crescent, my stance on this has certainly changed in the past semester. It seems as though more effort is being put into PR than actually maintaining teacher and student wellbeing, and I'd like to see this changed as soon as possible.
 - Cleaner bathrooms, hard floor not carpet, fix the concrete, classes are maintained nicely, I'd like a longer lunch and shorter classes, more prone to fall asleep in a longer class.
 - I think we could have a better counselor that can be more informative about college scholarships to more than just seniors. One that is constantly on top of that stuff and helps us out with being able to get that done.

- I think that we need a better counselor who will let us know about scholarships and other things that will help us. A good thing about the school is the improvements that have been made over the past couple years!
- The staff is a power trip, out of all the schools that I have been to this is the most unfair I've been treated. I felt my first-grade teacher in OKC held a higher degree of respect and honesty to me. The principal will wipe a kids slate clean if he is in sports. I'll come out and say that I had at least 20+ absences and only passed two classes, because I was seen as an outsider for not growing up in this hick town. If you don't play football, get out. If you're a girl and don't flirt with the weird teachers get out. I was on the honors class when I was at my previous school because I was treated with respect, so I treated my peers with that same respect. I am practically a grown a** man. I have a car, job, and I can make big boy decisions. So why should I sit in a school where I'm treated like sh**. I'm friends with some girls and heard them talking about how their boyfriends had 30 absences. That is not hyperbole, and you wanna know what happens to them because they've got the last name and play football. All their absences were wiped clean. So, they get the mantle while I'm left in the dirt, just because I wasn't allowed to play ball, ridiculous. I will be going online this semester. The counselor is the only one in this school to have showed me respect. The students are their whole own thing. You can do, bully, skip, leave, or whatever you want and no repercussions. I've dealt with bully's blah blah but since I've been in high school everyone has always liked me. I get here and it's like everyone loves me, and then they find out that I don't do drugs, as welcomed as I felt it was gone. Then they are always talking behind your back, you know little kid stuff. The ladies are really nice I'll give the school that. They have made me feel welcomed without trying to make it into a big deal. In my last school if you were struggling the coaches would help you in classes, that's what a coach is for. They would text me to make sure I was awake and eat breakfast. This makes my drive for school insane. I don't want to let them down. But when I get COVID and don't tell anyone so that the team won't get shut down as the coach begged us to do, he ends up kicking me out. And I talked to the coach's as soon as I had seen them at church, and they said no problem don't worry about it. As soon as I get back bam I'm off the team. The coaches are the same coaches so if I do anything else they're already gonna have it out as I tried joining a different sport and I was rejected after football. The sports here are horrible so I don't see why they wouldn't want an extra athlete. They had also let kids that literally skipped games, do drugs, skip, etc. still on the team. I've had trouble with the teachers having it out for me. I don't want to give any more of a clue of who I am as I want to be Anonymous, but I'm sure some of the details if in someone's hands would know who I was. I had a teacher give me an assignment. I read the rules. Made the extra credit. She changed the rules and argued and called me stupid and mocked my English skill. I have screen shots of the teacher doing this and I had confronted her and she had a coach pull me out of class to tell me I had right to say any of that and that I was "being a di** and jack****" "who do you think you are thinking you run things around here, you need to watch yourself" this sounds a lot like a suppressed environment. Sounds a lot like the Nazis. Giving a certain criterion of people a benefit whilst stripping away others because they don't fit into their little Society. I've been ranting and I could go on for longer, but I highly doubt anything will be done about this. But if I am traced from this and asked about it, I will speak up.
- The 5 and 6 grade going do the middle school hell way. they are so loud.

- I think some things that could be improve is actually a new high school with more electives give kids a chance to seek out what their hearts want to do after high school for instance carpentry machining welding computer repair cyber security and teach them the basic stuff the one part of the year and then move to a advance part the next semester over all a new high school building would be nice to have
- I don't think any hard-core drugs are being used but there is vaping going on in the bathrooms during class transition periods. The bathrooms are gross and there is no hot/warm water to truly get your hands clean. My life revolves around the agricultural industry and not once has someone taken the time to sit with me and talk about future college plans.
- Get better bathroom toilet paper
- I really think in areas that can be improved is a bit more discipline for the high school and having more monitors around. In your eyes It might seem as there isn't going much on, but so much goes on during school, weed, vapes, inappropriate behavior in the parking lot, rude behavior the kids have towards teachers, and even high schoolers being discouraging to others, it's sad to see. I know no one is going to speak up and say something about it so here I am to do just that. I understand you can't catch and fix all of these things but if there would be some changes in place, I know it would make a difference. I enjoy being at school but seeing all these things makes it hard to enjoy it. I hope you can take some things that was said into consideration, thank you.

Appendix D:
Community Input Focus Group

Community Input Focus Group

The Community Input Focus Group was held on January 24, 2022. There were seven participants (community members) who were asked to provide their opinions and concerns regarding most areas of the school district. The comments below are those provided by the participants.

MANAGEMENT, PERSONNEL, AND COMMUNICATIONS

Management

School Board

- They have a hard job.
- There are people on the board who no longer have kids on the board. How do they know what is going on in the schools?
- Some see board members without kids as potentially being a good thing, since they won't be pushing the programs their kids are in.
- Some meddle too much and gossip too much. They let the gossip affect how they do things as a board.
- They should get community input more frequently.
- You can freely talk as a citizen at board meetings now.
- All the true discussions happen during closed session.
- When are the board meetings? Some don't know.
- The board room is too small to be public-friendly. There are only four extra chairs.
- They should do public input sessions in the cafeteria at least once a semester.
- Many board members do not know what is going on in the school.
- If you go to some with a concern, they just talk about you to other board members.
- They are trying to do what is best for our schools.

Superintendent

- New superintendent is on top of the lack of performance of some staff and that is a good thing.
- Superintendent is a go-getter.
- A lot of the employees with whom they find fault were hired several superintendents ago.

- Concern about succession planning among teachers – a lot of the teachers have been here forever and will retire soon.
- Athletic director hires and fires coaches. That should be a superintendent role.
- New superintendent is making a lot of people uncomfortable and that is a good thing.
- We love the new superintendent. She has some hurdles ahead that she is not going to be able to jump over in Year 1.
- Superintendent is doing great things and we are going in the right direction.
- We cannot go to our kids' class parties, unless we are "special." This is source of irritation.
- Administrators need to demonstrate equal love for the Ag kids and not just the sports kids. They hope the superintendent will show up at the local livestock show.

Principals

- Elementary principal seems pretty engaged with the kids. She seems fun.
- Feel that teachers' opinions about the elementary principal are improving.
- Elementary teachers did not have a real performance review until now.
- Elementary principal is fine and doing good things.
- When parent issues are brought to the high school principal, his approach to address parent concerns is to blow them off. He does not research situations and instead just plays it down. Generally, issues are swept under the rug.
- High school principal knows nothing about the Ag program. Why not? Why hasn't he put in the time to learn about it?
- Although the high school principal has done some positive things, there is room for improvement.

Personnel

- They have heard that some people cannot be fired. They do not know why. One thinks that employees have to be put on a plan of improvement before you can be fired.
- There are politics here. If you have a good last name, the teachers love you.
- Some staff got their feelings hurt when they didn't get the promotion they wanted.

INSTRUCTIONAL DELIVERY SYSTEM

- Participants with blended families feel that all their children are treated equally. Parents of multi-racial students reported no problems.
- Families come from Edmond and Mustangs to put their children into this school district. While they are happy to be here, they still want improvement.
- Some participants have students here knowing they will not get the best education available. They want them here because it is small and they can keep tabs on their kids.
- Would like to have soccer, cross country, band, and music. We need a new sound system for the football games.
- We only need half an art teacher so that we could then get a music teacher. We are missing something by not having a music teacher. We need music and band.
- We have good welding equipment getting no use because we have no one to teach it. That is a waste. Could parents volunteer to teach a course in welding?
- We have some amazing teachers. But we have some who have been here so long they feel like they can do whatever they want. One teacher decides which students get to go to lunch and which do not—that is a bad thing.
- IEP students are ignored and just pushed through. Teachers do not accommodate them. Regular education teachers do not talk with sped teachers. Regular education teachers do not make any accommodations in their classrooms. Every teacher has a folder for each IEP kid but they just ignore them. Regular education teachers should be pushed to do the right things.
- Education in the elementary school is better than in the high school.
- Some high school students are “assigned” to get teachers coffee in town. Some kids are still being assigned a period as “aide”. Neither is in the best interest of the students.
- We could improve our curriculum. We think the superintendent has started doing this.
- HS Algebra II should never have consecutive days of IXL assignments. Teachers need to be actually teaching.
- We should offer enough electives so that high school seniors do not run out of topics, maybe offer dual enrollment college coursework.
- One high school teacher misses 50-60 days of school a year. Even if it’s a health issue, you still need to do your job.
- Things today are better than they were 10 years ago.

Counseling

- There are problems with the work of the high school counselor. Some students are placed into classes incorrectly – put into Advanced Art, but didn't do the prerequisites. The high school counselor will not email diplomas to college. As a result, one student missed a scholarship because diploma deadlines were not met. High school students and parents are left to fend for themselves when it is time to research potential college scholarships.
- New middle school counselor is amazing.
- The elementary counselor is the best of the best. She is the favorite of many kids.

BUSINESS OPERATIONS

- They feel they have limited understanding in this area.
- A lot of the stipends are given rather than earned. We have coaches that “coach” every sport, but they do not even show up for practice. They are not earning their money. Outside of coaching stipends, some question whether some of the people earning a stipend are qualified to do these jobs.
- Why do some people get three full-time jobs for three part-time jobs? One cannot do three jobs full-time in an 8-hour day.
- They have overhauled the purchase order system since the former Ag teacher stole money from the Blue and Gold program and from parents directly. One positive thing about the theft is there going to be better oversight over all programs now.

FACILITIES

- Getting better in this area. Curb appeal is better. Tiger Pride is coming back.
- It is an improvement from 30 years ago; however, what we have done recently was the first things we have done in 30 years.
- Students have noticed the improvements in high school bathrooms recently.
- Some parents are trying to do a fundraiser to get concrete for elementary and middle school basketball courts. Also looking at a fundraiser for long jump and high jump areas – we have state qualifiers in these sports and they have nowhere to practice.
- Bathrooms next to Ms. Bell's classroom in the high school will back up into her classroom if there is a clog. We should have fixed this issue before putting in the new floors. Overflowing seems to happen at night or on weekends, so no one catches the mess quickly.
- The new high school floor is nice.

- We have used high school kids to do cleaning in the past and it was awful. What we have now is better.
- No real complaints about cleanliness.

SUPPORT SERVICES

Child Nutrition

- Some students hate the lunch. Some have never eaten. One alleges they have gotten ill from eating it. One said the milk is curdled. If a student forgets to bring lunch, some choose to just go hungry rather than get a school meal.
- Mustang Schools has better variety.
- If you are in the back of the line you do not have enough time to eat.
- Some families have always just brought their own lunch and have not tried school meals.

Transportation

- No issues, buses are usually right on time.
- Some parents are driving their kids because they would be picked up at 7:05 am and that's too early.
- Some parents just prefer taking their kids to and from school.

Technology

- Teachers are terrible at inputting grades into gradebook. SEP21 grades were input in DEC21. Families do not know what is going on with student grades.
- Some teachers let kids play irrelevant, non-educational games on their phones.
- Some teachers are emailing parents every 2-3 weeks with updates. Others never send any emails.
- One teacher is great about posting things on the google link to help kids learn concepts in a variety of ways.
- Teachers should be required to daily post their assignments. Some do, some do not.

Appendix E:
Resource Referenced in Chapter 2

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?

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?

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 <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>
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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>Collective responsibility</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><i>How do you know this?</i></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 all 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>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>
<p>Learning-focused collaboration</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><i>How do you know this?</i></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>Existence of professional learning</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><i>How do you know this?</i></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>Reflective professional enquiry</p> <p>There is little reflection on, or enquiry into, practice. Data collection and the use of data to inform and develop learning and teaching practice are limited. Data may be seen as an end in itself and often as someone else's problem.</p> <p><i>How do you know this?</i></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> 	

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>Openness, networks and partnerships</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><i>How do you know this?</i></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>Inclusive membership</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>
Mutual trust, respect and support	<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>				



PLC processes				
Optimising resources and structures	<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>				



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>Promoting professional learning</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>Evaluating and sustaining the PLC</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>Leading and managing to promote the PLC</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

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