

LEGISLATIVE BUDGET BOARD

Wharton Independent School District

Management and Performance Review

PREPARED BY LEGISLATIVE BUDGET BOARD STAFF

WWW.LBB.TEXAS.GOV

NOVEMBER 2024

Wharton Independent School District

Management and Performance Review

PREPARED BY LEGISLATIVE BUDGET BOARD STAFF

WWW.LBB.TEXAS.GOV

NOVEMBER 2024

CONTENTS

EXECUTIVE SUMMARY	1
1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT	9
2. EDUCATIONAL SERVICE DELIVERY	25
3. BUSINESS SERVICES	47
4. HUMAN RESOURCES MANAGEMENT	59
5. FOOD SERVICE MANAGEMENT	75
6. FACILITIES MANAGEMENT	87
7. TRANSPORTATION MANAGEMENT	95
8. SAFETY AND SECURITY	103
9. INFORMATION TECHNOLOGY MANAGEMENT	115

EXECUTIVE SUMMARY

LEGISLATIVE BUDGET BOARD SCHOOL PERFORMANCE REVIEW BACKGROUND

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

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

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

WHARTON ISD

The review team visited the district in March 2024.

The review team identified 27 findings and recommendations based on the analysis of data and the onsite observation of the district’s educational, financial, and operational services and programs. Some recommendations are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based

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

Wharton ISD is located in Wharton County, approximately 63.0 miles southwest of Houston. The district is served by regional Education Service Center III (Region 3). The state legislators for the district are Senator Joan Huffman and Representative Stan Kitzman.

During school year 2022–23, Wharton ISD’s enrollment was 1,844 students, served by 352.5 full-time-equivalent staff positions. As of March 2024, the district operates four campuses, including two elementary schools, one junior high school, and one high school. During school year 2022–23, the student population in Wharton ISD was identified as 61.1 percent Hispanic, 25.9 percent African American, 10.1 percent White, 2.1 percent two or more races, 0.6 percent Asian, 0.1 percent American Indian, and 0.1 percent Pacific Islander. Additionally, 78.9 percent of students were identified as economically disadvantaged.

FINANCIAL OVERVIEW

During fiscal year 2023, Wharton ISD’s actual operating expenditures totaled \$30.1 million in all funds, which equals \$16,385 per pupil, compared to statewide per-pupil expenditures of \$12,389. Approximately 52.0 percent of Wharton ISD’s total actual operating expenditures were allocated to instruction, which is less than the statewide percentage of 55.3 percent.

The district’s total fund balances decreased by 36.3 percent from fiscal years 2022 to 2023, resulting in a total fund balance for fiscal year 2023 of \$8.2 million. Wharton ISD’s operating fiscal year is from July 1 to June 30.

For the district’s fiscal year 2024, Wharton ISD adopted a budget of approximately \$21.1 million. The district received a School Financial Integrity Rating System of Texas rating of B/Above Standard Achievement for school year 2022–23. Wharton ISD received a Smart Score of 1.5, with an academic performance rating of Very Low Academic Progress and a High spending rate in May 2020. See **Chapter 3. Business Services Management** for more information about these rating systems.

**FIGURE 1
WHARTON ISD'S ACCOUNTABILITY RATINGS
SCHOOL YEARS 2016–17 TO 2021–22**

DISTRICT/CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 AND 2020–21 (2)	2021–22 (3)
C.G. Sivells Elementary School	Met Standard	Not Rated	F	Not Rated	Not Rated
Wharton Elementary School	Met Standard	Not Rated	F	Not Rated	Not Rated
Wharton Junior High School	Met Standard	Met Standard	B	Not Rated	Not Rated
Wharton High School	Met Standard	Met Standard	C	Not Rated	Not Rated
Districtwide	Met Standard	Not Rated	C	Not Rated	Not Rated

NOTES:

- (1) An alphabetical accountability rating system was implemented for school years 2017–18 to 2018–19. Districts and campuses identified as Hurricane Harvey Provision eligible in school year 2017–18 that received a designation less than A/Met Standard were labeled Not Rated
- (2) Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic.
- (3) Pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, districts and campuses that would have received a rating of D or F for school year 2021–22 were designated Not Rated.

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

EDUCATIONAL OVERVIEW

TEA issues accountability ratings for each district and campus annually. **Figure 1** shows the state accountability ratings for Wharton ISD’s campuses from school years 2016–17 to 2021–22. For school year 2021–22, the district and its campuses received designations of Not Rated pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, which authorized the Commissioner of Education to assign a Not Rated designation to a district or campus that would have received a D or F rating. TEA did not issue ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic.

Figure 2 shows academic performance measures for Wharton ISD, Region 3, and the state. Wharton ISD’s academic performance rates are lower than those of the region and state for all measures, except the Texas Success Initiative assessment outcomes.

ACCOMPLISHMENTS

During its review, the review team identified noteworthy accomplishments resulting from the district’s best practices. Subsequent chapters discuss seven district accomplishments, including the following practices.

COMMUNITY PARTNERSHIPS

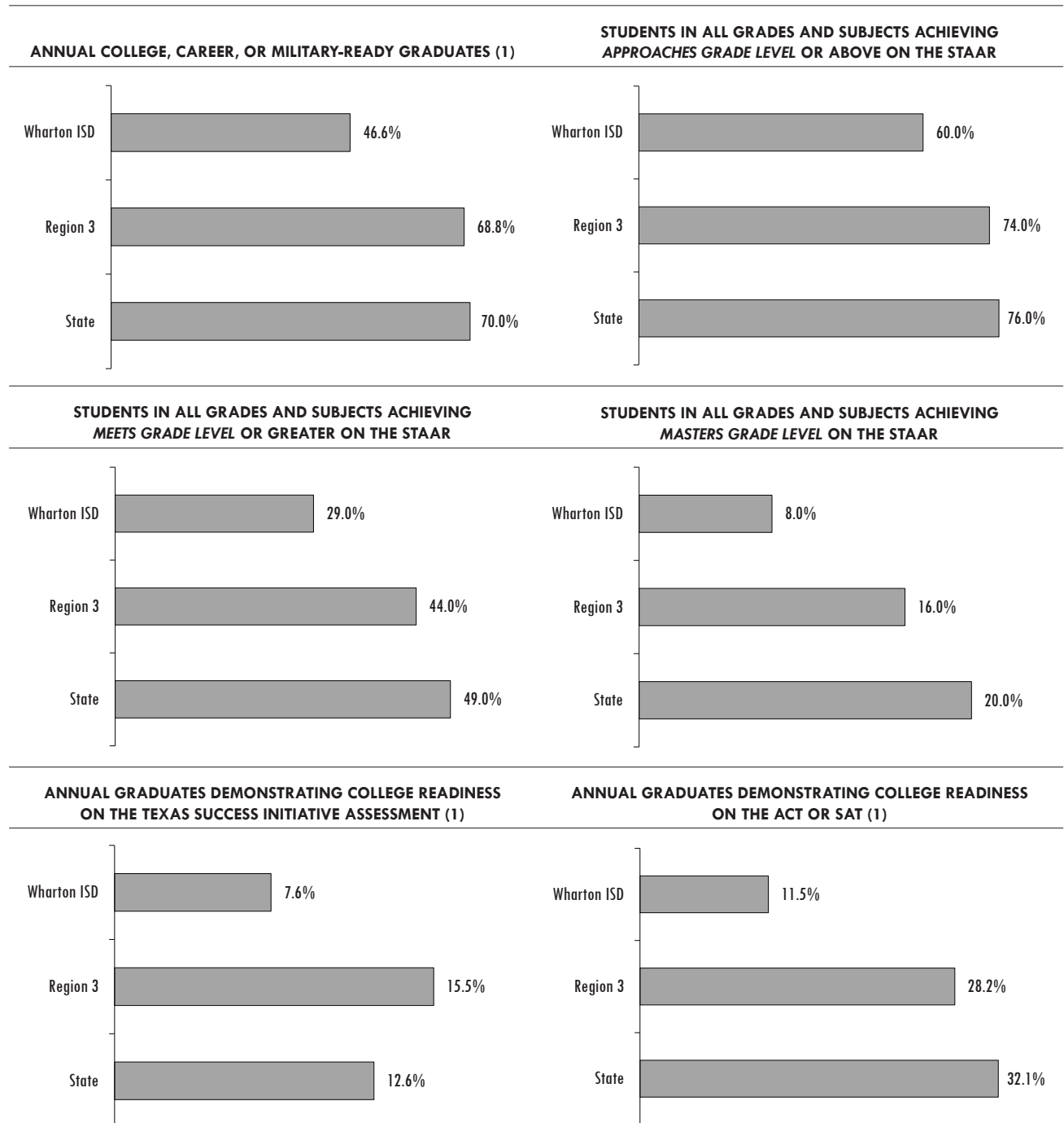
Wharton ISD leverages strong community partnerships to provide additional academic and nonacademic services to students and families. Key partnerships include Communities In Schools (CIS), the Boys and Girls Club, and Just Do It Now (JDIN). CIS places coordinators in schools to offer

services such as counseling, tutoring, life skills training, and family outreach. At the time of review team’s onsite visit, CIS supported several district schools, and the coordinator position at Wharton Elementary School was vacant. The Boys and Girls Club offers afterschool and summer programs focused on academics, character development, and athletics for youth ages six to 17. JDIN provides mentoring, tutoring, and social skills development through its Yes WE Can program. Nearly 79.0 percent of students in Wharton ISD are identified as economically disadvantaged; therefore, the district’s community partnerships provide holistic student support to help meet students’ broader social, emotional, and physical needs.

CURRICULUM MANAGEMENT SYSTEMS

Wharton ISD implements an aligned curriculum, an instructional framework, and common assessments to support student learning. Since June 2020, the superintendent has focused on coordinating curriculum and instruction, resulting in the implementation of a curriculum management plan that communicates expectations for curriculum, instruction, and assessments. The district’s curriculum plan aligns learning objectives horizontally within a grade level, vertically from one grade level to the next, and with the state standards. The district supports this alignment through its use of the TEKS Resource System, an online curriculum management system based on the state’s required curriculum standards of the Texas Essential Knowledge and Skills. The district also uses curriculum calendars, pacing guides, and teacher collaboration through professional learning communities to maintain alignment.

**FIGURE 2
ACADEMIC PERFORMANCE MEASURES FOR WHARTON ISD, REGIONAL EDUCATION SERVICE CENTER III (REGION 3),
AND THE STATE
SCHOOL YEAR 2022–23**



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

Wharton ISD implements the Fundamental Five framework to guide instructional practices, which include lesson framing, student engagement, small group discussions, personalized recognition, and critical writing. School leaders monitor the use of these strategies through regular classroom observations and recognize outstanding teachers.

The district's comprehensive assessment plan includes formative and summative assessments such as curriculum-based tests, vendor-provided math assessments, NWEA MAP Growth assessments, district benchmarks, and State of Texas Assessments of Academic Readiness (STAAR) field tests. These tools enable Wharton ISD to track student progress and adjust curriculum and programs accordingly. Together, these efforts constitute a cohesive system to support student success.

DATA SYSTEMS

Wharton ISD implements data-driven systems to monitor student progress, inform instructional practices, and provide targeted interventions. The district's data consists of common formative and summative assessment scores. Common assessments provide identical questions to all students in a course or grade level and subject area, enabling Wharton ISD to measure student performance consistently and equitably. Wharton ISD develops or selects assessments aligned to state curriculum standards, and, therefore, assessment outcomes can inform teaching strategies, student interventions, and curriculum decisions.

The district's data system includes color-coded charts that track student progress, which facilitates the comparison of students' current and previous performance, and their performance relative to their peers. The system prevents the necessity of staff collecting and analyzing all student data manually. Wharton ISD's systems also aggregate data to provide insights at the classroom, subject, or grade level, using color-coded tables to identify students who are mastering, meeting, or approaching mastery of the subject matter, in alignment with STAAR grading standards.

The availability of student-level data facilitates the work of teachers to identify which students may benefit from targeted interventions and monitor their progress during those interventions. Classroom-level data helps staff to refine instructional strategies and assists teachers and campus leaders to investigate relationships between instructional practices and student learning outcomes.

TEEN COURT

Wharton ISD has an effective teen court program, which the district established in school year 2021–22 to hear students' class C misdemeanor charges, such as truancy or minor-in-possession. Teen courts offer an alternative to traditional adjudication and sentencing conducted by municipal or justice courts for teenagers charged with certain offenses. Teen defendants can plead no contest or guilty and have their case heard by student volunteers, who serve as the prosecuting attorneys, defense attorneys, and members of the jury. Instead of paying a fine, the defendant's penalty typically involves community service, completing educational programs, and future participation in teen court. Once the penalty is satisfied, the case is dismissed, and the offense is not recorded as a conviction on the defendant's record.

During interviews, staff reported that they found the teen court program effective, which recent data supports. The attendance rate and chronic absenteeism rate at Wharton High School improved during the first year of teen court implementation, as attendance increased by 1.4 percentage points and chronic absenteeism decreased by 2.0 percentage points.

COMMUNITY ELIGIBILITY PROVISION

Wharton ISD provides free meals to all students through the federal Community Eligibility Provision (CEP) program, which enables high-poverty districts to serve no-cost meals without collecting household income applications. This approach increases students' access to nutritious meals, reduces stigma, and leads to positive outcomes such as improved academic performance, lower suspension rates, and higher participation in school meal programs.

Since adopting CEP during school year 2018–19, Wharton ISD has recorded an increase in meal participation rates. The U.S. Department of Agriculture reimburses the district based on the percentage of students identified as categorically eligible for free meals, known as the identified student percentage (ISP). To qualify for the maximum reimbursement rate, the ISP must be 62.5 percent or greater. The district uses a direct certification process, which accurately identifies eligible students by matching enrollment records with qualifying program data.

Additionally, Wharton ISD strategically groups campuses to maximize their ISP. During school year 2021–22, all campuses except Wharton High School had ISPs greater than 62.5 percent. By grouping campuses, the district

achieved a combined ISP of 72.5 percent, enabling 100.0 percent reimbursement for meals served at all campuses.

FINDINGS AND RECOMMENDATIONS

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

- (1) program monitoring and evaluation;
- (2) budgeting and resource allocation;
- (3) policies and procedures; and
- (4) planning.

PROGRAM MONITORING AND EVALUATION

Regular monitoring and evaluation of district programs and operations serve to promote effectiveness, efficiency, legal compliance, and alignment with educational goals. These processes drive continuous improvement, enhance accountability, and strengthen compliance with applicable laws. The review team observed several key district programs and functions that are ineffective and noncompliant with state and federal laws or industry standards.

For example, Wharton ISD does not monitor or evaluate its special education services, and the district does not implement special education initiatives in compliance with state and federal statutes or best practice guidelines. The federal Individuals with Disabilities Education Act (IDEA) of 2004 mandates that school districts identify and evaluate all children with disabilities who require special education and services. At C.G. Sivells Elementary, staff reported that the Special Education Department frequently rejects student referrals for evaluation, except in cases of severe and obvious disabilities, often without appropriate justification or with reasons that conflict with federal guidelines. This practice may delay or deny students access to a free and appropriate education guaranteed by federal law. During school year 2022–23, the district's special education identification rate was 10.7 percent, lower than the statewide average rate of 12.7 percent and the national average of 15.2 percent. Additionally, the district reported zero students with dyslexia at C.G. Sivells Elementary during school years 2021–22 and 2022–23, suggesting failures in identifying and serving students with disabilities. This noncompliance could result in negative academic outcomes for students, increased risk of litigation against the district, and heightened TEA monitoring or sanctions against the district.

Similarly, the district lacks an effective strategy for monitoring and addressing teacher turnover. Wharton ISD's turnover rate for the 2022–23 school year was 56.8 percent, more than twice that of comparable districts, Region 3 districts, and the state. High teacher turnover diminishes instructional quality, student performance, and workplace climate and increases recruitment, hiring, and training costs. Improving teacher retention is crucial to maintaining high-quality instruction and fostering a positive educational environment.

Wharton ISD's Transportation Department also lacks performance metrics to guide management and assess the effectiveness and efficiency of its transportation function. Transportation costs vary among districts, and rural districts such as Wharton ISD may transport students across longer distances, thus generating higher route costs. However, without a process to track performance metrics, Wharton ISD cannot assess its transportation operations accurately, identify inefficiencies, and capitalize on opportunities to decrease costs.

Similarly, the district does not assess performance measures or engage in strategic planning for the Food Service Department. The lack of measurable standards limits the district's ability to oversee department operational performance effectively, make informed management decisions, or provide the department with adequate support. The regular use of key performance indicators can provide district administration insights into program performance barriers, such as meal period schedules, bus arrival times for breakfast, and staff recruitment issues. Effective districts enhance food service operations through attention and adjustments to these areas.

The following recommendations would improve the district's monitoring and evaluation activities:

- evaluate special education practices to identify those that do not align with state and federal law and develop and implement corrective actions to comply with these regulations;
- develop a written compliance plan for implementing procedures and strategies outlined in the *Dyslexia Handbook*;
- implement an annual evaluation of Human Resources Department operations and improve teacher engagement to develop informed and effective retention strategies;

- develop performance metrics to measure the effectiveness and efficiency of the Transportation Department;
- develop a process for monitoring and improving the Food Service Department's performance.

BUDGETING AND RESOURCE ALLOCATION

Effective budget development processes promote transparency, impose consistency, and help districts manage resources efficiently while maintaining compliance with regulations. The proper allocation of resources is essential to delivering the materials, technology, and support that students need for academic success, including funding for qualified teachers, extracurricular programs, and special services for students with disabilities or specific needs. A well-planned budget also helps the district provide equitable access to education for all students, regardless of socioeconomic background, with resources targeted to underserved or high-need areas to help close achievement gaps.

However, Wharton ISD's budget development and monitoring processes are informal and inconsistent and exclude key stakeholders, such as campus principals and community stakeholders. During the school year 2023–24 budget process, the district did not provide staff with budget instructions, materials, guidelines, or a calendar outlining the process steps. The district posts the proposed and adopted budgets on the Business Department's webpage; however, it does not publish budget information documents to engage and inform the community about budget priorities and how to participate in the process. In addition to a lack of formal guidelines, the district does not offer budget managers sufficient training or written procedures to maximize efficient spending in compliance with state and federal requirements.

Without stakeholder input, the district risks ineffective resource allocation. Wharton ISD has high administrative costs compared to other districts and state standards. Among a selection of peer districts, Wharton ISD has the highest administrative costs, both in total costs and as a percentage of its total budget, for fiscal year 2024. Additionally, the district allocated the lowest percentage of its budget to instructional costs compared to peer districts. This imbalance leads to resource inequalities as excessive administrative spending diverts funds from classrooms, teachers, and programs that directly affect student achievement. An analysis of staffing and budget allocations shows that the district's elementary schools are under-resourced, despite their critical need for support.

During school year 2018–19, the most recent year for which TEA issued A-to-F accountability ratings, both elementary school campuses received F ratings. Despite the elementary school campuses' evident need for support, Wharton ISD historically has under-resourced these campuses compared to the secondary campuses. When comparing the staffing levels to the Texas Association of School Boards benchmark staffing ratios, the elementary schools have up to eight fewer teachers than the recommended levels, and the secondary schools have up to 10 more teachers than the recommended levels. The district's inequitable staffing practices are similar to its budgeting practices, as resources disproportionately are assigned to the secondary campuses.

The following recommendations would improve the district's processes for budgeting and resource allocation:

- develop written budget procedures and provide training to guide staff in budget development and monitoring;
- evaluate administrative staffing levels and identify opportunities for consolidation or restructuring; and
- adopt staffing and budgeting practices that promote the equitable support of students at all campuses.

POLICIES AND PROCEDURES

Local school board policies articulate the board's adopted positions regarding various matters and should align with the legal board policies, which outline relevant state and federal laws. District procedures specify how these policies should be implemented. Together, policies and procedures provide a framework for district operations, empowering staff to perform their duties effectively, efficiently, and consistently while adhering to applicable laws. The review team identified opportunities for Wharton ISD to improve its policies and procedures in several areas of district operations, including board operations, special education, finance, records management, facilities management, safety and security, and technology.

The review team found that the Wharton ISD Board of Trustees lacks a mechanism to enforce compliance with its policies and procedures. The district's School Board Operating Procedures contain guidelines for agenda development, member conduct, communication, and trustee training. However, some board members have not adhered to these protocols. Violations include failing to complete required training, visiting campuses without prior notice, contacting staff directly, and

managing community complaints personally. This noncompliance undermines administrative authority and can erode community trust, ultimately hindering efforts to enhance student achievement.

Wharton ISD also lacks a board policy to guide the management of the district's general fund balance, and the district's total assigned and unassigned fund balance decreased by 28.7 percent from fiscal years 2019 to 2023. A district's fund balance is an important indicator of its financial health, which influences school bond ratings and options districts may have in addressing unplanned costs. Without a formal fund balance policy to guide the district in short-term and long-term planning, reserves in the general fund could decrease to levels insufficient to protect against increases in normal operating costs.

In addition to opportunities to enhance board policies, the district lacks formal, documented procedures for key operational functions, including records management, preventive maintenance, visitor management, and technology operations, leading to significant risks and inefficiencies. In the absence of clear guidelines, the district's employee records are incomplete, outdated, over-retained, and susceptible to unauthorized access, compromising data integrity and privacy. Additionally, the district's inconsistent visitor management practices make schools vulnerable to security breaches. The lack of preventive maintenance procedures threatens the longevity of district facilities and equipment, increasing the risk of costly repairs and operational disruptions. Similarly, the absence of documented procedures for technology operations increases the risk of losing institutional knowledge related to information technology (IT) systems as employees leave the district's employment or transition to new roles. The following recommendations would improve the district's policies and procedures:

- adopt a policy to hold board members accountable for abiding by school board operating procedures and board policy;
- establish a board policy to identify the fund balance level the district will maintain in the general fund;
- adopt a written records management plan and conduct a cost-benefit analysis of digitizing employee records;
- develop, document, and implement a formal preventive maintenance program and a process for tracking deferred maintenance;

- standardize, document, and monitor visitor management procedures districtwide; and
- finalize the Technology Department's procedures and document all vital technology tasks in a comprehensive standard operating procedures manual for staff.

PLANNING

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

Wharton ISD does not have an effective process to develop, monitor, or evaluate district, campus, and targeted improvement plans in accordance with statutory requirements. The Texas Education Code mandates annual development and revision of district and campus improvement plans (DIP and CIP), with measurable goals and strategies to enhance student performance. Wharton ISD's process for developing the 2023–24 DIP and CIPs excluded key components, including stakeholder involvement and a comprehensive needs assessment. Additionally, many goals and strategies have not been updated from one year to the next, hindering the district's ability to show progress and adapt to evolving needs.

The district currently lacks updated plans in several critical operational areas. Most notably, it does not have comprehensive technology planning documents, including a long-range technology plan, a cybersecurity plan, or a technology disaster-recovery plan. These plans are essential to providing a strategic framework for the district's future, detailing necessary upgrades, resource allocations, and protocols to safeguard and enhance the resilience of its IT systems. Additionally, Wharton ISD has not established a family engagement plan, which is vital for fostering a collaborative educational environment, supporting student success, and strengthening community connections. The district also lacks a wellness plan, mandated by the federal Healthy, Hunger-Free Kids Act of 2010, to guide nutrition education and evaluate its implementation.

The following recommendations would enhance the district's planning efforts:

- develop and implement processes to strengthen district and campus improvement planning;

- establish a process to develop, review, and update the district’s long-range technology, technology disaster-recovery, and cybersecurity plans;
- develop comprehensive parent and family engagement plans in accordance with state and federal laws; and
- develop and implement a wellness plan that aligns with district policy and federal standards.

The following chapters summarize the district’s accomplishments, the review team’s findings, and numbered recommendations. Detailed explanations for the accomplishments and recommendations include estimated fiscal impacts. Each chapter concludes with fiscal data, when appropriate, showing the chapter’s recommendations that have estimated savings or costs for school years 2025–26 to 2029–30.

1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT

ACCOMPLISHMENT

- ◆ Wharton ISD leverages strong community partnerships to provide additional academic and nonacademic services to students and families.

FINDINGS

- ◆ Wharton ISD board members lack understanding of their roles and responsibilities, leading to operational inefficiencies and governance issues.
- ◆ Wharton ISD does not have an effective process to develop, monitor, or evaluate district, campus, and targeted improvement plans in accordance with statutory requirements.
- ◆ Wharton ISD has low levels of parent and family engagement.

RECOMMENDATIONS

- ◆ **Recommendation 1: Adopt a policy to hold board members accountable for abiding by school board operating procedures and board policy.**
- ◆ **Recommendation 2: Develop and implement processes to strengthen district and campus improvement planning.**
- ◆ **Recommendation 3: Develop comprehensive parent and family engagement plans in accordance with state and federal laws.**

BACKGROUND

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

A school district’s community involvement function involves communicating with stakeholders and engaging them in district decisions and operations. District stakeholders

FIGURE 1–1
CITY OF WHARTON DEMOGRAPHICS
CALENDAR YEAR 2022

RACE/ETHNICITY	PERCENTAGE
Hispanic or Latino	43.6%
Black or African American	29.2%
White	25.3%
Two or More Races	9.9%
Asian	0.9%
American Indian and Alaskan Native	0.0%

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

include students, staff, parents, residents, and business owners. Stakeholders must be aware of and engaged in the district’s issues, challenges, and priorities. Communication tools include public meetings, paper and electronic correspondences, engagement events, local media, the district’s website, and social media.

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

Wharton Independent School District (ISD) is located in Wharton County, approximately 60.0 miles southwest of Houston. It encompasses approximately 182.0 square miles and is served by the Texas Education Agency’s (TEA) regional Education Service Center III (Region 3). According to the U.S. Census Bureau, the city of Wharton recorded a population of 8,669 in calendar year 2022. The population of Wharton has decreased by 2.1 percent since 2010. **Figure 1–1** shows the city’s demographics in 2022.

The city of Wharton is the seat of Wharton County and contains the county offices and the district court. Wharton County Junior College, an accredited, two-year,

comprehensive community college, has four campuses including one located in Wharton and three in neighboring counties. It reported a fall 2023 enrollment of 5,687 students.

According to 2022 census data, the median household income of Wharton was \$37,722, with a poverty rate of 21.1 percent of households. The largest employment sectors are in educational services, and healthcare and social assistance, which combined employ 20.2 percent of the local workforce. Wharton ISD is located in the Gulf Coast region of Texas, according to the 2022 economic categorization report by the Comptroller of Public Accounts. The industries that employ the most workers in this region include restaurants, education, and healthcare.

During school year 2022–23, Wharton ISD employed 352.5 total full-time-equivalent staff positions. Student enrollment has decreased by 7.7 percent from 1,998 during school year 2018–19 to 1,844 during school year 2022–23. **Figure 1–2** shows the student demographics of Wharton ISD for school year 2022–23.

The Legislative Budget Board’s (LBB) School Performance Review Team visited the district in March 2024. At the time of the onsite visit, the district operated four campuses: C.G. Sivells Elementary School, Wharton Elementary School, Wharton Junior High School, and Wharton High School.

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

- adopt goals and objectives for the district;
- adopt policies;
- hire and evaluate the superintendent;
- adopt an annual budget and tax rate; and

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

RACE/ETHNICITY	PERCENTAGE
Hispanic	61.1%
African American	25.9%
White	10.1%
Two or More Races	2.1%
Asian	0.6%
Pacific Islander	0.1%
American Indian	0.1%
Economically disadvantaged	78.9%

NOTE: Percentages may not sum to 100.0 due to rounding.
SOURCE: Texas Education Agency, Texas Performance Reporting System, school year 2022–23.

- seek to establish working relationships with other public entities to make effective use of community resources and to serve the needs of public-school students in the community.

The seven-member board serves staggered, three-year terms, and elections are held annually on the state’s May uniform election date. **Figure 1–3** shows Wharton ISD’s board members, their respective roles, their professions, and the years they were first elected, as of March 2024.

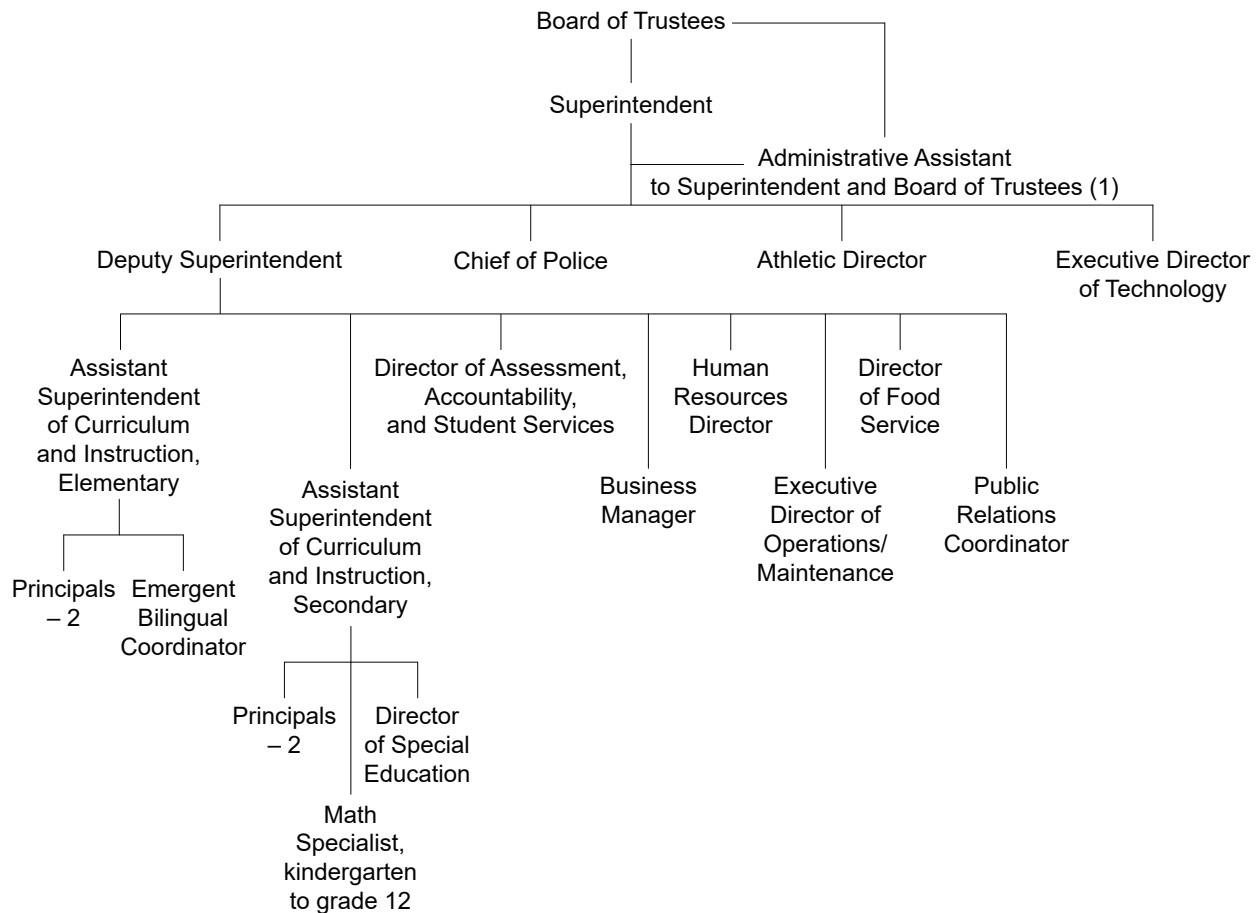
The district conducts monthly public board meetings facilitated by the board president. As of March 2024, the board typically meets on the third Thursday of each month at 7:00 PM in the boardroom, located at the Wharton ISD district administrative office. In compliance with the Texas Open Meetings Act, district staff post a printed public notification of board meetings at the district’s Education Support Center and post an electronic announcement on the district’s website, typically five days before the scheduled meeting. Wharton ISD Board Policy BE (LOCAL) states

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

MEMBER	ROLE	PROFESSION	YEAR ELECTED
Sherrell Speer	President	Retired	1993
Miguel Santes	Vice President	Barber/business owner	2021
Philip Henderson Sr.	Secretary	Texas Department of Transportation	2021
Curtis W. Evans	Member	Retired	2015
Doris Teague	Member	Retired	2022
Ann Witt	Member	Retired	2022
Marie Ward	Member	Sales Associate	2023

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

FIGURE 1–4
WHARTON ISD’S DISTRICT ORGANIZATION, SCHOOL YEAR 2023–24



NOTE: (1) The administrative assistant to the superintendent also serves as the administrative assistant to the Board of Trustees.
SOURCE: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

that the district may call special meetings at the board president’s discretion or upon the request of two board members. From March 2023 to March 2024, the board held 12 regular meetings and 11 special meetings. Four special meetings were called to develop and adopt the budget, and two meetings were held for specialized board training.

The public may attend all regular meetings and address the board regarding topics of interest. Individuals who want to address the board or provide public comment must register with the superintendent’s administrative assistant before the meeting. In accordance with board policy, an individual’s public comment is limited to five minutes per meeting and is permitted regardless of whether the topic is an item on the agenda. In addition, the board addresses personnel matters and other confidential topics in closed sessions as needed.

At the time of the review, Dr. Michael O’Guin was the Wharton ISD superintendent and had been in the position since June 9, 2020. Since the time of the review, Dr. O’Guin resigned, and the board appointed Mr. Olatunji Oduwole to serve as superintendent. The superintendent reports directly to the board and oversees the management of the district’s daily operations and is charged with executing board policies. Five staff report directly to the superintendent, including the deputy superintendent, chief of police, athletic director, executive director of technology, and the superintendent’s administrative assistant. **Figure 1–4** shows Wharton ISD’s district organization as of March 2024.

The board enrolled in TEA’s Lone Star Governance (LSG) program in October 2022. LSG is a continuous-improvement model of governance focused on improving student outcomes by leading the board through workshops, coaching, and

ongoing support. Through the LSG process, Wharton ISD's board adopted specific five-year academic goals for the district and developed a dedicated board calendar in collaboration with an assigned coach.

The board conducts the superintendent's summative evaluation annually in June and performs an additional mid-year review in January. As part of the LSG process, the board adopted a new superintendent evaluation tool in September 2023. This tool includes superintendent constraints and goals for the position to address requirements in the Texas Education Code, Chapter 11, that focus on (1) early childhood literacy and math proficiency, and (2) college, career, and military readiness outcomes. The superintendent and the board also collaborated to develop additional evaluation criteria focusing on district management and operations, leadership, and communications, climate, and community relations as indicators of progress toward district improvement.

The superintendent uses the previous two years of historical agendas as a guide to draft the agenda for each board meeting. The superintendent's administrative assistant provides the agenda for the board president to review and approve. If two members have requested in writing to place an item on the agenda that requires significant preparation time, the president may defer the item to the following regular board meeting or at a special meeting. Routine items that do not require discussion before a vote appear on the consent agenda. Physical copies of agenda packets and other approved board materials are available for trustees at the district administrative office and are posted online on BoardBook at least 10 days before the board meeting. The agenda may be revised up to 72 hours in advance of the meeting, in accordance with board policy.

The review team observed the February 2024 and March 2024 regular board meetings. The board members followed Robert's Rules of Order, with some guidance from the superintendent. The review team's analysis of board meeting minutes from February 2023 to March 2024 found board members attend meetings regularly.

Formal amendments to local board policy may be initiated by the superintendent, board members, district staff, or community residents. Amendments may be adopted or amended by a majority vote of the board at any regular or special meeting if board members receive advance written notice of the proposed change and the amendment is placed on the meeting agenda.

The district also receives periodic policy updates through the Texas Association of School Boards (TASB) subscription service, which appear on the agenda for the board to review. According to the superintendent, the district scheduled a comprehensive review of all board policies with TASB for April 2024.

The public relations coordinator oversees Wharton ISD's community involvement functions. The coordinator manages community-invited activities, produces promotional flyers, and promotes district events through social media platforms, district and campus websites, email, and mass texts. The district also communicates with families via signage on campuses, videocasts of the Scholastic Network on television screens in campus foyers, and a media-consolidation platform called ParentSquare. The public relations coordinator also manages the Let's Talk chat widget on the district website, through which stakeholders may direct questions or comments, and the appropriate campus or district staff respond within 24 hours. The district also posts monthly videos that highlight district activities, and each campus principal is responsible for promoting weekly newsletters that are posted on the campus website.

Campuses coordinate and host various events throughout the year, such as open houses, movie nights, awards assemblies, and holiday programs. Elementary campuses host events, including book fairs and reading picnics, and provide afterschool opportunities that feature reading, math, and science themes intended to improve students' academic skills. Secondary campuses host athletics, career-and-technical education events, and events to assist families with completing the Free Application for Federal Student Aid for college.

DETAILED ACCOMPLISHMENT

COMMUNITY PARTNERSHIPS

Wharton ISD leverages strong community partnerships to provide additional academic and nonacademic services to students and families.

Local partnerships include Communities in Schools (CIS), the Boys and Girls Club, and Just Do It Now (JDIN).

CIS is a national nonprofit organization that places site coordinators within public schools to collaborate with district staff to identify students who may need additional support. Based on each student's needs, CIS coordinators provide individual counseling, support groups, basic life

FIGURE 1–5
WHARTON ISD BOARD OF TRUSTEES OPERATIONAL CONSTRAINTS
SCHOOL YEAR 2023–24

- 1 The board shall not direct staff on the day-to-day operations of the district.
- 2 The board shall not fail to support the majority decisions of the board.
- 3 The board shall not deviate from the board operating procedures.
- 4 The board shall not average less than 50.0 percent of their board meeting time spent on student outcomes.
- 5 The board shall not fail to direct any complaint through the proper chain of command, per board operating procedures.

SOURCE: Wharton ISD, March 2024.

skills, tutoring, mentoring, and enrichment opportunities. The coordinators also make home visits when needed, connect families with additional community resources, and collaborate with campus principals to determine how best to support the specific goals of each campus. At the time of the onsite visit, C.G. Sivells Elementary, Wharton Junior High School, and Wharton High School received CIS support, and the coordinator position at Wharton Elementary was vacant.

Wharton ISD partners with the Boys and Girls Club, a youth development organization that strives to help students reach their full potential as productive, caring, and responsible citizens. The club provides afterschool and summer opportunities for youth ages six to 17, which include meals, homework assistance, athletics, character development, and access to the arts.

The local JDIN’s intervention and prevention program called Yes WE Can provides afterschool mentoring, tutoring, and homework help for students. The organization also enhances students’ social skills and problem-solving skills and provides opportunities for field trips outside of the community.

As shown in **Figure 1–2**, 78.9 percent of Wharton ISD’s student population is economically disadvantaged, a subgroup that may face many challenges aside from academics. The district’s community partnerships provide support services that address students’ social, emotional, and physical needs within and outside of school.

DETAILED FINDINGS

BOARD ROLES AND RESPONSIBILITIES (REC. 1)

Wharton ISD board members lack understanding of their roles and responsibilities, leading to operational inefficiencies and governance issues.

Wharton ISD has developed policies and procedures that guide board operations and board member conduct. The

district last revised its School Board Operating Procedures (SBOP) in March 2022. The SBOP describes important board procedures and requirements, such as agenda development, member conduct, information requests, communication, the role and authority of board members, and required trustee training.

Additionally, the district adopted Board Policy BBF (LOCAL), which requires members to adhere to ethical standards including equity in attitude, trustworthiness in stewardship, honor in conduct, integrity of character, and commitment to service. As part of the Lone Star governance process, the board also approved board constraints in September 2023 that focus primarily on member behavior and roles and responsibilities. **Figure 1–5** shows the board constraints for school year 2023–24.

According to interviews, some board members do not comply with the procedures outlined in the SBOP or the board constraints. For example, training records indicate that some board members have not completed mandatory training as outlined in statute, rule, and SBOP. **Figure 1–6** shows continuing education requirements for board members.

The district provided the review team with training records for all current board members. **Figure 1–7** shows a summary of Wharton ISD’s board member continuing education hours from the time that each member was elected.

Figure 1–7 shows that various members have not completed required trainings such as the orientation to the Texas Education Code, the Texas Open Meetings Act, and school safety. Additionally, the district did not record training for members addressing cybersecurity or sexual abuse, human trafficking, and other maltreatment of children. Interviews also indicated that some board members have not completed the LSG training, which focuses the board’s attention on student outcomes.

**FIGURE 1–6
CONTINUING EDUCATION REQUIREMENTS FOR TEXAS SCHOOL DISTRICT BOARDS OF TRUSTEES**

REQUIRED CONTINUING EDUCATION	FIRST YEAR IN OFFICE	SUBSEQUENT YEARS IN OFFICE
Local district orientation	3.0 hours within the first 120 days in office	Not required
Orientation to the Texas Education Code	3.0 hours within the first 120 days in office	Not required
Update to the Texas Education Code	Following each legislative session; training must be of sufficient length to address major changes	Following each legislative session; training must be of sufficient length to address major changes
Team building	At least 3.0 hours	At least 3.0 hours annually
Additional continuing education based on the district’s framework for school board development	At least 10.0 hours within the first year in office	At least 5.0 hours annually
Evaluating and improving student outcomes	At least 3.0 hours within the first 120 days in office	At least 3.0 hours every two years
Education addressing sexual abuse, human trafficking, and other maltreatment of children	At least 1.0 hour within the first 120 days in office	At least 1.0 hour every two years
The Texas Open Meetings Act	At least 1.0 hour within the first 90 days in office	Not required
The Texas Public Information Act	At least 1.0 hour within the first 90 days in office	Not required
Cybersecurity	Required to attend a training; hours vary by provider	Required to attend one training annually
School Safety	2.0 hours within the first 120 days in office	Every two years

SOURCE: Texas Education Agency, School Board Training Requirements, March 2024.

As a result of not having completed required training, some board members may lack knowledge and skills fundamental to board operations. For example, during interviews, three members could not describe how the district develops and approves the budget and could not recall obtaining this information during any training. Another member reported being unaware that the SBOP provides information about board procedures. One board member reported not understanding that serving a term is a three-year commitment during which multiple monthly meetings may occur.

In addition to lacking required training, some board members frequently breached SBOP guidelines and board policies by conducting activities outside of the defined scope of their roles, such as the following actions:

- visiting campuses without notifying principals 24 hours in advance;
- contacting staff directly and conducting personal investigations; and
- directly handling community complaints instead of referring them through the proper district process.

Furthermore, although board policy designates the board president as the primary contact for the district’s

attorney, some members have contacted the district’s attorney directly, bypassing the board president and incurring legal fees. From May 2023 to November 2023, these actions and inquiries, including an issue concerning a board members’ residency, totaled nearly \$2,430 in legal fees.

Interviews and analysis of board meeting minutes suggest that a sense of distrust and dysfunction exists among the board members, including some members’ relationship with the superintendent. This distrust has contributed to operational inefficiencies and governance issues. According to interviews, two members will not engage in communication with the superintendent outside of board meetings. Interviews suggested that this lack of communication has caused frustration and confusion. For example, as members read through the board packet and agenda before a board meeting, they are encouraged to discuss with the superintendent any questions in advance to mitigate time answering questions during the meeting. However, due to the lack of communication with the superintendent, some members have not asked questions beforehand and instead have raised items from the consent agenda for discussion, which has contributed to longer board meetings.

FIGURE 1–7
WHARTON ISD BOARD OF TRUSTEES RECORDED TRAINING HOURS
MAY 2021 TO MARCH 2024

CONTINUING EDUCATION TOPIC	SPEER	SANTES	HENDERSON	TEAGUE	WITT	EVANS	WARD
Local district orientation	(1)	(2)	(2)	(2)	(2)	(1)	(2)
Orientation to the Texas Education Code	(1)	0.0 hours	0.0 hours	0.0 hours	0.0 hours	(1)	3.0 hours in 2023
Update to the Texas Education Code	2.0 hours in 2023	3.0 hours in 2021; 2.0 hours in 2023	3.0 hours in 2021; 0.0 hours in 2023	0.0 hours	0.0 hours	0.0 hours in 2021; 2.0 hours in 2023	0.0 hours
Team building	(3)	3.0 hours in 2021 (3)	3.0 hours in 2021 (3)	(3)	(3)	(3)	3.0 hours in 2023 (3)
Additional continuing education, based on the district's framework for school board development	13.0 hours in 2023	14.25 hours in 2021; 14.0 hours in 2022; 12.0 hours in 2023	21.5 hours in 2021; 43.75 hours in 2022; 26.25 in 2023	11.0 hours in 2022; 8.0 hours in 2023	13.0 hours in 2022; 0.0 hours in 2023	19.0 hours in 2021; 18.0 hours in 2022; 10.0 hours in 2023	0.0 hours
Evaluating and improving student outcomes	3.0 hours in 2023	1.0 hours in 2021; 3.0 hours in 2023	4.0 hours in 2021; 0.0 hours in 2023	3.0 hours in 2023	0.0 hours	3.0 hours in 2021; 3.0 hours in 2023	0.0 hours
Education addressing sexual abuse, human trafficking, and other maltreatment of children	0.0 hours	0.0 hours	0.0 hours	0.0 hours	0.0 hours	0.0 hours	0.0 hours
The Texas Open Meetings Act	(1)	0.0 hours	0.0 hours	1.0 hour in 2022	0.0 hours	(1)	0.0 hours
The Texas Public Information Act	(1)	0.0 hours	0.0 hours	0.0 hours	0.0 hours	(1)	0.0 hours
Cybersecurity	0.0 hours	0.0 hours	0.0 hours	0.0 hours	0.0 hours	0.0 hours	0.0 hours
School Safety	0.0 hours	1.0 hour in 2021	1.0 hour in 2021	0.0 hours	0.0 hours	0.0 hours	0.0 hours

NOTES:

- (1) First-year training hours for board members elected before May 2021 are unavailable.
- (2) The district does not formally track board members' completion of local district orientation.
- (3) All board members attended a Roles and Responsibilities training for 3.0 hours during 2023. This training was reported as Additional Continuing Education but might fulfill some team building requirements.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

Staff reported that the lack of communication among board members and the superintendent also occurs during closed sessions. The superintendent and members reported that arguments and name-calling have occurred during these closed sessions, resulting in ineffective and unnecessarily long meetings. For example, the March 2024 meeting included a closed-session discussion that lasted more than 3.0 hours regarding issues concerning administrator contract renewal and new hires, police department jurisdictional issues, board members' responsibilities, and an incident that violated the high school student code of conduct. Analysis of board meeting minutes from May 2023 to March 2024 shows that the average duration of a regular board meeting was 216.0 minutes, significantly longer than the LSG-recommended meeting length of 120.0 minutes.

Member noncompliance with board policies could continue to cost the district money and contribute to an atmosphere of distrust that affects perceptions of the school district within the community. Furthermore, board members' lack of training and involvement in daily management of the district may undermine administrator leadership and authority. This practice hinders administrators from implementing key districtwide initiatives essential to improving student achievement.

Existing board policies and the SBOP do not contain a self-policing policy to hold members accountable for their actions. Effective governance of local school districts depends on well-trained board members who understand and execute their roles and responsibilities. Effective school boards focus on the oversight of management, policymaking, planning, and evaluation, leaving the implementation of board policy and daily administration of the district to the superintendent.

The Wharton ISD board should adopt a policy to hold board members accountable for abiding by board operating procedures and board policy.

The board president, collaborating with the board secretary and board members, should identify language related to enforcing Board Policy BBF (LOCAL) on ethics and draft a policy that incorporates this language. This policy should include a list of specific sanctions to impose on individual board members who violate the policy. Such sanctions could include a public censure of the board member for repeated violations of the board's policies and related operating procedures.

The board secretary should revise the SBOP to include this new language related to enforcing the board's ethics

policy and submit the draft for the board to review and approve. The board should review the draft and adopt the revisions in consultation with the district's attorney. All members should attest in writing that they have received a printed copy of the SBOP and acknowledge its availability online. Members should review the operating procedures to clarify their role expectations and responsibilities annually at the board member retreat. The SBOP should be featured prominently in the required local orientation for new trustees.

The board president and the superintendent's administrative assistant should monitor each member's continuing education report to identify training topics related to roles and responsibilities that individual board members have not attended and promote targeted training for board members to attend.

The district could implement this recommendation with existing resources.

IMPROVEMENT PLANS (REC. 2)

Wharton ISD does not have an effective process to develop, monitor, or evaluate district, campus, and targeted improvement plans in accordance with statutory requirements.

The Texas Education Code mandates annual development, evaluation, and revision of the district improvement plan (DIP) and campus improvement plans (CIPs) to improve student performance. The Texas Education Code requires DIPs and CIPs to set measurable annual goals, objectives, and strategies to monitor student performance and specify resource allocations to meet these goals.

Figure 1–8 shows some of the Texas Education Code requirements for the DIP and other aspects of district-level and campus-level planning.

As shown in **Figure 1–8**, the Texas Education Code requires districts to involve various stakeholders in district and campus improvement planning processes. Classroom teachers, for example, must constitute at least two-thirds of the professional staff representation on the decision-making committees, and the DIP must include a comprehensive needs assessment. Additionally, the district must outline monitoring timelines and delineate formative evaluation criteria to assess periodically its progress toward achieving the goals and objectives established in the DIP and CIPs. Wharton ISD is not developing its DIP and CIPs in accordance with these requirements.

**FIGURE 1–8
THE TEXAS EDUCATION CODE REQUIREMENTS FOR DISTRICT AND CAMPUS IMPROVEMENT PLANS
FISCAL YEAR 2024**

SECTION	IMPROVEMENT PLAN REQUIREMENTS
§11.251(b)	Planning processes shall “involve the professional staff of the district, parents, and community members in establishing and reviewing the district’s and campuses’ educational plans, goals, performance objectives, and major classroom instructional programs. The board shall establish a procedure under which meetings are held regularly by district-level and campus-level planning and decision-making committees that include representative professional staff, including, if practicable, at least one representative with the primary responsibility for educating students with disabilities, parents of students enrolled in the district, business representatives, and community members.”
§11.251(e)	At least two-thirds of the elected professional staff representatives on the district-level and campus-level planning committees must be classroom teachers.
§11.252(a)(1) and (2)	The district improvement plan must include “a comprehensive needs assessment addressing district student performance on the achievement indicators, and other appropriate measures of performance, that are disaggregated by all student groups served by the district, including categories of ethnicity, socioeconomic status, sex, and populations served by special programs, including students in special education programs.”
	The district improvement plan must include measurable district performance objectives.
§11.252(a)(5), (a)(6), and (a)(7)	The district improvement plan must include provisions for resources needed to implement identified strategies, staff responsible for ensuring compliance of each strategy, and timelines for ongoing monitoring of each strategy.
§11.252(a)(8)	The district improvement plan must include formative evaluation criteria for determining periodically whether strategies are resulting in intended improvement of student performance.
§11.252(e) and §11.253(g)	The district-level committee shall hold at least one public meeting per year. Each campus-level committee shall hold at least one public meeting per year.
NOTE: Selected provisions shown are not exhaustive of statutory requirements. SOURCE: The Texas Education Code, Chapter 11.	

Wharton ISD’s DIP is developed annually during a summer retreat by the superintendent’s cabinet. In addition to the superintendent, the cabinet consists of the deputy superintendent, the two assistant superintendents of curriculum and instruction, the executive director of technology, the chief of police, and the athletic director. Staff reported that, during the retreat, the cabinet aligns the district’s goals and vision for the upcoming year, which involves examining data centered on assessment, discipline, teacher retention, campus improvement plans for accountability, and academic indicators. According to the superintendent, cabinet members review data and develop the district’s comprehensive needs assessment. The superintendent reported that the cabinet solicits input from campus-level administrators and department heads as part of the development process. However, staff listed on the DIP planning documentation provided conflicting reports regarding their involvement in the process, with some reporting no actual involvement in developing the DIP or the comprehensive needs assessment. Staff reports also conflicted regarding which document was developed first and influenced the other.

Wharton ISD maintains a District Educational Improvement Committee consisting of four teachers, two parents, two business representatives or community members, two assistant superintendents, one district office staff, and the deputy superintendent. This site-based decision-making (SBDM) committee advises the superintendent regarding educational goals and objectives, which include preparing, reviewing, and revising the DIP. However, this committee lacks the mandated two-thirds representation of classroom teachers required by the Texas Education Code, Section 11.251(e).

Similarly, campus principals develop the CIPs with support from the elementary and secondary assistant superintendents of curriculum and instruction, campus leadership, instructional coaches, and counselors. The district also has established SBDM committees at each campus; however, none contains both community representatives and parents as required by the Texas Education Code, and three of the four committees lack the statutorily required two-thirds representation of classroom teachers.

In addition to omitting essential stakeholders, a complete comprehensive needs assessment was not included in the

FIGURE 1–9
WHARTON ISD DISTRICT IMPROVEMENT PLAN EXCERPT, SCHOOL YEAR 2023–24

GOAL 1, OBJECTIVE 3 ACTIVITY/STRATEGY	TIMELINE	EVALUATION
2. The district will provide a variety of resources for professional development that focus on research-based strategies for instruction. (Target Group: All) (Strategic Priorities: 1)	August 2023 to July 2024	Criteria: 100% of the teachers will have the opportunity to select and attend relevant professional development through a variety of agencies that support bilingual; English as a second language; migrant, career and technical education, and science, technology, engineering, and mathematics academies. Review professional development calendar and end of professional development survey.

SOURCE: Wharton ISD District Improvement Plan, March 2024.

school year 2023–24 DIP, in violation of the Texas Education Code, Section 11.252(a)(1). The lack of stakeholder input and a comprehensive needs assessment hinders the district from accessing important data to develop effective improvement plans.

Additionally, a comparison of the DIPs submitted to the review team beginning in school year 2020–21 shows that 85.0 percent of the activities and strategies included from school years 2020–21 to 2023–24 are identical. Although some activities and strategies continue each year, most goals, objectives, and strategies should be updated to represent progress toward completion and advancement. Reusing goals, objectives, activities, and strategies may not represent accurately the district’s current efforts to improve student outcomes and student success.

Interviews also indicate that Wharton ISD’s improvement plans are not living documents that are evaluated and revised regularly. Based on an analysis of board meeting minutes, the board did not discuss the school year 2023–24 DIP and CIPs that were approved on the consent agenda at the September 2023 board meeting. Additionally, staff reported that the superintendent does not update the board about progress toward accomplishing the improvement plans’ goals throughout the school year.

Wharton ISD’s DIP also contains evaluation criteria for activities and strategies that lack specificity, making progress difficult to monitor and evaluate in accordance with the Texas Education Code, Sections 11.252(a)(7) and 11.252(a)(8). **Figure 1–9** shows the district’s evaluation criteria.

As written, the evaluation criteria shown in **Figure 1–9** provide an opportunity for teachers to select and attend training. However, it does not address whether all teachers will receive relevant professional development, specify how much or how often training is provided, or describe quarterly check-ins or other formative monitoring frequencies. Setting

monitoring frequencies assists the district to track progress toward goals at specific intervals, which helps to ensure these goals are accomplished within the stated timeframe. For example, Atlanta ISD’s DIP identifies formative monitoring time points in November, January, and March, and includes a summative time point in June for each of the activities outlined in its DIP. Improvement plans supported by specific, measurable, achievable, relevant, and time-bound (SMART) activities and strategies enable leaders to develop more comprehensive and detailed DIPs and CIPs that clarify and strengthen improvement planning.

During school year 2022–23, Wharton Elementary School and Wharton Junior High School ranked in the lowest 5.0 percent of all campuses in the state that receive funding pursuant to the federal Elementary and Secondary Education Act, Title I, Part A (Title I), based on TEA’s performance ratings. As a result, Wharton ISD was required to submit targeted improvement plans (TIP) to TEA for each campus in accordance with federal academic accountability requirements for Comprehensive Support and Improvement (CSI) campuses. Pursuant to the Texas Education Code, Section 39A.060, these plans (1) are intended to guide campuses to identify and analyze areas of growth and areas that require improvement; and (2) must be submitted to the district’s board of trustees.

An analysis of Wharton ISD’s TIPs show that four of six essential elements of the plans at both campuses are reported as not started throughout the beginning, middle, and end-of-year documentation. If the campuses made improvements within these areas, the documentation does not reflect self-assessed progress toward the stated goals. Documents show that the assistant superintendent for curriculum and instruction for elementary schools is assigned the role of the district coordinator of school improvement. The TIPs state that the district coordinator of school improvement is required to provide or facilitate the provision of all the

necessary district-level commitments and support mechanisms to ensure the successful implementation of the plan, and is responsible for ensuring that campus principals enact the plan elements as indicated. The TIP documentation does not report whether these actions are taking place.

Overall, the district's lack of coordinated effort to develop, monitor, and evaluate its improvement plans could be detrimental to school advancement. The district and campus improvement plans are intended to guide district and campus staff to improve student performance. These plans should guide the establishment of yearly priorities, focus energy and resources, and ensure that staff and stakeholders are working toward commonly aligned goals and monitoring them throughout the year. Stakeholder involvement is essential to developing plans that meet the educational needs of the community the district serves. When district and campus plans lack community, parental, and teacher input, that disengagement can hinder the district's efforts to build consensus and secure support for its initiatives.

A lack of necessary oversight to monitor and update implementation could compromise the effectiveness of TIPs, which could result in failure to achieve the desired educational outcomes. TEA's Center for Effective Schools provides information on its website regarding TIPs and required elements, which includes information to support principals and various submission checklists.

Wharton ISD should develop and implement processes to strengthen district and campus improvement planning.

The superintendent should assign the director of assessment, accountability, and student services to the district and campus SBDM committees to monitor the compliance of planning processes with statutory requirements.

The director should perform the following tasks:

- collaborate with the superintendent, cabinet, and campus principals to develop a timeline and process for revising and reviewing the DIP and CIPs;
- confirm that all SBDM committees have statutorily required representation from professional staff, parents, local businesses, and the community;
- confirm that each goal and objective is supported by SMART activities and strategies;
- affirm that activities and strategies directly support the goals and objectives in each plan and use resources appropriately;

- hold accountable both assistant superintendents of curriculum and instruction for supporting principals in setting and appropriately tracking goals for their campuses;
- update each improvement plan's evaluation criteria quarterly to track progress; and
- update the superintendent and board quarterly regarding progress toward the defined goals.

To confirm that the TIPs meet requirements, the assistant superintendents should perform the following tasks:

- review the document that outlines CSI intervention requirements and activities and review the district coordinator of school improvement role's description, which are published by TEA; and
- schedule strategic check-ins with the campus principals to support the timely completion and appropriate filing of documentation.

The district could implement this recommendation with existing resources.

PARENT AND FAMILY ENGAGEMENT (REC. 3)

Wharton ISD has low levels of parent and family engagement.

During school year 2023–24, Wharton ISD implemented several strategies to increase parent and family engagement. For example, Taxpayer Tuesday is a quarterly event during which stakeholders tour a host campus, learn about district initiatives, and speak with the superintendent and district staff. However, these events take place during school hours, which limits the ability of working parents and community residents to attend. The Coffee and Conversations event is hosted by the superintendent three times per year at different campuses. This event also provides an opportunity for conversations and feedback about the district. However, it also occurs during school hours and poses similar attendance challenges.

Although Wharton ISD's school year 2023–24 DIP includes goals to establish and maintain parent–teacher organizations (PTO) or booster clubs at most campuses, only C.G. Sivells Elementary School had an active PTO at the time of the review team's onsite visit. During interviews, principals said they want to increase engagement with parents and families by establishing a consistent PTO at each campus. One principal reported difficulty finding a parent willing to lead the organization as a barrier to establishing and maintaining an effective PTO at the campus.

**FIGURE 1–10
WHARTON ISD DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT PARENT SURVEY RESULTS
CALENDAR YEAR 2024**

STATEMENT	AGREE	DISAGREE	N/A OR I DO NOT KNOW
The district communicates with parents in a timely manner.	37.7%	57.7%	4.7%
I am sufficiently informed about what is going on at my child’s school.	44.7%	54.1%	1.2%
Schools have enough volunteers to help with student and school programs.	12.9%	60.0%	27.1%

NOTE: Totals may not sum due to rounding.
SOURCE: Legislative Budget Board School Performance Review Team Survey, January 29, 2024, to February 23, 2024.

The review team surveyed Wharton ISD parents regarding the district’s engagement efforts. **Figure 1–10** shows the 85 survey responses collected from January 29, 2024, to February 23, 2024. The results indicate that some parents do not believe that the district communicates in a timely manner, and they do not feel sufficiently informed about activities at their children’s school. Additionally, many parents said that they do not believe schools have enough volunteers to help with student and school programs.

Wharton ISD receives Title I funding, which requires the district to implement a parent and family engagement plan. Each local agency that receives funds “shall develop jointly with, agree on with, and distribute to, parents and family members of participating children a written parent and family engagement policy.” However, the district has not developed such a plan to comply with this requirement. The Texas Administrative Code, Title 19, Part 2, Chapter 102, Subchapter AA, Section 102.1003, requires each prekindergarten program that serves eligible students who are age four to develop a family engagement plan, implement it, and make it available on the district website by November 1 each year. As of March 2024, C.G. Sivells Elementary had posted a family engagement plan from school year 2019–20.

The district’s lack of a parent and family engagement policy contradicts the goal of improving student outcomes. Research consistently shows that parents’ involvement in their child’s education leads to improved student achievement and social–emotional outcomes, regardless of a family’s ethnic background or socioeconomic status. The American Psychological Association’s 2019 meta-analysis of 448 independent studies also found that parents benefit from being involved at school by building social capital. Volunteering or attending activities such as open houses help parents build networks and accumulate resources and information they can use to better support their children.

TEA and regional Education Service Center XVI’s (Region 16) Parent and Family Engagement Statewide Initiative provides resources, professional development, and support to all districts in the state. These resources can assist in the district’s development, technical assistance, and implementation of parent and family engagement plans. Region 16’s website includes a description of the statewide initiative, compliance, compact, and policy requirements, and outlines best practices. TEA and Region 16 also provide a comprehensive Title 1, Part A, Parent and Family Engagement Policy Toolkit to assist districts and campuses in developing successful programs that meet state and federal requirements.

Wharton ISD should develop comprehensive parent and family engagement plans in accordance with state and federal laws.

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

- task the public relations coordinator to lead the development of the engagement plans;
- establish a committee of parents and stakeholders to assist with developing the plans;
- distribute the plans in English and Spanish;
- schedule an annual meeting for Title I parents; and
- schedule an annual evaluation that incorporates parent and family feedback regarding the content and effectiveness of the plans.

The plans should include the following elements:

- feature community and family events planned for the school year;
- provide opportunities for parents and families to engage with school activities outside of normal school hours; and

- be accessible on the district's website and campus websites.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

BOARD CALENDAR

Wharton ISD's board calendar lacks detail and is not published on the district website.

During interviews, some board members reported confusion regarding the budget cycle and the development of district plans. The current board calendar should be enhanced to help the district provide additional information to board members and the community.

The board calendar should contain the dates for major district and campus events, and for required board activities, such as budget adoption, DIP and CIP adoption, the superintendent's evaluation, all school board meetings and workshops, and board trainings. The calendar also should include public meetings for the SBDM committees.

A detailed board activity calendar published to the website would assist the district in the following tasks:

- streamlining monthly agenda planning;
- addressing all legally required actions timely;
- allotting time to address policy, planning, and evaluation in addition to routine and urgent issues;
- informing all board members of when specific items will be addressed;
- conveying the cycle of district business and the board's appropriate role to new trustees and the community; and
- tracking items that are deferred for future consideration.

The district should review the Lone Star Governance Participant Manual from TEA, which provides an example of a monitoring calendar that could guide the development of a more comprehensive and transparent board calendar.

SUPERINTENDENT EVALUATION TOOL

Wharton ISD's superintendent's evaluation tool does not specify clear, measurable indicators.

District data demonstrates that the statutorily required goals for early childhood literacy and mathematics and for college, career, and military readiness are specific and measurable in accordance with statute. However, other goals associated with the tool lack specificity. For example, the District Management and Operations category describes the following four indicators in the superintendent's performance:

- provides the means for a safe school and work environment;
- recruits, hires, and retains quality staff;
- maintains a balanced budget by being fiscally responsible; and
- provides the means to maintain and improve facilities based on district needs.

These indicators are not defined clearly; therefore, each board member could interpret success differently. Indicators that are vague and open to interpretation could cause friction and stress in the evaluation process. Without clear indicators, neither the board nor the superintendent can determine whether adequate results are achieved.

Wharton ISD's board should collaborate with the superintendent to revise its evaluation tool and rewrite all indicators in a SMART model. This revision would improve clarity and support a fairer evaluation. TASB provides resources and frameworks to guide evaluation tools, noting that it is critical that the board establish SMART goals that are clear, focused, and designed to drive intentional improvement.

VOLUNTEER PROCESS

Wharton ISD's volunteer process is challenging to access and navigate, which may depress rates of volunteer participation.

Staff report that the district struggles with recruiting volunteers. During school year 2022–23, the district approved 27 volunteers through its Frontline application system. Although the district has an established process for vetting volunteers, the information regarding how to volunteer is not accessed easily on the district's website. Potential volunteers first must navigate from the Careers tab through a link to access the list of vacancies, which lists volunteer opportunities among professional openings.

Accessing the Volunteer link navigates to a landing page for new applicants that contains information more applicable to professional job seekers. For example, the landing page states that the application will consist of multiple steps and will require at least one hour to complete; however, staff report that the process is shorter for prospective volunteers, from whom the district collects only the information necessary for a background check and to determine whether fingerprint collection is necessary. The entire process can be confusing and may deter prospective volunteers.

The public relations coordinator should collaborate with the human resources director to formalize and clarify the district's volunteer processes and publish them on the district website. The posted information should include policies and procedures on topics such as soliciting, training, assigning, tracking, and recognizing volunteers. Human resources staff should consider amending the language on the Frontline system to differentiate the volunteer application's requirements and time commitment from those of district staff application. The district could implement an accessible, separate volunteer webpage on the district website to provide prospective volunteers with the application information and current volunteer opportunities. Campus leaders and human resources staff should monitor whether these actions increase participation.

BOARD OF TRUSTEES TRAINING

Wharton ISD does not have a standardized process to accurately track board member training.

Provisions in Texas law govern the initial training and continuing education of school board members regarding their roles and responsibilities. Continuing education requirements for school board trustees developed by the State Board of Education appear in the Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter A, Section 61.1.

Wharton ISD board members are informed of training opportunities by the superintendent's administrative assistant, the district's LSG coach, the superintendent, and Region 3. Staff report that board members have substantial opportunity to secure their required training hours.

However, confusion exists among board members regarding how their training is recorded. The superintendent's administrative assistant enters completed training hours into the TASB Continuing Education Credit Report Service (CECRS) when members submit their training certificates.

However, information gathered from staff interviews suggests that some members enter their own data into their CECRS accounts and complete the process independently. When members travel to training as a group, they assist each other with logging the hours.

The district also may not comply with transparency requirements for board member training. Section 61.1(j) states that at the last regular board meeting before an election of trustees, the board president must announce the name of each board member who has completed the required continuing education, who has exceeded the required hours of continuing education, and who is deficient in meeting the required continuing education. Board agendas from April 2023 and April 2024 indicate that the public announcement should have occurred. However, the minutes from these meetings do not include the announcement in 2024, and each member's individual training status is not recorded for either year for the public record.

Without consistently tracking board training and informing members about the process, to the district cannot confirm which trainings board members attended.

Wharton ISD should standardize the tracking process and review the process annually with board members.

The superintendent should ensure that the administrative assistant and board members are informed about board training requirements, and assign the following duties to the administrative assistant:

- compile a comprehensive record of all board member trainings;
- develop written instructions for board members that outline the documentation required to log training into TASB's CECRS system;
- consult quarterly with the board members to determine which of the State Board of Education training requirements they meet; and
- access the CECRS system quarterly and update the master training record with the hours board members submitted.

The superintendent also should collaborate with the board president to train board members regarding this process annually at the board member retreat. The superintendent should assure that the board president publicly announces each trustee's required training status at the April board

meeting before the May election. Each member's training status should be recorded in the board meeting minutes. If the minutes show that a trustee is deficient, the board could take further action through its accountability policy, as discussed in Recommendation 1.

FISCAL IMPACT

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

2. EDUCATIONAL SERVICE DELIVERY

ACCOMPLISHMENTS

- ◆ Wharton ISD implements an aligned curriculum, an instructional framework, and common assessments to support student learning.
- ◆ Wharton ISD implements data-driven systems to monitor student progress, inform instructional practices, and provide targeted interventions.
- ◆ Wharton ISD implements gifted and talented practices in alignment with the Texas Education Agency's Texas State Plan for the Education of Gifted/Talented Students.

FINDINGS

- ◆ Wharton ISD does not implement special education initiatives in full compliance with state and federal statutes or best practice guidelines.
- ◆ Wharton ISD does not comply with statutory requirements regarding the screening for and treatment of dyslexia and related disorders.
- ◆ Wharton ISD lacks processes to allocate staffing, resources, and support equitably.

RECOMMENDATIONS

- ◆ **Recommendation 4: Evaluate special education practices to identify those that do not align with state and federal law and develop and implement corrective actions to comply with these regulations.**
- ◆ **Recommendation 5: Develop a written compliance plan for implementing procedures and strategies outlined in the *Dyslexia Handbook*.**
- ◆ **Recommendation 6: Adopt staffing and budgeting practices that promote the equitable support of students at all campuses.**

BACKGROUND

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

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

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

A district's size and structure often dictate how staff manage educational services. Regardless of a district's composition, the superintendent is responsible for the administration and leadership of the planning, organization, operation, supervision, and evaluation of the district's education programs and services, pursuant to the Texas Education Code, Section 11.201(d)(1). Section 11.202(a) designates principals as the instructional leaders of their campuses. Additional staff contribute frequently to support the administration and management of these services.

Successful delivery of educational services involves assessing campus and student needs, establishing academic goals at the district and campus levels, identifying strategies to achieve those goals, addressing barriers to achievement, and monitoring students' academic performance and progress. Additionally, a district's educational services provide support for teachers and students. Support for teachers includes professional development and resources related to curriculum, instruction, and classroom management. Support for students includes enrichment, acceleration, accommodations, and modifications to foster academic growth.

As of March 2024, Wharton Independent School District (ISD) operated four campuses: C.G. Sivells Elementary School, Wharton Elementary School, Wharton Junior High

School, and Wharton High School. The district’s enrollment for school year 2022–23 was 1,844 students. **Figure 2–1** shows the enrollment at each Wharton ISD campus and the grade levels each serves.

Figure 2–2 shows the student demographics of Wharton ISD compared to the student demographics of the state. For school year 2022–23, the district reported that 78.9 percent of its student population was economically disadvantaged, compared to the statewide rate of 62.0 percent. In Texas education policy, the terms economically disadvantaged and educationally disadvantaged have an identical meaning. Educationally disadvantaged is defined in the Texas Education Code, Section 5.001(4), to mean eligible to participate in the national free or reduced-price lunch program. This eligibility extends to students from families with incomes at or less than 185.0 percent of the federal poverty level, or whose families participate in other federal or state-administered public assistance programs.

Figure 2–3 shows Wharton ISD’s academic accountability ratings for school years 2016–17 to 2021–22. The 2022–23 accountability ratings have not been released at the time of this publication and are pending, subject to change based on judicial rulings or Texas legislative decisions.

The Texas Education Agency (TEA) issues annual academic accountability ratings to districts and campuses. In 2017, the Texas Legislature mandated the creation of an A-to-F accountability system, which took effect for districts in school year 2017–18 and for campuses the following year. However, accountability rating assignments have been affected by several factors.

**FIGURE 2–1
WHARTON ISD CAMPUSES AND ENROLLMENT
SCHOOL YEAR 2022–23**

CAMPUS	GRADE LEVELS	ENROLLMENT
C.G. Sivells Elementary School	Early education to grade one	429
Wharton Elementary School	Grades two to five	476
Wharton Junior High School	Grades six to eight	369
Wharton High School	Grades nine to 12	570

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

**FIGURE 2–2
WHARTON ISD STUDENT DEMOGRAPHICS
SCHOOL YEAR 2022–23**

STUDENTS	DISTRICT	STATE
Hispanic	61.1%	52.9%
African American	25.9%	12.8%
White	10.1%	25.7%
Two or more races	2.1%	3.0%
Asian	0.6%	5.1%
American Indian	0.1%	0.3%
Pacific Islander	0.1%	0.2%
Economically disadvantaged	78.9%	62.0%
Emergent bilingual student/English learner	15.1%	23.0%
At risk	56.2%	53.3%

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

During school year 2017–18, Wharton ISD and its campuses met the criteria for TEA’s Hurricane Harvey Provision. In accordance with this provision, eligible districts that would

**FIGURE 2–3
WHARTON ISD’S ACCOUNTABILITY RATINGS, SCHOOL YEARS 2016–17 TO 2021–22**

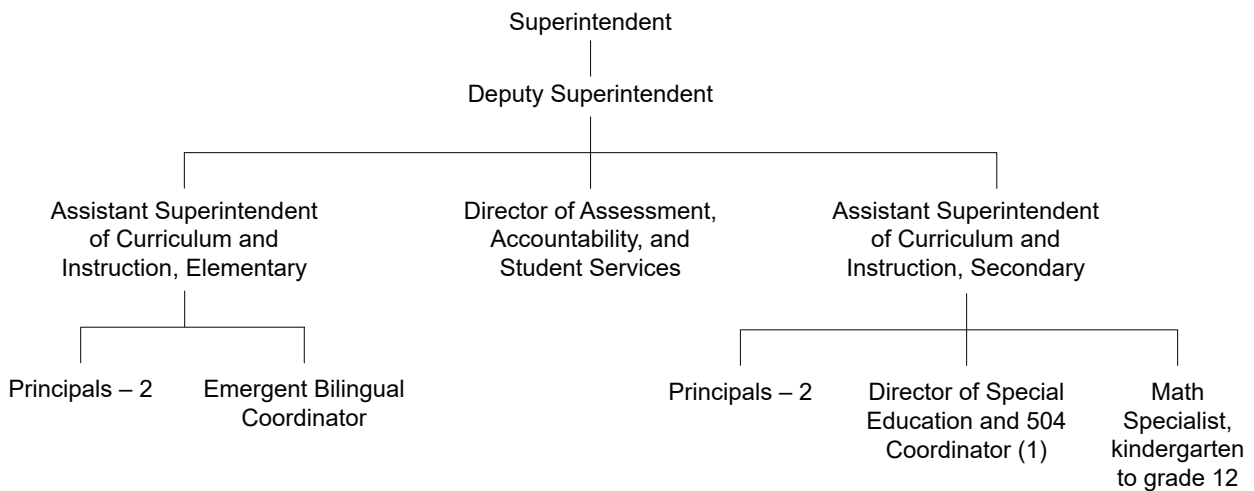
DISTRICT/CAMPUS	2016–17	2017–18 (1)	2018–19	2019–20 AND 2020–21 (2)	2021–22 (3)
C.G. Sivells Elementary School	Met Standard	Not Rated	F	Not Rated	Not Rated
Wharton Elementary School	Met Standard	Not Rated	F	Not Rated	Not Rated
Wharton Junior High School	Met Standard	Met Standard	B	Not Rated	Not Rated
Wharton High School	Met Standard	Met Standard	C	Not Rated	Not Rated
Districtwide	Met Standard	Not Rated	C	Not Rated	Not Rated

NOTES:

- (1) An alphabetical accountability rating system was implemented for school years 2017–18 to 2018–19. Districts and campuses identified as Hurricane Harvey Provision eligible in school year 2017–18 that received a designation less than A/Met Standard were labeled Not Rated.
- (2) Districts and campuses did not receive accountability ratings for school years 2019–20 and 2020–21 due to closures during the onset of the COVID-19 pandemic.
- (3) Pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, districts and campuses that would have received a rating of D or F for school year 2021–22 were designated Not Rated.

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

FIGURE 2–4
WHARTON ISD’S EDUCATIONAL SERVICE DELIVERY ORGANIZATION, SCHOOL YEAR 2023–24



NOTE: (1) Section 504=federal Rehabilitation Act of 1973, Section 504, which prohibits discrimination on the basis of disability and requires school districts to provide free, appropriate, public education to each qualified student with a disability in their jurisdiction.
 SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

have received a B, C, D, or F rating, and eligible campuses that would have received an Improvement Required rating, were designated Not Rated.

During school years 2019–20 and 2020–21, TEA designated all districts and campuses Not Rated: Declared State of Disaster due to the onset of the COVID-19 pandemic.

During school year 2021–22, Wharton ISD and all its campuses received Not Rated designations pursuant to Senate Bill 1365, Eighty-seventh Legislature, Regular Session, 2021, which authorized the Commissioner of Education to establish alternative evaluation procedures for districts and campuses that would have received a D or F rating but achieved a 95.0 percent participation rate on state assessments.

Wharton Junior High School received a B rating during school year 2018–19, representing Wharton ISD’s only academic accountability rating higher than a C since TEA introduced the A-to-F rating system.

Figure 2–4 shows Wharton ISD’s educational service delivery organization for school year 2023–24.

As shown in **Figure 2–4**, the superintendent, the deputy superintendent, and two assistant superintendents of curriculum and instruction oversee the district’s educational services. The elementary assistant superintendent of curriculum and instruction oversees C.G. Sivells Elementary

School and Wharton Elementary School, and the secondary assistant superintendent of curriculum and instruction oversees Wharton Junior High School and Wharton High School. The elementary assistant superintendent of curriculum and instruction also oversees the district’s bilingual and English-as-a-second-language programs, and the secondary assistant superintendent also oversees the district’s special education and federal Rehabilitation Act of 1973, Section 504, programs.

The director of assessment, accountability, and student services manages several federal grant programs, oversees student services such as the gifted-and-talented program, and administers assessment and accountability procedures.

Wharton ISD implements several innovative programs for its students. The district’s designated Early College High School, the Realizing Our Academic Reward (ROAR) Academy, offers students an opportunity to earn a high school diploma and either an associate degree or at least 60.0 credit hours toward a baccalaureate degree, pursuant to the Texas Education Code, Section 29.908(b)(2). In addition, the district offers a Pathways in Technology Early College High Schools (P-TECH) program, Wharton Connections Academy P-TECH, which provides an opportunity for students to earn a high school diploma and an industry certification or an associate degree, pursuant to the Texas Education Code, Section 29.553(b)(3). Additionally, TEA awarded Wharton ISD a Learning

Acceleration Support Opportunities grant, which provides funding for academic growth and innovation through targeted acceleration strategies. This grant funds Eureka Math for Wharton ISD students in kindergarten through grade five and Carnegie Learning’s Texas Math Solution for students in grades six to 12.

DETAILED ACCOMPLISHMENTS

CURRICULUM MANAGEMENT SYSTEMS

Wharton ISD implements an aligned curriculum, an instructional framework, and common assessments to support student learning.

The superintendent stated that coordinating and aligning the curriculum and instruction has been his priority since assuming the role in June 2020. To achieve this goal, he collaborated with district leadership beginning in school year 2020–21 to develop and implement a curriculum management plan that communicates expectations for curriculum, instruction, and assessments.

Wharton ISD’s curriculum plan aligns learning objectives horizontally within a grade level, vertically from one grade level to the next, and with the state standards. The district supports this alignment through its use of the TEKS Resource System, an online curriculum management system that includes the following resources:

- Vertical Alignment Documents, which present the expected progression of competencies and skills in each grade level;
- Year at a Glance Documents, which provide an overview of the organization and pacing for the year’s instructional plan; and
- Instructional Focus Documents, organizational tools that articulate the details of each unit.

In addition to the TEKS Resource System, the district uses locally developed curriculum calendars and vendor-recommended pacing guides for Eureka Math and Carnegie Learning. Additionally, Wharton ISD schedules time for teachers to engage in professional learning communities (PLC). PLCs, organized by content area or grade level, support horizontal instructional alignment by enabling teachers to plan, analyze student data, and develop instructional strategies collaboratively.

Wharton ISD implements the Fundamental Five framework, based on the book by Sean Cain and Mike Laird, to

communicate its expectations for curriculum delivery. The framework outlines the following key practices to improve student engagement and achievement:

- framing the lesson to communicate to students a focus for their learning;
- maintaining proximity to students to encourage engagement;
- engaging in frequent and purposeful small group talk to enhance students’ retention and understanding and maintain their attention;
- recognizing and reinforcing students with personalized acknowledgment of their efforts; and
- writing critically, which develops critical thinking skills by clarifying, organizing, defending, refuting, analyzing, connecting, or expanding on ideas or concepts in the lesson.

The district has implemented systems to monitor and reinforce the implementation of Fundamental Five strategies. Principals and assistant principals conduct weekly walkthroughs and teacher observations to evaluate instructional practices and provide feedback. During the walkthroughs, campus leaders identify a Fundamental Five Teacher of the Week who demonstrates outstanding use of a Fundamental Five strategy. The principal nominates one identified Teacher of the Week to the district curriculum staff, who select a Fundamental Five Teacher of the Month. Wharton ISD recognizes the nominated and selected teachers and highlights their effective instructional strategies in the district and campus curriculum newsletters.

In addition, the district has a comprehensive assessment plan that enables it to collect formative and summative data to inform curriculum and program decisions. Wharton ISD’s assessment plan includes the following formative and summative assessments:

- curriculum-based assessments – locally developed assessments that align with the TEKS; the district administers the tests across subject or grade levels to reliably measure student, teacher, and curricular progress;
- mathematics assessments – vendor-developed assessments embedded in the district’s Eureka and Carnegie Learning math programs, which function like curriculum-based assessments;

**FIGURE 2–5
WHARTON ISD DISTRICTWIDE ASSESSMENTS AND TIMELINES, SCHOOL YEAR 2023–24**

ASSESSMENT	ADMINISTRATION FREQUENCY	TIME BETWEEN ASSESSMENTS	ADDITIONAL INFORMATION
Curriculum-based Assessment (for STAAR-tested subjects and courses) (1)	7 times per year	3 weeks	Math assessments take place every four weeks in accordance with Eureka and Carnegie pacing guides
Curriculum-based Assessment (for subjects and courses not assessed by the STAAR)	4 times per year	9 weeks	
NWEA MAP Growth Assessments (2)	3 times per year	Approximately 70 instructional days	Screenings occur at the beginning, middle, and end of the school year
District Benchmark	1 time per year		Benchmark assessments take place in late January to early February
STAAR Stand-alone Field Test (for STAAR-tested subjects and courses)	1 time		Administered by the Texas Education Agency in February 2024

NOTES:

- (1) The State of Texas Assessments of Academic Readiness (STAAR) is administered in the following grades, subjects, and courses: math, grades 3 to 8; reading, grades 3 to 8; science, grades 5 and 8; social studies, grade 8; Algebra I, English I and II, biology, and U.S. history.
- (2) NWEA is a not-for-profit education organization that develops academic assessments that measure the achievement and growth of students in kindergarten to grade 12 in subjects including math, reading, language usage, and science.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

- NWEA MAP Growth assessment – interim assessment for subject-specific performance and growth; NWEA is a not-for-profit education organization that develops academic assessments for students in kindergarten to grade 12 in early literacy, math, reading, language usage, and science;
- District Benchmark – a released STAAR assessment taken at the beginning of the second semester in STAAR-tested subjects and courses; and
- STAAR Stand-Alone Field Test – TEA administered this assessment online in February 2024. TEA required selected campuses to participate in the Field Test but allowed all remaining campuses to administer the Field Test voluntarily. Wharton ISD volunteered to participate during school year 2023–24.

Figure 2–5 shows Wharton ISD’s assessments and their administration timelines.

By aligning curriculum, communicating instructional expectations, and establishing a districtwide assessment plan, Wharton ISD has achieved a coherent curriculum management system to support student learning.

DATA SYSTEMS

Wharton ISD implements data-driven systems to monitor student progress, inform instructional practices, and provide targeted interventions.

A data-driven system provides valuable information to teachers and school leaders, but its effectiveness is contingent upon the quality of the data. Wharton ISD’s data consists of common formative and summative assessment scores, based on assessments shown in Figure 2–5. Common assessments provide identical questions to all students in a course or grade level and subject area, enabling Wharton ISD to measure student performance consistently and equitably. Wharton ISD develops or selects assessments aligned to state curriculum standards, which means assessment outcomes can inform teaching strategies, student interventions, and curriculum decisions.

The district’s data system includes color-coded charts that track student progress in the formative and summative assessments. This system facilitates visual comparisons of students’ current and previous performance, and their performance relative to their peers. The data system eliminates the need for all staff to collect and analyze all student data manually. Wharton ISD’s systems also aggregate data to provide insights at the classroom, subject, or grade level, using color-coded tables to identify students who are mastering, meeting, or approaching mastery of the subject matter, in alignment with STAAR grading standards.

Student-level data facilitates teachers in identifying who may benefit from targeted interventions and monitor progress in those interventions. Classroom-level data helps staff to refine instructional strategies. District leaders review this data and engage in strategic discussions with campus leaders who then

**FIGURE 2–6
SELECTED STANDARDS FROM THE TEXAS STATE PLAN FOR THE EDUCATION OF GIFTED AND TALENTED (GT) STUDENTS
2019**

ACCOUNTABILITY STANDARD	REQUIRED ACTIVITIES
Fidelity of Service	
1.2	GT education policies and procedures are reviewed and recommendations for improvement are made by an advisory group of community members, parents of GT students, school staff, and GT education staff, who meet regularly for that purpose.
Student Assessment	
2.20	All kindergarten students are considered automatically for GT and other advanced-level services.
2.26	Final determination of students' need for GT services is made by a committee of at least three local educators who have received training in the nature and needs of GT students and who have met and reviewed the individual student data (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.1(4)).
Professional Learning	
5.1	A minimum of 30.0 clock hours of professional learning that includes the nature and needs of GT students, identification and assessment of GT students, and curriculum and instruction for GT students is required for teachers who provide instruction and services that are a part of the district's defined GT services (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.2(1)).
5.6	Teachers who provide instruction and services that are a part of the district's defined GT services receive a minimum of six hours annually of professional development in GT education that is related to state teacher GT education standards (the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter A, §89.2(3), and Part 7, Chapter 233, §233.1).

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

join PLCs, where teachers have also reviewed the data and developed instructional strategies. Teachers and campus leaders then engage in a collaborative discussion to investigate relationships between instructional practices and student learning outcomes. For example, data can identify teachers whose students would benefit from spiraled instruction, a strategy designed to improve students' knowledge and retention by revisiting and reinforcing topics and skills.

In addition, grade-level data may inform district practices or decisions, such as whether to expand or discontinue a professional development opportunity or supplemental instructional program. Wharton ISD collects supplemental instructional program usage data to determine student engagement, and they can cross-reference usage data with student learning outcome data to assess the program's effectiveness.

Campuses also create data walls to display student learning outcomes for teachers to analyze. Data walls are another way Wharton ISD encourages teachers to investigate relationships between instructional practices and student learning outcomes.

GIFTED AND TALENTED PROGRAM

Wharton ISD implements gifted-and-talented (GT) practices in alignment with the Texas Education Agency's Texas State Plan for the Education of Gifted/Talented Students.

The State Plan, adopted by the State Board of Education (SBOE) in 1990 and revised in 2019, provides requirements for and guidance to districts in meeting the unique needs of their GT population. The State Plan outlines standards for six aspects of GT services and divides them into two implementation categories, accountability standards and exemplary standards. Accountability standards are services required by state law and SBOE rule. Exemplary standards are services that reflect best practices for districts and educators who seek excellence for their GT students. **Figure 2–6** shows a subset of State Plan standards that Wharton ISD is implementing.

According to a Legislative Budget Board analysis of GT programs in Texas, school districts did not implement certain accountability standards consistently. However, Wharton ISD successfully met those standards through the following actions:

- universally screening kindergarten students, in accordance with the State Plan's Accountability Standard 2.20;
- involving community members and parents in a GT advisory group, in accordance with the State Plan's Accountability Standard 1.2; and

- establishing procedures to track professional learning hours to demonstrate compliance with the State Plan's Accountability Standards 5.1 and 5.6.

The district has outlined these procedures in its GT handbook. It is evident by Wharton ISD's comprehensive GT policies, procedures, and practices that leadership evaluates the GT program for alignment with the State Plan.

DETAILED FINDINGS

CHILD FIND (REC. 4)

Wharton ISD does not implement special education initiatives in full compliance with state and federal statutes or best practice guidelines.

IDENTIFICATION AND EVALUATION

Wharton ISD does not implement services to ensure eligible students with disabilities receive a free appropriate public education.

The federal Individuals with Disabilities Education Act (IDEA) of 2004 mandates that school districts identify, locate, and evaluate all children with disabilities residing within their jurisdictions who require special education and related services. This obligation, known as Child Find, applies to children, ages three to 21, regardless of the severity of their disability. In addition to federal regulations, the Texas Administrative Code, Title 19, Chapter 89, Subchapter AA, Division 2, states that if a student continues to experience difficulties in the general education classroom after receiving interventions and support services, or if district staff suspect a disability and a possible need for special education and related services, district staff must refer the student for a full individual and initial evaluation for special education services. When the school district initiates the referral, the district must notify the student's parents.

School districts have an affirmative, ongoing obligation in accordance with the Child Find mandate to evaluate students with disabilities, rather than waiting for referrals. However, when a parent, guardian, or any other individual involved in the student's education or care makes a referral for special education services, the district is subject to the following deadlines required by IDEA; the Texas Education Code, Section 29.004; and the Texas Administrative Code, Title 19, Part 2, Chapter 89, Subchapter AA, Division 2, Section 89.1011:

- notification – a district has 15 school days from the referral to provide a parent or guardian with prior

written notice, a copy of procedural safeguards, and an overview of special education services to obtain informed consent for evaluation;

- evaluation – a district has 45 school days to conduct a full and individual initial evaluation, including a written report, after receipt of the signed parental consent; and
- determination – the admission, review, and dismissal (ARD) committee must meet to determine eligibility within 30 calendar days of the written report's completion.

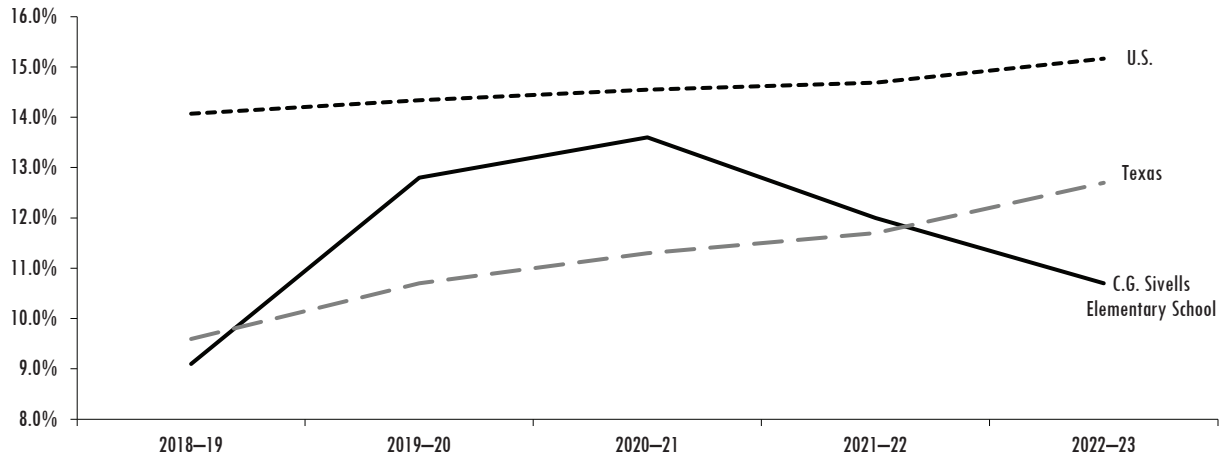
The district may deny a parent's request for an initial evaluation; however, it must provide written notice to the parent within 15 days, explaining its decision.

The Legislative Budget Board's School Performance Review Team visited the district in March 2024. C.G. Sivells Elementary School staff reported that the district's Special Education Department consistently rejects their referrals to evaluate students, except in cases of severe and obvious disabilities. In addition, staff indicated that the department either did not provide a rationale for these rejections or offered explanations that were inconsistent with federal guidance, such as denying evaluation based on the student's age.

IDEA requires districts to evaluate students in all grade levels suspected of having a disability. By arbitrarily rejecting referrals, Wharton ISD is denying, or at least delaying, eligible students from receiving a free appropriate public education. Wharton ISD's reported rates of students receiving special education services at C.G. Sivells Elementary School are representative of these practices. **Figure 2–7** shows the percentage of students in C.G. Sivells Elementary School receiving special education services compared to the percentages of students across the state and nationally from school years 2018–19 to 2022–23.

Since the U.S. Department of Education's Office of Special Education and Rehabilitative Services issued findings of noncompliance to the Texas Education Agency (TEA) in January 2018, TEA has initiated steps to improve access to special education services for eligible students. TEA developed a Corrective Action Response that outlined strategies to enhance special education identification and evaluation. As shown in **Figure 2–7**, the percentage of special education students receiving services in Texas schools increased from school years 2018–19 to 2022–23. Although

FIGURE 2-7
PERCENTAGE OF STUDENTS RECEIVING SPECIAL EDUCATION SERVICES AT C.G. SIVELLS ELEMENTARY SCHOOL COMPARED TO PERCENTAGES IN THE STATE AND IN THE U.S. SCHOOL YEARS 2018-19 TO 2022-23



SOURCE: Texas Education Agency, Texas Performance Reporting System, school years 2018-19 to 2022-23.

the special education program at C.G. Sivells Elementary School expanded and its percentage of students receiving services began to approach the national rate from school years 2018-19 to 2020-21, the school’s percentage has fallen farther below the national rate each subsequent year.

STAFFING

Wharton ISD also does not staff its special education program effectively. During interviews, staff speculated that understaffing in the special education department likely caused Wharton ISD’s noncompliance with federal and state requirements for identifying and evaluating students with disabilities. Special education staff include evaluative staff, such as diagnosticians, licensed school psychologists, and ARD facilitators, and instructional staff, such as life skills teachers, certified special education teachers, and paraprofessionals. Staff suggested that if Wharton ISD lacks sufficient special education staffing to identify and teach students across the entire district, it may be compensating by not adequately identifying and supporting students at C.G. Sivells Elementary School. District leadership reported that Wharton ISD had approximately eight vacant special education positions at the time of the review.

Special education shortages are not unique to Wharton ISD. In March 2022, the Office of the Governor established the Teacher Vacancy Taskforce (TVTF) to address teacher retention and recruitment challenges across Texas. According to the *TVTF Final Report: Developing a Thriving Teacher*

Workforce in Texas, February 2023, special education teachers had the highest out-of-field service rate, at 52.0 percent in 2022. The TVTF recommended hiring incentives and subsidies toward certification examinations for special education teachers.

The Texas Association of School Boards reported that nearly 68.0 percent of districts surveyed during school year 2023-24 offered annual special education incentive stipends ranging from \$200 to \$14,000. However, multiple staff reported that Wharton ISD does not offer incentive stipends to special education staff, making it challenging to compete with neighboring districts for qualified job candidates.

BUDGETING

Wharton ISD also does not manage its financial resources effectively to maximize state and federal allocations for the education of children with disabilities. Available expenditure data confirms that Wharton ISD has decreased its special education expenditures by 39.7 percent from fiscal years 2021 to 2023. **Figure 2-8** shows budgeted and actual special education expenditures from the general fund during this period.

As shown in **Figure 2-8**, during fiscal years 2022 and 2023, Wharton ISD’s actual special education expenditures are less than the budgeted and the previous year’s expenditures. Pursuant to IDEA, districts must maintain the same level of local financial support for special education services as during

**FIGURE 2–8
WHARTON ISD’S BUDGETED AND ACTUAL EXPENDITURES FOR STUDENTS WITH DISABILITIES
FISCAL YEARS 2021 TO 2023**

YEAR	BUDGETED EXPENDITURES (GENERAL FUND)	ACTUAL EXPENDITURES (GENERAL FUND)	DIFFERENCE BETWEEN BUDGETED AND ACTUAL	CHANGE FROM PREVIOUS YEAR’S ACTUAL EXPENDITURES
2021	\$1,543,731	\$1,597,002	\$53,271	\$82,629
2022	\$1,637,669	\$1,353,920	(\$283,749)	(\$243,082)
2023	\$1,345,973	\$963,430	(\$382,543)	(\$390,490)

NOTES:

(1) Fiscal year 2020 actual expenditures totaled \$1,514,373.

(2) Wharton ISD operates on a fiscal year beginning July 1 and ending June 30.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System Financial Data, fiscal years 2021 to 2023; Wharton ISD, March 2024

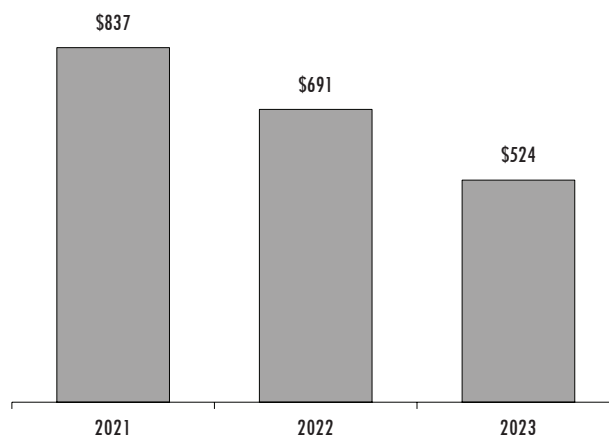
the previous compliant fiscal year. Districts can demonstrate compliance with this requirement through four methods, including per-pupil methodologies, which are particularly useful for districts such as Wharton ISD that have experienced a decrease in enrollment. **Figure 2–9** shows the per-pupil expenditures for students with disabilities in Wharton ISD from fiscal years 2021 to 2023. As shown in **Figure 2–9**, per-pupil expenditures for students with disabilities decreased by 37.4 percent during this time.

If a district fails to demonstrate expenditure compliance through any of the four methods, it will have the opportunity to claim an allowable federal exception, accept a voluntary reduction in funding, or both. If the district is unable to offset the reduction in expenditures through these means, it must refund the difference to TEA. Due to voluntary staff departures, TEA granted Wharton ISD a maintenance-of-effort exception of \$20,295 for fiscal year 2023. However, if the district’s maintenance-of-effort requirement exceeds this amount, Wharton ISD will be required to accept a voluntary reduction and refund the excess to TEA using state or local funds.

In addition to general funds, Wharton ISD also receives federal funding for special education through IDEA, Part B, grant funds. IDEA, Part B, funds are provided to schools to supplement state and local funds in providing support services for children ages three to 21 with disabilities.

Figure 2–10 shows Wharton ISD’s IDEA, Part B, grant, award amounts, award amounts remaining, and the percentage remaining for fiscal years 2021 to 2023. As shown in **Figure 2–10**, Wharton ISD recorded remaining amounts ranging from \$0 to \$490,112, and remaining percentages from 0.0 percent to 100.0 percent at the end of grant periods. Although the federal government provides districts an additional 12.0 months to use these funds, substantial

**FIGURE 2–9
WHARTON ISD’S PER-PUPIL EXPENDITURES FOR STUDENTS
WITH DISABILITIES
FISCAL YEARS 2021 TO 2023**



SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System Financial Data, fiscal years 2021 to 2023; Wharton ISD, March 2024

outstanding amounts suggest that the district did not develop an adequate program plan, conduct activities outlined in the approved grant application, or promptly draw down budgeted funds.

TEA’s Grants Administration Division outlines strategies for effective grant management intended to ensure that school districts carry out allowable activities within established timelines and request payment for associated expenditures. The agency recommends the following strategies:

- develop a system for collecting, managing, and submitting necessary programmatic and financial data;

**FIGURE 2–10
FEDERAL INDIVIDUALS WITH DISABILITIES EDUCATION ACT (IDEA), PART B, GRANT AWARDS TO WHARTON ISD
GRANT YEARS 2020–21 TO 2022–23**

GRANT YEAR(S)	GRANT	AWARD	REMAINING AMOUNT	PERCENTAGE REMAINING
September 2020 to September 2021	Special Education (Formula)	\$870,213	\$178,029	20.0%
September 2020 to September 2021	Special Education – Preschool (Formula)	\$18,532	\$0	0.0%
September 2021 to September 2022	Special Education (Formula – American Rescue Plan Act (ARPA))	\$179,088	\$179,088	100.0%
September 2021 to September 2022	Special Education (Preschool – ARPA)	\$8,680	\$22	0.3%
September 2021 to September 2022	Special Education (Formula)	\$1,052,635	\$268,853	25.5%
September 2021 to September 2022	Special Education – Preschool (Formula)	\$18,706	\$0	0.0%
August 2022 to September 2023	Special Education (Formula)	\$1,180,206	\$490,112	41.5%
August 2022 to September 2023	Special Education – Preschool (Formula)	\$19,065	\$9,125	47.9%
October 2022 to September 2023	Special Education (Formula – ARPA Carryover)	\$179,088	\$0	0.0%
October 2022 to September 2023	Special Education (Preschool – ARPA Carryover)	\$21	\$21	100.0%

NOTE: Federal funds that are not obligated at the end of a grant period remain available for an additional 12.0 months pursuant to the federal General Education Provisions Act, Section 421(b), known as the Tydings Amendment. The remaining funds may be rolled over into the next fiscal year’s grant allocation.

SOURCE: Texas Education Agency, Federal Grant Awards by Grantee for School Years 2020–21 to 2023–24.

- establish clear, written policies, procedures, and responsibilities;
- maintain effective internal controls for all assets;
- request payments regularly for allowable and budgeted expenditures;
- maintain accurate financial and programmatic records;
- monitor goals, timelines, records, activities, and funds to identify discrepancies and adjust as necessary; and
- amend the application as necessary.

The most concerning consequence of violating special education statutes and not following best practice guidelines is the effect on students in the district. Students may struggle to advance academically if they do not receive specially designed instruction and related services to access the general education curriculum. Without mandated services and support, these students may not master grade-level content, achieve a passing performance level on STAAR, or be eligible

for promotion or graduation at the same rate as they otherwise might.

Texas statutes outline sanctions for districts that fail to uphold students’ special education rights or effectively support their learning outcomes. If students do not achieve a passing performance level on STAAR, TEA may lower a district’s or a campus’s academic accountability rating. Subsequently, pursuant to the Texas Education Code, Section 39A.001(1) (A) and (B), and the Texas Administrative Code, Title 19, Part 2, Chapter 97, Subchapter EE, the Commissioner of Education may appoint a monitor, conservator, or board of managers to a district based on iterative declines in its academic performance and accreditation status.

Pursuant to the Texas Education Code, Section 29.010, districts that do not comply with special education laws may be subject to increased TEA monitoring, investigations, or sanctions.

Violating the Child Find requirements also is a liability for the school district. School district staff that know or suspect

that a student has a disability have an affirmative duty to act on the student's behalf. If staff fail to act, they have defaulted on their obligation. If the school district fails to act and the student does not receive the necessary services, the district may be liable for this failure and subject to litigation.

Wharton ISD should evaluate special education practices to identify those that do not align with state and federal law and develop and implement corrective actions to comply with these regulations.

The superintendent should direct the secondary assistant superintendent of curriculum and instruction and the director of special education to implement practices that support compliance with Child Find, including the following actions:

- review and update special education evaluation procedures to comply with state and federal laws;
- train staff regularly regarding special education policies, procedures, and best practices;
- develop and maintain student data systems to support initial evaluations, goal setting, and progress monitoring;
- promote community awareness of Child Find by hosting parent meetings and distributing or posting informative materials; and
- establish effective systems to meet evaluation, notification, and screening timelines.

The superintendent should prioritize identifying and evaluating current and former C.G. Sivells Elementary School students who were delayed or denied special education evaluations. An ARD committee should consider the need for compensatory services as part of the initial individualized education program if a student's initial evaluation was delayed or denied. Wharton ISD leadership should allocate appropriate staffing and resources to provide these services.

In addition, the superintendent, in consultation with the elementary and secondary assistant superintendents of curriculum and instruction and the director of special education, should identify and address the root causes of the district's noncompliance with Child Find. The district should isolate all underlying causes and develop processes to address each one. The superintendent should monitor compliance with Child Find quarterly, using

quantitative and qualitative metrics such as completed referrals and staff surveys.

The superintendent should implement strategies from the *TVTF Final Report* to improve the recruitment and retention of special education teachers. Additional opportunities to recruit or retain special education staff include the following actions:

- collaborating with universities to recruit recent special education graduates;
- expanding the district's Grow Your Own program to support staff in earning special education certification; and
- providing retention stipends for special education positions.

The district should maximize support for students with disabilities by using state, local, and IDEA, Part B, funds effectively and in compliance with state and federal laws. Wharton ISD should plan strategically for special education when establishing its annual budget. This process should involve the following actions:

- assessing the district's special education needs using student data (e.g., academic, behavioral), and teacher data (e.g., retention, vacancy);
- soliciting staff priorities for the special education program;
- identifying where student needs align with staff priorities to establish goals and deliverables;
- developing specific, measurable, attainable, and time-bound special education goals and deliverables that are aligned with the special education budget; and
- communicating the special education plan, its rationale, and its progress to stakeholders.

In addition, the district should work closely with the IDEA, Part B, program and funding contacts at TEA to maximize the district's ability to draw down all expenditures in accordance with program guidelines.

No fiscal impact is assumed for this recommendation until the district has analyzed its special education practices and developed corrective action steps, which may result in costs or savings.

**FIGURE 2–11
SERVICES REQUIRED BY THE FEDERAL INDIVIDUALS WITH DISABILITIES EDUCATION ACT (IDEA) OF 2004 AND THE FEDERAL REHABILITATION ACT OF 1973, SECTION 504**

CATEGORY	IDEA	REHABILITATION ACT, SECTION 504
Eligibility	A child must meet one of 13 disability categories that adversely affects educational performance.	A child must have a mental or physical impairment that substantially limits a major life activity.
Plans	Individualized education programs (IEP) include: <ul style="list-style-type: none"> • measurable goals; • progress reporting; • accommodations (1); • services; and • specially designed instruction (2) 	Section 504 plans include: <ul style="list-style-type: none"> • accommodations (1); and • services for certain children
Parental Rights	Parents are guaranteed rights to procedural safeguards, prior written notice, informed consent, the right to participate in decision making, and the right to access their child’s records, including a copy of the student’s written IEP.	Parents have guaranteed rights to procedural safeguards and student records but are not guaranteed a written Section 504 plan.

NOTES:

- (1) Accommodations address a student’s needs, based on the disability; examples include assistive technology, preferential seating, and extra time for assignments.
- (2) Specially designed instruction is the individualized adaptation of content, methodology, or delivery of instruction to address a student’s disability-related needs and support access to the general education curriculum.

SOURCES: The Rehabilitation Act of 1973, Section 504; the Individuals with Disabilities Education Act of 2004.

DYSLEXIA (REC. 5)

Wharton ISD does not comply with statutory requirements regarding the screening for and treatment of dyslexia and related disorders.

During onsite interviews, several Wharton ISD staff reported that the district did not provide special education evaluations or services to students with dyslexia before school year 2023–24. The district previously served all students with dyslexia through Section 504 services.

Special education and Section 504 services are mandated by federal laws that ensure students with disabilities receive a free appropriate public education. The federal Rehabilitation Act of 1973, Section 504, is a civil rights law applicable to public education, while IDEA is an education law. As such these laws afford students different services and protection. **Figure 2–11** shows the key differences between IDEA and Section 504.

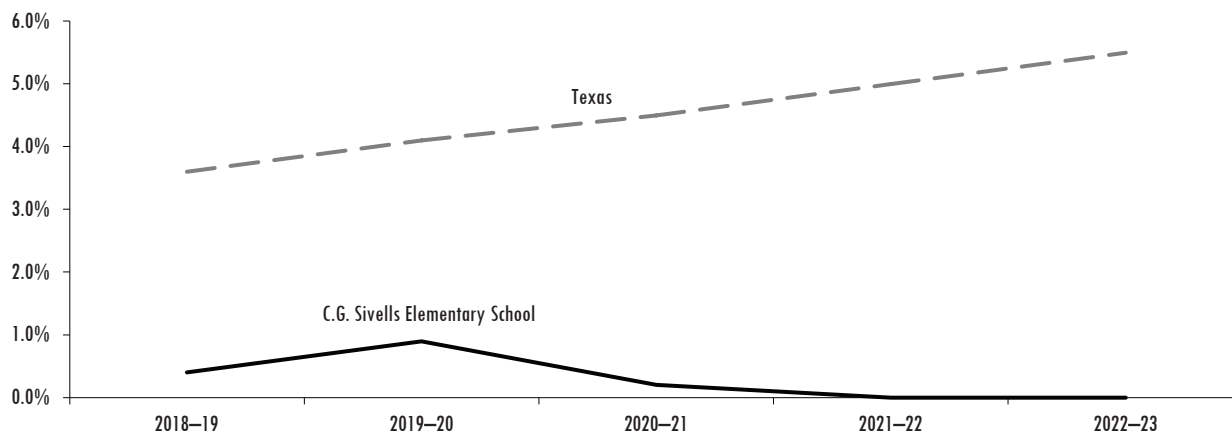
Wharton ISD changed its special education procedures for school year 2023–24 to evaluate students with dyslexia for special education services. Staff said this change reportedly was in response to the enactment of House Bill 3928, Eighty-eighth Legislature, Regular Session, 2023, which relates to dyslexia evaluations, identification, and instruction. The legislation codified several state and federal special education evaluation requirements. However, IDEA has required

districts to provide special education services to students with dyslexia since its reauthorized in December 2004, and the U.S. Department of Education, Office of Special Education and Rehabilitative Services, and TEA reiterated this requirement in 2015 and 2018, respectively.

TEA notified districts in calendar year 2018 that, contrary to previous statewide guidance, dyslexia independently qualifies as a learning disability, eligible for services in accordance with IDEA. In 2021, TEA required districts to evaluate students suspected of having dyslexia for special education before considering Section 504 services. However, Wharton ISD did not evaluate students with dyslexia for special education services until House Bill 3928 required districts to refer all students with dyslexia who benefitted from standard protocol dyslexia instruction for evaluation in accordance with IDEA to continue receiving the instruction after school year 2025–26.

Dyslexia screening and treatment procedures must comply with statutes. The Texas Education Code, Section 38.003, requires dyslexia screening for all kindergarten and grade one students, and additional screening or testing is required in later grades as appropriate. Additionally, the Texas Education Code, Section 28.006(c) and (g), requires school districts to administer a reading instrument to diagnose reading development and comprehension to all students

FIGURE 2–12
PERCENTAGE OF STUDENTS IDENTIFIED WITH DYSLLEXIA AT C.G. SIVELLS ELEMENTARY SCHOOL COMPARED
TO THE PERCENTAGE IDENTIFIED STATEWIDE
SCHOOL YEARS 2018–19 TO 2022–23



SOURCE: Texas Education Agency, Texas Performance Reporting System, school years 2018–19 to 2022–23.

in kindergarten, grade one, grade two, and students in grade seven who did not demonstrate reading proficiency on the grade six reading assessment instrument. The SBOE developed *The Dyslexia Handbook: Procedures Concerning Dyslexia and Related Disorders*, which outlines all requirements for districts to screen for, evaluate, and treat dyslexia and related disorders. The handbook is incorporated in rule as part of the Texas Administrative Code, Title 19, Part 2, Chapter 74, Subchapter C, Section 74.28.

Despite statutory requirements and SBOE guidance, Wharton ISD has not developed effective procedures to support the timely execution of dyslexia screening and diagnostic requirements. For example, at the time of the onsite visit, staff reported that the district had not established a budget, process, or deadlines for screening, diagnosing, evaluating, or serving students with or suspected of having dyslexia.

Specifically, staff reported that C.G. Sivells Elementary School teachers referred students for evaluation if they met the dyslexia screening or diagnostic criteria. However, the Special Education Department did not accept the referrals. Dyslexia data validated staff concerns. Despite dyslexia screening and reading diagnostic outcomes, the district indicates zero students identified with dyslexia in the Public Education Information Management System data reported to TEA for C.G. Sivells Elementary School for school years 2021–2022 and 2022–2023.

Figure 2–12 shows the percentage of students identified with dyslexia at C.G. Sivells Elementary School compared to the statewide percentage of students for school years 2018–19 to 2022–23. The data indicate a consistent increase in the percentage of students identified with dyslexia in Texas during this period, coinciding with expanded statewide screening and diagnostic practices. At C.G. Sivells, the percentage of students identified with dyslexia increased at a similar rate from school years 2018–19 to 2019–20. However, the percentage in the following school year decreased to less than the school year 2018–19 level and then decreased to 0.0 percent for school year 2021–22, where it remained for school year 2022–23.

Data shown in **Figure 2–12** compares dyslexia identification trends but it does not compare actual student percentages. Because the early elementary grades are a school district's first opportunity to identify students with dyslexia, these grades have the lowest number of identified students with dyslexia. Every year that a district administers a dyslexia screener and initiates referrals based on the outcomes, the number of identified students is expected to rise.

Figure 2–13 shows the percentages of students with dyslexia in C.G. Sivells Elementary School and the elementary schools in Wharton ISD's peer districts. Peer districts are districts similar in size and other characteristics to Wharton ISD that are used for comparison purposes. The four peer districts for Wharton ISD are Atlanta ISD, Bay City ISD, El Campo ISD, and Shepherd ISD. As

**FIGURE 2–13
DYSLEXIA IDENTIFICATION IN WHARTON ISD AND PEER DISTRICTS
SCHOOL YEARS 2018–19 TO 2022–23**

YEAR	WHARTON ISD C.G. SIVELLS ELEMENTARY EE TO GRADE 1(1)(2)	ATLANTA ISD ATLANTA PRIMARY EE TO GRADE 2	BAY CITY ISD ROBERTS ELEMENTARY GRADES 1 AND 2	EL CAMPO ISD HUTCHINS ELEMENTARY GRADES 1 TO 3	SHEPHERD ISD SHEPHERD PRIMARY EE TO GRADE 2
2018–19	0.4%	1.7%	0.4%	1.3%	0.0%
2019–20	0.9%	2.0%	0.9%	2.3%	1.6%
2020–21	0.2%	2.6%	0.2%	1.4%	1.2%
2021–22	0.0%	2.0%	1.1%	0.8%	2.0%
2022–23	0.0%	2.2%	0.6%	2.1%	0.8%
5-Year Average	0.3%	2.1%	0.6%	1.6%	1.1%

NOTES:

(1) Campuses were chosen based on the inclusion of grade one students, which is the year that *The Dyslexia Handbook: Procedures Concerning Dyslexia and Related Disorders* specifies an annual dyslexia screening deadline of January 31.

(2) EE=Early childhood education.

SOURCE: Texas Education Agency, Texas Performance Reporting System, school years 2018–19 to 2022–23.

shown in **Figure 2–13** Wharton ISD’s five-year average percentage of students with dyslexia is less than half that of the next lowest district, which indicates that its students are not screened and diagnosed appropriately as required in statute and the *Dyslexia Handbook*.

In addition to the concerns about dyslexia evaluation, the staff expressed concerns about dyslexia treatment. Notably, the district dyslexia specialist supports students at all campuses except for C.G. Sivells Elementary School. Staff reported that when the Special Education Department did not evaluate or serve dyslexia students in accordance with *The Dyslexia Handbook*, the principal at C.G. Sivells Elementary School collaborated with the elementary assistant superintendent of curriculum and instruction to implement campus-level supports for students who were identified for dyslexia evaluation.

By not adhering to the *Dyslexia Handbook* procedures, Wharton ISD is not providing access to timely interventions to students in need. A study published in the *Journal of Educational Psychology* in October 2017 found that students at risk for reading disabilities who received intervention in grades one and two achieved nearly twice the gains in foundational reading skills as at-risk students who did not receive intervention until grade three. Students who received intervention in grade one had stronger reading outcomes than their peers who did not receive intervention until grade two, which demonstrates the importance of early dyslexia identification and intervention.

Delayed or missed dyslexia identification and treatment also may lead to poor student health outcomes. The July 2020 *Journal of Pediatrics* posits that intervening in grade three or later is a “wait-to-fail approach.” Instead, by intervening in kindergarten and grade one, educators can capitalize on heightened brain adaptability. Intensive early reading interventions had the most benefit for at-risk readers. According to the article, by failing to take advantage of the ideal time to provide intervention, the school district places students with dyslexia at risk of the following outcomes:

- decreased self-esteem, which can progress to anxiety and depression;
- increased likelihood of dropping out of high school;
- decreased likelihood of attending programs of higher education;
- increased risk of entering the juvenile justice system;
- increased likelihood of experiencing unemployment; and
- increased likelihood of earning less than the national average income.

Wharton ISD should develop a written compliance plan for implementing procedures and strategies outlined in the *Dyslexia Handbook*.

The superintendent should collaborate with the elementary and secondary assistant superintendent of curriculum and instruction and the director of special education to develop a

compliance plan that contains effective dyslexia procedures and a root-cause analysis of Wharton ISD's noncompliance with the *Dyslexia Handbook* to develop and implement corrective actions.

In addition, these administrators jointly should establish effective written procedures for Wharton ISD's dyslexia screening, identification, and support services. The principal of C.G. Sivells Elementary School should provide input throughout the process to help ensure that the procedures address the campus's needs and historical deficiencies in dyslexia resources and support. These procedures should include the following elements:

- a detailed implementation plan outlining tasks, timelines, and milestones;
- the staff responsible for accomplishing each task;
- a prioritized list of resources, including funding, staff, and technology;
- a process to communicate the procedures and their component tasks, milestones, and timelines;
- a schedule to monitor the timely delivery of tasks; and
- an annual review and revision process to improve procedures, tasks, milestones, and their implementation.

The root-cause analysis of the district's weaknesses and noncompliance with required dyslexia procedures should include the following actions:

- clearly describe the problem;
- collect relevant data;
- identify reasons for the problem;
- analyze each reason, using methods such as the Five Whys, Pareto Analysis, Data Trend Analysis, or Barrier Analysis;
- identify the most plausible root cause(s);
- develop and implement solutions to address the root cause; and
- monitor their implementation.

This analysis should consider deficits in dyslexia and special education training as causes. Solutions could include professional development on topics related to dyslexia screening, identification, and early intervention. The district

should explore available training opportunities through TEA, including the following suggested topics:

- Texas Dyslexia Academies;
- Guidance for the Comprehensive Evaluation of a Specific Learning Disability; and
- Texas Reading Academies.

This recommendation could be implemented with existing resources.

CAMPUS RESOURCES (REC. 6)

Wharton ISD lacks processes to allocate staffing, resources, and support equitably.

During school year 2018–19, when TEA last issued A-to-F accountability ratings, both elementary school campuses received F ratings. Despite the elementary school campuses' evident need for support, Wharton ISD historically has under-resourced these campuses compared to the secondary campuses.

C.G. Sivells Elementary School and Wharton Elementary School are staffed inequitably compared to Wharton ISD's secondary campuses and the Texas teacher staffing benchmark. **Figure 2–14** shows actual teacher staffing levels at each campus for school year 2022–23, and projected benchmark levels based on the ratio identified by the Texas Association of School Boards. When comparing the staffing levels to the benchmark, the elementary schools have up to eight fewer teachers than the recommended levels, while the secondary schools have up to 10 more teachers than the benchmark.

Similarly, the campuses' student-to-teacher ratios reveal inequities. **Figure 2–15** shows the number of students per teacher at each campus in school year 2022–23. Wharton Junior High School has a student-to-teacher ratio that is approximately half that of the elementary school campuses.

The district's inequitable budgeting practices mirror its staffing practices, with resources disproportionately assigned to the secondary campuses. **Figure 2–16** shows each campus's fiscal year 2024 per-student total operating budget, instructional budget, and special education budget. Instructional costs are included to isolate learning expenditures from secondary-specific costs such as athletics equipment and travel. By all measures, Wharton Elementary School and C.G. Sivells Elementary School receive significantly less funding than Wharton Junior High School and Wharton High School.

**FIGURE 2–14
WHARTON ISD ACTUAL COMPARED TO BENCHMARK TEACHER STAFFING LEVELS
SCHOOL YEAR 2022–23**

CAMPUS	ENROLLMENT	BENCHMARK STAFFING RATIO FOR TEACHERS (1)	BENCHMARK TEACHER STAFFING (2)	ACTUAL TEACHER STAFFING	DIFFERENCE
C.G. Sivells Elementary School	429	67.4 to 1,000	28.9	21.5	(7.4)
Wharton Elementary School	476	67.4 to 1,000	32.1	24.3	(7.8)
Wharton Junior High School	369	67.4 to 1,000	24.9	35.1	10.2
Wharton High School	570	67.4 to 1,000	38.4	46.7	8.3

NOTES:

- (1) The teacher benchmark ratio is based on the Texas Education Agency’s Public Education Information Management System Standard Report for Teachers and Student Enrollment for school year 2022–23, as identified by the Texas Association for School Boards.
- (2) Benchmark teacher staffing is based on the benchmark ratio, which the Texas Association of School Boards identified as 67.4 teachers per 1,000 students.

SOURCES: Texas Education Agency, Texas Performance Reporting System, school year 2022–23; Texas Association of School Boards, Strategic Staffing, 2024.

To facilitate fair comparisons among schools, the Texas Smart Schools Initiative developed the Apples2Apples tool. Administered by Texas A&M University, this tool allows for meaningful evaluations of spending and performance across districts and campuses by adjusting for factors such as local labor markets and accounting for differences between elementary and high schools. The Texas Smart Schools Initiative also considers student demographics and mobility when assigning each district and campus a spending index. Additionally, the tool incorporates audited financial data from three consecutive years to improve accuracy and minimize volatility. As a result, the 2020 Smart School results reflect data from school years 2016–17, 2017–18, and 2018–19. A campus spending index includes only campus-related expenditures, such as instruction, instructional services, school leadership, and student support services. The spending index ranges from Very Low (5.0) to Very High (1.0).

**FIGURE 2–15
WHARTON ISD RATIO OF STUDENTS TO TEACHER
BY CAMPUS
SCHOOL YEAR 2022–23**

CAMPUS	STUDENT-TO-TEACHER RATIO
C.G. Sivells Elementary School	19.9
Wharton Elementary School	19.6
Wharton Junior High School	10.5
Wharton High School	12.2

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

Figure 2–17 shows the spending index assigned to each Wharton ISD campus in the 2018, 2019, and 2020 Smart School results, as well as the average spending index of these three years. Both of the district’s elementary schools received

**FIGURE 2–16
WHARTON ISD PER-STUDENT BUDGET ALLOCATIONS BY CAMPUS
FISCAL YEAR 2024**

CAMPUS	TOTAL OPERATING EXPENDITURE BUDGET	INSTRUCTIONAL EXPENDITURES BUDGET (1)	SPECIAL EDUCATION EXPENDITURES BUDGET (2)
C.G. Sivells Elementary School	\$5,487	\$3,683	\$307
Wharton Elementary School	\$6,115	\$4,468	\$700
Wharton Junior High School	\$7,988	\$5,811	\$1,373
Wharton High School	\$8,644	\$6,035	\$2,383

NOTES:

- (1) Instructional expenditures include those budgeted under function code 11, Instruction. Function codes are a component of the accounting code structure that all districts must use to record revenues and expenditures.
- (2) Special education expenditures include those budgeted under program intent code 23, Services to Students with Disabilities. Program intent codes are a component of the accounting code structure that all districts must use to record revenues and expenditures.
- (3) Total enrolled membership from the October 2023 Snapshot Report is used to calculate per-student allotments.

SOURCE: Texas Education Agency, Public Education Information Management System, Individual Campus Financial Budget Reports, fiscal year 2024.

FIGURE 2–17
WHARTON ISD CAMPUS SPENDING INDEX ASSIGNMENTS
2018 TO 2020 SMART SCHOOL RESULTS (1)

CAMPUS	2018	2019	2020	AVERAGE SPENDING INDEX
C.G. Sivells Elementary School	5.0 Very Low Spending	5.0 Very Low Spending	4.0 Low Spending	4.7 Very Low Spending
Wharton Elementary School	5.0 Very Low Spending	5.0 Very Low Spending	5.0 Very Low Spending	5.0 Very Low Spending
Wharton Junior High School	3.0 Average Spending	2.0 High Spending	2.0 High Spending	2.3 High Spending
Wharton High School	5.0 Very Low Spending	3.0 Average Spending	5.0 Very Low Spending	4.3 Low Spending

NOTE: Texas Smart Schools releases scores based on data averaged over three years. For example, the 2020 Smart School results are based on data from school years 2016–17, 2017–18, and 2018–19. The most recent Texas Smart Schools results were released in May 2020.
 SOURCE: Texas Smart Schools Initiative, 2018–2020 Smart Scores.

an average spending index rating of Very Low, while Wharton Junior High School’s average spending index was rated High. The most recent Smart School results, from May 2020, do not represent current expenditures. However, the scores validate the spending disparities shown in **Figure 2–16** and indicate that they historically have been an issue for the district.

In addition to distributing staff and resources inequitably among campuses, Wharton ISD allocates staff and funding inefficiently between instructional and administrative costs. The Texas Education Code, Section 44.0071, requires school districts to report to the Commissioner of Education the percentage of the district’s expenditures used to fund direct instructional and administrative activities. The Commissioner establishes maximum threshold ratios for school districts’ administrative expenditures, as outlined in the Texas Administrative Code, Title 19, Part 2, Chapter 109, Subchapter AA, Section 109.1001, and the School Financial Integrity Rating System of Texas (FIRST). School FIRST establishes accountability for financial management practices in Texas public schools and encourages districts to maximize allocations for direct instructional purposes.

TEA outlines instructional and administrative costs in its Financial Accountability System Resource Guide. Direct instructional costs include those related to teaching, educational resources, professional or curriculum development, and counseling services. Administrative costs include those associated with general administration, such as human resources and certain activities of the superintendent and board of trustees, and instructional leaders, such as assistant superintendents.

Figure 2–18 shows superintendent staffing levels for Wharton ISD and its peer districts, each district’s fiscal year

2023 administrative cost ratio, and its corresponding administrative ratio score in the School FIRST rating system. Wharton ISD employs twice the number of staff in superintendent-level positions as its peer districts. In addition, Wharton ISD’s administrative cost ratio is nearly double that of the next-highest district, and its School FIRST administrative cost ratio score is the lowest among all peer districts.

Figure 2–19 shows Wharton ISD’s annual administrative cost ratios and corresponding School FIRST indicator scores from school years 2019–20 to 2023–24. The school years 2019–20 to 2021–22 ratios and scores are from Final School FIRST reports, 2022–23 ratios and scores are from Preliminary School FIRST reports, and 2023–24 ratios and scores are projections based on budget data provided by the district. Wharton ISD’s school year 2022–23 School FIRST rating, the most recent available as of March 2024, represents school year 2021–22 expenditures and includes an administrative cost ratio score of 0 out of 10. An analysis of expenditure and budget data from the district for fiscal years 2023 and 2024 indicates that Wharton ISD will likely maintain an administrative cost ratio score of zero in 2023–24 and 2024–25. Despite Wharton ISD’s school year 2022–23 School FIRST administrative cost ratio score, Wharton ISD did not take significant action to increase allocation for direct instructional purposes. The district’s excessive administrative spending decreases the amount available to fund instruction at all campuses.

To put Wharton ISD’s administrative cost ratio into perspective, six out of 1,018 districts in Texas received 0 points for this School FIRST indicator. **Figure 2–20** shows the number of school districts in Texas that received each

**FIGURE 2–18
WHARTON ISD SUPERINTENDENT STAFFING, ADMINISTRATIVE COST RATIO, AND ADMINISTRATIVE COST RATIO SCORE COMPARED TO PEER DISTRICTS**

DISTRICT	SUPERINTENDENT COUNT (2)	DEPUTY SUPERINTENDENT COUNT (2)	ASSISTANT SUPERINTENDENT COUNT (2)	TOTAL SUPERINTENDENT STAFF (2)	ADMINISTRATIVE COST RATIO (1)	ADMINISTRATIVE COST RATIO SCORE (1)
Wharton ISD	1.0 position	1.0 position	2.0 positions	4.0 positions	0.2422	0
Atlanta ISD	1.0 position	none	1.0 position	2.0 positions	0.1015	10
Bay City ISD	1.0 position	none	1.0 position	2.0 positions	0.0916	10
El Campo ISD	1.0 position	none	1.0 position	2.0 positions	0.0815	10
Shepherd ISD	1.0 position	none	1.0 position	2.0 positions	0.1216	8

NOTES:

(1) The administrative cost ratio is measured in Indicator 13 on the state’s school financial accountability rating system. Ratios greater than an established threshold indicate that districts are considered top-heavy, according to Texas Education Agency guidance regarding district administrative and instructional budget practices. Fiscal year 2023 ratings are based on data from school year 2021–22.

(2) Staffing counts are based on district websites, as of March 2024.

SOURCES: Texas Education Agency, School Financial Integrity Rating System of Texas, school year 2022–23; staff information is from district websites, as of March 2024.

**FIGURE 2–19
WHARTON ISD ADMINISTRATIVE COST RATIO BY YEAR
SCHOOL YEARS 2019–20 TO 2023–24**

YEAR	ADMINISTRATIVE COST RATIO	SCHOOL FIRST INDICATOR SCORE	SCHOOL FIRST INDICATOR SOURCE
2019–20	0.1409	6	Final 2020–21 (1)
2020–21	0.1325	8	Final 2021–22 (1)
2021–22	0.2422	0	Final 2022–23 (1)
2022–23	0.2183	0	Projected 2023–24 (2)
2023–24	0.2354	0	Projected 2024–25 (2)

NOTES:

(1) Final School FIRST Ratings are based on expenditure data submitted to the Texas Education Agency.

(2) Projected values are based on budgeted data provided by the district.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, School Financial Integrity Rating System of Texas, school years 2020–21, 2021–22, and 2022–23; Wharton ISD, March 2024.

possible score for their administrative cost ratio from the 2022–23 School FIRST ratings.

Wharton ISD also does not provide equitable support to the elementary campuses. Services provided to support students and teachers at each campus simultaneously can reflect the district’s financial and staffing investment in those campuses and can reinforce inequalities among campuses.

For instance, the district provides special education support inequitably, disproportionately affecting elementary students. The Special Education Department rejects most evaluation referrals from C.G. Sivells Elementary School, and students at Wharton Elementary School are more likely to be evaluated for special education services. This disparity harms both campuses. C.G. Sivells Elementary School must

**FIGURE 2–20
ADMINISTRATIVE COST RATIO RESULTS FOR ALL TEXAS SCHOOL DISTRICTS
SCHOOL YEAR 2022–23 INDICATOR SCORES**

INDICATOR SCORE	NUMBER OF SCHOOL DISTRICTS
10	820
8	133
6	44
4	13
2	2
0	6
Total	1,018

NOTE: School Financial Integrity Rating System of Texas (FIRST) Administrative Cost Ratio Indicator scores for school year 2022–23 are based on financial data from school year 2021–22.

SOURCE: Texas Education Agency, School Financial Integrity Rating System of Texas, school year 2022–23.

serve students whose needs have not been properly evaluated and identified, and who will later transition to Wharton Elementary School, where their staff must address both delayed and new referrals for evaluation. Wharton Elementary School students who initially were delayed or denied services must receive compensatory services, which are required interventions to help a student regain progress or skills lost due to a school district’s failure to provide a free appropriate public education. Wharton Elementary School is responsible for delivering this level of support despite receiving the second-lowest special education budget and staffing levels in the district.

Figure 2–21 shows the special education population at each Wharton ISD campus in school year 2022–23. Wharton Elementary School serves the greatest percentage of special education students. However, as shown in **Figure 2–16**, Wharton Elementary School receives less special education funding per student than the junior high school or high school. Adequate financial resources and staffing are essential and legally mandated for special education. Insufficient funding can undermine student learning and compel staff to compensate for the lack of resources and services, further straining their ability to meet the needs of all students.

Additionally, elementary staff reported disparate access to disciplinary services such as in-school suspension and the disciplinary alternative education program for eligible students. Access to effective disciplinary services and systems is important to a campus’s ability to maintain a safe, orderly environment conducive to student learning. Student disciplinary issues, including access and placements, are discussed in more detail in **Chapter 8. Safety and Security**.

When the district invests resources, staffing, and support into a campus, it can benefit students by improving their learning outcomes. However, when the district does not invest adequately in a campus, student behavior and learning may suffer, which may initiate a feedback loop of escalating dysfunction.

Wharton ISD should adopt staffing and budgeting practices that promote the equitable support of students at all campuses.

The Wharton ISD superintendent should audit the district’s staffing and resource allocation practices with the support of the deputy superintendent, the elementary and secondary superintendents of curriculum and instruction, and the director of human resources. The audit should identify the following components:

**FIGURE 2–21
WHARTON ISD SPECIAL EDUCATION POPULATION BY
CAMPUS, SCHOOL YEAR 2022–23**

CAMPUS	PERCENTAGE OF STUDENTS RECEIVING SPECIAL EDUCATION SERVICES
C.G. Sivells Elementary School	10.7%
Wharton Elementary School	16.0%
Wharton Junior High School	13.3%
Wharton High School	12.8%

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

- procedures for allocating staff (e.g., adding, reallocating, consolidating positions);
- procedures for budget development specific to instruction (function code 11, as outlined in TEA’s Financial Accountability System Resource Guide (FASRG)), special education (program intent code 23, as outlined in FASRG), and each campus (organizational codes, as outlined in FASRG);
- any weaknesses in these procedures (e.g., lack of planning, lack of connection between budget and goals, lack of stakeholder engagement, lack of data or evidenced-based staffing or budgeting strategies); and
- recommendations to correct identified weaknesses.

As part of the audit process, district leadership should encourage leaders at C.G. Sivells Elementary School and Wharton Elementary School to provide input regarding existing practices and recommend changes.

District leadership should collaborate with legal counsel to identify statutory requirements and accountability indicators that Wharton ISD must prioritize during budget development. The district also should seek assistance identifying best practices by consulting with outside entities, such as TEA, regional education service centers (ESC), and educational organizations. Several educational organizations and associations in Texas support school administrators, school boards, and school business and operations professionals by providing resources, training, and leadership in school district budget development and human resources operations.

The superintendent, in coordination with the deputy superintendent, the elementary and secondary assistant superintendents of curriculum and instruction, and the human resources director, should develop revised staffing

and budgeting processes by implementing the corrective actions developed during this process. These actions should include, but not be limited to, increasing campus and stakeholder engagement during budget development and implementing staffing allocation models. Robust stakeholder engagement improves budget development by assisting the district to incorporate diverse needs and goals into the planning process. The adoption and use of staffing allocation models support an equitable and appropriate distribution of staff across the district. Formulas should adhere to statutory or evidence-based guidelines.

After the district identifies and implements staffing formulas, campus and district leadership should review the formulas' recommendations to confirm that they meet specific needs and applicable statutory requirements.

If the district requires assistance with this recommendation, the superintendent may contact the Division of School Governance at TEA to discuss the appointment of a monitor. The Commissioner of Education appoints agency monitors to participate in district activities and provide recommendations to the board of trustees and the superintendent. The district should be aware that the costs associated with an appointed monitor are the responsibility of the school district, billed at a rate of \$125 per hour, plus travel expenses.

This recommendation could be implemented with existing resources. No fiscal impact is assumed for the appointment of a monitor, as the district should first determine whether additional assistance is necessary.

ADDITIONAL OBSERVATIONS

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

LIBRARY STAFFING

Wharton ISD's campus library staffing practices do not align with public school library standards.

The Texas State Library and Archives Commission (TSLAC) adopts standards, in consultation with the SBOE, for elementary, middle, and high school libraries. TSLAC's *School Library Programs: Standards and Guidelines for Texas*, 2018, provides a framework for self-assessment and strategic planning that a school district

may consider when developing, implementing, or expanding its library services. TSLAC's *Standards and Guidelines*, outlined in the Texas Administrative Code, Title 13, Part 1, Chapter 4, Subchapter A, Section 4.1, are voluntary standards and are distinct from the mandatory School Library Program: Collection Development Standards outlined in Section 4.2, developed pursuant to House Bill 900, Eighty-eighth Legislature, Regular Session, 2023, known as the Restricting Explicit and Adult-designated Educational Resources Act.

TSLAC's *Standards and Guidelines* define six components of an effective school library program and provide performance metrics for each component. Each district evaluates its school library program's component against the objective performance metrics to categorize it as Distinguished, Accomplished, Proficient, Developing, or Improvement Needed.

According to TSLAC's *Standards and Guidelines*, all campuses, regardless of total enrollment, must employ either 1.0 certified librarian or 0.5 (i.e., a part-time or shared) certified librarian position to meet any standard higher than Improvement Needed. **Figure 2–22** shows TSLAC standards for staffing.

Currently, Wharton ISD does not employ a certified librarian at any campus. A paraprofessional library staff member manages the library, along with other campus duties. Due to the ongoing renovation of Wharton Junior High School, junior high school students currently share a library with Wharton High School students. Consequently, the high school librarian paraprofessional provides library services to all secondary students. All campus libraries at Wharton ISD rank as Improvement Needed for staffing standards based on the lack of certified librarians. **Figure 2–23** shows the Wharton ISD libraries, their average daily attendance, current staffing levels, and staffing levels needed to achieve TSLAC's Proficient and Distinguished standards.

The district employed certified librarians as recently as school year 2020–21, which indicates that employing certified librarians is feasible for Wharton ISD. Until the district resumes employing certified librarians, Wharton ISD should consider contracting with an ESC for librarian support. Additionally, the district should minimize or eliminate library paraprofessionals' duties outside the library until the district hires or contracts with certified librarians to support the paraprofessionals.

FIGURE 2–22
TEXAS STATE LIBRARY AND ARCHIVES COMMISSION'S PUBLIC SCHOOL LIBRARY STAFFING STANDARDS, 2018

ELEMENTARY STANDARDS					
AVERAGE DAILY ATTENDANCE	DISTINGUISHED (MINIMUM)	ACCOMPLISHED (MINIMUM)	PROFICIENT (MINIMUM)	DEVELOPING (MINIMUM)	IMPROVEMENT NEEDED
250–500	1.0 certified librarian position; 1.0 staff position	1.0 certified librarian position; 0.5 staff position	0.5 certified librarian position; 0.5 staff position	0.5 certified librarian position; 0.5 staff position	no certified librarian; no staff
501–1,000	1.0 certified librarian position; 1.5 staff positions	1.0 certified librarian position; 1.25 staff positions	1.0 certified librarian position; 1.0 staff position	1.0 certified librarian position; 0.5 staff position	0.5 certified librarian position; 0.5 staff position
Greater than 1,000	2.0 certified librarian positions; 2.0 staff positions	1.5 certified librarian positions; 2.0 staff positions	1.25 certified librarian positions; 1.0 staff positions	1.0 certified librarian position; 1.0 staff position	0.5 certified librarian position; 0.5 staff position
SECONDARY STANDARDS					
AVERAGE DAILY ATTENDANCE	DISTINGUISHED (MINIMUM)	ACCOMPLISHED (MINIMUM)	PROFICIENT (MINIMUM)	DEVELOPING (MINIMUM)	IMPROVEMENT NEEDED
250–750	1.0 certified librarian position; 1.5 staff positions	1.0 certified librarian position; 1.25 staff positions	1.0 certified librarian position; 1.0 staff position	0.5 certified librarian position; 0.5 staff position	no certified librarian; 1.0 staff position
751–1,200	1.0 certified librarian position; 2.0 staff positions	1.0 certified librarian position; 1.75 staff positions	1.0 certified librarian position; 1.5 staff positions	1.0 certified librarian position; 1.0 staff position	0.5 certified librarian position; 0.5 staff position
1,201–2,000	2.0 certified librarian positions; 2.0 staff positions	2.0 certified librarian positions; 2.0 staff positions	2.0 certified librarian positions; 2.0 staff positions	1.5 certified librarian position; 2.0 staff positions	1.0 certified librarian position; 1.0 staff position
Greater than 2,000	2.0 certified librarian positions; 3.0 staff positions	2.0 certified librarian positions; 2.5 staff positions	2.0 certified librarian positions; 2.0 staff positions	2.0 certified librarian positions; 2.0 staff positions	1.0 certified librarian position; 1.0 staff position

SOURCE: Texas State Library and Archives Commission, *School Library Programs: Standards and Guidelines for Texas*, 2018.

FIGURE 2–23
WHARTON ISD'S CAMPUS LIBRARY STAFFING COMPARED TO STATE LIBRARY STAFFING STANDARDS
SCHOOL YEAR 2022–23

CAMPUS	AVERAGE DAILY ATTENDANCE (1)	CURRENT STAFFING (NEEDS IMPROVEMENT)	PROFICIENT STAFFING	DISTINGUISHED STAFFING
C.G. Sivells Elementary School	408	no certified librarian; 1.0 staff position	0.5 certified librarian position; 0.5 staff position	1.0 certified librarian position; 1.0 staff position
Wharton Elementary School	452	no certified librarian; 1.0 staff position	0.5 certified librarian position; 0.5 staff position	1.0 certified librarian position; 1.0 staff position
Wharton Junior High and High School (2)	892	no certified librarian; 1.0 staff position	1.0 certified librarian position; 1.5 staff positions	1.0 certified librarian position; 2.0 staff positions

NOTES:

- (1) Average daily attendance (ADA) was estimated by multiplying the total number of students reported in the Texas Academic Performance Report for school year 2022–23 by 95.0 percent. Texas State Library and Archives Commission standards for staffing are based on ADA and campus type.
- (2) Due to ongoing construction, Wharton Junior High School students currently share a library with Wharton High School students.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Texas Academic Performance Report, 2022–23; Texas State Library and Archives Commission, *School Library Programs: Standards and Guidelines for Texas*, 2018; Wharton ISD, March 2024.

READING STANDARDS

Wharton ISD adopted a phonics curriculum that does not comply with Texas statute and rules.

The Texas Education Code, Section 28.0062, requires districts to provide a phonics curriculum that uses systemic and direct instruction in kindergarten through grade three to ensure all students obtain necessary early literacy skills. To meet this requirement, the Texas Administrative Code, Title 19, Part 2, Chapter 74, Subchapter CC, Section 74.2001(b) stipulates that a district's language arts phonics curriculum must:

- align with current and confirmed research in reading and cognitive science; and
- provide concise, direct, explicit, and systematic phonics instruction.

A district's phonics curriculum may not:

- teach word recognition through visual memory, guessing, the shape of a word, or the use of pictures or context clues to decode words instead of explicitly teaching words that cannot be sounded out and that do not follow the rules of phonics; or
- be used solely for intervention purposes rather than for core instruction implementation.

TEA reviewed some of the most used phonics programs for compliance with required criteria in law and rule and posted the *List of Compliant Phonics Programs* online in March 2023.

Wharton ISD's reading language arts program is Houghton Mifflin Harcourt's (HMH) Into Reading Texas, which is included in TEA's list of compliant phonics programs. However, the district uses McGraw-Hill's Open Court Reading program to teach phonics. TEA reviewed but did not approve this program.

Wharton ISD has several options to achieve compliance with these requirements. One option is for the district to implement the HMH Into Reading phonics curriculum. Alternatively, the district can consult with TEA or collaborate with a regional ESC to evaluate McGraw-Hill's Open Court Reading phonics program for areas of noncompliance using TEA's Phonics Rubric. A district may use a noncompliant product if it updates the materials to address the issues identified, as outlined in TEA's *List of Compliant Phonics Programs Frequently Asked Questions* document. In addition, the ESC may assist the district in identifying and adopting

an alternative, approved phonics curriculum that aligns with Wharton ISD's instructional preferences and values. However, adopting an additional phonics curriculum may present a cost to the district.

FISCAL IMPACT

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

The Legislative Budget Board's School Performance Review Team did not identify a fiscal impact for the findings in this chapter. Any savings or costs will depend on how the district chooses to address these findings.

3. BUSINESS SERVICES

FINDINGS

- ◆ Wharton ISD has high administrative costs relative to comparable districts and state standards.
- ◆ Wharton ISD's general fund balance is decreasing, and the district has not established formal goals for maintaining minimum fund-balance levels.
- ◆ Wharton ISD's budget development and monitoring processes are informal and inconsistent.

RECOMMENDATIONS

- ◆ **Recommendation 7: Evaluate administrative staffing levels and identify opportunities for consolidation or restructuring.**
- ◆ **Recommendation 8: Establish a board policy to identify the fund balance level the district will maintain in the general fund.**
- ◆ **Recommendation 9: Develop written budget procedures and provide training to guide staff in budget development and monitoring.**

BACKGROUND

An independent school district's business services function administers the district's resources and directs risk management and purchasing operations.

Resource administration includes budget preparation, accounting and payroll, financial reporting, auditing, strategic planning, and ensuring compliance with related state and federal laws and regulations. The Financial Accountability System Resource Guide (FASRG) is a comprehensive manual that outlines the financial accounting and reporting requirements for Texas school districts. The FASRG is adopted into the Texas Administrative Code, Title 19, Part 2, Chapter 109, Subchapter C, Section 109.41, and available on the Texas Education Agency (TEA) website.

Asset and risk management includes managing investments, capital assets, and insurance coverages. The goal of sound investment management is to maximize returns while ensuring the safety and liquidity of district funds to meet fluctuating cash-flow demands in accordance with the Texas Government Code, Chapter 2256. Capital asset management

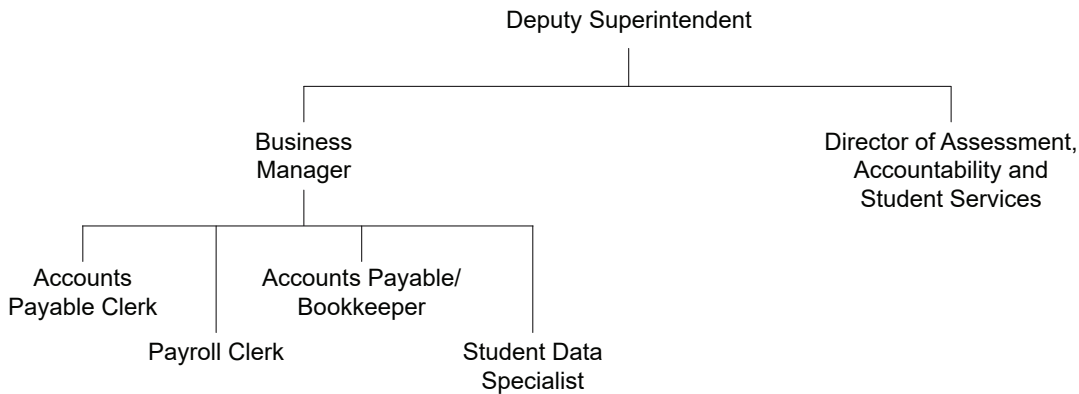
involves identifying a district's property (e.g., buildings, vehicles, equipment) and protecting it from theft and obsolescence. Effective asset and risk management also includes protecting the district from financial loss with cost-effective insurance premiums.

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

During school year 2022–23, Wharton Independent School District (ISD) operated four campuses and had an enrollment of 1,844 students. Wharton ISD's Business Department manages the district's budget, accounts receivable and payable, and purchasing activities. **Figure 3–1** shows the organization of Wharton ISD's Business Department. The business manager reports to the deputy superintendent and oversees the district's accounts payable, purchasing, payroll, accounting, and Public Education Information Management System (PEIMS) reporting functions. The accounts payable clerk and the accounts payable/bookkeeper process requisitions, purchase orders, and vendor payments. The payroll clerk processes employee compensation for the district. The student data specialist oversees the work of the campus secretaries, attendance clerks, and registrars who enter student data into PEIMS. During school year 2023–24, Wharton ISD contracted with regional Education Service Center XII (Region 12) for business office support services, including accounting, audit preparation, and payroll services. The director of assessment, accountability and student services reports to the deputy superintendent and oversees compliance and program management for the district's federal and state grants.

Wharton ISD operates on a fiscal year beginning July 1 and ending June 30. **Figure 3–2** shows Wharton ISD's actual financial data from fiscal years 2020 to 2023 and budgeted

**FIGURE 3–1
WHARTON ISD’S BUSINESS DEPARTMENT ORGANIZATION, SCHOOL YEAR 2023–24**



SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

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

CATEGORY	2020	2021	2022	2023	2024
Revenue					
Local Tax	\$13,654,262	\$12,951,527	\$12,316,785	\$12,866,004	\$13,522,709
Other Local and Intermediate	\$502,548	\$626,677	\$635,022	\$2,523,534	\$985,908
State	\$5,508,696	\$3,979,516	\$4,762,542	\$4,770,259	\$3,802,093
Federal	\$334,324	\$151,380	\$792,598	\$1,008,267	\$489,290
Total Revenue	\$19,999,830	\$17,709,100	\$18,506,947	\$21,168,064	\$18,800,000
Operating Expenditures (2)					
11 Instruction	\$9,781,459	\$9,521,962	\$7,732,343	\$10,218,429	\$9,186,123
12 Instructional Resources and Media	\$645,648	\$565,722	\$80,085	\$77,966	\$57,033
13 Curriculum and Staff Development	\$234,213	\$231,122	\$54,483	\$24,731	\$18,154
21 Instructional Leadership	\$114,078	\$102,918	\$493,186	\$835,447	\$777,200
23 School Leadership	\$1,316,203	\$1,284,838	\$1,442,658	\$1,402,607	\$1,617,630
31 Guidance Counseling Services	\$447,409	\$384,182	\$371,597	\$(46,117)	\$325,122
32 Social Work Services	\$677	\$27,174	\$16,755	\$60,057	\$56,339
33 Health Services	\$207,223	\$189,905	\$102,885	\$250,231	\$287,634
34 Transportation	\$905,976	\$835,697	\$935,045	\$1,086,391	\$1,052,951
35 Food Service Operation (3)	\$0	\$0	\$0	\$0	\$0
36 Extracurricular	\$729,278	\$630,036	\$844,911	\$885,069	\$728,596
41 General Administration	\$1,428,846	\$1,356,800	\$1,777,261	\$1,679,167	\$1,427,667
51 Facilities Maintenance and Operations	\$3,200,366	\$2,221,360	\$3,538,569	\$3,789,667	\$3,146,032
52 Security and Monitoring	\$209,687	\$210,876	\$212,258	\$309,941	\$295,025
53 Data Processing Services	\$119,806	\$113,793	\$413,686	\$678,668	\$628,169
61 Community Services	\$0	\$0	\$0	\$0	\$0
Total Operating Expenditures	\$19,340,869	\$17,676,385	\$18,015,722	\$21,252,254	\$19,603,675

NOTES:

- (1) Data for fiscal years 2020 to 2023 are reported as actual data. Data for fiscal year 2024 is budgeted data.
- (2) Operating expenditures include accounting codes the Texas Education Agency requires districts to use when recording expenditures.
- (3) Wharton ISD participates in the National School Lunch Program and the School Breakfast Program. The district accounts for revenues and expenditures for these programs separately from the general fund in a special revenue fund.

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2019–20 to 2023–24.

FIGURE 3–3
WHARTON ISD'S TAX RATE COMPARED TO PEER DISTRICTS, SCHOOL YEARS 2019–20 TO 2023–24

DISTRICT	2019–20	2020–21	2021–22	2022–23	2023–24
Wharton ISD	\$1.2972	\$1.2864	\$1.3134	\$1.2751	\$1.0844
Atlanta ISD	\$1.1683	\$1.1547	\$1.1079	\$1.1079	\$0.9178
Bay City ISD	\$1.5372	\$1.4314	\$1.3912	\$1.2600	\$1.0445
El Campo ISD	\$1.1264	\$1.1264	\$1.0765	\$1.0527	\$1.0527
Shepherd ISD	\$1.2933	\$1.2727	\$1.1730	\$1.1556	\$1.0010

NOTE: Tax rates are calculated per \$100.00 in property valuation.

SOURCES: Texas Education Agency, school district adopted maintenance and operations and interest and sinking tax rates, school years 2018–19 to 2022–23; school district websites for school year 2023–24; San Jacinto County Appraisal District website for Shepherd ISD data.

FIGURE 3–4
FINANCIAL RATINGS FOR WHARTON ISD AND PEER DISTRICTS, FISCAL YEARS 2020 TO 2022

DISTRICT	FIRST RATING	SMART SCORE	ACADEMIC PROGRESS RATING	SPENDING INDEX
Wharton ISD	B/Above Standard	1.5	Very low	High
Atlanta ISD	A/Superior	2.0	Average	Very high
Bay City ISD	A/Superior	2.5	Low	Average
El Campo ISD	A/Superior	3.0	Low	Low
Shepherd ISD	A/Superior	2.0	Very low	Average

NOTES:

- (1) The most recent Financial Integrity Rating System of Texas (FIRST) scores, released in school year 2022–23, represent data from school year 2021–22.
- (2) Texas Smart Schools releases scores based on data averaged over three years. For example, 2020 Smart School results are based on data from school years 2016–17, 2017–18, and 2018–19. The most recent Texas Smart Schools results were released in May 2020.

SOURCE: Texas Smart Schools Initiative, 2018–2020 Smart Scores.

financial data for fiscal year 2024 for the general fund. The largest expenditure category for each of these years was instruction, which accounted for 46.9 percent of the total operating expenditures in fiscal year 2024, followed by facilities maintenance and operations, which accounted for 16.0 percent of total operating expenditures that year. During fiscal year 2023, the district's instruction expenditures increased by 32.2 percent from the previous year due to additional federal funding through the Elementary and Secondary School Emergency Relief Fund, a federal program administered by the U.S. Department of Education in response to the COVID-19 pandemic. For fiscal year 2024, Wharton ISD adopted a deficit budget that included \$19,603,675 in expenditures and \$18,800,000 in revenues.

Figure 3–3 shows Wharton ISD's tax rate compared to peer districts from school years 2019–20 to 2023–24. Peer districts are districts similar in size and other characteristics to Wharton ISD that are used for comparison purposes. The Legislative Budget Board's School Performance Review Team selected four peer school districts for Wharton ISD: Atlanta ISD, Bay City ISD, El Campo ISD, and Shepherd ISD. The tax rate, set by the local district pursuant to Texas statute, contributes to local revenue. Wharton ISD reported a higher tax rate than all but one of its four peer districts from school

years 2019–20 to 2021–22. In school years 2022–23 and 2023–24, Wharton ISD had the highest tax rate compared to peer districts.

School districts in Texas receive two financial ratings, the School Financial Integrity Rating System of Texas (FIRST) and Smart Score. School FIRST, the state's school financial accountability rating system, evaluates districts' financial management practices to provide accountability, transparency, and continuous improvement. The system aims to encourage school districts to optimize their financial resources to provide the maximum allocation possible for direct instructional purposes. The Smart Score rating measures academic progress and spending at Texas' school districts and campuses. This rating, which ranges from one star (very low) to five stars (very high), indicates a district's success in combining cost-effective spending with measurable student academic progress. The district and campus Smart Score calculations use three-year averages to provide more stable and consistent measures that show less year-to-year volatility. The most recent Smart Score rating results, released in May 2020, use data from school years 2016–17 to 2018–19.

Figure 3–4 shows Wharton ISD's School FIRST and Smart Score ratings compared to peer districts. Wharton ISD

**FIGURE 3–5
WHARTON ISD’S ADMINISTRATIVE COSTS COMPARED TO PEERS, FISCAL YEAR 2024**

DISTRICT	ENROLLMENT	TOTAL BUDGET	ADMINISTRATIVE COSTS	INSTRUCTIONAL COSTS	ADMINISTRATIVE COSTS AS A PERCENTAGE OF TOTAL BUDGET	INSTRUCTIONAL COSTS AS A PERCENTAGE OF TOTAL BUDGET
Wharton ISD	1,823	\$25,549,980	\$2,204,868	\$9,586,425	8.6%	37.5%
Atlanta ISD	1,926	\$22,219,729	\$1,254,082	\$10,668,696	5.6%	48.0%
Bay City ISD	3,514	\$39,922,516	\$2,026,181	\$21,030,973	5.1%	52.7%
El Campo ISD	3,326	\$38,139,064	\$1,987,747	\$24,087,960	5.2%	63.2%
Shepherd ISD	1,958	\$22,851,450	\$1,732,837	\$12,810,755	56.1%	7.6%

SOURCES: Wharton ISD Fiscal Year 2024 Adopted Budget; Atlanta ISD Fiscal year 2024 Adopted Budget; Bay City ISD Fiscal year 2024 Adopted Budget; El Campo ISD Fiscal Year 2024 Adopted Budget; Shepherd ISD Fiscal Year 2024 Adopted Budget; Texas Education Agency.

**FIGURE 3–6
SCHOOL FIRST ADMINISTRATIVE COST RATIO INDICATOR SCORE GUIDE, FISCAL YEAR 2023**

AVERAGE DAILY ATTENDANCE	10.0	8.0	6.0	4.0	2.0	0.0
1,000 to 4,999	≤0.1151	>0.1151 to ≤0.1401	>0.1401 to ≤0.1651	>0.1651 to ≤0.1901	>0.1901 to ≤0.2151	>0.2151

SOURCE: Texas Education Agency, School Financial Integrity Rating System of Texas, school year 2022–23.

scored a School FIRST rating of B/Above Standard, which was lower than the A/Superior rating earned by all four of its peer districts in school year 2022–23. Wharton ISD’s 2020 Smart Score rating of 1.5 is the lowest among the four peer districts and its spending rating was higher than three peer districts.

Wharton ISD’s external auditor found no instances of noncompliance or other material weaknesses in the district’s financial management during the last three years’ financial audits.

DETAILED FINDINGS

ADMINISTRATIVE COSTS (REC. 7)

Wharton ISD has high administrative costs relative to comparable districts and state standards.

A school district’s administrative costs include operating expenses related to its management, planning, directing, and evaluation functions. These costs include expenditures for superintendents, finance staff, human resources staff, instructional supervisors, special population coordinators, assistant superintendents for instruction, and other district administrative office staff. Instructional costs include expenditures associated with teachers, aides, substitutes, librarian staff and media services, counseling services, curriculum development, and instructional staff development.

Figure 3–5 shows Wharton ISD administrative and instructional costs compared to peer districts. Among the peer districts, Wharton ISD has the highest administrative costs, both in total costs and as a percentage of its total budget in fiscal year 2024. Additionally, Wharton ISD spent the least amount of its budget on instructional costs compared to peer districts. Notably, Wharton ISD spends more on administrative costs than Bay City ISD, a district with 1,691 more students.

Wharton ISD’s high administrative costs also are evident in its School FIRST scores. To guide districts in using their resources efficiently to support teaching and learning, TEA sets benchmarks for the ratio of a district’s administrative expenditures to its instructional expenditures in the School FIRST rating system. A school district’s administrative cost ratio is calculated by dividing administrative costs by instructional costs. TEA establishes maximum threshold ratios for administrative costs for districts based on average daily attendance (ADA) and other district characteristics. Districts whose administrative cost ratios exceed the maximum ratio receive a score of 0.0 points; districts whose ratios are less than the threshold receive a score from 2.0 to 10.0 points. Figure 3–6 shows the points awarded for ranges of administrative cost ratios for districts with an ADA ranging from 1,000 to 4,999 students.

For fiscal year 2023, Wharton ISD’s administrative cost ratio was 0.2183, exceeding the maximum threshold of 0.2151 for

districts with an ADA of 1,000 to 4,999. Wharton ISD was the only district among the four peer districts that received 0.0 points on this indicator in School FIRST; scores for the four peer districts ranged from 8.0 points to 10.0 points.

An analysis of the district’s leadership staffing shows that Wharton ISD could lower administrative costs by streamlining administrative processes. **Figure 3–7** shows Wharton ISD enrollment and district administration positions compared to peer districts.

Figure 3–7 shows that Wharton ISD has the lowest enrollment, but the highest number of district administrative staff compared to peer districts. Wharton ISD employed 10.0 district office staff positions; the peer districts average 4.3 staff positions. Wharton ISD’s administration has four superintendent positions, which include the superintendent, deputy superintendent, and two assistant superintendents. This staffing level is greater than all the peer districts, most of which employ one superintendent and one assistant superintendent.

The data in **Figure 3–7** shows district administrative leadership positions reported in the Wharton ISD school year 2022–23 Texas Academic Performance Report. Nonleadership staff salaries are included in the administrative expenditures used to calculate the administrative cost ratio. The review team observed that Wharton ISD also appears to employ more business department staff and more human resources staff than peer districts.

Excessive administrative spending can lead to inequalities in resource distribution within a school district. The portion of the budget allocated to administrative salaries and overhead does not directly support classrooms, teachers, and programs that affect student achievement. An analysis of budget and staffing allocations by campus shows that the district’s elementary schools are under-resourced, and the district provides insufficient special education services due to staffing constraints. For more details, see **Chapter 2. Educational Service Delivery**.

Removing unnecessary positions or combining job functions can help lower staffing costs without sacrificing effectiveness. The Texas Association of School Boards recommends that districts evaluate staffing allocations in each department, analyze workloads, and identify positions with overlapping job duties that could be combined. Strategies to reduce staffing costs could include implementing an administrative hiring freeze, offering exit incentives, and absorbing positions through attrition.

**FIGURE 3–7
WHARTON ISD AND PEER DISTRICT ADMINISTRATIVE STAFFING
FISCAL YEAR 2023**

DISTRICT	ENROLLMENT	DISTRICT ADMINISTRATION POSITIONS (1)
Wharton ISD	1,844	10.0
Atlanta ISD	1,879	3.6
Bay City ISD	3,579	4.9
El Campo ISD	3,349	4.6
Shepherd ISD	1,958	4.0

NOTES:

- (1) The Texas Education Agency’s Texas Performance Reporting System defines district administrative staff as superintendents, presidents, chief executive officers, chief administrative officers, business managers, athletic directors, and other administrators reported with a district office identification and not a campus identification.
- (2) At the time of the review, fiscal year 2023 data was the most recent available data in the Texas Performance Reporting System.

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

Wharton ISD should evaluate administrative staffing levels and identify opportunities for consolidation or restructuring.

The superintendent and the human resources director should perform the following activities:

- conduct a comprehensive review of all district administrative positions and evaluate the necessity and effectiveness of each role in relation to the district’s goals and priorities;
- identify opportunities to consolidate roles and eliminate redundancies;
- consider implementing attrition and hiring freezes for nonessential administrative positions, and carefully evaluate whether a vacant position must be filled or if the responsibilities could be absorbed by existing staff;
- provide incentives for eligible administrative staff to retire early, particularly if staff are nearing retirement age;
- evaluate staffing ratios across departments and functions to maximize the efficient allocation of resources, and adjust staffing levels as needed to match workload demands and priorities;
- provide training and professional development opportunities for administrative staff to assume

additional responsibilities and fill gaps left by reduced staffing levels;

- communicate openly with staff, parents, and community stakeholders about the need to decrease administrative staffing and the rationale for specific decisions; and solicit their feedback to inform the thoughtful and transparent implementation of any changes; and
- continuously monitor the effects of staffing reductions on the effectiveness and efficiency of administrative operations, service delivery, and staff morale to identify opportunities for adjustment or additional support.

The fiscal impact assumes the district decreases its administrative cost ratio to 0.1151, the optimal level for school districts with an ADA ranging from 1,000 to 4,999. This cost decrease would result in an approximate savings of \$1,101,470 per year ($(\$2,204,868 \text{ fiscal year 2024 administrative costs} - (\$9,586,425 \text{ fiscal year 2024 instruction costs} \times 0.1151))$), which is a savings of \$5,507,350 across five years.

FUND BALANCE (REC. 8)

Wharton ISD's general fund balance is decreasing, and the district has not established formal goals for maintaining minimum fund-balance levels.

A school district's general fund is its primary account for financial transactions and the main funding source for daily operational expenditures, such as salaries and facilities maintenance. General fund revenue sources include local maintenance and operations taxes, state aid, and foundation entitlements.

The general fund balance is the measurement of the general fund's remaining resources at the end of the fiscal year, representing the difference between the district's overall assets and liabilities. This metric is an important indicator of the district's financial health. Maintaining reserves in the general fund provides a financial safeguard that provides funding to address unforeseen financial events or delays in the receipt of state and local revenue. For example, districts receive most of their property tax collections from December to February. Some districts use fund balance reserves to cover expenditures at the start of the school year until tax revenue is received.

The Governmental Accounting Standards Board, an independent organization that sets accounting and financial

reporting standards, established criteria for designating school district fund balances into the following five categories:

- nonspendable – amounts that are not in spendable form, such as inventory, or amounts that are required to be maintained intact, such as a permanent fund;
- restricted – amounts that can be spent only for specific purposes in accordance with constitutional provisions, enabling legislation, or external resource providers such as grantors or creditors;
- committed – amounts constrained to specific purposes by formal actions of the board of trustees;
- assigned – amounts the district intends to use for a specific purpose; and
- unassigned – amounts that are available for any purpose.

Statute does not dictate the size of a school district's fund balance; however, Texas Administrative Code, Title 19, Part 2, Chapter 109, Subchapter AA, Section 109.1001 identifies minimum fund balance levels in School FIRST. To achieve an A/Superior rating, School FIRST requires a district to have less than a 25.0 percent decrease in its combined assigned and unassigned fund balance during a three-year period or to maintain 75 days' operating expenditures in these fund balances. Additionally, the Government Finance Officers Association's (GFOA) 2015 publication, *Fund Balance Guidelines for the General Fund*, recommends that governments maintain an unrestricted general fund balance of at minimum two months of regular operating expenditures.

Figure 3–8 shows Wharton ISD's fund balances from school years 2018–19 to 2022–23. The district's ending fund balance for school year 2022–23 was \$8,186,056, with an unassigned fund balance of \$8,173,020.

Figure 3–8 shows that Wharton ISD's total assigned and unassigned fund balance has ranged from 4.6 months to 7.8 months of operating expenditures throughout this period, consistently meeting both GFOA and TEA guidelines. However, the district's fund balance has decreased each year from fiscal years 2019 to 2023, for a total five-year decrease of 28.7 percent. The greatest one-year decrease occurred from fiscal years 2022 to 2023, during which the district's fund balance decreased by 15.5 percent. District staff reported that this decrease could be attributed to using the assigned fund balance to pay for capital projects, including the construction of a gym and locker rooms and renovations to high school classrooms and science laboratories.

**FIGURE 3–8
WHARTON ISD’S FUND BALANCES, FISCAL YEARS 2019 TO 2023**

FUND BALANCES	2019	2020	2021	2022	2023
Nonspendable	\$15,246	\$0	\$76,636	\$56,592	\$13,036
Restricted	\$0	\$0	\$0	\$0	\$0
Committed	\$3,480,000	\$3,480,000	\$3,430,002	\$3,120,002	\$0
Assigned	\$750,000	\$750,000	\$750,000	\$750,000	\$0
Unassigned	\$10,711,942	\$10,322,926	\$9,465,749	\$8,927,416	\$8,173,020
Total Assigned and Unassigned	\$11,461,942	\$11,072,926	\$10,215,749	\$9,677,416	\$8,173,020
Total fund balances	\$14,957,188	\$14,552,926	\$13,722,387	\$12,854,010	\$8,186,056
Increase/(decrease) from previous year (assigned and unassigned)	\$3,473,258	(\$389,016)	(\$857,177)	(\$538,333)	(\$1,504,396)
Percentage change from previous year (assigned and unassigned)	30.2%	(3.4%)	(7.7%)	(5.3%)	(15.5%)
Total operating expenditures	\$17,730,248	\$19,340,869	\$17,676,385	\$18,015,722	\$21,340,837
Fund balance (assigned and unassigned) as a percentage of total operating expenditures	64.6%	57.3%	57.8%	53.7%	38.3%
Fund balance (assigned and unassigned) as months of total operating expenditures	7.8	6.9	6.9	6.4	4.6

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System Financial Data, school years 2018–19 to 2021–22; Wharton ISD Annual Financial Report, fiscal year 2023.

Wharton ISD does not have a policy establishing a minimum fund balance. Furthermore, staff report conflicting understandings of the district’s goals for its financial position. Some staff reported that the district’s informal fund balance goal is \$8.0 million, or a minimum of six months’ operating expenditures. However, the superintendent reported that the goal is to restore it to the fiscal year 2020 amount of \$14.5 million.

A district’s fund balance is an important indicator of its financial health, which influences school bond ratings and options districts may have in addressing unplanned costs. Without a formal fund balance policy to guide the district in short-term and long-term planning, reserves in the general fund could decrease to levels insufficient to protect against increases in normal operating costs. A fund balance policy helps safeguard district resources and can provide the following tools to promote financial health:

- a framework to evaluate budgetary decisions;
- a guide that can be helpful to taxpayers; and
- a plan structured to ensure cash flow for daily operations, unforeseen financial crises, budget shortfalls, or maintaining bond ratings.

GFOA recommends that governments establish a formal policy on the level of unrestricted fund balance to be maintained in the general fund for accounting and budgetary purposes. This policy is set by the appropriate policy body, and it articulates a framework and process for how the government will adjust the level of unrestricted fund balance during a specific period.

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

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

According to the Texas Association of School Board Officials, districts should address each of the five fund balance categories in their formal fund balance policies. The district’s fund balance policies should address the following guidelines:

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

Wharton ISD should establish a board policy to identify the fund balance level the district will maintain in the general fund.

The Wharton ISD Board of Trustees should adopt a local fund-balance policy that articulates a framework and process for building and maintaining its combined assigned and unassigned fund balance in excess of 75 days’ operating expenditures. The business manager and the superintendent should review the monthly fund balance levels for the past three fiscal years to determine a reasonable fund balance level to meet the district’s needs. The policy should identify priorities for unassigned fund balance amounts that exceed the minimum acceptable levels identified in the policy. The policy also should include a plan to restore the fund balance if it decreases to less than the identified level.

The district could implement the recommendation with existing resources.

BUDGET PROCESS (REC. 9)

Wharton ISD’s budget development and monitoring processes are informal and inconsistent.

The Texas Education Code, Section 44.002, requires school districts to prepare an operating budget covering all estimated revenue and proposed expenditures of the district for the following fiscal year. According to TEA’s FASRG, an effective school district’s budget process enables campuses and departments to plan future operations in a manner that best serves students’ needs. A school district’s budget is based on campus and district-level planning processes and communicates the district’s goals and objectives to the community. The FASRG outlines the following basic steps for school district budget development:

- establish an overall district revenue projection;
- establish school allocations based on projected enrollments and resources;

- develop budgets or expenditure plans for each school and department;
- compile individual budgets or expenditure plans into a comprehensive budget in accordance with anticipated revenues; and
- present the district budget to the board of trustees to review and approve.

In response to staff turnover in the Business Department, Wharton ISD contracted with Region 12 for accounting and business support services beginning in school year 2022–23. For the district’s annual budget development process, Region 12 accountants develop enrollment and revenue projections and allocate funds for campus and department budgets. For the school year 2023–24 budget, district leadership reported that the business manager, superintendent, and deputy superintendent met with campus administrators and department leaders to obtain feedback regarding budget allocations before submitting the budget to the board for approval. This process is informal, and the district did not provide staff with budget instructions, worksheets, guidelines, or a budget calendar detailing the steps of the process. Wharton ISD’s financial procedures manual does not include information related to budget development or monitoring.

The absence of a formal, documented budget process may have caused the district to exclude key stakeholders from the school year 2023–24 budget process. During interviews, staff reported inconsistent processes for budget development and confusion about how the budget is developed. Some staff reported meeting with district leadership to communicate department needs and provide feedback regarding proposed budget allocations. However, most of the district’s principals reported that they were disconnected from the budget process and were not involved in the decisions for their school year 2023–24 campus budgets.

Similarly, Wharton ISD did not obtain or incorporate community input into the school year 2023–24 budget. The superintendent said that the district provides an opportunity for public comment during budget workshops. However, staff reported that they were not aware of district efforts to solicit public participation in the budget process. Although the district posts the proposed and adopted budgets on the Business Department’s webpage, it does not publish a budget information document to engage and inform community stakeholders regarding budget priorities and how to participate in the process.

In addition to a lack of documented budget guidelines, the district does not provide budget managers with sufficient budget management training or written procedures to maximize efficient spending in compliance with federal and state requirements. Business Department staff reported they provide budget training sessions for principals and campus secretaries at the start of each year. However, staff do not have access to a comprehensive budget manual; the only documentation provided is a list of budget codes. During interviews, only experienced staff expressed feeling confident managing various funds effectively. In addition, interviews revealed inconsistent knowledge among campus staff and district instructional leaders regarding available grant funds and state allotments.

For example, the district does not provide principals with adequate training on federal funding compliance. The director of assessment, accountability, and student services serves as the district's grants manager and prepares and submits the district's annual grant applications and periodic reports. During interviews, principals and campus secretaries reported inconsistent understanding of available grant funds and procedures for managing assets purchased with grant funds. Some campuses have developed internal systems for tracking grants; others reported they could not view grant funds in the district's financial management system.

The lack of budget management training may prevent the district from maximizing the use of federal funding. A four-year summary of federal grant awards from school years 2020–21 to 2022–23 shows that Wharton ISD received \$12.8 million in federal grants and did not expend approximately \$1.6 million, or 12.4 percent.

In addition, campus staff and district instructional leadership reported that they were uninformed regarding spending requirements for state allotments. The Foundation School Program (FSP) establishes the amount of funding distributed to school districts in accordance with Texas school finance law and provides the state share of this funding to districts. Tier One of the FSP provides school districts basic funding through several allotments for programs such as regular education, special education, dyslexia, compensatory education, bilingual education, and more. The Texas Education Code, Title 2, Subtitle I, Chapter 48, Subchapter A, specifies spending requirements for each of these programs, mandating that a portion of funds be used directly for the designated programs.

Failure to understand these spending requirements could lead to potential misuse of funds or noncompliance with spending obligations. TEA may ask districts that do not meet these spending requirements to make up the difference during the next school year or adjust future funding. Clint ISD publishes a *State Allotment Financial and Expenditure Guidelines, 2022*, document that describes the roles and responsibilities of district positions responsible for monitoring and implementing spending requirements.

GFOA's *Best Practices in School Budgeting, 2017*, recommends that school districts adopt an inclusive approach to decision-making that engages stakeholders such as the school site leadership, teachers' association representatives, parents, and community representatives to address issues of concern to these groups.

Similarly, TEA recommends that superintendents collaborate with their school boards to implement site-based budgeting methods in the development of the school district's annual budget. Districts can implement site-based budgeting to decentralize financial decision-making to individuals who best understand the needs of individual campuses. This model facilitates input from community stakeholders, teachers, and other campus staff regarding the resource allocation decisions that affect their schools. It also delegates more authority of financial resources to campus decision-makers. According to the National Center for Education Statistics (NCES), involving campus and community stakeholders through inclusion in site-based committees enables them to contribute to the budget development process from the beginning, rather than solely at the final stage when the budget is presented for public review and approval during board meetings.

The NCES handbook *Financial Accounting for State and Local School Systems, 2014*, recommends that school districts develop budget preparation guidelines that contain the following elements:

- a budget transmittal letter from the superintendent that provides the overall context for budget development at the school level;
- a budgetary overview that explains the philosophy, approach, development process, major assumptions, and any changes in the process from the previous year;
- a description of fiscal limitations imposed such as maintenance of service levels, increases or decreases in resource allocations, and staff hiring guidance;

- a calendar of critical dates for budget completion, submission, and review;
- instructions for budgeted expenditure items and required submission details;
- a standard budget preparation worksheet and submission forms; and
- a list of the account codes necessary for preparing the budget.

The NCES states that “the budget calendar provides critical dates for the preparation, submission, and review of school budgets” and recommends that districts take the following steps:

- determine the necessary level of detail. If several calendars with varying levels of detail are used, they should be summarized in a master calendar to verify that all activities and dates are consistent and compatible;
- identify all activities that must be included in the calendar and arrange them chronologically; and
- assign completion dates to each activity, including suggested or mandatory start dates for certain activities to schedule their timely completion.

Wharton ISD should develop written budget procedures and provide training to guide staff in budget development and monitoring.

The business manager and the superintendent should develop budget preparation guidelines that include the following components:

- a budget transmittal letter from the superintendent that provides the overall context for budget development at the school level;
- a budgetary overview that explains the budgeting philosophy and approach, outlines the budget development process, and refers to major assumptions and changes in the budgetary process from the previous year;
- roles and responsibilities of district administrative staff, department staff, and campus staff in the budget preparation process.
- fiscal limitations to be observed, specific percentage increases or decreases in resource allocations, and staff hiring guidance;

- a calendar of critical dates for budget completion, submission, and review to help inform all parties when to provide feedback;
- a copy of standard budget preparation worksheets and submission forms; and
- a list of the account codes necessary for preparing the budget.

The business manager should update the financial management procedures to include guidelines for budget monitoring, including allotment expenditures, and provide training to all budget managers on budget guidelines and calendar dates.

The business manager should develop an informative budget document and post it on the district’s website to provide the public and interested parties with information pertaining to the district’s financial operations.

The district could implement the recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district’s programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report’s other findings and recommendations.

FINANCIAL PROCEDURES

Wharton ISD has modernized purchasing activities by transitioning from paper-based processes to electronic systems. In addition, the district has implemented controls to mitigate the risks associated with fraud, waste, and abuse, including centralizing contract management, vendor payments, and bank reconciliations for activity funds. The district recently published its updated financial procedures manual on its website to support compliance and clarity in financial operations. However, the review team observed additional opportunities to strengthen documented procedures.

First, the district lacks formal processes for tagging, tracking, and inventorying district assets. Interviews revealed widespread confusion regarding which departments have asset management responsibilities. The Technology Department tags and inventories technology assets exceeding \$500. However, most district staff could not identify the department responsible for managing nontechnology capital

assets valued at \$5,000 or more. According to the executive director of operations and maintenance, the Maintenance Department informally tracks capital assets; however, this process is not documented. In addition, the review team noted inconsistent practices among campuses regarding the inventorying of assets valued at less than \$5,000, and staff reported being uninformed regarding protocols for tagging, tracking, and disposing of grant-funded assets. The business manager should develop a formal process for staff to inventory and track all assets in the district.

Wharton ISD also lacks a state and federal grants manual to guide the management of grant funds. Several district staff are responsible for grants management, including the director of assessment, accountability, and student services, the secondary assistant superintendent of instruction, and the police chief. These staff reported inconsistent processes for

grant development, monitoring, and purchasing. The district should develop and document a grants procedures manual to promote consistency, compliance, transparency, and efficiency in grant-management processes.

FISCAL IMPACT

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

The Legislative Budget Board’s School Performance Review Team identified a fiscal impact for **Recommendation 7**.

RECOMMENDATION	2024–25	2025–26	2026–27	2027–28	2028–29	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
3. BUSINESS SERVICES							
7. Evaluate administrative staffing levels and identify opportunities for consolidation or restructuring.	\$1,101,470	\$1,101,470	\$1,101,470	\$1,101,470	\$1,101,470	\$5,507,350	\$0
Total	\$1,101,470	\$1,101,470	\$1,101,470	\$1,101,470	\$1,101,470	\$5,507,350	\$0

4. HUMAN RESOURCES MANAGEMENT

FINDINGS

- ◆ Wharton ISD’s implementation of its teacher certification exemption is unclear and inconsistent.
- ◆ Wharton ISD’s teacher retention strategies are deficient.
- ◆ Wharton ISD lacks processes to manage employee records effectively.

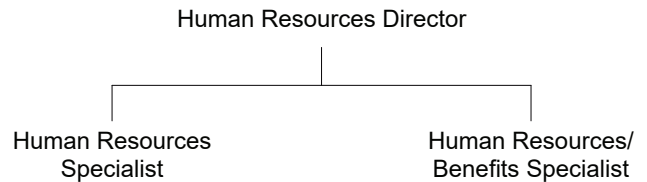
RECOMMENDATIONS

- ◆ **Recommendation 10: Develop written hiring and employment procedures specific to uncertified teachers to achieve the district’s goals outlined in its local innovation plan.**
- ◆ **Recommendation 11: Implement an annual evaluation of Human Resources Department operations and improve teacher engagement to develop informed and effective retention strategies.**
- ◆ **Recommendation 12: Adopt a written records management program and conduct a cost-benefit analysis of digitizing employee records.**

BACKGROUND

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

FIGURE 4–1
WHARTON ISD’S HUMAN RESOURCES DEPARTMENT ORGANIZATION
SCHOOL YEAR 2023–24



SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

leave, discrimination, medical privacy, safety, termination, and eligibility to work. Strategic-based responsibilities include recruitment and retention, compensation and benefits, and staff relations.

The Legislative Budget Board’s (LBB) School Performance Review Team visited Wharton Independent School District (ISD) in March 2024. Wharton ISD’s HR Department consists of three staff, which includes an HR specialist and an HR/benefits specialist, both of whom report to the HR director. The HR director reports to the deputy superintendent, who reports to the superintendent. **Figure 4–1** shows the organization of Wharton ISD’s HR Department.

Figure 4–2 shows data for Wharton ISD’s HR Department staffing compared to its peer districts. Peer districts are districts similar in size and other characteristics to Wharton ISD that are used for comparison purposes. The peer districts for Wharton ISD are Atlanta ISD, Bay City ISD, El Campo ISD, and Shepherd ISD.

FIGURE 4–2
WHARTON ISD’S AND PEER DISTRICTS’ HUMAN RESOURCES DEPARTMENT STAFFING, SCHOOL YEAR 2022–23

DISTRICT	HR FULL-TIME-EQUIVALENT (FTE) STAFF	STUDENT ENROLLMENT	HR STAFF PER 100 STUDENTS	TOTAL FTE STAFF	HR STAFF PER 100 STAFF
Wharton ISD	3.0	1,844	0.16	352.5	0.85
Atlanta ISD	2.0	1,879	0.11	353.3	0.57
Bay City ISD	3.0	3,579	0.08	550.4	0.55
El Campo ISD	2.0	3,349	0.06	479.8	0.42
Shepherd ISD	1.0	1,958	0.05	289.9	0.34

NOTE: Human resources (HR) staff numbers are from school year 2023–24.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD; Atlanta ISD; Bay City ISD; El Campo ISD; Shepherd ISD, March 2024; Texas Education Agency, Texas Academic Performance Report, school year 2022–23.

As shown in **Figure 4–2**, Wharton ISD has the highest ratios of both HR staff per student and HR staff per total staff, compared to peer districts. An industry standard ratio for public school district HR staff has not been determined. However, a 2019 survey of institutions of higher education by the College and University Professional Association for Human Resources (CUPA-HR) determined the ratios of HR staff per 100 full-time students ranges from 0.19 to 0.23 and the ratios of HR staff per 100 total full-time-equivalent (FTE) staff ranges from 0.92 to 1.22. Wharton ISD’s HR staff ratios are slightly lower than the CUPA-HR ranges but are notably higher than those of their peer districts.

Wharton ISD’s HR processes are the primary responsibility of the HR Department. The superintendent, deputy superintendent, assistant superintendents of curriculum and instruction, district department heads, campus administrators, and campus secretaries also perform some HR functions. **Figure 4–3** shows the HR activities assigned to Wharton ISD staff during school year 2023–24.

During school year 2022–23, Wharton ISD employed 352.5 FTE positions serving 1,844 students at four

campuses. **Figure 4–4** shows Wharton ISD’s FTE positions by position type, total staff, and total students from school years 2018–19 to 2022–23.

Despite a 7.7 percent decrease in student enrollment from school years 2018–19 to 2022–23, Wharton ISD’s total FTE count increased by almost the same percentage. Additionally, the number of teachers employed in Wharton ISD has decreased by 12.3 percent during the past five school years. However, the number of district office administrators, educational aides, and auxiliary staff increased by 51.5 percent, 63.8 percent, and 14.0 percent, respectively.

Figure 4–5 shows Wharton ISD’s distribution of staff by position type compared to its peer districts and averages among regional Education Service Center III (Region 3) districts and the state for school year 2022–23.

As shown in **Figure 4–5**, Wharton ISD’s proportion of teachers to total staff is the smallest compared to its peer districts, Region 3 districts, and all districts in the state. Specifically, teachers represent a smaller percentage of total

FIGURE 4–3
WHARTON ISD’S HUMAN RESOURCES ACTIVITIES BY POSITION, SCHOOL YEAR 2023–24

POSITION	HUMAN RESOURCES (HR) ACTIVITIES
HR director	<ul style="list-style-type: none"> • Conduct investigations and process grievances. • Recruit and onboard new staff. • Manage the application system and post job vacancies. • Determine new-hire compensation and draft employee contracts. • Respond to Public Information Act requests. • Process terminations and resignations. • Update compensation schedule and conduct salary research. • Update HR policies and the employee handbook. • Conduct performance evaluations for HR staff. • Host staffing meetings with campus leadership. • Develop and administer the district’s Grow Your Own program. (1)
HR/benefits specialist	<ul style="list-style-type: none"> • Conduct new-hire processes, including background checks, fingerprinting, benefits enrollment, new staff orientation, initiating staff profiles in the Human Resources Management System, and establishing employee records. • Manage required trainings via PublicSchoolWorks. • Track teacher certification and contract status. • Process workers’ compensation claims. • Update employee records. • Assist with stipend management.
HR specialist	<ul style="list-style-type: none"> • Administer the district’s unemployment and Family and Medical Leave Act benefits. • Assist with absence management. • Respond to service records requests and manage the district’s employee records. • Conduct hiring and staff management processes of substitute teachers.
Superintendent	<ul style="list-style-type: none"> • Determine staffing levels, compensation, and recruitment and retention strategies. • Conduct performance evaluations.
Deputy superintendent	<ul style="list-style-type: none"> • Assist with determining staffing levels, compensation, and recruitment and retention strategies. • Conduct performance evaluations.

FIGURE 4–3 (CONTINUED)
WHARTON ISD'S HUMAN RESOURCES ACTIVITIES BY POSITION, SCHOOL YEAR 2023–24

POSITION	HUMAN RESOURCES (HR) ACTIVITIES
Assistant superintendents of curriculum and instruction	<ul style="list-style-type: none"> • Administer professional development programs for instructional staff. • Conduct performance evaluations. • Process grievances. • Assist with determining staffing levels.
Department heads	<ul style="list-style-type: none"> • Recruit department staff. • Receive applications and conduct interviews. • Conduct performance evaluations. • Maintain employee records.
Campus administrators	<ul style="list-style-type: none"> • Recruit campus staff. • Receive applications and conduct interviews. • Conduct performance evaluations. • Provide professional development. • Maintain employee records. • Manage and update stipend assignments. • Track certification progress.
Campus secretaries	<ul style="list-style-type: none"> • Maintain employee records. • Manage and update stipend assignments.

NOTE: (1) The Grow Your Own Program promotes education within the community to recruit teachers for the district.
 SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

FIGURE 4–4
WHARTON ISD FULL-TIME-EQUIVALENT POSITIONS, SCHOOL YEARS 2018–19 TO 2022–23

POSITION TYPE	2018–19	2019–20	2020–21	2021–22	2022–23	5-YEAR PERCENTAGE CHANGE
Teaching staff	145.5	141.9	150.5	133.0	127.6	(12.3%)
Professional support	25.6	22.6	30.1	21.1	24.2	(5.5%)
Campus administrative staff	14.4	14.0	13.4	13.6	11.2	(22.2%)
District administrative staff	6.6	8.0	8.9	9.0	10.0	51.5%
Educational aides	48.3	55.8	59.7	53.0	79.1	63.8%
Auxiliary staff	88.1	82.3	87.1	110.8	100.4	14.0%
Total staff	328.5	324.6	349.7	340.5	352.5	7.3%
Total students	1,998	2,001	1,914	1,966	1,844	(7.7%)

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Education Agency, Texas Academic Performance Report, school years 2018–19 to 2022–23.

FIGURE 4–5
WHARTON ISD STAFF DISTRIBUTION BY POSITION TYPE COMPARED TO PEER DISTRICTS, REGION 3, AND THE STATE SCHOOL YEAR 2022–23

POSITION TYPE	WHARTON ISD	ATLANTA ISD	BAY CITY ISD	EL CAMPO ISD	SHEPHERD ISD	REGION 3 (1)	STATE
Teaching staff	36.2%	43.4%	41.1%	46.9%	44.6%	45.6%	48.7%
Professional support	6.9%	10.8%	7.5%	8.7%	5.0%	7.8%	10.9%
Campus administrative staff	3.2%	2.8%	3.4%	4.9%	4.8%	3.1%	3.3%
District administrative staff	2.8%	1.0%	0.9%	1.0%	1.4%	1.5%	1.2%
Educational aides	22.4%	16.9%	16.5%	17.3%	16.4%	15.7%	11.3%
Auxiliary staff	28.5%	25.0%	30.7%	21.3%	27.9%	26.2%	24.6%
Total staff	352.5	353.3	550.4	479.8	289.9	7,892.8	763,729.4
Total students	1,844	1,879	3,579	3,349	1,958	48,619	5,518,432

NOTES:

(1) Region 3=regional Education Service Center III.

(2) Totals may not sum due to rounding.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Education Agency, Texas Academic Performance Reports, school year 2022–23.

FIGURE 4–6
PAYROLL EXPENDITURES FOR WHARTON ISD, PEER DISTRICTS, REGION 3, AND THE STATE
SCHOOL YEAR 2022–23

CATEGORY	WHARTON ISD	ATLANTA ISD	BAY CITY ISD	EL CAMPO ISD	SHEPHERD ISD	REGION 3 (1)	STATE
Total operating expenditures (in millions)	\$30.1	\$26.2	\$45.4	\$45.7	\$25.6	\$661.8	\$68,178.3
Payroll expenditures (in millions)	\$21.4	\$19.2	\$33.6	\$32.2	\$19.2	\$487.2	\$53,061.1
Payroll as a percentage of total operating expenditures	71.0%	73.6%	73.9%	70.3%	74.9%	73.6%	77.8%
Payroll expenditures per student	\$11,626	\$10,261	\$9,422	\$9,690	\$9,804	\$10,065	\$9,642

NOTE: (1) Region 3=regional Education Service Center III.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Education Agency, Public Education Information Management System, Actual Financial Data, school year 2022–23.

staff at Wharton ISD than all comparison groups by a range of 4.9 to 12.5 percentage points. Wharton ISD also employs the second fewest professional support staff such as nurses, librarians, and counselors, proportionally. Conversely, the percentage of Wharton ISD staff who are district administrators is at least twice that of all its peers and the state, and almost twice that of Region 3. Educational aides in Wharton ISD also represent a higher proportion of total staff than all comparison groups by a range of 5.1 to 11.1 percentage points.

Figure 4–6 shows the actual payroll expenditures of Wharton ISD, peer districts, Region 3, and the state during school year 2022–23.

During school year 2022–23, Wharton ISD’s payroll accounted for about 71.0 percent of its total operating expenditures and represented \$11,626 in payroll spending per student. Although Wharton’s payroll expenditure percentage was the second lowest compared to peer districts and the state, Wharton ISD had the highest payroll expenditures per student by a minimum of \$1,365. However, Wharton ISD’s school year 2023–24 budget projects a significant decrease in payroll spending by \$5,111,894, decreasing its per-student payroll spending to \$8,950.

DETAILED FINDINGS

TEACHER CERTIFICATION EXEMPTION (REC. 10)

Wharton ISD’s implementation of its teacher certification exemption is unclear and inconsistent.

The Texas Education Code, Section 12A.001, authorizes a school board to adopt a resolution designating its district as a District of Innovation (DOI) if the district’s most recent performance rating shows acceptable performance. Such a

district must develop a statutorily required, local innovation plan before receiving a DOI designation. A local innovation plan must include a comprehensive educational program for the district, which may include the following components:

- innovative curriculum, instructional methods, and provisions regarding community participation, campus governance, and parental involvement;
- modifications to the school day or year;
- provisions regarding the district budget and sustainable program funding;
- accountability and assessment measures that exceed the requirements of state and federal law; and
- any other innovations prescribed by the board of trustees.

The plan also must identify statutory requirements that inhibit district goals and from which the district should be exempted upon adoption of the plan, within certain limits.

Wharton ISD received its DOI designation in calendar year 2018. The district’s DOI plan establishes the goal of making teacher certification decisions based on local need and exempts the district from the requirement to employ teachers certified by the State Board for Educator Certification (SBEC), pursuant to the Texas Education Code, Section 21.003. The DOI plan gives the district flexibility to hire candidates for high-demand subjects who do not have a standard SBEC teaching certification. The plan maintains statutory certification requirements for special-education and bilingual teachers.

According to Wharton ISD’s DOI plan, the district “will make every attempt to hire individuals with appropriate certifications for the position in question. However, when

that is not reasonably possible, the district will have the flexibility to hire individuals who are knowledgeable in the area and equipped to effectively perform the duties of the position in question.” After candidates are hired, the plan states that “the district will encourage teachers to obtain their appropriate certification.” The plan also states that Wharton ISD will certify teachers locally and will develop local criteria for teacher training. Despite these provisions, Wharton ISD has not established clear procedures for implementing the teacher certification exemption as stated in its DOI plan.

First, the district had not updated its board policies to include its current hiring practices at the time of the review team’s onsite visit. Wharton ISD Board Policy DBA (LEGAL) outlines the federal, state, and local regulations on employment regarding credentials and certifications. However, as of March 2024, the policy had no statement regarding the exemption to the requirements of the Texas Education Code, Section 21.003, nor did it mention the district’s innovation plan. Districts commonly acknowledge the exemption in relevant board policy and post information on their websites regarding alternative certification programs or other district requirements for aspiring teachers. Each of Wharton ISD’s peer districts has a DOI plan that includes an exemption to the teacher certification requirement, and all except Shepherd ISD has a notation included in its board policy DBA stating, “the board has adopted an innovation plan that affects application of provisions in this legally referenced policy.”

In addition, although Wharton ISD’s hiring and employment processing procedures typically are well-documented and effective, they fail to include the DOI plan’s innovation strategies related to screening, hiring, assigning, and training uncertified teachers.

For example, the district has not established clear criteria for an uncertified candidate to be considered “knowledgeable in the area and equipped to effectively perform the duties of the position.” HR staff described an informal process that included considering past work experience and college credits when evaluating an applicant’s qualifications; however, the HR Department has no documented procedures to guide administrators in making this determination. The deputy superintendent reported implementing a formal process in her former role as HR director for evaluating qualifications of uncertified candidates that was based on the High Objective Uniform State Standard of Evaluation (HOUSSE). The HOUSSE point system evaluated college credits, work experience, and professional development using a point

system, and was used to establish a highly qualified status for teachers in accordance with the federal No Child Left Behind Act prior to 2017. The district’s employee records checklist includes documents referring to this status, suggesting previous use of this process. However, the review team found no completed documents during its review of the district’s employee records. Additionally, some principals reported processes for assessing uncertified candidates, including screening applicants and requiring them to present sample lessons. These practices are inconsistent among campuses, and principals reported that the expectations of the HR Department were unclear. One principal reported that the HR Department frequently changes the expectation for candidates’ sample lessons and that consistency in the process of hiring uncertified teachers could be improved.

Campus and district administrators also reported erroneous understandings about the subject areas to which the certification exemption applies. For example, the DOI plan states that special education and bilingual teachers will continue to be required to hold a standard teaching certification. One Wharton ISD campus principal reported awareness of this requirement. The other three principals reported understanding that an uncertified candidate with a bachelor’s degree was eligible to teach any subject. In October 2023, the Texas Education Agency (TEA) received a complaint regarding a teacher providing instruction in a Wharton ISD bilingual classroom without the appropriate certification. Misunderstanding of teacher certification requirements among campus leaders raises a concern for potential violations of state and federal laws safeguarding the educational rights of students in special populations.

Wharton ISD also has no requirements, expectations, or incentives for uncertified teachers to become certified, despite the DOI plan’s provision for the district to encourage certification. Some principals require uncertified teachers to enroll in an alternative certification program (ACP), which allows them to receive an intern certification for the year. These principals provide additional support and track certification progress, but without a mandate or guidance from district administration, these practices are inconsistent among campuses. As a result, neither the exact number of uncertified teachers who are working toward certification nor their progress is available to district or campus administrators.

Data from TEA shows Wharton ISD employs 72 teachers without a standard SBEC teaching certification; three of whom hold intern certifications and are working toward standard certification in an ACP. In total, uncertified or

**FIGURE 4-7
WHARTON ISD'S AND PEER DISTRICTS' TEACHER WORKFORCE BY CERTIFICATION TYPE
SCHOOL YEAR 2023-24**

DISTRICT	STANDARD CERTIFICATION	NO CERTIFICATION	INTERN CERTIFICATION	TEMPORARY PERMIT	TOTAL TEACHERS	PERCENTAGE WITHOUT STANDARD CERTIFICATION
Wharton ISD	55	69	3	N/A	127	56.7%
Atlanta ISD	136	20	2	N/A	158	14.0%
Bay City ISD	185	34	7	N/A	226	18.1%
El Campo ISD	220	29	3	N/A	252	12.7%
Shepherd ISD	103	28	9	3	143	28.0%

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Education Agency, school year 2023-24.

intern-certified teachers account for 56.7 percent of Wharton ISD's teacher workforce. **Figure 4-7** shows teacher certification data for Wharton ISD and its peer districts for school year 2023-24.

As shown in **Figure 4-7**, Wharton ISD's percentage of teachers without a standard certification is the highest of all its peer districts by a minimum of 28 percentage points. Wharton ISD also employs the largest number of uncertified teachers despite having the fewest total teachers. Additionally, Wharton ISD employs 69 teachers with no prior pedagogical or instructional training who are not working toward standard certification in an ACP, a number more than double that of its peer districts.

Furthermore, the district compensates all teachers according to the same salary scale without additional pay or other compensation for uncertified teachers who attain certification. Acquiring certification imposes a cost to uncertified teachers without offering a compensatory award, which could deter uncertified teachers from seeking certification, contrary to the DOI plan.

Finally, the district does not appear to have established a local training and certification process specific to uncertified teachers, in accordance with the DOI plan. According to district staff, all new teachers, regardless of certification status, are assigned a mentor teacher and attend new-hire training. At the time of the review team's onsite visit, uncertified teachers did not receive additional professional development compared to their certified peers. In conjunction with the lack of processes to require or track ACP progress, failing to provide additional training to uncertified teachers is both inconsistent with the district's DOI plan and undermines new teacher effectiveness.

The lack of clarity in developing and implementing the teacher certification exemption in the district's hiring

and employment practices is damaging to the actual and perceived quality of the district's staff and services. Public perception of the quality of Wharton ISD's teaching staff is poor, according to review team surveys of campus staff and parents. Among respondents, 26.0 percent of parents agreed that the district employs qualified staff. Additionally, 21.3 percent of parents agreed that the district provides a high-quality education, and 43.8 percent agreed that the district's teachers are knowledgeable in the subject areas they teach. Among staff respondents, 77.2 percent of campus staff did not agree that experienced and certified teachers fill job openings. Inconsistency in the district's processes for screening, hiring, and supporting uncertified teachers also undermines equity in the quality of teaching staff across the campuses. Because some campuses implement more stringent screening practices than others, students inevitably receive instruction from professionals with varying levels of expertise and effectiveness.

Approximately 91.0 percent of school districts in Texas have a teacher certification exemption through a DOI plan. However, when teaching candidates do not have prior screening or training from a state certification process, districts must implement clear and consistent processes to determine whether applicants are knowledgeable and equipped to maintain a well-trained and effective teaching staff. A district's HR department must develop and implement hiring processes that are efficient, informed by best practices, legally compliant, and consistent with district goals to maintain a staff of effective teachers capable of delivering high-quality instruction.

Wharton ISD should develop written hiring and employment procedures specific to uncertified teachers to achieve the district's goals outlined in its local innovation plan.

FIGURE 4–8
RATE OF TEACHER TURNOVER IN WHARTON ISD, COMPARISON DISTRICTS, REGION 3, AND THE STATE
SCHOOL YEARS 2018–19 TO 2022–23

DISTRICT	2018–19	2019–20	2020–21	2021–22	2022–23	5-YEAR PERCENTAGE CHANGE	SCHOOL YEAR 2022–23 ENROLLMENT
Wharton ISD	24.8%	23.7%	26.6%	42.8%	56.8%	129.0%	1,844
Bay City ISD	25.6%	27.9%	17.6%	18.9%	25.8%	0.8%	3,579
El Campo ISD	14.4%	13.3%	17.1%	19.1%	17.4%	20.8%	3,349
Lamar CISD (1)	12.5%	15.6%	11.6%	15.8%	18.9%	51.2%	42,461
Tidehaven ISD	16.6%	11.5%	10.6%	15.0%	13.9%	(16.3%)	1,045
Van Vleck ISD	16.1%	21.7%	8.4%	20.3%	7.7%	(52.2%)	1,071
Region 3 (2)	17.7%	18.3%	16.7%	19.1%	21.2%	19.8%	N/A
State	16.5%	16.8%	14.3%	17.7%	21.4%	29.7%	N/A

NOTES:

(1) Lamar CISD=Lamar Consolidated ISD.

(2) Region 3=regional Education Service Center III.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Education Agency, Texas Academic Performance Reports, school years 2018–19 to 2022–23.

The superintendent should consult with the district’s legal counsel and the Texas Association of School Boards (TASB) policy consultant to review Wharton ISD’s DOI plan, its goals, and corresponding board policy to clarify the plan’s language and to align policy and practice with the plan.

The HR director also should collaborate with the deputy superintendent to develop, document, and train staff regarding the hiring and employment processes specific to uncertified teachers as stated in the DOI plan. These procedures should clarify the following inconsistencies:

- teaching positions that may and may not be filled with uncertified teachers;
- expectations for screening and interviewing uncertified teaching candidates;
- criteria for assessing an uncertified teaching candidate’s knowledge and skills; and
- expectations for achieving an SBEC teacher certification, and the criteria and process for achieving local certification, including procedures for oversight and the responsible department.

The HR director should evaluate the processes annually and solicit ongoing feedback from campus principals to determine whether the processes are effective in identifying qualified, capable applicants.

The district could implement this recommendation with existing resources.

TEACHER ATTRITION (REC. 11)

Wharton ISD’s teacher retention strategies are deficient.

Teacher retention is key to maintaining high-quality instruction, improving student performance, and fostering a positive workplace climate. Retaining teachers also decreases costs related to recruiting, hiring, and training new teachers. Wharton ISD’s teacher turnover rates demonstrate that the district has opportunities to improve teacher retention strategies.

Figure 4–8 shows teacher turnover rates for Wharton ISD, similar districts, the region, and state from school years 2018–19 to 2022–23. To make relevant staffing and salary comparisons, the review team selected a set of comparison districts based on size, proximity, and whether they compete with Wharton ISD for staff. These districts, which differ in some cases from the peer districts, are Bay City ISD, El Campo ISD, Lamar Consolidated ISD (CISD), Tidehaven ISD, and Van Vleck ISD.

As shown in **Figure 4–8**, Wharton ISD’s teacher turnover rate for school year 2022–23 is 56.8 percent. HR department staff reported that the district’s turnover rate is low; however, it is more than twice the rate of any of the comparison districts, Region 3 districts, and the state. Moreover, Wharton ISD’s teacher turnover rate is more than seven times higher than that of the district with the least turnover, Van Vleck ISD. If Wharton ISD maintained this rate of turnover, it would have an estimated 62 teacher vacancies to fill before school year 2024–25. Turnover costs a rural school district roughly \$9,000 per teacher. Considering the district’s

attrition rate of 56.8 percent during school year 2022–23, Wharton ISD’s ineffective retention strategies may cost the district more than \$500,000.

Wharton ISD administrative staff reported being aware of the district’s turnover issue and that developing and deploying new retention strategies has been a top priority during recent years. The district has implemented the following retention strategies:

- implementing a new calendar with more teacher work days to support planning time and professional development;
- adding employee assistance program benefits and increasing the district’s contribution to the Teacher Retirement System of Texas’ TRS-ActiveCare health coverage;
- offering stipends for teachers in high-need subject areas;
- establishing Wharton ISD Academy for Future Teachers;
- implementing a Strategic Staffing Initiative incentive for all certified core-subject teachers and elementary paraprofessionals;

- hosting award ceremonies and events, including perfect attendance luncheons;
- increasing teacher recognition; and
- providing retention bonuses for all staff.

District staff reported that the main barriers to teacher retention in Wharton ISD include the district’s poor reputation stemming from staff misconduct and student behavior issues, and competition from surrounding districts that offer higher teacher salaries.

The district responded to area hiring competition by increasing teacher salaries in school year 2023–24 to improve retention. **Figure 4–9** shows data for teacher salaries and supplemental compensation at Wharton ISD and comparison districts for school year 2023–24.

As shown in **Figure 4–9**, base pay for Wharton ISD teachers is higher than that of all the comparison districts except for Lamar CISD, which pays beginning teachers with bachelor’s degrees \$8,500 more and is about 23 times larger than Wharton ISD by student enrollment. At five years and 10 years of service, Wharton ISD continues to pay teachers more than Bay City ISD, El Campo ISD, and Tidehaven

**FIGURE 4–9
TEACHER SALARIES AND COMPENSATION AT WHARTON ISD AND COMPARISON DISTRICTS, SCHOOL YEAR 2023–24**

DISTRICT	TEACHER SALARY			OTHER COMPENSATION/BENEFITS
	NO EXPERIENCE	5 YEARS' EXPERIENCE	10 YEARS' EXPERIENCE	
Wharton ISD	\$54,000	\$56,550	\$59,100	<ul style="list-style-type: none"> • \$1,000 master’s stipend; • \$3,000–\$4,000 Strategic Staffing Initiative incentive for core subject teachers; • \$2,000 retention stipend; • \$500 new teacher mentor stipend; • \$5,000 bilingual stipend; • \$1,500–\$5,000 stipends for high-demand areas; • healthcare premium cost (employee only): \$147–\$224; and • five local leave days; accumulate to a maximum of 20
Bay City ISD	\$50,800	\$52,500	\$56,638	<ul style="list-style-type: none"> • \$1,000 master’s stipend; • \$5,000 relocation stipend for teachers new to the district; • healthcare premium cost (employee only): \$0; • six local leave days; accumulate to a maximum of 20; and • Grow Your Own programs: district-paid alternative certification up to \$5,000; district-paid bachelor’s degree with teacher certification up to \$47,000; district-paid master’s degree with principal certification up to \$10,000
El Campo ISD	\$53,000	\$56,021	\$58,676	<ul style="list-style-type: none"> • \$1,230 master’s stipend; • \$5,000 bilingual signing bonus; \$3,250 bilingual stipend; • \$4,000–\$5,000 special-education certification stipends; • \$300–\$8,000 stipends for high-demand areas; • healthcare premium cost (employee only): \$142–\$219; and • five local leave days; accumulate to a maximum of 60

**FIGURE 4–9 (CONTINUED)
TEACHER SALARIES AND COMPENSATION AT WHARTON ISD AND COMPARISON DISTRICTS, SCHOOL YEAR 2023–24**

DISTRICT	TEACHER SALARY			OTHER COMPENSATION/BENEFITS
	NO EXPERIENCE	5 YEARS' EXPERIENCE	10 YEARS' EXPERIENCE	
Lamar CISD	\$62,500	\$64,550	\$67,150	<ul style="list-style-type: none"> • \$1,000 master’s stipend; • \$2,000–\$5,000 special-education certification and retention stipends; • \$4,000 bilingual stipend; • \$1,650 English as a Second Language (ESL) stipend; ESL certification exam reimbursement; • \$25/hour for new teacher mentors; \$2,500/semester resident teacher mentor stipend; • healthcare premium cost (employee only): \$51.86–\$103.67; and • five to seven local leave days; no accumulation limit
Tidehaven ISD	\$51,496	\$54,170	\$58,095	<ul style="list-style-type: none"> • ~3.0% higher salary for a master’s degree; • Teacher Incentive Allotment: \$6,119–\$23,647 in additional compensation (based on campus and designation) every year for five years after designation is achieved; and • five local leave days; accumulate to a maximum of 20
Van Vleck ISD	\$51,466	\$57,604	\$66,168	<ul style="list-style-type: none"> • healthcare premium cost (employee only): \$122–\$199; and • five local leave days; no accumulation limit

NOTE: All additional compensation information was sourced from respective district websites; some information was not available.
SOURCES: Legislative Budget Board School Performance Review Team; Bay City ISD; El Campo ISD; Lamar CISD; Tidehaven ISD; Van Vleck ISD; Wharton ISD, March 2024.

ISD. Additionally, Wharton ISD offers supplemental compensation and additional benefits similar to those of comparison districts. Based on these criteria, the district’s teacher compensation is generous relative to its size, which should be sufficient to retain significantly more staff. However, a teacher turnover rate of 56.8 percent indicates that other factors may be causing Wharton ISD’s teachers to leave the district.

One possibility is the district’s high percentage of “novice” teachers, who are uncertified or have fewer than

five years of experience. Research from TEA and the Charles Butt Foundation shows that 39.0 percent of uncertified teachers are retained in the profession after five years, and that teachers are more likely to leave if they are inexperienced or lack adequate professional support and training. Specifically, novice teachers account for only 36.0 percent of the state’s educator workforce, but 69.0 percent of all teachers exiting the profession. **Figure 4–10** shows Wharton ISD’s percentage of novice teachers compared to comparison districts, the region, and state for school year 2022–23.

**FIGURE 4–10
PROPORTION OF NOVICE TEACHERS BY EXPERIENCE IN WHARTON ISD, COMPARISON DISTRICTS, REGION 3,
AND THE STATE, SCHOOL YEAR 2022–23**

DISTRICT OR REGION	0 YEARS' EXPERIENCE	1–5 YEARS' EXPERIENCE	TOTAL NOVICE (1) TEACHER PROPORTION
Wharton ISD	36.3%	26.9%	63.2%
Bay City ISD	17.2%	22.5%	39.7%
El Campo ISD	3.7%	24.0%	27.7%
Lamar CISD	6.7%	26.3%	33.0%
Tidehaven ISD	1.3%	27.0%	28.3%
Van Vleck ISD	1.3%	16.4%	17.7%
Region 3 (2)	11.5%	20.5%	32.0%
State	9.7%	26.3%	36.0%

NOTES:
(1) Novice refers to teachers with five or fewer years of experience.
(2) Region 3=regional Education Service Center III.
SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Education Agency, Texas Academic Performance Report, school year 2022–23.

FIGURE 4–11
WHARTON ISD EDUCATOR WORKFORCE BY YEARS OF EXPERIENCE
SCHOOL YEARS 2018–19 TO 2022–23

YEAR	0 YEARS	1–5 YEARS	6–10 YEARS	11–20 YEARS	≥21 YEARS
2018–19	11.6%	33.7%	12.4%	24.5%	17.9%
2019–20	6.9%	33.8%	14.9%	26.2%	18.3%
2020–21	15.2%	33.2%	11.0%	25.0%	15.6%
2021–22	19.5%	33.8%	13.7%	18.4%	14.2%
2022–23	36.3%	26.9%	14.0%	13.8%	9.0%
5-year percentage change	212.9%	(20.2%)	12.9%	(43.7%)	(49.7%)

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Education Agency, Texas Academic Performance Reports, school years 2018–19 to 2022–23.

As shown in **Figure 4–10**, the percentage of Wharton ISD teachers who are novices is higher than every comparison group by at least 23.5 percentage points. Furthermore, more than one-third of Wharton ISD teachers have no experience, which is considerably higher than the district with the second-highest percentage of inexperienced teachers.

Figure 4–11 shows Wharton ISD’s educator workforce by years of experience from school years 2018–19 to 2022–23.

As shown in **Figure 4–11**, the population of teachers at Wharton ISD that has no experience has increased more than 200.0 percent during the past five years. During the same period, the percentage of more experienced teachers in each category has decreased, except for teachers with six to 10 years of experience. These data suggests that Wharton ISD often has filled vacant teaching positions with individuals new to the profession, assembling an inexperienced educator workforce that is vulnerable to attrition.

Research has shown that providing novice teachers with more professional support and training, such as field experience, instructional coaching, and observation feedback, may mitigate the risk of attrition. Teachers in Wharton ISD who are not certified—those with the least experience—are not provided with district-mandated supplemental training beyond standard professional development given to all teachers. In addition, approximately 50.0 percent of campus staff said they do not believe that teachers have the resources and support to be successful, according to the review team’s survey.

With a high rate of teacher turnover and an inexperienced educator workforce that is likely to experience significant attrition within five years, Wharton ISD’s need for effective retention strategies is critical. TASB’s recommendation for developing informed and successful retention strategies

is to improve staff engagement and feedback through opinion surveys and retention interviews, which are administrators’ individual conversations with staff to discuss job satisfaction. An HR department that operates in a district with an established culture of transparency and honest, open communication can gain valuable insight into the staff’s needs and develop more tailored and effective retention strategies.

Similarly, conducting annual performance audits of the HR department can empower districts with data-driven knowledge for improving personnel management, including retention of instructional staff. In a 2010 report, the American Enterprise Institute (AEI), a nonprofit and public-policy research organization, emphasizes the importance of evaluating HR operations in school districts. According to the AEI, “improving the quality of teaching requires that a system be able to monitor personnel; gauge performance; and competently manage hiring, transfers, benefits, employee concerns, and termination.” To achieve that outcome, effective HR departments develop and track operational goals by regularly analyzing key performance indicators such as teacher retention and separation rates, the percentage of teachers with effective ratings, hiring timelines, vacancies, and employee satisfaction with the HR department.

The HR director does not formally evaluate HR operations. Wharton ISD’s current processes to engage staff and solicit feedback include climate and culture surveys, monthly staffing meetings, and an exit survey for separating staff. However, campus staff reported feeling fearful of retaliation for truthful responses to survey questions and reported that the response of district administrators to staff feedback has been inadequate. Additionally, completion of the exit survey is optional; therefore, the district collects feedback inconsistently. The HR director reported that feedback is

always positive, but the review team was unable to obtain comprehensive exit survey response data.

Wharton ISD should implement an annual evaluation of Human Resources Department operations and improve teacher engagement to develop informed and effective retention strategies.

The HR director should develop and implement a process for evaluating HR operations, including procedures for goal setting and progress tracking. The HR director should use the following performance measures and other metrics to track the department's operational strengths and opportunities:

- percentage of new teachers;
- retention rates of teachers by years of service;
- teacher vacancies unfilled on the first instructional day for students;
- noncertified teachers as a percentage of total teachers;
- substitute placement rate;
- staff satisfaction;
- average days from recommendation by hiring manager to start date; and
- exit interview completion rate.

The superintendent and HR director should meet quarterly to assess HR goals and performance measures. The HR director also should provide the Board of Trustees with quarterly updates regarding HR goals and performance improvements.

The HR director also should use TASB resources to develop thorough, transparent, and consistent processes to engage teachers and collect useful feedback. These resources include sample questions for stay interviews and best practices for developing a post-survey communication plan to follow up on staff responses. The HR director also should provide engagement training for staff that emphasizes the district's commitment to positive culture and staff satisfaction, the value of honest feedback, the guarantee of anonymity and protection from retaliation, and a plan of action for addressing staff concerns. The HR director and superintendent should use department performance measures and teacher feedback to identify and address opportunities in the district's current retention strategies, and to conduct ongoing analysis

and make improvements to district policies that incentivize teachers to stay in Wharton ISD.

The district could implement this recommendation with existing resources.

RECORDS MANAGEMENT (REC. 12)

Wharton ISD lacks processes to manage employee records effectively.

School district records include student information documents, payroll information, financial records, and employee records. An effective records management program (RMP) details procedures for the establishment, maintenance and use, retention and storage, destruction, and archival preservation of district records. An RMP also describes the roles and responsibilities of the records management officer (RMO) and records custodians, and includes a records control schedule, which outlines how long the district will keep each type of record before archival or destruction.

Wharton ISD's Board Policies CPC (LEGAL) and CPC (LOCAL) outline the statutory requirements and the district policies related to records' custody, maintenance, and disposition. The board policies require the superintendent to serve as the RMO, oversee the establishment of a records management program, and establish the district's records control schedule.

Despite these policies, Wharton ISD lacks documented processes for retaining, managing, securing, archiving, or disposing of district records. Although the HR Department has primary responsibility for maintaining employee records, district staff could not clearly identify the RMO or produce the district's RMP. District staff also provided inconsistent information about which staff and departments are responsible for various records management roles, including the disposal of employee records. As a result, employee records across the district are incomplete, over-retained, outdated, and vulnerable to inappropriate access.

Wharton ISD stores official employee records in the district administration building, and the absence of a documented RMP, clear roles and responsibilities of records custodians, and record management training causes inconsistency and miscommunication. For example, a review of active staff records showed that the district does not include all items required by its records checklist consistently. The following listed items were missing:

- teacher certifications;

- job descriptions;
- employment eligibility verification forms (U.S. Citizenship and Immigration Services Form I-9); and
- employee observations and evaluations.

Campuses and departments in Wharton ISD also maintain employee records containing various documents, such as physical and electronic copies of employee applications, employment processing documents, disciplinary records, doctors' notes, and performance evaluations. Principals and department leaders maintain these files at their discretion due to the lack of formal records management training or consistent guidance from the HR Department. For example, HR staff reported that performance evaluation forms must be returned to the district administration building upon completion. However, principals reported being uninformed of that expectation, and the review team observed that none of the official employee records in its review contained a completed evaluation. This decentralization of records and lack of clear expectations and training places confidential staff information at risk of being accessed inappropriately or lost.

Unclear processes for managing records also undermine the organization and accuracy of Wharton ISD's employee records, which are stored in 20 filing cabinets inside a storage room in the district administration building. Fifteen of the filing cabinets contain the records of inactive staff, three contain records of active staff, and one contains records of substitute teachers; the final cabinet is designated for the records of staff who recently have left the district's employment. According to HR staff, separating the records of recent former staff facilitates the process of providing service records and employment verifications required by these former employees as they pursue employment in other districts. However, no formal process or criteria is in place to prompt the transfer of records from the cabinet of recently inactive employee records to one of the longer-term cabinets. Similarly, some employee records contained inaccurate information because they had not been updated to include staffs' new positions or transfers within the district.

Wharton ISD also lacks a records control schedule detailing how the district will archive or dispose of employee records. The Texas State Library and Archives Commission (TSLAC) has established record retention guidelines that districts must follow, which specify how long records must be retained by state and local entities before destruction or archival preservation. TASB develops retention guides that describe

TSLAC minimum requirements and best practices for record retention and disposal. Wharton ISD's HR Department uses a TASB guide to determine retention periods, but it is outdated and does not satisfy board policy requirements for adopting a records control schedule. Additionally, district staff do not receive records management, archival, or disposal training, and the employee records have not been audited or purged in at least seven years, according to HR staff.

Wharton ISD also could improve physical security controls for records. Staff reported that the filing cabinets that store employee records remain unlocked during business hours in which the department receives a high volume of service records requests. The filing cabinets otherwise are locked, but the key is stored in the same room. In addition, the storage room containing the filing cabinets also houses student files and other district property. This room has three entrances, one of which leads to the warehouse. It is unclear whether all entrances are locked, and HR staff could not confirm that badge access for the main entrance is restricted. Staff reported that maintenance staff frequently use the file room to access the warehouse, and the superintendent said that many individuals enter and exit the file room unmonitored.

Another inefficiency in Wharton ISD's records management process includes the duplication of physical and digital documents. When establishing a new employee record, HR staff print, scan, and copy multiple documents, which are stored or completed digitally. For example, job applications that are completed online and available to district staff electronically also are printed and placed in employee records. Additionally, policy acknowledgements, salary agreements, and contracts that are available electronically also are printed and duplicated during the process to initiate employment. Wharton ISD staff reported knowledge of a previous effort to digitize these records but could not specify when or why the process halted. Managing employee records digitally can streamline, expedite, and improve many processes such as employment processing and contract renewal, decrease administrative and storage costs, secure sensitive data, and enhance the department's overall performance, according to TASB. TASB provides resources to help districts transition to electronic files in compliance with all applicable laws and maximize their Human Resource Information System (HRIS) processes for document management.

Poor organization, training, guidance, and communication regarding the management of employee records jeopardizes the confidentiality of staff information and could result in legal consequences for the district. Record mismanagement

also causes records to be inaccurate or over-retained, which inhibits a district's organizational efficiency and unnecessarily increases storage costs. The district can mitigate those security risks and organizational inefficiencies by adopting a consistent, documented RMP that assigns clear roles and responsibilities to records managers. An example of such an RMP appears on Carroll ISD's website.

Wharton ISD should adopt a written records management program and conduct a cost-benefit analysis of digitizing employee records.

In compliance with board policy and state law, the superintendent should oversee the development of a written RMP utilizing TASB and TSLAC resources. The plan should include the following HR Department actions:

- designate a records management officer and records custodians and outline their respective roles and responsibilities;
- develop control procedures for storing, organizing, and updating physical and electronic documents, including a formal checklist for items to be maintained in the official and campus employee records;
- adopt a district retention schedule that follows TSLAC requirements and contains procedures for auditing and purging records after the expiration of their retention period; and
- develop and implement security protocols for all documents based on storage location.

The plan should be made available to all staff in compliance with the TSLAC reporting requirements. The HR director should train all records custodians on the plan's procedures, monitor their consistent implementation, and review the records management processes annually for effectiveness. The HR director also should conduct an audit of the current files, update any outdated files, and dispose of any over-retained records. After this initial audit is completed, the district can review the files every few years to confirm records are properly maintained.

Additionally, the HR director should collaborate with the deputy superintendent to conduct a cost-benefit analysis of digitizing employee records and review of the district's current HRIS capabilities. If electronic file management is determined to be in the best interest of the district, the HR director could use the data migration and digitization period

as an opportunity to update or purge outdated and over-retained files.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

GROW YOUR OWN PROGRAM

The development and implementation of Wharton ISD's Grow Your Own (GYO) program has been communicated inconsistently.

Through partnerships with colleges and universities, some school districts have developed GYO programs to help community residents and district staff become teachers. In addition to lowering the teaching profession's barrier to entry and addressing instructional staff shortages, research shows that GYO programs attract and develop more diverse staff with both a pre-existing understanding of the students and personal investment in the community. As such, GYO programs have proven effective at enhancing a district's teacher quality and retention.

To address Wharton ISD's teacher shortage, the HR Department began developing a GYO program called the Wharton Academy for Future Teachers (WAFT) in school year 2022–23. Through this program, district staff can receive a bachelor's degree in educational studies from Grand Canyon University in exchange for a three-year teaching commitment. Wharton ISD adopted a local innovation plan pursuant to the Texas Education Code, Chapter 12A, that exempts its teachers from state certification requirements, making a bachelor's degree the primary requirement for becoming a teacher. Thus, the WAFT program aims to grant staff access to an affordable education, increase staff's earning potential, and equip the district with a sustainable source for staffing teaching positions.

According to a district job posting, the WAFT program began receiving applicants in December 2022, and participants were scheduled to enroll in coursework in the fall of 2023. However, the program had not been implemented fully nor received school board approval at the time of the review team's onsite visit in March 2024. The job

posting lacks many details, including the name of the institution and the consequences for participants who breach their contracts. District communication about the program's status was inconsistent and staff reported inconsistent information regarding its size, start date, and cost to the district and participants. For example, discrepancies are evident between information in the job posting and the superintendent's statements regarding the financial obligations of participants. The HR Department had selected a cohort of participants for the original intended start date. However, HR staff were interviewing new candidates in March 2024 to replace those who rescinded their applications after the program was delayed. No comprehensive program documentation was available to the review team, raising concerns about the accuracy and completeness of the information provided to potential applicants and consistency in the program's implementation.

Staff also reported the district has launched a second GYO program in partnership with the University of Houston at Victoria, through which staff can earn a standard classroom teacher certification and a master's degree concurrently. The superintendent and other district officials were unable to confirm the status of or provide detailed information about this program, suggesting a lack of oversight.

Improving the organization and management of the WAFT program should be a top priority for Wharton ISD. The program's success depends on comprehensive documentation, consistent communication, and regular monitoring and improvement activities. Bay City ISD's website contains extensive information on its GYO program, which offers staff three education and development pathways according to individual need, in return for teaching commitments.

Wharton ISD should develop comprehensive and consistent documentation on its GYO programs, post the information on the district website, and implement processes to advertise, monitor, and improve the programs. To maximize efficiency, the HR director should perform program advertising and monitoring together with primary HR activities such as recruitment and retention and an HR Department evaluation, respectively.

SUBSTITUTE STAFFING

Wharton ISD's approach to addressing substitute shortages is ineffective and harmful to staff morale. At the time of the review, the district reported employing approximately 27 substitute teachers. However, TEA data for school year 2023–24 shows seven substitute teachers are employed in

Wharton ISD and staff reported that fewer—less than five—are regularly available due to campus preferences and scheduling conflicts. To address this shortage, beginning in school year 2023–24, district leadership directed elementary campuses to use paraprofessionals to cover classes instead of hiring substitutes. Paraprofessionals who accept substitute teaching assignments and meet additional requirements receive additional compensation in accordance with the district's Strategic Staffing Initiative (SSI). However, the district did not effectively communicate the SSI plan, leading to confusion among campus staff about the incentive terms and requirements.

In addition, the district's decision to implement the SSI plan appears to have excluded feedback from campus staff. District leadership report that it implemented this practice due to an abundance of paraprofessionals at the elementary level, despite conflicting reports from campus staff that the number of paraprofessionals did not meet campus needs. For example, one elementary campus reported seven vacant paraprofessional positions. Staff reported that these vacancies and the district's mandate to use paraprofessionals as substitutes result in a lack of sufficient paraprofessional support for teachers and students. The district implemented a hiring freeze in spring 2024, which staff reported worsened the substitute and paraprofessional shortage; staff reported that leaving classes uncovered and causing frustration among staff. Elementary school administrators reported that their inability to hire substitute teachers or fill paraprofessional vacancies results in classes remaining uncovered, which requires the dispersal of students to other classrooms. Campus administrators report that this practice has diminished student learning and staff morale.

The SSI practice also failed to mitigate the lack of class coverage at the junior high school and high school. Although the secondary campuses are permitted to hire substitutes, HR staff reported that up to five substitutes are available per day, which frequently is inadequate to account for all teacher absences and classroom vacancies across the two secondary campuses. For example, one secondary administrator reported having up to 13 teacher absences per week at a campus and having regular access to two substitutes. The administrator has asked other teachers to cover class vacancies during their planning periods, but many staff reported preferring their planning time to the small compensation offered. The continued lack of coverage for teacher absences and vacancies at Wharton ISD's secondary schools is evidence of the SSI program's ineffectiveness.

The district's shallow pool of substitutes and use of paraprofessionals to cover open classes has resulted in ineffective staffing practices and frustration among campus staff. Wharton ISD should determine an alternative method for addressing the shortage of substitute teachers and implement procedures to make future staffing decisions that prioritize feedback from campus leaders. Developing more effective practices would improve staff morale by providing campuses with support tailored to their needs.

GRIEVANCES

Wharton ISD's Board Policies DGBA (LEGAL) and DGBA (LOCAL) outline a three-tiered process for staff to file grievances. First, complaints are submitted to an appropriate administrator or supervisor. If the employee's grievance is not resolved, the employee may request a conference with the superintendent or designee. If the issue remains unresolved, the employee may appeal the complaint to the board. District staff reported that staff have filed four grievances from June 2020, the start of the superintendent's tenure, to March 2024.

However, during the review team's interviews, most staff reported being unfamiliar with the grievance process. Other staff reported that they had not been trained in the grievance process and that they directed questions about the process to district administration. Grievance forms are available in the district administrative office but not on the district's website.

The review team's survey data indicate that most campus and district staff did not think the grievance process is clear. Among respondents, 60.7 percent of campus staff and 71.4 percent of district staff disagreed or did not know whether the district's grievance process was fair and timely. The HR director reported conducting investigations upon receipt of a complaint but denied the existence of an appeal process. The HR director also could not provide documentation of procedures for this process, so it is not clear if these investigations are compliant with DGBA (LOCAL). Without clarity and training on the grievance and investigation processes, Wharton ISD is at-risk of violating staff's civil and employment rights, which could result in legal consequences.

Properly handling grievances is essential to minimizing the district's risk of legal exposure. Wharton ISD should provide all supervisory and HR staff with training on the grievance process and post an electronically accessible version of the staff grievance form on the district staff resources webpage. Additionally, the district should

consider producing and posting online a brief training video regarding the grievance process.

LEAVE AND SEPARATION PROCEDURES

Wharton ISD's employee leave and separation processes are implemented and communicated inconsistently.

During the process of terminating district employment, staff receive an electronic link to an exit interview survey, which prompts the HR and Technology departments to perform tasks such as collecting district property and deactivating accounts. The same tasks must be completed when staff take leave, including Family and Medical Leave Act (FMLA) leave, voluntary unpaid leave, or involuntary administrative leave during misconduct investigations.

However, neither staff leaving the district nor those taking leave are required to complete the exit survey, so the Technology Department staff rely on the HR Department to notify them of any staff leave or separations. This notification frequently is delayed or does not occur, according to Technology Department staff, which prevents them from completing the necessary tasks in a timely manner. When the Technology Department is not notified, tasks such as collecting devices, badges, and keys may be performed by the campus administrator or by the HR Department when exiting staff receive their final paychecks. The staff responsible for managing employee leave and separation processes perform their duties inconsistently, and interdepartmental communication regarding these practices is unclear. This inconsistency undermines the district's organizational efficiency, increases the risk that former or inactive staff might gain unauthorized access to the district's physical and digital assets, and could compromise an investigation of staff misconduct.

Wharton ISD's teacher turnover rate for school year 2022–23 was 56.8 percent, which equates to the separation of at least 60 staff that year. Additionally, the district experiences high rates of absenteeism. HR Department staff reported offering FMLA or unpaid leave to eligible staff members with more than three consecutive absences, which increases the likelihood of staff taking leave that initiates formal separation procedures. Frequent misconduct allegations further increase instances of staff leave. The HR Department has reported investigating approximately five misconduct allegations per school year, and local news agencies have reported nearly one staff arrest per year during the past five years for serious offenses. Although not all allegations result

in leave, the frequency of separations and staff taking leave underscores the need for more efficient processes.

Wharton ISD should document the district's leave and separation procedures and monitor to ensure their consistent implementation at all departments and campuses. The HR director should collaborate with all relevant departments to clarify roles and responsibilities, provide training for campus administrators, and establish a system for timely communication of staffing changes.

FISCAL IMPACT

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

5. FOOD SERVICE MANAGEMENT

ACCOMPLISHMENT

- ◆ Wharton ISD provides free meals to all students and follows best practices to maximize reimbursements through the federal Community Eligibility Provision program.

FINDINGS

- ◆ Wharton ISD's Food Service Department does not maximize use of the U.S. Department of Agriculture's Foods in Schools Program entitlement funds.
- ◆ Wharton ISD does not assess performance measures or engage in strategic planning for the Food Service Department.
- ◆ Wharton ISD's School Health Advisory Council has not developed a plan to implement the district's wellness goals.

RECOMMENDATIONS

- ◆ **Recommendation 13: Assess Food Service Department needs and develop a plan that maximizes its use of its federal Foods in Schools entitlement.**
- ◆ **Recommendation 14: Develop a process for monitoring and improving the Food Service Department's performance.**
- ◆ **Recommendation 15: Develop and implement a wellness plan that aligns with district policy and federal standards.**

BACKGROUND

An independent school district's food service operation provides meals to its students and staff. The district may provide meals through the U.S. Department of Agriculture (USDA) Food Service programs, which include the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Fresh Fruit and Vegetable Program (FFVP), the Summer Food Service Program (SFSP), and the USDA Foods in Schools Program. These programs provide financial assistance to school districts through cash reimbursements and allocations of USDA Foods to support their meal services. In return, the districts must serve meals

that meet federal nutritional requirements, and districts must offer free or reduced-price lunches to eligible students. School districts can be reimbursed for snacks served to children enrolled in after-school programs. A district's food service operation also may offer catering services to supplement the food service budget.

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

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

Wharton ISD offers free lunch and breakfast to all students. In school year 2022–23, Wharton ISD served 1,844 students from early childhood to grade 12. The district operates three cafeterias: one each at C.G. Sivells Elementary School, Wharton Elementary School, and Wharton High School. As of March 2024, the high school cafeteria also serves junior high school students during ongoing renovations of Wharton Junior High School. Each cafeteria has a kitchen for food storage and meal preparation. Due to space constraints in campus kitchens, the district stores some of its food at a warehouse, where staff receive and inventory goods and from which staff make daily deliveries to campuses.

Figure 5–1 shows Wharton ISD's beginning and ending fund balance for NSLP, which includes SBP, and its food services revenue and expenditures on those programs from fiscal years 2019 to 2023. The district's food service revenues exceeded expenditures from fiscal years 2022 to 2023, which caused the NSLP fund balance to increase by 20.1 percent. The Food Service Department budgeted \$1,467,000 for fiscal year 2024 expenditures.

Figure 5–2 shows Wharton ISD's lunch and breakfast participation rates compared to peer districts, districts served

**FIGURE 5–1
WHARTON ISD FOOD SERVICE REVENUE, EXPENDITURES, AND FUND BALANCE
FISCAL YEARS 2019 TO 2023**

YEAR	BEGINNING NSLP FUND BALANCE (1)	TOTAL FOOD SERVICE REVENUE	TOTAL FOOD SERVICE EXPENDITURES (2)	DIFFERENCE BETWEEN REVENUE AND EXPENDITURES	ENDING NSLP FUND BALANCE
2019	\$87,288	\$1,276,147	\$1,193,087	\$83,060	\$169,507 (2)
2020	\$169,507	\$1,112,214	\$1,173,271	(\$61,057)	\$95,450 (2)
2021	\$95,450	\$958,437	\$961,592	(\$3,155)	\$110,295 (3)
2022	\$110,295	\$1,769,953	\$1,174,597	\$595,356	\$705,651
2023	\$669,975	\$1,630,847	\$1,453,334	\$177,513	\$847,488

NOTES:
 (1) The district’s National School Lunch Program (NSLP) Fund also accounts for the School Breakfast Program (SBP) and records financial activities related to food services subsidized with federal reimbursement revenues from the U.S. Department of Agriculture.
 (2) The district transferred a portion of its NSLP Fund to its Summer Food Service Program Fund. Data shown for fiscal years 2019 and 2020 represent the remaining fund balance after the transfer.
 (3) During fiscal year 2021, the district transferred general revenue funds to its NSLP Fund to compensate for losses in accordance with U.S. Department of Agriculture regulations. These data represent the fund balance after the transfer was made.
 SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Wharton ISD Annual Financial Reports, fiscal years 2019 to 2023.

by regional Education Service Center III (Region 3), and the state. Peer districts are districts similar in size and other characteristics to Wharton ISD that are used for comparison purposes. For this review, the peer districts chosen were Atlanta ISD, Bay City ISD, El Campo ISD, and Shepherd ISD. Participation rates represent the ratio of the average number of students served daily in the meal program to the average daily attendance during the same period. During school year 2022–23, Wharton ISD’s lunch participation rate exceeded both state and regional rates and the rate of most peer districts. For breakfast participation, Wharton ISD’s rate surpassed both the state and regional rates, although it was lower than most peer districts’ rates.

Wharton ISD’s Food Service Department employs 33 staff, including a food service director, a food service secretary, four cafeteria managers, two warehouse and delivery staff, and 25 cafeteria workers. The food service director reports to the deputy superintendent and oversees daily program operations, financial management, staff training and recruitment, menu planning, ordering, and compliance. Managers supervise and train cafeteria workers, receive deliveries to verify accuracy, oversee food quality and menu compliance, and manage cash. Cafeteria workers prepare meals. The food service secretary manages warehouse inventory, coordinates deliveries, and supports administrative and monitoring tasks. Warehouse and delivery staff maintain food safety and cleanliness in the warehouse, handle deliveries, and assist with inventory management. **Figure 5–3** shows the department’s organization.

**FIGURE 5–2
MEAL PARTICIPATION RATES (1) FOR WHARTON ISD,
PEER DISTRICTS, EDUCATION SERVICE CENTER III
(REGION 3), AND THE STATE
SCHOOL YEAR 2022–23**

DISTRICT	LUNCH PARTICIPATION RATE	BREAKFAST PARTICIPATION RATE
Wharton ISD	81.2%	41.8%
Atlanta ISD	78.5%	46.3%
Bay City ISD	72.5%	52.4%
El Campo ISD	62.9%	36.8%
Shepherd ISD	83.9%	54.3%
Region 3 (2)	69.3%	38.7%
State (2)	62.1%	32.9%

- NOTES:
 (1) Participation rates represent the average daily participation from August to May divided by the average daily attendance for school year 2022–23.
 (2) The state and regional breakfast participation rates account for severe-needs sites only, in which at least 40.0 percent of the lunches served during the previous school year were free or reduced-price. The districts shown serve severe-needs sites exclusively.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Department of Agriculture, March 2024; Texas Education Agency, Region and School District Average Daily Attendance Report, school years 2004–05 to 2022–23.

DETAILED ACCOMPLISHMENT

COMMUNITY ELIGIBILITY PROVISION

Wharton ISD provides free meals to all students and follows best practices to maximize reimbursements through the federal Community Eligibility Provision (CEP) program.

Typically, school districts determine eligibility for free or reduced-price meals through household applications that assess family income levels and household size. Students that meet federal income thresholds receive meals at no cost or a reduced price, and others pay the standard price. The CEP program, introduced by the Healthy, Hunger-Free Kids Act of 2010, enables high-poverty districts to serve no-cost meals without collecting household income applications. This approach increases students’ access to nutritious meals, reduces stigma, and leads to positive outcomes such as improved academic performance, lower suspension rates, and higher participation in school meal programs.

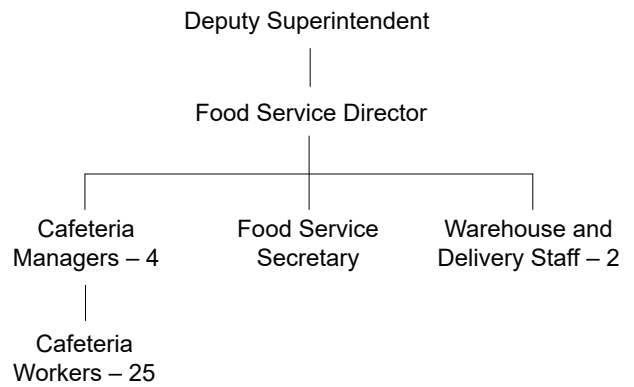
Implementing CEP can be financially beneficial for districts through increased meal participation rates, reduced administrative burdens through the elimination of meal applications, and potential for increased reimbursement rates. The financial benefits of implementing CEP depend on the district’s participation rates, student demographics and efforts to maximize federal reimbursements.

Wharton ISD’s participation rates have increased since adopting CEP districtwide in school year 2018–19. **Figure 5–4** shows the district’s breakfast and lunch participation rates during three consecutive school years before implementing CEP compared to three consecutive school years after implementing CEP.

The USDA reimburses school districts that implement CEP based on the student population served. The percentage of students the district identifies as categorically eligible for free meals, known as the identified student percentage (ISP), determines reimbursements for a school or group of schools. Eligible students include those who participate in qualifying federal or state-administered programs, such as the Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, certain types of Medicaid, Head Start, and state-funded prekindergarten. Students identified as migrant, homeless, or in the care of the Department of Family and Protective Services (DFPS) also are eligible automatically.

If a school’s or group’s ISP is 62.5 percent or greater, it qualifies for the maximum reimbursement rate from the

**FIGURE 5–3
WHARTON ISD’S FOOD SERVICE DEPARTMENT ORGANIZATION
SCHOOL YEAR 2023–24**



SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

**FIGURE 5–4
WHARTON ISD MEAL PARTICIPATION RATES BEFORE AND AFTER IMPLEMENTING CEP (1)
SCHOOL YEARS 2015–16 TO 2017–18 AND 2021–22 TO 2023–24 (2)**

YEARS	THREE-YEAR AVERAGES (3)	
	BREAKFAST	LUNCH
2015–16 to 2017–18	34.5%	68.8%
2021–22 to 2023–24 (3)	43.0%	80.7%

NOTES:

- (1) Wharton ISD implemented the federal Community Eligibility Provision (CEP) districtwide during school year 2018–19.
- (2) Data for school years 2019–20 and 2020–21 are excluded because food service operations were disrupted due to the onset of the COVID-19 pandemic.
- (3) Three-year average is the mean of the annual rates for the indicated period. Annual participation rates represent the average daily participation from August to May divided by the average daily attendance for each school year.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Department of Agriculture, Texas Open Data Portal, Meals and Reimbursement Claims, school years 2015–16 to 2023–24; Texas Education Agency, Region and School District Average Daily Attendance Report, school years 2004–05 to 2022–23; Foundation School Program, Summary of Finances Report, school year 2023–24.

USDA for each breakfast and lunch served. If a lower percentage of students is identified, the district receives a lower reimbursement rate from USDA. Efforts to maximize federal reimbursement focus on maximizing ISP because reimbursements are based on this percentage. Strategies for increasing ISP focus on identifying every eligible student and grouping schools effectively.

FIGURE 5–5
WHARTON ISD'S USDA FOODS ENTITLEMENT USAGE
SCHOOL YEARS 2022–23 AND 2023–24

YEAR	TOTAL BEGINNING ENTITLEMENT	ENTITLEMENT USED	ENTITLEMENT REMAINING	PERCENTAGE OF TOTAL ENTITLEMENT REMAINING
2022–23	\$106,726	\$92,360	\$14,366	13.5%
2023–24	\$112,942	\$101,794	\$11,148	9.9%

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Department of Agriculture, March 2024.

To identify eligible students, CEP districts use a process called direct certification, which involves matching school enrollment records with data from the qualifying programs. The Texas Department of Agriculture (TDA) provides a data-matching system to help districts develop a direct certification list. Wharton ISD's Food Service Department implements best practices to ensure they identify all eligible students through direct certification monthly. This process includes steps for reviewing the direct certification list for accuracy, such as updating records to fix discrepancies and making changes to reflect shifts in student enrollment. Additionally, the department identifies students in special categories, such as those classified as homeless or in DFPS care, to include all eligible students. As of school year 2023–24, Wharton ISD's established ISPs enable maximum possible reimbursement.

Districts also can maximize ISP by grouping campuses strategically. Each campus can have its own ISP and reimbursement rate, or the district can establish campus groupings to balance campuses that have higher and lower ISPs to maximize reimbursement. The ISP for a group is calculated by dividing the total number of identified students by the total enrolled students across all campuses within the group. A district can explore multiple grouping scenarios to test which scenario would maximize revenue. When Wharton ISD last established its ISP during school year 2021–22, every campus had an ISP greater than 62.5 percent except for Wharton High School. Grouping all the campuses together achieved a combined ISP of 72.5 percent, which enables the district to receive reimbursement for 100.0 percent of meals at all campuses at the free rate.

DETAILED FINDINGS

FOODS IN SCHOOLS PROGRAM (REC. 13)

Wharton ISD's Food Service Department does not maximize use of the U.S. Department of Agriculture's Food in Schools Program entitlement funds.

School districts participating in the NSLP are eligible to receive donated food from USDA to support menu development. The USDA Foods in Schools Program purchases domestic agriculture products and coordinates their distribution to states for use in child nutrition programs. Each year, school districts receive an entitlement to spend on USDA Foods. The entitlement funding amount is based on the number of reimbursable lunches served during the previous school year, multiplied by the federal rate of assistance per meal.

The USDA Foods entitlement supplements a district's food costs, providing savings that otherwise would be spent in the commercial market. Because the funds do not roll over, a district forfeits funds if it does not use its full entitlement within the designated period. **Figure 5–5** shows the amount used and remaining value of Wharton ISD's USDA Foods entitlement from school years 2022–23 to 2023–24. In both school years, portions of the district's USDA Foods entitlement remained unused at the end of the year.

By failing to use the full USDA Foods entitlement, Wharton ISD lost access to those funds and incurred higher costs from commercial food purchases, leading to increased overall food expenses. As a result, the district missed the opportunity to reduce spending and increase savings on nutritious food for students.

TDA administers the state's USDA Foods in School Program. Each spring, TDA surveys participating districts to determine what products to order and provides each with its entitlement amount for the following school year. School districts can allocate their entitlement among four categories: Direct Delivery, Processing Diversion, the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program, and Local Grown. **Figure 5–6** shows each category of USDA Foods.

The most appropriate allocation of USDA Foods entitlements depends on each district's unique circumstances and operational needs. Factors such as student population

FIGURE 5–6
USDA FOODS IN SCHOOLS PROGRAM ENTITLEMENT ALLOCATION CATEGORIES

CATEGORY	DESCRIPTION
Direct Delivery	This category consists of a variety of USDA Foods, including fruits, vegetables, meats, cheese, and whole grains, which may be fresh, frozen, canned, or dried. These products often are minimally processed foods that can be incorporated into scratch cooking.
Processing Diversion	In this category, approved processing facilities convert raw USDA Foods, such as bulk ground beef, bulk chicken, tomato paste, and cheese, into end products such as chicken nuggets, beef patties, or pizza. This method often is more cost-effective than purchasing similar commercial products, as the value of USDA Foods is subtracted from the cost.
USDA DoD Fresh	The USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program offers fresh fruits and vegetables sourced through the DoD. Districts can benefit from the high-quality products available in various forms (whole or precut) and pack sizes. This program assists schools to incorporate fresh produce regularly into their menus.
Local Grown (2)	This category includes products procured from local farmers within the state. The benefits include reducing warehouse, storage, and delivery fees; providing fresher products to schools due to shorter delivery distances; and supporting local agriculture.

NOTES:

(1) USDA=United States Department of Agriculture.

(2) The Local Grown category formerly was called Farm to School.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Department of Agriculture, Food Distribution Program Foundations: USDA Entitlements, 2024.

demographics, menu requirements, available storage facilities, and labor capacity influence the best allocation of the entitlement among the categories. Districts that have adequate kitchen staff and storage might prefer Direct Delivery items that require preparation, whereas those that have limited space or staff may opt for Processing Diversion items that are ready to heat and serve. Additionally, districts may allocate funds to the USDA DoD Fresh or Local Grown programs to meet specific nutritional standards or support local agriculture.

Wharton ISD may have opportunities to more efficiently allocate its entitlement funds. As of March 2024, the district used its entitlement on Direct Delivery and USDA DoD Fresh products. The food service director adjusts the menu to accommodate USDA food availability, receiving most products as bulk foods, such as ground meat, ham, eggs, and USDA DoD Fresh fruits and vegetables. Despite monitoring the department's USDA Foods inventory and trying to maximize the program's benefits, Food Service staff reported challenges in utilizing the program fully because the variety of Direct Delivery options that meet their menu needs is limited.

The district does not use Processing Diversion to convert bulk foods into processed end products. Using this program option might increase the benefits the district gains from USDA Foods by providing products in various processed forms that better suit the district's menu needs. Department

staff reported challenges with increasing food costs during recent years, which has necessitated an increase in scratch cooking. This practice is especially challenging for staff at the high school kitchen, which currently shares storage and food preparation space with staff for the junior high school. Routing more USDA Foods through Processing Diversion could help the district fully make use of its entitlement, better align foods with menu needs, and mitigate space constraints, which would make space and labor available for other needs.

Delivery, processing, and storage costs vary among USDA Foods programs, and it is important for districts to analyze the costs and benefits of each when evaluating allocation options. **Figure 5–7** shows an example of an assessment processes that school districts can use to align their needs with their entitlement usage.

Wharton ISD should assess Food Service Department needs and develop a plan that maximizes its federal Foods in Schools entitlement.

The food service director should evaluate the district's program needs and explore options to maximize the usage of its USDA Foods entitlement, which includes the following activities:

- assess program needs by evaluating current menu requirements, storage capabilities, and staff training levels; consider the versatility of products

**FIGURE 5–7
ASSESSMENT PROCESS FOR ALLOCATING USDA FOOD ENTITLEMENT**

STEP	COMPONENTS
Menu analysis	<ul style="list-style-type: none"> • identify the most frequently used items; • assess flexibility and multiple uses of items; and • determine availability through Direct Delivery, Processing Diversion, USDA DoD Fresh (1), or Local Grown programs
Storage and delivery analysis	<ul style="list-style-type: none"> • calculate available storage space; • consider vendor delivery capabilities, especially in rural areas; and • determine capacity for receiving foods in bulk versus frequent, smaller deliveries
Cost analysis	<ul style="list-style-type: none"> • compare costs of direct delivery, processed items, and commercial procurement; and • consider hidden costs such as storage and delivery fees
Labor and equipment assessment	<ul style="list-style-type: none"> • assess staff capacity for preparing scratch meals using USDA Foods, considering factors such as available time, meal schedules, and staff experience levels; and • ensure necessary kitchen equipment is available
Consider department goals	<ul style="list-style-type: none"> • decide on participation in USDA DoD Fresh or Local Grown programs based on benefits and logistics
Regular monitoring and adjustment	<ul style="list-style-type: none"> • establish monthly monitoring of usage and adjustment of allocations; • use historical data to inform decisions and prevent overordering or underutilization of entitlement funding

NOTE: (1) USDA DoD Fresh=the U.S. Department of Agriculture Department of Defense Fresh Fruit and Vegetable Program.
 SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024; Texas Department of Agriculture, *The ABCs of USDA Foods*, December 2022; Texas Department of Agriculture, *USDA Foods Challenge: How to Get the Best Bang for Your Buck by Utilizing USDA Foods Entitlement*, 2022.

in different entrees and the flexibility of menus to accommodate substitutions;

- explore all USDA Foods options, including Direct Delivery, USDA DoD Fresh, Local Grown, and Processing Diversion, and consider how each fits the district’s needs.
- regularly monitor costs and savings by comparing USDA Foods prices to those of commercial products, including hidden costs such as storage-and-delivery fees; perform per-serving or per-pound cost calculations to generate accurate pricing comparisons; and
- track entitlement usage monthly and adjust allocations as needed, ensuring full utilization of entitlement funding.

The fiscal impact of this recommendation assumes the district would use its full USDA Foods entitlement by implementing strategies to maximize its use of the Foods in Schools Program, resulting in a savings of approximately \$14,366 per year. This amount is based on the average amount of Wharton ISD’s entitlement remaining for school year 2022–23. This savings would total \$71,830 across five years.

FOOD SERVICE PROGRAM OVERSIGHT (REC. 14)

Wharton ISD does not assess performance measures or engage in strategic planning for the Food Service Department.

Wharton ISD’s food service director is the only district staff knowledgeable about the department’s overall operations, including procurement, budgeting, planning, participation, and compliance. The deputy superintendent, who oversees the department, is not familiar with these processes. Similarly, the food service director reviews certain key performance indicators (KPI), such as participation rates and meals per labor hour. However, the deputy superintendent does not request or review reports regarding these indicators or the department’s financial standing. Additionally, district administrators do not review food service profit-and-loss statements regularly.

The lack of measurable standards limits the district’s ability to oversee department operational performance effectively, make informed management decisions, or provide the department with adequate support. The regular use of KPIs can provide district administration insights into program performance barriers, such as meal period schedules, bus arrival times for breakfast, and staff recruitment issues. Effective districts enhance food service operations through attention and adjustments to these areas.

FIGURE 5–8
KEY PERFORMANCE INDICATORS FOR FOOD SERVICE OPERATIONS

INDICATOR	CALCULATION	IMPORTANCE OF INDICATOR
Labor cost as percentage of total revenue	Total labor costs divided by total revenue	Labor costs are the largest expenditure that food service departments incur. Total labor cost ratios provide administrators with information regarding how much total program revenue is dedicated to compensating staff. Effective districts maintain labor costs of less than 45.0 percent of revenue.
Food cost as a percentage of total revenue	Total food costs divided by total revenue	Food cost, including the value of U.S. Department of Agriculture USDA Foods in Schools Programs distributions, should not exceed 40.0 percent, especially when labor cost is high. Food costs are affected by menu selections, purchasing practices, accurate forecasting, and control of waste.
Breakfast participation rates	Total number of breakfasts served divided by the total average daily attendance	Participation rates directly affect program revenues. Studies show a positive correlation between breakfast consumption and students' school attendance, alertness, health, behavior, and academic success. Factors that influence participation rates include menu selections, attractiveness of dining areas, open campuses, competitive food sales, and adequate time to eat.
Lunch participation rates	Total number of lunches served divided by the total average daily attendance	High participation rates indicate customer satisfaction and maximize program reimbursements. Factors that influence participation rates include menu selections, attractiveness of dining areas, open campuses, competitive food sales, and adequate time to eat.
Inventory on hand	Value of the ending inventory divided by the average daily food cost	Avoiding excess inventory helps reduce food theft and spoilage and decreases food costs. Optimal inventory targets are affected by the frequency of food and supply deliveries. For sites that receive weekly deliveries, schools should maintain no more than seven days of inventory on hand.
Meals per labor hour	Total number of meal equivalents for a period divided by the total number of paid labor hours for the same period	Most programs should maintain a minimum target of 18.0 meals per labor hour.

SOURCES: Legislative Budget Board School Performance Review Team, March 2024; Institute of Child Nutrition, *Essential Key Performance Indicators for School Nutrition Success*, April 2019; Julie Boettger, "Rx for a Healthy School Nutrition Program," *School Business Affairs*, Association of School Business Officials International, December 2009; Council of the Great City Schools, *Managing for Results in America's Great City Schools*, October 2023.

Furthermore, the department does not have any specific long-term or short-term goals. The absence of goals or measurement metrics leaves district level administration without a method for evaluating the food service program's current performance or exploring paths for future growth. Opportunities for program improvement, such as increasing wages, providing administrative training for employees, and implementing alternative service models to improve access to breakfast, such as breakfast in the classroom or second chance breakfast, have not been evaluated systematically as part of a long-term planning process. Pursuing these initiatives requires the district to commit resources and strategic planning.

The Food Service Department has funds to invest in its program. The department's revenue has increased faster than expenditures during the past five-year and 10-year periods. During school years 2021–22 and 2022–23, the fund balance has exceeded three months of average expenditures, which exceeds the TDA standard for nonprofit school food services programs. However, the absence of strategic planning

and goals leaves the district without guidance on the usage of the department's fund balance. As of March 2024, district staff reported not having plans for how to use these funds. The food service director had a list of items to buy, but they address immediate and routine needs. Additionally, district staff report being uncertain about the allowable uses of the food service fund, which raises concerns about financial accountability and the risk of fund misallocation.

An effective performance-measurement system enables leadership to monitor how food service program performance and costs compare to established benchmarks. Effective operations also report findings to the superintendent and school board and identify the need to take corrective actions to address problems such as excessive program costs, low staff productivity, or low student participation and satisfaction.

Figure 5–8 shows KPIs that district administrators can use to assess overall food service operations.

The Institute of Child Nutrition recommends that school districts review food service department financial

**FIGURE 5–9
BEST PRACTICES AND INDICATORS IN STRATEGIC PLANNING FROM SCHOOL NUTRITION ASSOCIATION'S
KEYS TO EXCELLENCE, 2019**

INDICATOR	DESCRIPTION
Best practice C1.1: The school nutrition program has a mission statement and conducts strategic planning regularly.	
C1.1.1	The mission statement includes, as the purpose of the program, the integral part that the school nutrition program plays in overall academic success.
C1.1.2	Strategic planning is conducted to identify the issues facing the school nutrition program that should be addressed.
C1.1.3	Strategies and action items are developed to address the issues.
C1.1.4	Representative school nutrition personnel from all levels are involved in strategic planning.
C1.1.5	The strategic plan is written and communicated to school nutrition personnel and to stakeholders in the school community.
C1.1.6	The mission statement represents, as the purpose of the program, the integral part that the school nutrition program plays in overall academic success.
Best Practice C1.2: The school nutrition program has written short-term and long-term goals that represent the strategic plan and focus on program improvement.	
C1.2.1	Goals are identified for the current year and the next two to three years, and they are consistent with the goals of the school district.
C1.2.2	Specific objectives and actions are identified.
C1.2.3	A written schedule or timeline for accomplishing goals is determined.
C1.2.4	School nutrition staff and assigned responsibilities are identified for each objective.
C1.2.5	Progress in achieving the goals is evaluated, and adjustments are made as needed.
C1.2.6	The goals along with the progress and evaluation are communicated to all school nutrition personnel and district administrators on a regular basis.
C1.2.7	Goals are identified for the current year and the next two to three years, and they are consistent with the goals of the school district.

SOURCE: School Nutrition Association, Keys to Excellence: Standards of Practice for Nutrition Integrity, 2019.

management practices on a continuous basis. Best practices include food service leadership regularly analyzing KPIs and district administration regularly receiving and reviewing uniform financial records. Budget managers are specifically advised to evaluate school-level income and expenditure projections frequently and amend the budget as needed to accommodate changes in participation and costs.

The School Nutrition Association’s 2019 resource *Keys to Excellence: Standards of Practice for Nutrition Integrity* identifies best practices for school nutrition programs across various topics, including administration and financial management. **Figure 5–9** shows selected best practices and indicators in strategic planning.

Wharton ISD should develop a process for monitoring and improving the Food Service Department’s performance.

The deputy superintendent should collaborate with the food service director to establish systems that enable district

leadership to evaluate the food service program and make informed decisions regarding limited resources. The deputy superintendent and food service director should perform the following tasks:

- establish a performance-measurement system that enables district leadership to evaluate the food service program and make informed decisions regarding resource allocation, including steps to: (1) develop a set of key performance indicators for the food service director to provide district leadership, which could include indicators shown in **Figure 5–8**; and (2) establish a regular reporting schedule for the deputy superintendent and determine the frequency and contents of the reports;
- develop a Food Service Department strategic plan that includes: (1) a mission statement that conveys the purpose of the program; (2) measurable long-term and short-term goals aligned with departmental needs and priorities; and (3) an annual evaluation

protocol to measure the department's effectiveness in achieving its goals, with regular progress reviews and updates as needed.

The district could implement this recommendation with existing resources.

WELLNESS PLAN (REC. 15)

Wharton ISD's School Health Advisory Council has not developed a plan to implement the district's wellness goals.

The federal Healthy, Hunger-Free Kids Act of 2010 requires every school district participating in NSLP or SBP to establish and implement a local wellness policy. This policy outlines methods to promote student wellness, reduce childhood obesity, and adhere to federal nutrition standards, and it must contain the following components:

- specific goals for nutrition promotion and education, physical activity, and other school-based activities;
- standards for all foods and beverages provided but not sold to students;
- standards for all foods and beverages sold to students;
- an assignment of individuals responsible for the implementation and oversight of the wellness policy;
- provisions for stakeholder participation in the development, implementation, and periodic review of the wellness policy; and
- a plan for measuring the implementation of the wellness policy.

Wharton ISD Board Policy FFA (LOCAL) addresses these topics and delegates several wellness-related activities to the district's School Health Advisory Council (SHAC). For instance, the policy tasks the SHAC with developing standards for foods and beverages provided to students and a plan for measuring the implementation of the wellness policy. The policy also tasks the SHAC with outlining a plan to implement the district's wellness goals. **Figure 5–10** shows Wharton ISD's wellness goals found in Board Policy FFA (LOCAL).

To support these wellness goals, a wellness plan must include the following components:

- strategies for engaging stakeholders in the wellness plan and policy;

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

According to the board policy, the district's deputy superintendent oversees the wellness plan's development and implementation. The Legislative Budget Board's School Performance Review Team visited the district in March 2024. At that time, the SHAC had not developed a wellness plan to accompany the board policy.

Without a comprehensive wellness plan, Wharton ISD may struggle to achieve its wellness goals. For example, district goals include prioritizing nutrition education districtwide and educating students, families, and the broader community about healthy eating. However, district staff reported being unaware of ongoing nutrition education or promotion activities. Although the district posted nutrition promotion material in the cafeterias, it did not post any nutrition education messages on the district's website or social media platforms. The lack of a detailed plan makes it difficult for the district to measure progress toward nutrition education goals, as specific milestones and success metrics are not clearly defined.

A wellness plan is an important tool in the strategic planning process to meet students' health and wellness needs. Addressing these needs requires a cross-departmental effort, and the SHAC and the wellness plan can serve as mechanisms to centralize and coordinate these efforts. An effective wellness plan also outlines how a district will meet its goals, offering space and structure for task division, resource allocation, and progress measurement. Additionally, it facilitates stakeholder involvement

Rogers ISD offers a strong example of a comprehensive wellness plan available on its website. This plan includes goals delineated into objectives, action steps, lists of resources needed, methods for measuring success, and relevant obstacles. Baseline measurements, such as the number of promoted nutrition events from the previous year, are included to facilitate the annual evaluation of the wellness plan's implementation.

**FIGURE 5–10
WHARTON ISD BOARD POLICY FFA (LOCAL) WELLNESS GOALS, SCHOOL YEAR 2023–24**

CATEGORY	GOALS
Nutrition Promotion	<ul style="list-style-type: none"> The district’s nutrition promotion activities shall encourage participation in the National School Lunch Program, the School Breakfast Program, and any other supplemental food and nutrition programs offered by the district. The district’s food service staff, teachers, and other district personnel shall consistently promote healthy nutrition messages in cafeterias, classrooms, and other appropriate settings. The district shall share educational nutrition information with families and the general public to promote healthy nutrition choices and positively influence the health of students. The district shall ensure that food and beverage advertisements accessible to students outside of school hours on district property contain only products that meet federal guidelines for competitive foods.
Nutrition Education	<ul style="list-style-type: none"> The district shall deliver nutrition education that fosters the adoption and maintenance of healthy eating behaviors. The district shall make nutrition education a districtwide priority and shall integrate nutrition education into other areas of the curriculum, as appropriate. The district shall provide professional development so that teachers and other staff responsible for the nutrition education program are adequately prepared to effectively deliver the program.
Physical Activity	<ul style="list-style-type: none"> The district shall provide an environment that fosters safe, enjoyable, and developmentally appropriate fitness activities for all students, including those who are not participating in physical education classes or competitive sports. The district shall provide appropriate staff development and encourage teachers to integrate physical activity into the academic curriculum where appropriate. The district shall make appropriate before-school and after-school physical activity programs available and shall encourage students to participate. The district shall make appropriate training and other activities available to district employees to promote enjoyable, lifelong physical activity for district employees and students. The district shall encourage parents to support their children’s participation, to be active role models, and to include physical activity in family events. The district shall encourage students, parents, staff, and community members to use the district’s recreational facilities, such as tracks and playgrounds, that are available outside of the school day.
Other School-based Activities	<ul style="list-style-type: none"> The district shall allow sufficient time for students to eat meals in cafeteria facilities that are clean, safe, and comfortable. The district shall promote wellness for students and their families at suitable district and campus activities. The district shall promote employee wellness activities and involvement at suitable district and campus activities.

SOURCES: Wharton ISD Board Policy Manual, FFA (LOCAL), Student Welfare: Wellness and Health Services, March 2024.

Wharton ISD should develop and implement a wellness plan that aligns with district policy and federal standards.

Wharton ISD’s SHAC should develop a wellness plan that meets Board Policy FFA (LOCAL) requirements. As part of this effort, the SHAC should take the following steps:

- define actionable steps, benchmarks, and activities to meet wellness goals;
- develop methodologies to track and measure wellness goal implementation, establishing evaluation criteria for effective progress monitoring;
- involve stakeholders through surveys, forums, and meetings to gather input;

- establish district standards that comply with nutritional requirements for food provided on campus but not sold as part of the food service program;
- develop a communication plan to disseminate wellness policy information via the district’s website, social media, newsletters, and community programs; and
- develop a schedule for the SHAC’s regular wellness plan review and revision, including protocols to assess effectiveness and recommend policy adaptations in response to evolving needs and best practices.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

MEAL SCHEDULES

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

Principals set mealtimes without standardized guidelines or feedback from the Food Service Department. For example, junior high school students are required to enter the cafeteria and sit down before joining the line, can result in a waiting period of 10 minutes, as observed by the review team. Including clean-up time, some students had as little as 12 minutes of actual seat time to eat their lunch.

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

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

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

The Food Service Department should develop written guidelines for mealtime planning and organization,

collaborating with school administrators to enforce these standards across all campuses. Furthermore, the department should assess mealtime duration regularly to provide optimal student accommodation.

LANGUAGE BARRIERS

Some staff of Wharton ISD's Food Service Department are non-English speakers. At the time of the onsite visit, the department relied on bilingual staff informally to translate training and related information for staff not proficient in English. Although the department provides comprehensive training resources and events, including monthly meetings, summer professional development, regular demonstrations, and a written handbook, the department provides these in English only, which may pose learning and communication barriers for certain staff.

In *Translating Employee Handbooks for Non-English Speakers*, the Texas Association of School Boards (TASB) notes that, although districts are not required to translate employee handbooks and training materials, districts should assure that non-English speaking employees fully understand the information. TASB suggests that translating employee handbooks and holding meetings in both English and another language, concurrently or separately, can help provide clarity to those who are not fluent in English.

Providing translated meetings and materials helps ensure that all staff, regardless of their language proficiency, receive the same information and can fully understand their responsibilities and expectations. Wharton ISD's Food Service Department can leverage bilingual staff, including the food service secretary, to provide Spanish translations. Additionally, using the translator function on the district's website can help translate important portions of materials.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations, and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review to determine the level of priority, appropriate timeline, and method of implementation. The LBB's School Performance Review Team identified a fiscal impact for **Recommendation 13**.

FISCAL IMPACT

RECOMMENDATION	2024-25	2025-26	2026-27	2027-28	2028-29	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
5. FOOD SERVICE MANAGEMENT							
13. Assess Food Service Department needs and develop a plan that maximizes its federal Foods in Schools entitlement.	\$11,148	\$11,148	\$11,148	\$11,148	\$11,148	\$55,740	\$0
Total	\$11,148	\$11,148	\$11,148	\$11,148	\$11,148	\$55,740	\$0

6. FACILITIES MANAGEMENT

FINDINGS

- ◆ Wharton ISD lacks a long-term, comprehensive, facilities master plan.
- ◆ Wharton ISD lacks a formal preventive maintenance process and relies on the knowledge of veteran staff to schedule recurring tasks.
- ◆ Wharton ISD does not manage, measure, or monitor its energy use effectively.

RECOMMENDATIONS

- ◆ **Recommendation 16: Establish an ongoing facilities master planning process, develop a facilities master plan, and update the plan annually.**
- ◆ **Recommendation 17: Develop, document, and implement a formal preventive maintenance program and a process for tracking deferred maintenance.**
- ◆ **Recommendation 18: Develop and implement an energy management plan in compliance with state law and board policy to conserve energy and reduce energy costs.**

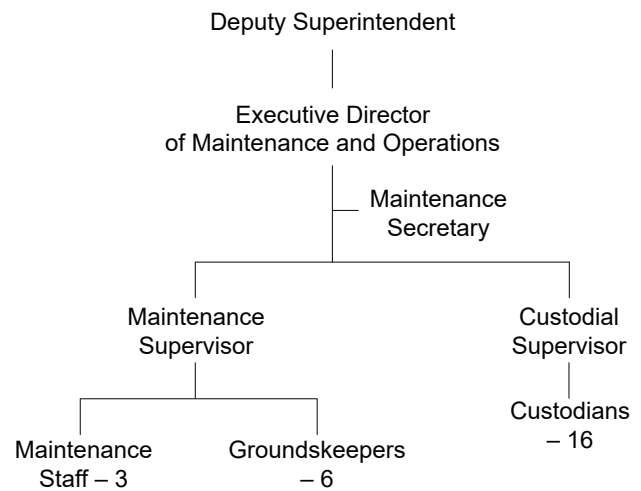
BACKGROUND

An independent school district's facilities program provides safe and clean learning environments. A school district's facilities include campuses, buildings, grounds, gymnasiums, athletic fields, portable buildings, storage structures, and warehouses. Facilities management involves acquisition and construction, maintenance and operations, and general administration.

Acquisition and construction include the purchase, remodel, or extension of buildings. Maintenance and operations involve activities required to keep the facilities and grounds open, clean, comfortable, insured, and in effective working condition. General administration consists of planning and budgeting for facility functions.

Wharton Independent School District (ISD) has four campuses: two elementary schools, one junior high school, and one high school. The district also owns and maintains an administrative building and a complex containing the maintenance facility, transportation facility, and food service warehouse. In addition, the district has facilities for sports, agriculture, arts, and trade programs.

FIGURE 6-1
WHARTON ISD'S FACILITIES MAINTENANCE
AND OPERATIONS ORGANIZATION
SCHOOL YEAR 2023-24



NOTE: Since the time of the review, the executive director of maintenance and operations title has changed to Maintenance and Operations Supervisor.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

Based on the Legislative Budget Board's School Performance Review team's observations when visiting the district in March 2024, the campuses and district buildings appeared to be clean and properly maintained. Surveys conducted before the review indicated that 75.0 percent of campus staff and 60.0 percent of parents felt that the district's schools and buildings were clean and properly maintained.

Wharton ISD's executive director of maintenance and operations oversees the district's buildings, maintenance, custodial, and transportation functions and reports to the deputy superintendent. A part-time maintenance supervisor helps manage the Maintenance and Operations Department, which consists of three maintenance workers and six groundskeepers. At the time of the onsite visit, three additional maintenance positions were vacant. The department also includes an administrative assistant to the Maintenance and Operations Department and a custodial supervisor who manages 16 custodial staff. **Figure 6-1** shows the reporting structure for Wharton ISD's Maintenance and Operations Department.

Figure 6–2 shows the year of construction and the square footage for each of the district’s campuses and its administration building based on a facility assessment report conducted during calendar year 2014. At the time of the onsite visit, the district was conducting an updated assessment of all district facilities.

Figure 6–3 shows the facilities maintenance and operations costs for Wharton ISD and its peer districts during fiscal year 2023. Peer districts are districts similar in size and other characteristics to Wharton ISD that are used for comparison purposes. The peer districts for Wharton ISD are Atlanta ISD, Bay City ISD, El Campo ISD, and Shepherd ISD. As shown in Figure 6–3, Wharton ISD spent \$3.9 million for facilities maintenance and operations, which was more than two of its peer districts but less than the peer district average. Wharton ISD’s facilities maintenance and operations expenditures represented 13.0 percent of its total expenditures and cost an average of \$2,126 per student, which is greater than all the peer districts. For fiscal year 2024, Wharton ISD budgeted approximately \$3.1 million for facilities maintenance and operations.

The district uses a work-order system to manage facilities maintenance requests. Staff members submit work order requests to assistant principals, who send them electronically to the Maintenance and Operations Department. After staff enter a request, the executive director of maintenance and operations reviews the work order and assigns it to the appropriate maintenance staff. The executive director reviews open requests daily and closes work orders as maintenance staff complete jobs.

DETAILED FINDINGS

FACILITIES MASTER PLANNING (REC. 16)

Wharton ISD lacks a long-term, comprehensive, facilities master plan.

**FIGURE 6–2
WHARTON ISD CAMPUSES AND ADMINISTRATION
BUILDING
SCHOOL YEAR 2022–23**

FACILITY	YEAR OF CONSTRUCTION	SQUARE FOOTAGE
Administration Building	1964	20,256
Wharton High School	1962	93,665
Wharton Junior High School	1974	73,717
C.G. Sivells Elementary School	1950	82,384
Wharton Elementary School	2008	95,097

NOTE: Data shown includes square footage for the main campus buildings and the administration building. It does not include separate buildings such as gymnasiums, band halls, and trade buildings; nor does it include the additional square footage for the Wharton Junior High School building that was under construction in March 2024.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD Facility Inventory, March 2024, based on a Texas Association of School Boards facilities assessment conducted during calendar year 2014.

An effective facilities master plan supports the district’s educational goals by aligning the current and future physical environment with students’ learning needs and the district’s resources. The development of a comprehensive school facilities master plan typically involves the following components:

- stakeholder engagement that may include students, teachers, administrators, and community members;
- data collection that addresses student demographics, enrollment projections, and facility conditions and capabilities;
- consideration of district initiatives and facility goals;
- identification of district project and renovation priorities;

**FIGURE 6–3
WHARTON ISD AND PEER DISTRICTS’ FACILITIES MAINTENANCE AND OPERATIONS COSTS, FISCAL YEAR 2023**

DISTRICT	FACILITIES MAINTENANCE AND OPERATIONS EXPENDITURES	PERCENTAGE OF ALL FUNDS	ENROLLMENT	COST PER STUDENT
Wharton ISD	\$3,911,760	13.0%	1,844	\$2,126
Atlanta ISD	\$2,259,968	8.6%	1,877	\$1,204
Bay City ISD	\$6,743,000	14.8%	3,565	\$1,891
El Campo ISD	\$6,066,501	13.3%	3,318	\$1,828
Shepherd ISD	\$2,542,491	9.9%	1,954	\$1,301
Peer average	\$4,402,990	11.7%	2,679	\$1,556

SOURCES: Legislative Budget Board School Performance Review Team, March 2024; Texas Education Agency, Public Education Information Management System, school year 2022–23.

- determination of project budgets and timelines;
- development of a living document that is reviewed and updated regularly to guide school district budgeting, spending, and construction decisions; and
- an ongoing, documented, assessment of district facilities detailing deferred and preventive maintenance.

The district's last building assessment was completed in calendar year 2014, and the district does not have an up-to-date building inventory report. A building assessment includes a comprehensive list of all buildings in the district. District staff reported plans to contract with a vendor to develop a facilities assessment as a basis for developing a long-term facilities plan; however, this initiative had not begun at the time of the review team's onsite visit.

Without a facilities master plan, the district makes major capital investment decisions and incurs maintenance and repair expenses without considering facility conditions, goals, or resources. Decisions about major facility renovations or upgrades often are made as staff identify needs and report them to district administration. Wharton ISD recently has begun significant construction and renovation projects. In 2018, voters approved a \$59.0 million bond for new junior high school and high school buildings, a maintenance facility, a baseball stadium, and various upgrades throughout the district. Cost estimates developed by an architecture firm did not include actual construction cost estimates from contractors.

After the bond's approval, the district determined the funds insufficient due to increasing construction costs and material prices during the COVID-19 pandemic. Consequently, the Wharton ISD Board of Trustees (board) canceled some of the planned projects, including building the new high school. The district used the bond proceeds to construct a new junior high school and baseball stadium, and for upgrades to the high school and C.G. Sivells Elementary School. Construction of the junior high school began in 2021, and still was in process as of March 2024. While construction occurred, junior high school students attended classes in portable buildings at the high school campus. The new junior high school campus is expected to open in fall 2024.

In addition to the bond projects, the district recently used its fund balance to build a new high school gymnasium and locker rooms, remodel classrooms, and add security vestibules and metal detectors to all campuses.

Wharton ISD's lack of a facilities master plan leads to reactive decision-making that focuses on short-term solutions rather than long-term goals. The district also lacks an effective, ongoing process for assessing facility conditions. The district addresses issues informally as maintenance staff observe them; however, the Maintenance and Operations Department does not follow a documented process or schedule for evaluating the condition of buildings and grounds to drive a comprehensive assessment for facilities planning.

Without a comprehensive facilities master plan, the district has no defined method for prioritizing or budgeting for facility issues. During interviews, staff identified several district facilities needs including:

- the transportation and maintenance buildings are insufficient to meet the needs of the district;
- older buildings, including Wharton High School and C.G. Sivells Elementary School, require ongoing repair and maintenance to remain operational; and
- buildings throughout the district have unaddressed deferred maintenance due to budgetary constraints.

Without an annual condition assessment process, the district may be unable to identify and address critical maintenance issues promptly. The lack of planning for facilities utilization may hinder educational opportunities and restrict the district's ability to use specialized facilities as intended.

A well-developed facilities management plan supports a highly effective educational system across many operational areas, including the following examples:

- providing a baseline assessment for decisions about district facilities;
- assuring that district facilities continue to meet current and long-range educational programming needs;
- facilitating input on district facilities from all stakeholders, including the community, parents, students, and staff;
- clearly communicating the district's facility requirements and goals; and
- providing a basis for developing bond proposals to support facilities improvements and accomplish educational initiatives.

**FIGURE 6–4
FACILITIES MASTER PLAN COMPONENTS**

COMPONENT	DESCRIPTION
Introduction	
District Facility Goals	Identify district goals and vision for its facilities
Issues and Findings	List the issues the district is facing (e.g., enrollment decreases, facility condition, bonding for contractors, excess space, overcrowded facilities)
Planning Process	Discuss the planning process (e.g., stakeholder engagement)
Executive Summary	Identify priority projects, costs, and funding
Existing and Projected Conditions	
Educational Structure	School district composition (i.e., number/type of schools and grade-level configurations), including anticipated changes
Site and Facilities Overview	School district boundaries and attendance zones; list of facilities, including physical addresses, dates of opening, square footage, etc.
Demographics and Enrollment	Include historical demographic information, possible influencing factors, and enrollment projections
Capacity and Utilization	
Functional Capacity Analysis	Identify maximum capacities at each site and factors that might affect capacity
Utilization Analysis	Identify utilization rates at each site and factors that affect current utilization
Space Needs	Discuss classroom and storage needs; identify vacant and underutilized spaces
Capital Improvement Program	
Available Funding	Provide an overview of district funding history; identify current and future financial resources available to meet capital, systems, security, maintenance, and technology needs
Planning Strategy and Implementation	Consider the following factors: Does the district need a new school? Which facilities need to be fully replaced, if any? Which facilities need major or minor renovation? Which facilities only need general maintenance? Which maintenance needs could result in capital needs if not addressed? Which facilities need to be closed, demolished, consolidated, or repurposed? Does the district have any early childhood facility needs?
Capital Plan Priorities	Identify priorities and anticipated sources of funding, and discuss the prioritization process including public engagement

SOURCE: New Mexico Public School Facilities Authority Facilities Master Plan Scope of Work Checklist, revised December 2022.

When developing a plan, effective school districts include input from teachers, students, parents, and other community stakeholders. The National Council on School Facilities website publishes facilities-planning resources, including informational videos on educational facilities planning and links to examples of facilities master plans from rural, suburban, and urban districts.

A 2016 report from the *Journal of Facility Management* titled “Heightened Change Awareness and Responsiveness Through Continuous Facility Master Planning” emphasizes the importance of a facilities master plan in guiding the transition from the existing physical infrastructure to educational environments that align with the district’s mission. The facilities master plan coordinates and aligns many diverse considerations into a strategic long-term vision for facilities.

The Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter CC, Section 61.1036(a)(9), encourages school districts to formulate long-range facilities plans before making major capital investments. **Figure 6–4** shows recommended components of a facilities master plan for school districts.

Wharton ISD should establish an ongoing facilities planning process, develop a facilities master plan, and update the plan annually.

The superintendent should establish a comprehensive, long-range, facilities master-planning process using the following key steps and considerations:

- develop a facilities inventory that identifies the use and size of each room at each campus;

- analyze student enrollment to establish accurate enrollment projections for at least five years;
- review and analyze deferred maintenance work to determine the current necessity of each project;
- identify current needs for safety, accessibility, and energy improvements;
- solicit input from district staff, students, community representatives, and other stakeholders through methods including establishing a subcommittee, conducting periodic meetings for feedback, and enabling stakeholders to submit feedback through the district's website;
- determine the training necessary to support maintenance staff in successfully implementing and maintaining planned improvements; and
- establish facilities and educational programming priorities.

After collecting these data, the deputy superintendent, the executive director of maintenance and operations, and the maintenance supervisor should develop and implement a continuous facilities planning process for approval by the superintendent. This process should contain the following elements:

- identify a committee of stakeholders to participate in the planning process, including the superintendent, maintenance and custodial staff, campus staff, parents, community stakeholders, students, and board members;
- develop a five-year facilities master plan that includes the status of each facility, facility goals and objectives, recommendations for facility improvements, and projected costs for these improvements; and that accounts for expected changes to facility needs, including curriculum and technology, safety and security developments, and the incorporation of local, state, and federal requirements;
- identify funding sources for the work; and
- implement a deferred maintenance schedule that includes a detailed backlog of all district maintenance activities, prioritized by building and equipment, and establish a timeline for performing deferred maintenance activities.

The district should submit the facilities master plan to the board and superintendent for review and approval. The district should review and update the information annually as new data and information become available.

The district could implement this recommendation with existing resources.

PREVENTIVE MAINTENANCE (REC. 17)

Wharton ISD lacks a formal preventive maintenance process and relies on the knowledge of veteran staff to schedule recurring tasks.

Preventive maintenance is the regular and routine maintenance of assets and equipment to maintain their optimal operation and prevent costly downtime from unexpected failure. Wharton ISD's preventive maintenance schedule is informal and based on the institutional knowledge of veteran maintenance staff. Additionally, staff reported that the district has deferred maintenance in many buildings throughout the district, which could result in costly repairs if not addressed. Examples include outdated electrical panels and wiring in many of the district's older buildings, an aging heating, ventilation, and air conditioning (HVAC) system at the high school, and walls that need repainting at Wharton Elementary School.

Instead of following a preventive schedule, the department prioritizes tasks as they occur. The department typically responds to work orders for safety issues first, then addresses other issues in the order in which districtwide staff submit work orders. The department relies on the historical knowledge of maintenance staff to determine the maintenance needs of district equipment. Relying solely on the institutional knowledge of veteran staff to ensure that facilities and equipment are maintained at appropriate intervals places the department at greater risk of inefficiency if these staff separate from the district's employment.

Without clearly documented preventive maintenance schedules and procedures, the district risks equipment failures or decreases in the useful life of facilities and equipment. A lack of sufficient preventive maintenance can increase maintenance costs throughout the district.

Wharton ISD should develop, document, and implement a formal preventive maintenance program and a process for tracking deferred maintenance.

The executive director of maintenance and operations should develop a comprehensive preventive maintenance plan and

FIGURE 6–5
SAMPLE FACILITIES PREVENTIVE MAINTENANCE SCHEDULE, MARCH 2024

ACTIVITY	FREQUENCY
Clean air-conditioning unit filters	Every 2 months
Change air-conditioning unit filters	Intervals ranging from 3 weeks to 12 weeks
Clean chiller condenser coils	Every 2 years
Clean fan coil and air handler evaporator coils	Annually
Clean ice machine condenser coils	Every 4 months
Inspect and test chillers' capacity	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
Inspect exterior lighting	Every 6 months
Inspect school gymnasium lighting	Annually
Inspect and clean gymnasium gas heaters	Annually
Inspect playground equipment	Monthly, repair as needed
Clean fire alarm system smoke detectors	Every 6 months
Inspect all interior and exterior bleachers	Annually, repair as needed
Clean, tighten, and lubricate rollout bleachers	Annually
Check exterior building and concrete caulking	Annually – replace every 8 years
Repaint stripes in exterior parking lots	Annually
Check condition of asphalt parking lots	Annually – replace every 12 years
Examine carpeting	Check quarterly for damage and replace every 15 years, or as needed
Examine vinyl composition tile floors	Check quarterly for damage and replace every 20 years, or as needed
Spray-wash exterior soffits and buildings	Every 2 years or as needed
Replace glass and plexiglass	As needed
Paint interior of facilities	Every 5 years
Paint exterior of facilities	Every 8 years
Perform general facility inspections	Annually

SOURCE: Legislative Budget Board School Performance Review Team, March 2024.

submit it to the superintendent for approval. **Figure 6–5** shows a sample preventive maintenance schedule the district could use as an example.

The executive director of maintenance and operations should arrange for all maintenance staff to receive training regarding the required steps for preventive maintenance tasks. The executive director of maintenance and operations should incorporate the preventive maintenance schedule into the work-order management system to schedule reminders and document that all tasks have been completed.

The district could implement this recommendation with existing resources.

ENERGY MANAGEMENT PLAN (REC. 18)

Wharton ISD does not manage, measure, or monitor its energy use effectively.

Texas school districts are required to develop energy management strategies to reduce their overall energy consumption. The Texas Education Code, Section 44.902(a), requires each district to establish a long-range energy plan to reduce its annual electric consumption by 5.0 percent, and

maintain its reduced consumption during subsequent years. Wharton ISD’s Board Policy CL (LEGAL) also includes these requirements.

During onsite interviews, Wharton ISD maintenance staff reported that the district is performing tasks to reduce energy consumption. For example, maintenance staff have installed energy-efficient, light-emitting diode (LED) lighting at C.G. Sivells Elementary School, Wharton Elementary School, and Wharton High School. However, the district has not developed a long-term plan to reduce energy consumption across the district.

Figure 6–6 shows Wharton ISD’s utility expenditures from fiscal years 2019 to 2023. Utility expenditures decreased from fiscal years 2019 to 2021 but increased by 23.6 percent from fiscal years 2021 to 2022. Without a defined energy management plan, the district’s energy consumption may continue to fluctuate from year to year.

An effective energy management plan includes strategies for using the minimum amount of energy while continuing to provide a desired level of comfort to building occupants. The plans also should incorporate strategies for educating building staff on energy efficiency, enhancing or automating building controls, properly maintaining existing equipment, and installing energy-efficient equipment as the district replaces systems.

The statutory requirements mandate that a school district’s long-range energy plan includes the following action steps:

- determine the total net cost and savings that may occur in the seven years after implementing each strategy;
- include strategies for achieving energy efficiency that result in net savings for the district, or that could be achieved without financial cost to the district; and
- outline the initial, short-term capital costs and lifetime costs and savings that could result from the implementation of each strategy.

Garland ISD outlines the district’s energy conservation efforts on its website. This information includes a mission statement, detailed steps to conserve energy throughout district buildings, and efforts to decrease utilities costs, conserve water usage, and cut down on waste removal costs. The district also has two staff positions responsible for promoting conservation efforts and monitoring the district’s energy use for inefficiencies.

FIGURE 6–6
WHARTON ISD UTILITY EXPENDITURES
FISCAL YEARS 2019 TO 2023

YEAR	UTILITY EXPENDITURES	PERCENTAGE CHANGE FROM PREVIOUS YEAR
2019	\$956,984	N/A
2020	\$952,102	(0.5%)
2021	\$829,370	(12.9%)
2022	\$1,024,869	23.6%
2023	\$966,936	(5.7%)

SOURCE: Texas Education Agency, Public Education Information Management System, fiscal years 2019 to 2023.

The State Energy Conservation Office (SECO) provides free support to schools in the following areas:

- energy accounting;
- energy-efficient facility operation and maintenance;
- indoor air quality;
- water conservation; and
- comprehensive energy planning.

SECO also provides preliminary energy assessments to districts at no cost. The preliminary energy assessment includes the following elements:

- analysis of utility bills and other building information to determine energy and cost utilization indices of facilities;
- recommended maintenance procedures and capital energy retrofits;
- structure and monitoring of customized procedures to control the run times of energy-using systems;
- informal onsite training for building operators and maintenance staff;
- follow-up visits to assist with the implementation of the recommendations and to determine savings associated with the project;
- development of an overall energy management policy;
- assistance with the development of guidelines for efficiency levels of future equipment purchases; and
- facility benchmarking using the Energy Star Portfolio Manager.

Wharton ISD should develop and implement an energy management plan in compliance with state law and board policy to conserve energy and reduce energy costs.

The executive director of maintenance and operations should develop an energy management plan that includes a mission statement and specific energy conservation and building management guidelines. These guidelines should include policies for appropriately regulating classroom temperatures and communication and enforcement strategies. The energy management plan also should include the following components:

- evaluating installed controls to monitor that systems are functioning correctly, which includes checking independent motion detectors for controlling lights and HVAC systems, checking night and weekend set-back controls, and performing preventive maintenance, such as fixing leaks to reduce water consumption;
- performing energy surveys to identify solutions for systems or operational practices that are wasting energy;
- adopting policies for closing windows and doors and for controlling exhaust fans to reduce the cost of heating and cooling;
- establishing a schedule for regular cleaning, maintenance, and filter changes of HVAC equipment to protect indoor air quality and extend the equipment life;
- adopting standards for routine maintenance that require the use of energy-efficient equipment; for example, using LED technology for all relamping and fixture replacements; and
- developing a plan to increase staff awareness; for example, encouraging district staff to place equipment with high-energy use, such as coffee pots and refrigerators, in common rooms instead of keeping personal equipment in classrooms and offices.

Wharton ISD also should train district staff in energy-efficient behaviors. The executive director of maintenance and operations should conduct an audit of the facilities to identify energy waste. Examples of wasteful practices include the installation of non-LED light bulbs, the presence of loose seals around doors and windows, and deferred maintenance to HVAC equipment.

Wharton ISD should request a preliminary energy assessment from SECO and continue to work with the agency to determine other workable energy management services that it can provide the district.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

CUSTODIAN TURNOVER

Interviews with principals and staff reveal that custodian turnover is a persistent and significant challenge for the district. Several staff reported that the custodian pay rate is lower than surrounding districts, which contributes to the turnover. High turnover is costly for the district due to the expenses involved in recruiting, hiring, and training new staff, only for them to leave shortly after. Moreover, without a stable and reliable custodial team, the district may be unable to maintain the cleanliness and daily upkeep necessary for effective campus operations. The district administration should review custodian pay levels in neighboring districts and local businesses to establish a competitive pay rate. Additionally, the district should explore additional strategies to reduce turnover and develop a long-term retention plan for custodian staff.

FISCAL IMPACT

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

7. TRANSPORTATION MANAGEMENT

ACCOMPLISHMENT

- ◆ Wharton ISD has taken proactive measures to promote safety aboard district school buses.

FINDINGS

- ◆ Wharton ISD does not evaluate bus routes regularly or use technology to support route management.
- ◆ Wharton ISD's Transportation Department lacks performance metrics to guide management and assess the effectiveness and efficiency of its transportation function.

RECOMMENDATIONS

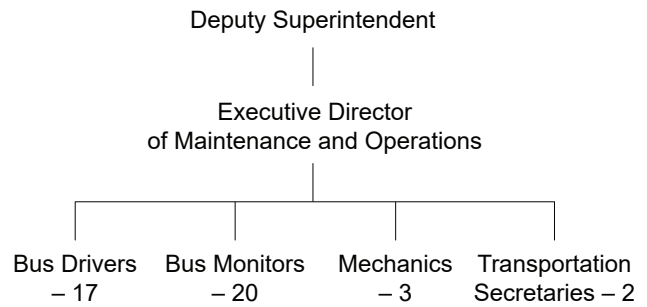
- ◆ **Recommendation 19: Develop an efficient bus-routing process to optimize planning and scheduling.**
- ◆ **Recommendation 20: Develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.**

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

Each district operating a regular transportation system is entitled to an allotment based on a rate per mile, per regular eligible student set by the Legislature in the General Appropriations Act. The following types of transportation, also referred to as route services, are eligible to generate transportation allotment funding: regular, special, career and technical education, and private. Districts also must adhere to requirements outlined in the Texas Transportation Code and the Texas Administrative Code that specify vehicle, driver, route, and safety standards.

A school district may self-operate a transportation system, contract with another school district, or contract with a mass

FIGURE 7-1
WHARTON ISD'S TRANSPORTATION DEPARTMENT ORGANIZATION, SCHOOL YEAR 2023-24



NOTE: Since the time of the review, the executive director of maintenance and operations title has changed to Maintenance and Operations Supervisor.
SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

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

Wharton Independent School District (ISD) self-manages the district's transportation system. The district's Transportation Department plots and implements the daily bus routes and coordinates transportation for athletics and other extracurricular trips. The Transportation Department also recommends district purchases of school buses to the superintendent.

The district maintains a fleet of 30 school buses that serve 20 bus routes, which include 17 regular education routes and three special-services routes. During school year 2022-23, the district reported transporting an average of 913 students daily, or 49.5 percent of the 1,844 enrolled.

The executive director of maintenance and operations oversees Wharton ISD's Transportation Department and reports to the deputy superintendent. The district has 17 bus drivers and 20 bus monitors. The department also employs three mechanics, who maintain and repair the district's vehicles, and two secretaries, who perform clerical and administrative duties. **Figure 7-1** shows the organization of Wharton ISD's Transportation Department for school year 2023-24.

**FIGURE 7–2
WHARTON ISD’S TRANSPORTATION ROUTING AND STATE FUNDING, SCHOOL YEARS 2020–21 TO 2022–23**

CATEGORY	2020–21	2021–22	2022–23
Average daily ridership – Regular program/Hazardous area service	829	816	879
Average daily ridership – Special program	43	37	34
Average daily ridership – Total students	872	853	913
Total annual state funding	\$206,106	\$177,491	\$124,315

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

Wharton ISD stores its buses and white fleet vehicles at the district’s fleet maintenance facility. White fleet vehicles are vehicles that are distinct from school buses and used for various purposes related to school operations, including transporting staff, students, and materials, as well as maintenance and administrative tasks. Transportation staff repair all district-owned vehicles at the facility and perform general maintenance, such as oil and tire changes. The fleet maintenance facility includes a fuel point that dispenses diesel fuel and unleaded gasoline.

Figure 7–2 shows the district’s student ridership during the past three school years. The average daily ridership increased from school years 2020–21 to 2022–23 by 41 students. From school years 2020–21 to 2022–23, total annual state funding decreased by \$81,791.

DETAILED ACCOMPLISHMENT

SAFETY MEASURES

Wharton ISD has taken proactive measures to promote safety aboard district school buses.

The district has equipped all school buses with surveillance cameras to monitor and record on-board activities. Cameras promote student safety and accountability, encouraging both students and staff to act responsibly. Additionally, the district installed global positioning system (GPS) tracking systems to monitor bus locations. GPS tracking can enhance operational efficiency and response time in case of emergencies.

The district also has assigned dedicated monitors to each bus. Monitors work alongside drivers to manage student behavior. Staff reported that employing monitors helps minimize disruptions and enables drivers to concentrate on navigating their routes safely.

Additionally, at the beginning of each school year, the Wharton ISD police chief conducts a Stop the Bleed training for all bus drivers and monitors. These sessions cover procedures for responding to bleeding emergencies,

enhancing staff preparedness to respond to a range of potential emergencies. Furthermore, staff assigned to special education buses are certified to administer CPR in medical emergencies.

DETAILED FINDINGS

ROUTE MANAGEMENT (REC. 19)

Wharton ISD does not evaluate bus routes regularly or use technology to support route management.

Route planning and management are fundamental elements of an effective and efficient transportation operation. Wharton ISD does not have a process to conduct thorough route planning and evaluation, which may result in less efficient service for students.

The district operates 17 regular bus routes and three special program bus routes daily. School buses pick up and deliver students to all four campuses each morning in grade-level order, beginning with C.G. Sivells Elementary School students at 7:00 AM and ending with Wharton High School students. The district staggers bell times 10 minutes apart to accommodate passenger unloading at each location.

According to the Wharton ISD executive director of maintenance and operations, the district has not made significant changes to bus routes in recent school years. The district’s annual route-planning process involves adding new students, updating addresses, and removing students who no longer need transportation. Wharton ISD does not periodically conduct thorough route evaluations or produce visual route maps to identify consolidation opportunities and inform parents of their child’s assigned route online. The department also does not use software or technology for route management. According to information gathered in interviews, the district has purchased routing software to develop bus routes, but the Transportation Department does not use the routing software due to a lack of training.

Neglecting to leverage technology deprives the district of potential time-saving benefits. The transportation secretaries are responsible for updating the routes at the beginning of the school year and adjusting them as needed by adding or removing students based on changes in ridership and updating addresses. The secretaries must update route sheets manually to include changes, which is a time-consuming process, particularly at the beginning of the year when many students must be routed to new campuses.

In addition, the lack of a process to review and optimize routing and scheduling may inhibit the district from maximizing the use of district funds. Bus routes affect the district’s total transportation expenditures. The number and length of bus routes affect transportation cost drivers such as the number of driver positions, vehicle maintenance positions, office staff, fuel usage, and bus purchases. **Figure 7–3** shows that Wharton ISD’s fiscal year 2024 budgeted transportation cost per student is the highest among its peer districts. Peer districts are school districts similar in size and other characteristics to Wharton ISD that are used for comparison purposes. The peer districts for Wharton ISD are Atlanta ISD, Bay City ISD, El Campo ISD, and Shepherd ISD.

Proper route planning can reduce fuel consumption, vehicle wear and tear, and staffing needs, which results in lower operational costs. *Idaho School Transportation Best Practices*, published by the Idaho State Department of Education and revised in January 2018, notes that effective routing is critical to establishing a cost-efficient and safe district student transportation system. Effective districts routinely evaluate the efficiency of their routes and schedules and fully utilize the capacity of technology, such as routing software, to optimize routes.

The *National School Transportation Specifications and Procedures*, adopted by the National Congress on School Transportation, is a route-planning resource. Its recommendations include the following elements:

- determine planning policies or guidelines, including eligibility and walk distances;
- develop routing strategies to increase efficiency or improve service levels, including feeder or transfer routes; and
- conduct periodic evaluations of route data to adapt each route plan to meet the needs of the school district.

FIGURE 7–3
WHARTON ISD’S BUDGETED TRANSPORTATION EXPENDITURES COMPARED TO PEER DISTRICTS FISCAL YEAR 2024

DISTRICT	EXPENDITURES	PER STUDENT
Wharton ISD	\$1,052,951	\$579
Atlanta ISD	\$841,256	\$437
Bay City ISD	\$1,348,818	\$385
El Campo ISD	\$1,435,678	\$435
Shepherd ISD	\$929,970	\$477

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school year 2023–24.

Many districts use an electronic system to develop efficient bus routes, including common productivity programs for producing spreadsheets and documents. Some districts use online applications for mapping and improving run routes. Both systems improve efficiency compared to manual processes.

Routing and scheduling software also may facilitate planning and scheduling efficient routes. Such systems can generate optimal routes quickly based on various factors such as distance, traffic patterns, and student locations. Routing and scheduling software can produce accurate and reliable routes that reduce the likelihood of human error and avoid issues such as missed stops or excessively long routes. Software also can provide detailed data and analytics on route performance, ridership, and efficiency, helping transportation managers make informed decisions and improve overall operations.

Wharton ISD should develop an efficient bus-routing process to optimize planning and scheduling.

The executive director of maintenance and operations should conduct a periodic route review to optimize bus routes and student ride times and verify that students’ information and stop data are current and accurate.

Additionally, the executive director of maintenance and operations should review the current routes and develop new routes, if necessary. The following steps are essential to this process:

- review or establish stops for eligible students, including home stops and congregated stops, based on the location and the number of students within walking distance; and
- establish routes systemwide to meet the following planning goals:

**FIGURE 7–4
WHARTON ISD TRANSPORTATION DEPARTMENT EXPENDITURES, SCHOOL YEARS 2020–21 TO 2022–23**

CATEGORIES	2020–21	2021–22	2022–23	PERCENTAGE CHANGE
Total Costs	\$940,796	\$907,667	\$1,110,958	18.1%
Cost per mile, Regular Program	\$5.83	\$3.97	\$6.22	6.7%
Cost per mile, Special-services Program	\$0.98	\$1.52	\$3.74	281.6%

SOURCE: Texas Education Agency, Student Transportation Operations reports for Wharton ISD, school years 2020–21 to 2022–23.

**FIGURE 7–5
WHARTON ISD AND PEER DISTRICTS’ OPERATIONS COMPARISON, SCHOOL YEAR 2022–23**

DISTRICT	OPERATIONS COST	BUSES	RIDERS	COST PER REGULAR PROGRAM MILE	COST PER SPECIAL-SERVICES PROGRAM MILE
Wharton ISD	\$1,110,958	30	913	\$6.22	\$3.74
Atlanta ISD	\$1,043,951	44	887	\$2.64	\$2.74
Bay City ISD	\$1,625,325	30	1,146	\$4.46	\$8.15
El Campo ISD	\$3,101,534	35	610	\$9.17	\$11.75
Shepherd ISD	\$1,108,450	40	1,143	\$4.62	\$2.55

SOURCES: Texas Education Agency, Transportation Operations Report and Route Services Report, school year 2022–23; Wharton ISD, March 2024.

- balancing the route time and individual student ride times among all routes in the system;
- maximizing seat usage on each bus within time and distance constraints; and
- minimizing bus usage by combining routes that have low ridership.

After the executive director of maintenance and operations has evaluated the routes, the transportation secretaries should enter the stop locations into a basic mapping application to verify route timing and to identify routes that may benefit from consolidation. Transportation staff should enter the route data, including stop locations, students assigned, and mileage, into a spreadsheet for easy retrieval and analysis. The executive director of maintenance and operations should use these criteria to review the routes annually and determine if any changes are necessary.

The district could implement this recommendation with existing resources.

PERFORMANCE METRICS (REC. 20)

Wharton ISD’s Transportation Department lacks performance metrics to guide management and assess the effectiveness and efficiency of its transportation function.

Staff reported that the Transportation Department coordinates daily student transportation effectively at the

campuses and for after-school student activities. However, the department does not track any performance metrics systematically to assess overall efficiency. The department also does not compare its performance to established benchmarks, key performance indicators (KPI), or peer districts to identify areas for improvement. KPIs track progress toward achieving the organization’s objectives by monitoring activities that could cause losses or failure.

Figure 7–4 shows Wharton ISD’s transportation expenditures. From school years 2020–21 to 2022–23, the total cost of transportation increased by 18.1 percent. During the same period, the cost per mile of the regular transportation program increased by 6.7 percent, and the cost per mile for special services increased by 281.6 percent. Without a process to track performance metrics, the district cannot determine whether annual cost-per-mile fluctuations relate to increased costs due to routing inefficiencies, increased fuel costs, or other expenses and operational factors that are not tracked.

A key indicator of a transportation operation’s efficiency is a comparison of the operation’s fleet and costs to those for similar-sized operations. **Figure 7–5** shows the operations cost, number of buses, ridership, and cost per regular program mile and special-services program mile for Wharton ISD and its peer districts during school year 2022–23.

As shown in **Figure 7–4**, Wharton ISD had the second-highest regular program cost per mile among the peer

districts for school year 2022–23, and the district’s special-services program cost per mile were lower than the average of the peer districts. Additionally, the district’s daily ridership was third highest while maintaining one of the smallest bus fleets among peers. Several factors could contribute to the difference in Wharton ISD’s data from its peers in these categories. For example, transportation costs may vary among districts based on district size and location. Rural districts may have to transport students over longer distances, thus generating higher route costs. However, without a process to track performance metrics, Wharton ISD is unable to assess its transportation operations accurately, identify inefficiencies, and capitalize on opportunities to lower costs.

Effective districts use performance-measurement systems to identify measurable goals and objectives. Continuous improvement relies on benchmarks. Districts set a desired goal for each measurement, document the data, and compare it to these benchmarks. Establishing performance metrics for transportation operations allows districts to make data-driven decisions supported by objective evidence. This process enables districts to assess departmental performance monthly or quarterly.

Figure 7–6 shows an example of transportation benchmarks used in other districts or noted in transportation research.

Wharton ISD should develop performance metrics to measure the effectiveness and efficiency of the Transportation Department.

The executive director of maintenance and operations should perform the following steps:

- develop key objectives and goals for the Transportation Department that are specific, measurable, achievable, relevant, and time-bound;
- determine the most relevant KPIs that align with the department’s goals and consider the following critical metrics related to efficiency, effectiveness, and safety:
 - cost per mile;
 - cost per student;
 - cost per bus;
 - on-time performance;
 - spare bus ratio;
 - driver absentee rate;

**FIGURE 7–6
TRANSPORTATION INDUSTRY BENCHMARKS**

BENCHMARK	MEASURE
Preventable accidents	1 per 100,000 miles
On-time performance	99.5% (includes all services)
Routing utilization efficiency	80.0% of available time or available capacity
Runs per bus (morning routes)	Ranges from 1.6 to 1.9 for a double-tiered system; ranges from 2.3 to 2.5 for a triple-tiered system
Bus-to-mechanic ratio	Ranges from 25:1 to 30:1, depending on bus types and ages
Spare bus ratio	10.0% to 15.0% (depends on bus types and trip volume)
Driver turnover rate	Less than 15.0%
Parts cost per mile (no labor)	Ranges from \$0.16 to \$0.18, depending on bus types and ages
Maintenance cost per Mile	Ranges from \$0.39 to \$0.43, depending on bus types and ages and assumes 13,000 miles per bus per year
Fleet miles per gallon	Ranges from 6.0 to 7.0 gallons, depending on bus types and ages
Driver labor as percentage of operating costs	Ranges from 39.0% to 43.0%, excluding benefits and workers’ compensation
Total labor as percentage of operating costs	Ranges from 54.0% to 61.0%, excluding benefits and workers’ compensation
Insurance and risk as percentage of cost	Ranges from 5.0% to 10.0%, excluding workers’ compensation
Annual cost per bus operated	Ranges from \$30,000 to \$50,000 per bus, excluding capital cost
Fleet useful life	Ranges from 10,000 miles to 15,000 miles per year; 180,000 miles maximum
Bus replacement policy	Ranges from 10.0 years to 12.0 years; 11.0 years to 13.0 years for spares

SOURCES: Legislative Budget Board School Performance Review Team, March 2024; Council of the Great City Schools, 2010; *American School and University* magazine, 2005; National Association of State Directors of Pupil Transportation Services, 2010.

- average student occupancy rate;
- accidents per 1,000 miles; and
- student behavior incidents per month;
- research industry standards or use historical data to set benchmarks for each KPI;

- develop a system for consistent and accurate data collection and consider the use of GPS tracking, routing software, and manual logs as data sources;
- regularly analyze the collected data to evaluate performance against benchmarks;
- develop comprehensive reports that highlight performance metrics, achievements, and areas needing improvement;
- continuously monitor performance and reassess the measurement system for relevance and accuracy; and
- make adjustments as needed to keep the system effective and aligned with departmental goals.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATION

During the onsite visit, the review team observed an additional issue regarding the district's programs and services to students, staff, and the community. This observation is presented for consideration as the district implements the report's other findings and recommendations.

TRAINING

Wharton ISD's Transportation Department does not provide driver safety awareness or skill improvement training other than the state-mandated training.

As prescribed by the Texas Department of Public Safety (DPS), new bus drivers are required to complete a 20.0-hour initial certification class, and all bus drivers are required to complete a course update every three years.

Aside from CPR and Stop the Bleed training, Wharton ISD's Transportation Department does not provide its staff with additional training to supplement mandatory driver certification courses. The department does not provide training regarding safety awareness, defensive driving, skill improvement, or student behavioral management for transportation-related issues.

No national standards mandate periodic training programs for school bus drivers. However, DPS describes the necessity for providing regular training in its Texas School Bus Driver Recertification Course, including the following benefits:

- periodic training helps drivers to retain critical operational and safety-related information provided during a previous training session or update;
- regular training informs drivers of changes in technology, rules, and regulations regarding the operation of school buses; and
- the periodic review of district policies and procedures and industry best practices can help to reduce the complacency that may occur in any profession or industry.

Wharton ISD should consider supplementing mandated driver training programs with periodic course updates to promote a culture of safety and a high level of driver skill.

The executive director of maintenance and operations and the deputy superintendent should foster an environment that supports departmental training initiatives and facilitates the attendance of bus drivers at training programs. For example, it is common for the staff of smaller districts who perform multiple roles to have scheduling conflicts when training programs are offered; therefore, professional development programs should be scheduled by the executive director of maintenance and operations in a manner that enables staff to attend transportation-related training programs periodically.

Additionally, the executive director of maintenance and operations should investigate resources available to develop an effective training program. One resource is the *School Bus Driver In-service Safety Series* produced by the National Highway Transportation Safety Administration (NHTSA), which provides useful training and skills improvement information to bus drivers at no charge to districts. This material, available at www.nhtsa.gov, includes an instructional guide, a presentation, and handouts regarding the following training topics:

- driver attitude;
- student management;
- highway–railway crossing safety;
- vehicle training;
- route knowledge;
- loading and unloading procedures;
- emergency evacuation;

- transporting students with special needs; and
- driving in adverse weather conditions.

In addition to the materials provided by NHTSA, the Transportation Department's periodic training should include safety-related concerns that are unique to Wharton ISD.

FISCAL IMPACT

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

8. SAFETY AND SECURITY

ACCOMPLISHMENT

- ◆ Wharton ISD has an effective teen court program.

FINDING

- ◆ Wharton ISD has not established staffing standards for nursing services.

RECOMMENDATION

- ◆ **Recommendation 21: Hire a nurse to serve at the high school and develop a staffing standard to staff nurses adequately at each campus.**

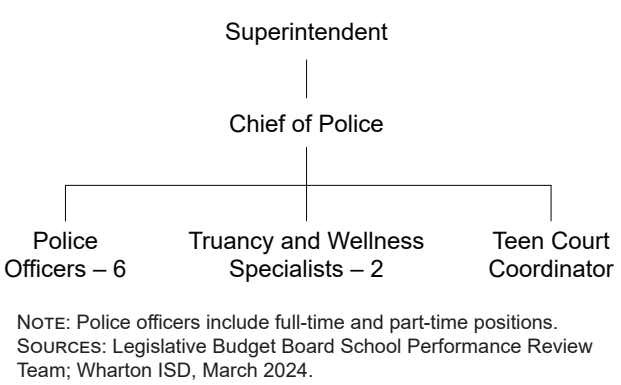
BACKGROUND

The goal of an independent school district’s safety and security function is to protect the physical and mental well-being of students and staff. To achieve this goal, a school district must collaborate with community and state organizations to prevent, mitigate, prepare for, respond to, and recover from emergencies and to identify and implement strategies to maintain an environment conducive to student learning.

School district safety and security involves securing facilities and assets, monitoring district property, and preparing for emergencies. Additionally, a school district must manage student behavior and develop procedures to promote mental health to protect the emotional and physical safety of students and staff. School safety management is often supported by local law enforcement and first responders, mental health professionals, and community service organizations. The management of safety and security responsibilities depends on a district’s size; larger districts often hire dedicated safety and security staff, and smaller districts may assign safety and security responsibilities to existing staff.

Wharton Independent School District (ISD) is responsible for the safety and security of four instructional and two noninstructional facilities. The instructional facilities are C.G. Sivells Elementary School, Wharton Elementary School, Wharton Junior High School, and Wharton High School. The district’s noninstructional facilities are the central administrative office and fleet maintenance facility.

FIGURE 8-1
WHARTON ISD’S POLICE DEPARTMENT
SCHOOL YEAR 2023-24



Wharton ISD maintains its own Police Department and the chief of police is responsible for overseeing district safety initiatives, such as the implementation of audit recommendations or statutory changes related to school district safety. **Figure 8-1** shows the organization of the district’s Police Department.

The Legislative Budget Board School Performance Review Team visited the district in March 2024. At the time of the onsite visit, the district employed four full-time police officers and two part-time police officers. Each of the four campuses has an armed officer present for the duration of the school day, pursuant to the Texas Education Code, Section 37.0814. In addition to a full-time police officer, C.G. Sivells Elementary School is assigned a part-time officer who also teaches. The high school also is assigned an additional officer who serves as a parking lot attendant and fills absences for other district officers. All officers meet daily after school with the chief of police to discuss events on their campuses.

Wharton ISD has established a district Safety and Security Committee (SSC) pursuant to the Texas Education Code, Section 37.109. Wharton ISD’s SSC consists of parents, a member of the Wharton ISD Board of Trustees (board), and district and campus staff who develop and annually review the district’s Emergency Operations Plan (EOP). The SSC also identifies safety needs for the district and makes recommendations to the board based on the district’s safety audit. For example, in response to the district’s calendar year 2023 safety audit, the SSC recommended that the district

FIGURE 8–2
ADDITIONAL SAFETY STAFF AND RESPONSIBILITIES IN WHARTON ISD
SCHOOL YEAR 2023–24

POSITION	SAFETY ASSIGNMENT
Assistant principals	Lead the campus safety team; serve as school representative on the district safety team.
Counselors	Promote a positive school climate through lessons on social and emotional well-being and behavior; respond to mental crises.
Nurses	Oversee the physical health of students by distributing medication, conducting mandatory screenings, and providing general first aid.
Restorative discipline coordinator	Promote a positive school climate and culture through positive, culturally competent, and research-based disciplinary practices.
DAEP staff	Support the educational goals of students temporarily placed in the DAEP.

NOTE: Disciplinary alternative education program (DAEP) staff include one full-time teacher and two paraprofessionals.
 SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

install security vestibules and metal detectors at all campuses and place additional cameras where necessary.

At each campus, an assistant principal oversees a campus safety team that meets monthly. Each campus is responsible for selecting the staff to serve on its campus safety team. Staff reported that principals, assistant principals, secretaries, counselors, nurses, police officers, hall monitors, and teachers serve on these campus safety teams. These campus safety teams discuss needs specific to their campus, and the assistant principals share that information during district SSC meetings. The campus safety teams also hold meetings with the chief of police after each safety drill to discuss areas for improvement.

Additionally, the district provides nursing services at each campus. Trained staff distribute prescription medications to students, provide care to students and staff with injuries and illnesses, and conduct annual health screenings for students.

The district also employs two truancy-and-wellness specialists and one teen court coordinator. These positions focus on absenteeism intervention and prevention. Truancy-and-wellness specialists perform the following duties:

- run attendance reports for each campus;
- meet with campus attendance clerks weekly to discuss student absence counts;
- host virtual truancy classes for parents;
- write truancy letters sent to student's homes;
- conduct home visits; and
- testify during truancy cases in teen court.

Figure 8–2 shows Wharton ISD staff outside of the Police Department who are assigned safety and security and behavior management roles, including assistant principals, counselors, disciplinary alternative education program staff, and the restorative discipline coordinator.

Wharton ISD's safety and security processes are supported by the following equipment and procedures intended to protect students, staff, and facilities:

- automatically closing and locking exterior doors;
- single entry points;
- security vestibules;
- intrusion alarms;
- cameras on the interior and exterior of all buildings;
- electronic door-buzzer entry systems with integrated audio and video capabilities for visitor management;
- mobile panic alerts and streamlined digital emergency response technology available to all staff through a phone application; and
- automated external defibrillators at each campus.

Additionally, the Wharton ISD Police Department uses school management software to monitor students' online activity and filter content on district devices.

The district uses emergency management software to conduct the following mandatory safety drills:

- secure or lockout;
- lockdown;
- evacuation; and
- shelter-in-place.

While onsite, the review team noted that all exterior doors were locked when visiting each campus. Wharton ISD Board Policy CSA (LOCAL) states that building entry points are inspected weekly at all campuses. Staff reported that police officers and hall monitors complete door checks daily, and all interior doors remain locked for the duration of the school day. Additionally, all playgrounds and sports facilities are enclosed by fences.

Figure 8–3 shows Wharton ISD’s security and monitoring expenditures compared to its total operating expenditures for the past five fiscal years. Wharton ISD’s fiscal year begins July 1 and ends June 30. From fiscal years 2019 to 2023, Wharton ISD security and monitoring expenditures increased 172.1 percent, and the rate of the district’s total operating expenditures increased by 37.0 percent.

Figure 8–4 shows the district’s per-student spending for safety measures from school years 2019–20 to 2023–24 compared to the state for safety expenditures. During this period, Wharton ISD’s per-student spending for safety measures increased overall from \$105 per student in school year 2019–20 to \$162 per student in school year 2023–24. During school year 2022–23, the district’s spending surpassed the state average due to the district’s construction of security vestibules and installation of metal detectors at each campus.

A school district’s student code of conduct outlines the rules of behavior for students and establishes procedures for maintaining a safe and positive learning environment. Wharton ISD’s Curriculum and Instruction Department

**FIGURE 8–3
WHARTON ISD’S SECURITY AND MONITORING EXPENDITURES (1)
FISCAL YEARS 2019 TO 2023**

YEAR	TOTAL OPERATING EXPENDITURES	SECURITY AND MONITORING EXPENDITURES	SECURITY AND MONITORING AS A PERCENTAGE OF TOTAL OPERATING EXPENDITURES
2019	\$22,009,034	\$153,918	0.7%
2020	\$23,799,000	\$209,687	0.9%
2021	\$21,852,899	\$210,876	1.0%
2022	\$23,551,271	\$239,578	1.0%
2023	\$30,147,780	\$418,798	1.4%

NOTE: (1) Total operating expenditures and security and monitoring expenditures represent all funds.
SOURCE: Texas Education Agency, Public Education Information Management System; fiscal years 2019 to 2023.

develops the district’s student code of conduct annually based on the Texas Association of School Boards (TASB) template, and campus administrators review it each summer. Administrators can recommend a change to the code of conduct through the superintendent, who must approve it before sending it to the board for final approval. Parents may request a printed copy of the code of conduct when registering at the beginning of the school year.

School districts are required to offer a disciplinary alternative education program (DAEP) that provides for the educational and behavioral needs of students who have been removed from their regular classes for disciplinary reasons. Wharton ISD’s DAEP is located on the Wharton

**FIGURE 8–4
SAFETY SPENDING PER STUDENT IN WHARTON ISD AND ALL DISTRICTS STATEWIDE, SCHOOL YEARS 2019–20 TO 2023–24**



NOTE: Amounts shown for school years 2019–20 to 2022–23 show actual financial data. Amounts shown for school year 2023–24 show Wharton ISD’s budgeted financial data; actual financial data for Wharton ISD and the state average were not available as of March 2024.
SOURCE: Texas Education Agency, Public Education Information Management System, Financial Data, school years 2019–20 to 2023–24.

FIGURE 8–5
WHARTON ISD DISCIPLINE DATA, SCHOOL YEARS 2018–19 TO 2022–23

GROUP	2018–19	2019–20	2020–21	2021–22	2022–23	PERCENTAGE CHANGE FROM 2018–19 TO 2022–23
District enrollment (1)	2,154	2,148	2,030	2,087	2,035	(5.5%)
Total count of students disciplined	521	519	379	548	418	(19.8%)
Total discipline counts	1,820	1,769	1,180	1,902	1,152	(36.7%)
Total count of students suspended in school (2)	482	488	339	473	349	(27.6%)
Total count of students suspended out of school (2)	168	123	152	275	206	22.6%
Total count of students removed to disciplinary alternative education program	48	33	46	56	31	(35.4%)

NOTES:

(1) All enrollment data represent cumulative year-end enrollment totals, which include all students in attendance at least 2.0 hours per day during the year.

(2) In-school suspension and out-of-school suspension data do not include data for partial days.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System, Student Discipline Report, school years 2018–19 to 2022–23; Texas Education Agency, Texas Academic Performance Report, school years 2018–19 to 2022–23; Wharton ISD, March 2024.

High School campus. As of March 2024, district staff reported that the DAEP was staffed by one certified teacher and two paraprofessionals.

Figure 8–5 shows Wharton ISD’s discipline data from school years 2018–19 to 2022–23. During this period, Wharton ISD has experienced an overall decrease in discipline incidents except for out-of-school suspensions. Although this period coincides with a 5.5 percent decrease in student enrollment, the discipline count decreased at a higher rate. In addition, the total number of students disciplined, including the total number of students placed in in-school suspension and DAEP, also decreased. However, from school years 2018–19 to 2022–23, the number of students placed in out-of-school suspensions increased by 22.6 percent.

The Texas Education Agency (TEA) maintains a database of school district discipline data. During school year 2022–23, Wharton ISD reported the following student discipline incidents most frequently:

- violation of the local student code of conduct;
- fighting/mutual combat; and
- controlled substances/drugs.

Wharton ISD encourages positive student behaviors through several programs and the support of a restorative discipline coordinator. The district implements Positive Behavioral Interventions and Support (PBIS) districtwide. PBIS is an evidence-based, tiered framework for supporting students’

behavioral, academic, social, emotional, and mental health. At the elementary schools, teachers employ the PAX Good Behavior Game, a classroom-based universal preventive intervention to teach students self-regulation. The district’s restorative discipline coordinator oversees the employment of restorative practices that focus on fostering school community and strengthening relationships.

The district also offers incentives for positive behavior through a free, online platform used at C.G. Sivells Elementary School and Wharton Elementary School, through which teachers award points for good behavior. Students spend these points at a campus store, which stocks items such as stickers, pencils, T-shirts, and snacks. This platform also communicates students’ behavioral status to parents. Wharton High School has a similar system in which students earn rewards currency called Tiger Bucks for good behavior, and the school hosts grade-level attendance competitions and events for high achievers. During the onsite visit, the review team observed an event at which students enjoyed early dismissal and free ice cream as a reward for academic achievement.

DETAILED ACCOMPLISHMENT

TEEN COURT

Wharton ISD has an effective teen court program. Teen courts offer an alternative to traditional adjudication and sentencing for teenagers from municipal or justice courts. In Texas, teen courts operate pursuant to the Texas Code of

Criminal Procedure, Article 45A.401 and the Texas Family Code, Section 54.032. Teenage defendants who plead no contest or guilty to certain offenses may have their cases heard by their peers. Instead of paying a fine, the defendant's penalty typically involves community service, educational programs, and future participation in teen court. After the penalty is satisfied, the municipal or justice court dismisses the case, and the offense is not recorded as a conviction on the defendant's record.

Studies show that teen court programs offer the following benefits for students:

- increased offender accountability;
- timely access to justice and resolution;
- cost savings; and
- improved community cohesion.

Some studies concerning recidivism rates of offenders who attend teen court instead of a justice court suggest that teen court programs can decrease recidivism rates.

During school year 2021–22, Wharton ISD established a teen court program for hearing students' class C misdemeanors, such as truancy or minor-in-possession charges. When a student is charged with a crime within the purview of the teen court, the campus principal files a report with the campus police officer. If the court of original jurisdiction approves the case for teen court, proceedings are similar to those of a municipal court, wherein the jury determines the student's punishment. Student volunteers serve as the prosecuting attorneys, defense attorneys, and jury. For truancy cases, the jury can assign community service ranging from 15.0 hours to 30.0 hours. For minor-in-possession charges, the assigned community service ranges from 25.0 hours to 40.0 hours. All students whose cases are heard in teen court must serve on a future teen court jury.

The Wharton County District Attorney, a probation officer, and the teen court coordinator alternate in serving as the teen court judge. A Wharton ISD police officer serves as the bailiff. Students, parents, teachers, and other Wharton ISD staff may be called to serve as witnesses.

During interviews, staff reported that they found the teen court program effective, which recent data supports. **Figure 8–6** shows the attendance rate and chronic absenteeism rate at the high school for school years 2020–21 and 2021–22.

FIGURE 8–6
WHARTON HIGH SCHOOL ATTENDANCE RATE
AND CHRONIC ABSENTEEISM RATES
SCHOOL YEARS 2020–21 AND 2021–22

YEAR	ATTENDANCE RATE	CHRONIC ABSENTEEISM
2020–21	87.7%	41.4%
2021–22 (1)	89.1%	39.4%

NOTES:

- (1) Wharton ISD established its teen court program during school year 2021–22.
- (2) As of March 2024, attendance and chronic absenteeism data were not available for school year 2022–23 and 2023–24.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System 2022–23; Wharton ISD, March 2024.

Student attendance rates and chronic absenteeism improved at the high school during the 2021–22 school year, the first year of teen court implementation, with the attendance rate increasing by 1.4 percent and chronic absenteeism rate decreasing by 2.0 percent.

DETAILED FINDINGS

NURSE STAFFING (REC. 21)

Wharton ISD has not established staffing standards for nursing services.

The Texas Education Code, Section 38.013, requires that school districts provide a coordinated health program for all campuses. Although statute does not require school districts to employ a nurse, TASB recommends that the district hire at least one registered nurse (RN) to oversee the district's health program and supervise any licensed vocational nurses (LVN), nurse aides, and nurse assistants.

The National Association of School Nurses (NASN) recommends that all students have access to a registered nurse (RN) throughout the school day, which may require the district to hire more than one nurse to meet the school population's needs.

The NASN recommends that districts consider the following factors to determine nurse staffing:

- number of students;
- safety, medical acuity, and health needs of students;
- characteristics and considerations of the student population, including social needs;
- characteristics and considerations of the school nurse and other clinic team members;

FIGURE 8–7
WHARTON ISD NURSING POSITION ASSIGNMENTS, SCHOOL YEAR 2023–24

STAFF	ASSIGNED CAMPUS(ES)	STUDENT ENROLLMENT (1)
1 licensed vocational nurse; 1 certified nursing assistant	C.G. Sivells Elementary School	429
1 registered nurse; 1 certified nursing assistant	Wharton Elementary School	476
1 nurse aide	Wharton Junior High School; Wharton High School	369; 570

NOTE: (1) As of March 2024, student enrollment data were not available for school year 2023–24 so student enrollment is from school year 2022–23.
 SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System 2022–2023; Wharton ISD, March 2024.

- context and culture of the school and school district that influence nursing service demands; and
- overall costs, effectiveness, and resources.

At the time of the onsite visit, Wharton ISD based nurse staffing on historical numbers but did not consider other relevant factors.

Wharton ISD employs two licensed nurses, an RN and an LVN. The district also employs three unlicensed assistive staff, including two certified nursing assistants (CNA), and one nurse aide that has not passed a certification exam. All nursing staff report to the RN, who serves as the district nurse.

Figure 8–7 shows the Wharton ISD nurses and their campus assignments. At the time of the review, an LVN and a CNA serve C.G. Sivells Elementary School, and an RN and a CNA serve Wharton Elementary School. During interviews, staff reported that a nurse aide serves the entire student populations of Wharton Junior High School and Wharton High School while these schools share a campus during the construction of the junior high school.

At the time of the onsite visit, a single nurse aide was serving 939 students, including 570 students at the high school and 369 at the junior high school. During interviews, staff at the junior high school and high school reported that sharing one nurse among the two campuses does not serve the students adequately.

For example, nurses reported doubt whether all required medical screenings could be conducted by one nurse aide for both the junior high school and high school student populations during school year 2023–24. State regulations require that a licensed professional conducts vision and hearing screenings for students in certain grade levels at each school district. In addition, school districts must evaluate

students in junior high school and high school for abnormal spinal curvature. The review team could not determine whether the nurse aide has the required certification to complete these screenings or to assist the district’s RN with the screenings. The lack of regular and comprehensive screenings increases the risk of students being undiagnosed for vision, hearing, and spinal issues, which could affect their academic performance and overall well-being adversely.

The lack of adequate nursing services could deprive students of proper medical care and healthcare education. The Centers for Disease Control and Prevention states that, “In the United States, more than 40.0 percent of school-aged children and teens have at least one chronic health condition. Some students with chronic conditions may miss school more frequently, which can affect their academic performance. For these students, school nurses or health centers offer vital help every day in managing their conditions. School nurses or other school health services staff may also be the first to identify chronic health conditions in students during routine health exams.”

Wharton ISD should hire a nurse to serve at the high school and develop a staffing standard to staff nurses adequately at each campus.

The chief of police and the district nurse, with assistance from Wharton ISD’s Human Resources Department, should recruit and hire an additional nurse to serve at the high school. Annually, the chief of police and deputy superintendent, with assistance from the district nurse, should analyze all factors when determining nurse staffing levels in the district and regularly evaluate the adequacy of nursing services provided to students.

The fiscal impact of this recommendation assumes that the district hires an additional LVN nurse position during school

year 2025–26. The district should consider the salary of the other Wharton ISD LVN nurse position when determining the new position's salary and benefits. The estimated annual cost to add this position would be \$32,794.80 (\$27,329 base salary + \$5,465.80 (20.0 percent of salary) in benefits), totaling \$163,974 during the next five school years.

ADDITIONAL FINDINGS

The Legislative Budget Board's School Performance Review Team identified additional opportunities for the district to enhance its safety and security management functions. The review team presented these findings and the related recommendations directly to Wharton ISD leadership to preserve the confidentiality of the district's safety and security operations.

ADDITIONAL OBSERVATIONS

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

EMERGENCY OPERATIONS PLAN UPDATES

Certain information in the district's EOP is missing or inaccurate.

The EOP states that it includes strategies for providing any required professional development training for suicide prevention, grief-informed and trauma-informed care, and psychological first aid to appropriate campus staff. The EOP states that these strategies, and additional information regarding psychological safety, appear in the Psychological Safety Annex, a document that outlines policies and procedures for safety operations regarding psychological safety as outlined in the Texas Education Code, Section 37.108(f). However, a Psychological Safety Annex, or a Psychological Resilience Annex, as outlined by the Texas School Safety Center, was not included within the EOP or the annexes provided to the review team.

In addition, the EOP lists items included in the emergency bags provided to each classroom. However, staff report that the items in the emergency bags actually provided to classrooms do not match the items listed in the EOP.

Charts shown in the EOP assign specific duties to staff during emergencies. However, several charts include duties not assigned to any staff.

Wharton ISD should update its EOP to include the Psychological Safety Annex and all other required information. During this process, the district should confirm that the information contained in the EOP is accurate and complete.

DISCIPLINE MONITORING

Wharton ISD does not monitor discipline data effectively to promote consistent and equitable discipline practices districtwide.

All campus staff use a districtwide discipline matrix to determine appropriate responses to student misconduct, which may vary slightly based on the grade level and ages of students at each campus. Although most campus administrators reported that discipline is administered uniformly districtwide, Wharton ISD's discipline data shows inconsistencies in how discipline is applied throughout the district.

Figure 8–8 shows significant variance in the percentage of students receiving discipline placements at each Wharton ISD campus from school years 2018–19 to 2022–23. Discipline placements are for students that are removed from the classroom through expulsion or placed in alternative disciplinary settings, including in-school suspension (ISS), out-of-school suspension, and DAEP.

The review team evaluated discipline data from districts similar in size and other characteristics to Wharton ISD to determine whether Wharton ISD's campus-level disciplinary data trends were similar.

Figure 8–9 shows Wharton Elementary School and Wharton Junior High School enrollment as a percentage of the district's enrollment, and their student discipline populations as a percentage of the district's discipline population in comparison to elementary school and junior high campuses in districts with similar enrollment sizes. The discipline population includes students who were placed or removed to an alternative disciplinary setting, such as ISS or DAEP, as shown in **Figure 8–5**.

As shown in **Figure 8–9**, the comparison group of elementary schools had discipline populations proportionate to or less than their enrollment, apart from Westwood ISD. In the junior high school comparison group, most had discipline populations disproportionately larger than their enrollment. Among these districts, Wharton ISD data shows the district has the second-largest difference between

FIGURE 8–8
WHARTON ISD'S PERCENTAGE OF STUDENTS DISCIPLINED BY CAMPUS, SCHOOL YEARS 2018–19 TO 2022–23

CAMPUS	2018–19	2019–20	2020–21	2021–22	2022–23 (1)	PERCENTAGE CHANGE FROM
						2018–19 TO 2022–23 (2)
C.G. Sivells Elementary School	4.8%	3.5%	0.0%	0.0%	0.0%	(100.0%)
Wharton Elementary School	23.1%	21.8%	13.8%	16.0%	15.5%	(32.9%)
Wharton Junior High School	38.1%	32.6%	30.4%	46.9%	46.5%	22.0%
Wharton High School	35.1%	42.2%	29.7%	38.6%	23.7%	(32.5%)

NOTES:

- (1) Discipline data for school year 2023–24 was not available as of March 2024.
- (2) Statutory changes to disciplinary alternative education program (DAEP) placements and positive-behavior programs may have affected the change in percentages of students disciplined at each campus, specifically for elementary school students. The Texas Education Code, Section 37.006, outlines the strict guidelines for removing a student younger than age 10 and placing these students in the DAEP. The Texas Education Code, Section 37.0013, requires districts to develop and implement an age-appropriate positive-behavior program.
- (3) Percentages of students disciplined represent the ratio of the discipline population to the cumulative year-end campus enrollment; the disciplined population represents all students in the cumulative population who were placed or removed to an alternative disciplinary setting such as in-school suspension, out-of-school suspension, or a DAEP, and the cumulative year-end enrollment includes all students in attendance at least 2.0 hours per day at some point during the year.

SOURCES: Legislative Budget Board School Performance Review Team; Texas Education Agency, Public Education Information Management System, Student Discipline Report, school years 2018–19 to 2022–23; Texas Education Agency, Texas Academic Performance Report, school years 2018–19 to 2022–23; Wharton ISD, March 2024.

FIGURE 8–9
WHARTON ISD'S CAMPUS DISCIPLINE TRENDS COMPARED TO SIMILAR DISTRICTS (1), SCHOOL YEAR 2022–23

DATA	WHARTON ISD	EL CAMPO ISD	SHEPHERD ISD	WESTWOOD ISD	ROYAL ISD	AVERAGE OF COMPARISON DISTRICTS
District enrollment (2)	2,035	3,499	2,145	1,538	2,875	2,514
Elementary school enrollment as a percentage of district enrollment (3)	25.3%	13.7%	20.4%	28.7%	28.7%	22.9%
Elementary school discipline population as a percentage of district discipline population (5)	19.1%	14.0%	19.2%	55.4%	15.4%	26.0%
Difference between proportional and actual discipline rates for elementary school students (6)	6.2%	(0.3%)	1.2%	(26.7%)	13.3%	(3.1%)
Junior high school enrollment as a percentage of district enrollment (4)	19.6%	21.7%	23.4%	14.7%	22.9%	20.7%
Junior high school discipline population as a percentage of district discipline population (5)	44.3%	40.3%	29.6%	13.7%	36.5%	30.0%
Difference between proportional and actual discipline rates for junior high school students (6)	(24.7%)	(18.6%)	(6.2%)	1.0%	(13.6%)	(9.3%)

NOTES:

- (1) Districts were selected based on enrollment size (less than 3,500) and population of students who are considered economically disadvantaged (greater than 70.0%). Districts with disciplinary data masked to comply with the federal Family Educational Rights and Privacy Act were not included.
- (2) All enrollment data represents cumulative year-end enrollment totals, which includes all students in attendance at least two hours a day at some point in the year.
- (3) Elementary campuses included are Wharton Elementary School (grades 2 to 5), Northside Elementary School (grades 4 to 5), Shepherd Intermediate School (grades 3 to 5), Westwood Elementary School (grades 3 to 6), and Royal Elementary School (grades 2 to 5).
- (4) Junior high campuses included are Wharton Junior High School (grades 6 to 8), El Campo Middle School (grades 6 to 8), Shepherd Middle School (grades 6 to 8), Westwood Junior High School (grades 7 to 8), and Royal Junior High School (grades 6 to 8).
- (5) Discipline population includes all students in the enrollment who were placed or removed to an alternative disciplinary setting such as in-school suspension, out-of-school suspension, or a disciplinary alternative education program.
- (6) The difference between proportional and actual discipline rates is calculated by subtracting campus discipline population as a percentage of district discipline population from campus enrollment as a percentage of district total enrollment. Some percentages calculated for the difference between proportional and actual discipline rates may not sum to equal their respective enrollment and population percentages due to rounding.

SOURCE: Texas Education Agency, District and Campus Discipline Reports, school year 2022–23.

enrollment and discipline population percentages for the elementary school students and the largest difference for junior high school students.

Wharton ISD does not analyze these data, however, and lacks a process to determine whether the disciplinary placement variation shown in **Figure 8–8** or the apparent disproportionality in discipline rates shown in **Figure 8–9** result from inconsistent practices, a flaw in the discipline matrix, or other external factors.

Placement disparities are most pronounced at Wharton Junior High School, which has the lowest enrollment percentage but the highest discipline population percentage. In addition, the junior high school is the only campus in Wharton ISD that showed an increase in discipline placements during this five-year period. During interviews, junior high school staff reported that they did not have a discipline problem at the campus, and staff could not explain the significant difference in the number of disciplinary placements at their campus compared to others. Without a process to review discipline data, the district cannot determine effectively whether the placements result from effective disciplinary processes or poor implementation of behavior management practices.

Monitoring and analyzing discipline data can inform decisions about which policies, procedures, and practices to use, which to continue, and how to build systems that support such efforts. Similarly, effectively evaluating discipline data enables districts to address policies and practices that may not be working as intended. Evaluating discipline data also assists districts in identifying whether certain student groups receive school discipline at higher or lower rates than others.

The district should establish a process to monitor all discipline reports from each campus regularly. The director of assessment, accountability, and student services should review disciplinary placements and recidivism rates by campus, grade level, race and ethnicity, and special education status. The director also should meet with campus administrators regularly to discuss concerning trends and gain feedback so the district can adjust discipline practices accordingly.

COUNSELING SERVICES

Wharton ISD lacks a clear process for oversight and evaluation of counseling services.

The Texas Education Code, Section 33.005, requires a school counselor to collaborate with the school faculty and staff, students, parents, and the community to plan, implement, and evaluate a comprehensive school counseling program that conforms to the most recent edition of the Texas Model for Comprehensive School Counseling Programs developed by the Texas Counseling Association (TCA). The counselor must structure the program to include the following components:

- a guidance curriculum to help high school students develop their full educational potential, including their interests and career objectives;
- a responsive-services component to intervene on behalf of any student whose immediate personal concerns or problems put the student's continued educational, career, personal, or social development at risk;
- an individual planning system to guide the student in planning, monitoring, and managing the student's educational, career, personal, and social development; and
- system support for teachers, staff, parents, and other community stakeholders to promote the educational, career, personal, and social development of students.

Wharton ISD employs five full-time counselors, one of whom also serves as the district counselor. Each campus has one counselor, except the high school, which has two. The district counselor's job description includes coordinating counselor meetings, disseminating important information to all counselors, and assisting other counselors with emergencies and test coordination as needed. Each counselor's job duties include program management, which involves planning school guidance and counseling programs to meet the needs of their students; developing and coordinating a regular program evaluation; and implementing changes based on evaluation findings. Staff reported that Wharton ISD previously employed a district-level position that oversaw the district's counseling services and developed goals and expectations for counselors. After that individual resigned, the district has not tasked any other positions with these responsibilities. The counselors at each campus now lack guidance and support, which hinders them from fulfilling all their duties.

The district's counselors offer lessons and individual and group counseling opportunities to meet their students' needs. However, staff reported that neither the campus nor the district has developed guidelines for counselors to follow when planning and implementing campus guidance and counseling programs, which has resulted in services that vary by campus. Staff reported that some principals discuss expectations for counseling services with counselors during meetings that accompany their annual evaluations. However, this practice is not a district policy, nor is it implemented by every campus principal.

Additionally, without oversight and evaluation of counseling services, some campus counselors may be performing duties without adequate support. For example, staff reported that counselors are asked to participate in special education students' transition meetings and develop modifications and accommodations for incoming special education students. However, the counselors previously were not required to fulfill special education duties and reportedly have not received sufficient support or training from the district for such tasks.

TCA's Texas Model is intended to help districts develop effective counseling programs that align with the statutory requirements associated with counseling programs. Through this model, counselors learn to use campus-specific and district-specific data to develop a comprehensive counseling program to meet their campuses' and districts' unique needs. In addition, the model provides examples of how administrators, counselors, teachers, and parents can best contribute to implementing the components of comprehensive counseling programs. The Texas Model also provides a developmental framework for a counseling program curriculum that includes activities at every grade level to enhance students' educational, career, personal, and social development.

The Texas Model outlines the following steps of the program implementation cycle:

- identify leadership for program improvement efforts;
- adopt a comprehensive counseling program model and program development process;
- assess the current program;
- establish the desired program structure;

- publish the program framework;
- plan transition to the desired program;
- develop and implement a master plan for implementation changes;
- make program improvements;
- make appropriate use of school counselor competencies; and
- evaluate the comprehensive school counseling program.

A comprehensive counseling program template is available on TEA's website, which Wharton ISD can use as an example. In addition, Dodd City ISD and Hughes Springs ISD have posted their comprehensive counseling programs on their websites, which is a best practice that encourages compliance with the Texas Education Code, Section 33.004(b), which requires a district to make its counseling curriculum available to parents.

The superintendent should assign the district counselor to lead the development of a districtwide, comprehensive guidance and counseling program based on the Texas Model. As part of this process, the district counselor should collaborate with campus counselors to perform the following tasks:

- assess the current counseling programs at each campus;
- establish a districtwide, comprehensive program structure;
- publish the program framework, including a mission and vision statement and program goals, on the district website;
- develop a master plan and a timeline for implementation changes; and
- establish a process to evaluate the comprehensive counseling program periodically.

The district counselor should use the comprehensive counseling program template available on TEA's website to help develop the district's program and review the comprehensive counseling programs posted by other districts.

With the superintendent’s approval, the district should publish the plan on its website. All counselors should receive notification and training on the specifics of the counseling program and should review the program annually to confirm that it includes current statutory requirements and best practices.

FISCAL IMPACT

Some of the recommendations provided in this report are based on state or federal laws, rules, or regulations,

and the district should address them promptly. Other recommendations are based on comparisons to state or industry standards, or accepted best practices, and the district should review them to determine the level of priority, appropriate timeline, and method of implementation. The review team identified a fiscal impact for **Recommendation 21**. If the district hires another nurse in accordance with the recommendation, it could incur the following costs.

RECOMMENDATION	2025–26	2026–27	2027–28	2028–29	2029–30	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
21. Hire a nurse to serve at the high school and develop a staffing standard to staff nurses adequately at each campus.	(\$32,794.80)	(\$32,794.80)	(\$32,794.80)	(\$32,794.80)	(\$32,794.80)	(\$163,974)	\$0
Total	(\$32,794.80)	(\$32,794.80)	(\$32,794.80)	(\$32,794.80)	(\$32,794.80)	(\$163,974)	\$0

9. INFORMATION TECHNOLOGY MANAGEMENT

FINDINGS

- ◆ Wharton ISD lacks a process for developing updated, comprehensive technology planning documents to help the district prepare effectively for future needs and mitigate risks.
- ◆ Wharton ISD's Technology Department does not document procedures effectively for technology-related tasks.
- ◆ Wharton ISD does not maintain an accurate inventory of technology assets.
- ◆ Wharton ISD's website contains outdated information and does not include all statutorily required postings.

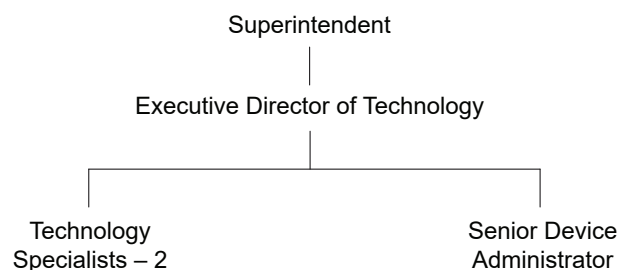
RECOMMENDATIONS

- ◆ **Recommendation 22: Establish a process to develop, review, and update the district's long-range technology, technology disaster-recovery, and cybersecurity plans.**
- ◆ **Recommendation 23: Finalize the Technology Department's procedures and document all vital technology tasks in a comprehensive standard operating procedures manual for staff.**
- ◆ **Recommendation 24: Develop a comprehensive inventory process for the district's technology assets and update its asset management system.**
- ◆ **Recommendation 25: Develop a process to review and update the district website.**

BACKGROUND

An independent school district's technology management and planning functions provide an essential foundation for the digital learning opportunities of all students and educators. One of the stated objectives of public education in the Texas Education Code, Chapter 4, is for campuses to implement and use technology to increase the effectiveness of student learning, instructional management, staff development, and administration. Districts must plan strategically for and efficiently manage technology resources to keep pace with innovations in technology.

FIGURE 9-1
WHARTON ISD TECHNOLOGY DEPARTMENT
ORGANIZATION, SCHOOL YEAR 2023-24



SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

An independent school district's technology department manages its hardware, software, and network systems. A district's technology management often varies based on its size and structure. Larger districts often allocate staff to oversee specific hardware, software, or network functions, and smaller districts assign staff to manage a range of technology functions.

Wharton Independent School District's (ISD) Technology Department is responsible for managing the district's technology resources, including installing, maintaining, and tracking technology devices throughout the district. The district's technology devices include staff and student laptop computers, printers, and switches and access points that support the district's Internet connection. Additionally, the department establishes staff and student email accounts and network access, manages the district's phone system, and administers E-rate grants for technology. The Technology Department also is responsible for training new teachers on district administrative and instructional applications during New Teacher Orientation.

Figure 9-1 shows the organization of Wharton ISD's Technology Department, which consists of four full-time staff: the executive director of technology, the senior device administrator, and two technology specialists. The executive director of technology manages the department's budget, coordinates technology purchases, and administers federal E-rate grants. The senior device administrator establishes new staff email accounts, access credentials, and security badges. The technology specialists resolve help desk

tickets. The Technology Department offices are located in the district administration building, and staff travel to the campuses as needed to assist with technology issues. The district does not have a position dedicated to instructional technology. Staff reported that teachers can request assistance from the technology specialists to use instructional technology equipment, such as interactive boards and projectors, through the district’s help-desk ticket system.

Wharton ISD uses a help-desk ticket system to track and resolve technology issues throughout the district. Staff submit help-desk tickets through a Google form on the district’s website. According to staff, the Technology Department is transitioning its ticket system to Frontline Education’s Help Desk Management software, which offers improved analysis of ticket data. **Figure 9–2** shows the number of tickets submitted to the Technology Department for school years 2021–22 to 2023–24.

The Legislative Budget Board’s (LBB) School Performance Review Team visited the district in March 2024. At the time of the onsite visit, staff reported that the district has 1,800 student laptop computers. For school year 2023–24, Wharton ISD’s enrollment was 1,823.

Wharton ISD also tracks the administrative and instructional software programs that staff and students use. Staff reported that the district evaluates its instructional software programs annually to ensure that they do not have duplicate programs. Furthermore, the district uses program usage reports to track how often students use the instructional software, such as for reading, writing and mathematics. Principals are required to include instructional program usage in their weekly newsletters, which are discussed during district leadership meetings. The district also monitors instructional technology hardware usage, such as student laptop computers and classroom interactive boards.

For school year 2023–24, Wharton ISD adopted a budget of \$628,169 for technology functions.

DETAILED FINDINGS

PLANNING (REC. 22)

Wharton ISD lacks a process for developing updated, comprehensive technology planning documents to help the district prepare effectively for future needs and mitigate risks.

Technology planning helps districts prepare for future needs, expenses, and risks, such as cybersecurity threats or disaster events. Effective technology planning includes the

FIGURE 9–2
WHARTON ISD HELP DESK TICKET SUBMISSIONS
SCHOOL YEARS 2021–22 TO 2023–24

YEAR	ANNUAL TICKETS	AVERAGE MONTHLY TICKETS
2021–22	724	60.3
2022–23	772	64.3
2023–24 (1)	365	52.1
Total	1861	60.0

NOTE: As of March 2024, data for school year 2023–24 represents June 1 to December 31, 2023.

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

development of a long-range technology plan, a technology disaster-recovery plan, and a cybersecurity plan.

LONG-RANGE TECHNOLOGY PLAN

A long-range plan guides a district’s technology goals and objectives during a period of three years to five years. Wharton ISD’s executive director of technology developed a long-range technology plan for school years 2019–20 to 2023–24. The plan is available on the district website and is based on the campus improvement plan goals, input from the superintendent, and the district’s obsolescence report. The obsolescence report states when devices need to be updated by campus and department during a five-year period. The report includes the cost per device and is updated annually.

An effective long-range technology plan uses the results of a needs assessment that identifies conditions that must be changed to achieve desired outcomes to develop the district’s long-term technology goals. The needs assessment results also help determine the funding necessary to achieve the district’s technology goals within a certain timeframe. However, Wharton ISD does not conduct a technology needs assessment consistently or seek feedback from staff on their technology needs.

Figure 9–3 shows a comparison of Wharton ISD’s long-range technology plan to best practice components.

As shown in **Figure 9–3**, the district’s long-range technology plan lacks best-practice components, including mission and vision statements, needs assessment findings, and funding sources. The plan has not been revised since January 2019, and the district has not established a process to keep it updated. For example, the plan states that the Technology Department

will “maintain online Texas Enterprise Information System (TxEIS) Attendance and Gradebook software,” but the district replaced TxEIS with the Skyward student information system at the beginning of school year 2022–23.

Additionally, Wharton ISD’s long-range technology plan states that district will follow the obsolescence policy of replacing teacher computers after five years and replace all other computers as needed. However, at the time of the review team’s onsite visit, the district did not follow this device replacement process, nor the more detailed process established in the executive director of technology’s obsolescence report. District data show 722 of the district’s 1,664 laptop computers, desktop computers, and tablet devices, or 43.4 percent, were purchased in 2018 or before. Staff reported that budgetary constraints limit the number of devices that can be replaced each year.

Without an updated long-range technology plan, Wharton ISD cannot effectively identify challenges and develop new or updated goals to address the district’s needs. The district also is not able to effectively evaluate progress toward meeting its goals or determine whether funds are used efficiently.

Furthermore, the Texas Education Code, Section 32.001, requires the State Board of Education to develop technology goals that guide school districts in their long-range technology planning. These goals were updated in 2022 and are outlined in TEA’s Revised and Extended Long-range Plan for Technology (LRPT).

The LRPT provides districts with guidance and informational resources to develop long-range technology plans that meet their unique needs. In addition to six strategic goals, the LRPT details 18 focus areas that represent trends and priorities in education. However, Wharton ISD has not evaluated its long-range technology plan to ensure it incorporates the goals and focus areas established in the LRPT.

Granbury ISD’s long-range technology plan is updated annually based on student, staff, and parent surveys, software utilization, and student performance. The plan includes the best practice components and incorporates the strategic goals of the LRPT. The district’s technology director presents the plan for the following school year to the Granbury ISD Board of Trustees at the December board meeting.

**FIGURE 9–3
WHARTON ISD’S LONG-RANGE TECHNOLOGY PLAN
COMPARED TO BEST PRACTICE COMPONENTS
SCHOOL YEAR 2023–24**

BEST PRACTICE COMPONENTS	WHARTON ISD’S PLAN
Mission and vision statements	No
Needs assessment findings	No
Goals or objectives	Yes
Steps or strategies to meet goals and objectives	Yes
Staff responsible for meeting goals and objectives	Yes
Timeline	Yes
Funding sources for completing each goal and objective	No
Success measures	Yes

SOURCE: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

Hillsboro ISD’s Technology Plan describes the existing conditions of its technology infrastructure and the technology equipment and programs available to staff and students. It also states the findings of the district’s needs assessment that guided its goals.

TECHNOLOGY DISASTER-RECOVERY PLAN

As part of the district’s disaster recovery processes, Wharton ISD maintains a backup server in an offsite location and contracts with a company for cloud-based backup servers. However, the district’s disaster recovery plan has not been updated for 2023–24 school year, nor was staff feedback used in its development.

A technology disaster-recovery plan contains detailed instructions on how a district will respond to unplanned incidents that affect its technology infrastructure, such as natural disasters, power outages, and other disruptive events. The plan guides staff on how to restore business operations and continue instruction in a quick and effective manner in case of a disruption.

The executive director of technology developed the district’s technology disaster-recovery plan in conjunction with regional Education Service Center III. Wharton ISD’s technology disaster-recovery plan includes the following components:

- objectives;
- names and contact information of key staff;

- plan overview;
- emergency response;
- media;
- financial and legal issues; and
- detailed steps for recovery of specific technology hardware and software.

Although the district's technology disaster-recovery plan is comprehensive, it has not been updated since school year 2022–23. The district also did not include key district staff in the plan development, such as the superintendent and business office staff. During interviews, some technology staff reported not knowing the district has such a plan.

Stakeholder involvement in technology disaster planning is an important element for identifying critical processes and accounting for them in the disaster-recovery plan. Training staff on the plan helps ensure departments will be aware of their responsibilities during a disaster and able to assist the organization restart business operations as soon as possible. The disaster-recovery plan should be tested periodically to confirm its effectiveness and revised based on the results of the test. Effective plans are updated regularly based on new or retired equipment and applications, facilities additions or closures, and changes to staff and external partnerships with disaster-recovery responsibilities.

CYBERSECURITY PLAN

Cybersecurity is important for school districts because they can be vulnerable targets for cyberattacks and online threats. Educational institutions electronically store a lot of sensitive information, including student and staff data. A cyberattack can have serious consequences for any school district.

Wharton ISD uses various services for addressing cybersecurity including firewalls, virus protection, and content filters. Additionally, the superintendent collaborates with the executive director of technology to deliver cybersecurity training to staff.

The executive director of technology developed Wharton ISD's cybersecurity plan, titled 2020–24 Cybersecurity Policy. A cybersecurity plan guides staff to secure the district's equipment and data, determines cybersecurity risk, implements appropriate mitigation planning, and protects the district's network against a cyberattack and other cybersecurity incidents. The plan is thorough and includes procedures; however, staff reported that it has not been

updated since 2020, and the district does not follow it because some of the information is outdated.

Without an updated cybersecurity plan, the district does not have a guide to identify and correct vulnerabilities regularly. The district is susceptible to data loss or theft that could shut down district operations or result in the unlawful attainment of staff's and students' personal information. Additionally, a cybersecurity incident could affect student instruction. A U.S. Government Accountability Office report, *Critical Infrastructure Protection: Additional Federal Coordination Is Needed to Enhance K–12 Cybersecurity*, found that student learning could be interrupted from three days to three weeks following a cyberattack.

TEA's Texas Gateway website provides information, webinars, and tools related to cybersecurity. The Texas Cybersecurity Framework is a tool districts can use to perform a self-assessment to identify their cybersecurity risks. Identifying these risks can guide a district's cybersecurity plan on how to protect, detect, and respond to vulnerabilities in their networks. The National Institute of Standards and Technology also has published its Cybersecurity Framework 2.0 that can be used as an outline for a cybersecurity plan.

Fort Hancock ISD's cybersecurity plan contains detailed processes that technology staff use to secure and maintain the district's hardware and software resources. The plan also includes an annual informational assessment to guide the district in updating its cybersecurity efforts.

Wharton ISD should establish a process to develop, review, and update the district's long-range technology, technology disaster-recovery, and cybersecurity plans.

For the long-range technology plan, the executive director of technology should perform the following activities:

- collaborate with technology staff to develop a technology needs assessment for the district; seek assistance from the National Center for Education Statistics, which provides resources for performing an effective technology needs assessment;
- present the results of the needs assessment to the superintendent, the elementary and secondary assistant superintendents of curriculum and instruction, and the business manager, and collaborate with these staff to develop measurable technology goals for the district;

- update the long-range technology plan with a mission and vision statement, needs assessment findings, goals, and funding sources. The superintendent should review and approve the plan; and
- present the plan to the Wharton ISD Board of Trustees for approval.

The executive director of technology and the superintendent should meet annually to evaluate goal progress and adjust the plan, as needed.

For the disaster-recovery plan, the executive director of technology should perform the following actions:

- request feedback on the current plan from the superintendent, deputy superintendent, business manager, and the public education information management system coordinator to ensure critical operations are accounted for in the plan;
- review and update the existing plan, including any changes based on staff feedback;
- present the plan to the superintendent and the board for approval; and
- develop a formalized process and timeline to test, review, and update the plan annually.

For the cybersecurity plan, the executive director of technology should collaborate with technology staff to perform the following activities:

- perform a vulnerability assessment of the district's current hardware and software resources;
- identify any gaps and address any critical issues that arise;
- update the plan with procedures that technology staff will use regularly to detect and respond to any cybersecurity issues; and
- test, review, and update the cybersecurity plan annually.

The district could implement this recommendation with existing resources.

STANDARD OPERATING PROCEDURES MANUAL (REC. 23)

Wharton ISD's Technology Department does not document procedures effectively for technology-related tasks.

The Technology Department lacks comprehensive standard operating procedures (SOP), which are written documents containing step-by-step instructions for specific tasks. An SOP details which tasks need to be performed and how often. SOPs help staff complete an organization's most essential tasks effectively and align the organization's operations with industry best practices.

The department relies primarily on staff's knowledge and experience to troubleshoot technology problems in the district. Although Wharton ISD's Technology Department has some procedures documented, it lacks SOPs for all technology responsibilities. Instead, new Technology Department staff receive on-the-job training by observing the work of current staff, and new employees are encouraged to take notes as they learn new tasks.

The executive director of technology and the senior device administrator have served the district for 27 years and 33 years, respectively; the most experienced technology specialist had two years of service, and the other specialist had five months of experience with the district at the time of the onsite visit. Additionally, staff reported that the Technology Department previously has experienced turnover in the technology specialist positions. The district's lack of SOPs may increase the challenges associated with training new technology staff. It also causes the Technology Department to rely heavily on the institutional knowledge of its veteran staff to conduct operations and places the department at risk of losing operational effectiveness and efficiency when these staff leave the district.

Effective school districts have comprehensive, documented operating procedures, which provide new staff with guidance on performing district technology tasks and serve as reference points for tasks performed seasonally or annually. Procedures also help districts develop work standards, promote consistency, and implement overall operational efficiency. Additionally, detailed written procedures can guide others in performing the duties of a staff member during a long-term absence or separation from the district.

The Technology Department should finalize its department procedures and document all vital technology tasks in a comprehensive SOP manual for staff.

To develop the SOP manual, the executive director of technology should perform the following actions:

**FIGURE 9–4
DISCREPANCIES IN WHARTON ISD’S ELECTRONIC DEVICES INVENTORY, SCHOOL YEAR 2023–24**

TAG NUMBER	SERIAL NUMBER	PRODUCT	LOCATION	STATUS	DATE PURCHASED	CAMPUS OR DEPARTMENT INVENTORY
5WISD000020334	9PG59Z1	Dell OptiPlex 3010 desktop	Staff	In Use	2013	Wharton High School
5WISD000020334	9PG59Z1	Dell OptiPlex 3020	Students	Student	2014	Wharton High School
5WISD000030344	R914M0HV	Lenovo Think Book 13s G2 ITL	Room: Temp	Disposed	2021	C.G. Sivells Elementary School
5WISD000030361	R914M0HV	Lenovo Think Book 13s G2 ITL	Staff	In Use	2021	C.G. Sivells Elementary School
5WISD000031246	R914M0H7	Lenovo Think Book 13s G2 ITL	Staff	In Use	2021	Wharton Junior High School
5WISD000033891	MJ0KC0D2	ThinkCentre M70Q Gen 3	Staff	In Use	2023	Special Education Department
5WISD000031246	MJ0KC0D2	Lenovo ThinkCentre M80s Gen 3	Staff	In Use	2023	Wharton Junior High School

SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.

- collaborate with technology staff to identify staff duties that need to be documented and review existing procedure documents for any needed updates;
- assign technology staff to write procedures based on their expertise and assigned tasks, and provide them with a timeline for completion;
- review the accuracy of procedures documented by staff;
- approve all staff procedures and organize them into a comprehensive document that is centrally located and easily accessible by all technology staff; and
- collaborate with technology staff to review and update the SOP manual annually or as new responsibilities are added.

The district could implement this recommendation with existing resources.

INVENTORY (REC. 24)

Wharton ISD does not maintain an accurate inventory of technology assets.

The senior device administrator is responsible for inventorying and tracking technology districtwide, and all technology staff assist with the process. Staff assign a bar code to each new device, which is scanned into the district’s inventory system. This process occurs year-round, according to staff, and the district performs a comprehensive inventory at the end of each school year. The district inventories its devices using

Destiny, a library management system, but has begun moving its inventory data to a new asset management system.

The Technology Department provided the review team with separate inventories for its four campuses, three departments (Maintenance Department, Special Education Department, and the Wharton ISD Police Department), and the district administration office, which totaled 1,990 devices. Devices included desktop computers, laptop computers, printers, projectors, and tablet computers, and were assigned a status, such as available, in use, lost, stolen, student, parts, and recycled. A review of the inventories showed that 53 desktop computers appeared in both the district office and the junior high school inventories. Additionally, the review team found discrepancies for 61 devices listed and could not determine whether these items were listed twice or inadvertently had been assigned the same tag number or serial number. Other fields in the inventories also showed discrepancies, including product name, location, status, and date of purchase. **Figure 9–4** shows examples of discrepancies found in the inventories for electronic devices.

During interviews, several staff reported devices that were not included in the district’s technology inventories. For example, staff reported that the district has 1,800 student laptop computers, but inventory data lists 1,161. Several staff said that the district has a student-to-device ratio of one-to-one. However, the high school inventory lists 116 student laptop computers, but the campus enrollment for school year 2022–23 was 570 students.

Staff also reported that the district recently purchased printers and interactive boards, but these items were missing from the inventories. The Wharton Elementary School principal said all the teachers at that campus had classroom projectors, which also were absent from the inventories. Additionally, a review of the inventory shows that equipment related to maintaining the district's Internet network also was not listed.

Without an accurate device inventory, the district is at risk for loss or theft of devices, which can diminish the district's finances and cybersecurity efforts. Furthermore, it could hinder the district's ability to plan effectively for future device replacements and could result in the district unnecessarily spending funds to purchase duplicate devices.

Effective school districts tag and track all technology assets, maintain a comprehensive device inventory, and perform regular audits of devices to confirm the asset count and location and identify any discrepancies. Asset management systems enable districts to streamline their asset tracking efforts and track devices with ease using remote location options. Additionally, the National Institute of Standards and Technology's Computer Security Resource Center published an online report, *IT Asset Management*, that provides guidance on connecting asset management to cybersecurity efforts.

Wharton ISD should develop a comprehensive inventory process for the district's technology assets and update its asset management system.

As the district transitions to the new asset management system, the executive director of technology and the senior device administrator should conduct a comprehensive physical inventory of all district devices. As part of this physical inventory, Technology Department staff should identify and correct any duplications and discrepancies in the inventory and review the current inventories of district and campus devices to ensure an accurate device count. Department staff should consult with campus principals to identify devices that are not listed in the inventory for tagging and inclusion in the asset management system. The district should conduct a similar inventory of devices at the end of each school year and update its asset management system accordingly.

The district could implement this recommendation with existing resources.

WEBSITE (REC. 25)

Wharton ISD's website contains outdated information and does not include all statutorily required postings.

Wharton ISD uses its website to promote the district and inform the community and staff on upcoming events and deadlines. The public relations (PR) coordinator is responsible for updating the district's website, and the executive director of technology maintains its functionality.

During school year 2023–24, the district transitioned to a new website-hosting company, and staff reported that the district is still in the process of updating web pages. District staff who wish to publish information on the website notify the PR coordinator by email or through Class Intercom, an application that enables the PR coordinator to edit materials before posting them.

The PR coordinator reports periodically checking the website for outdated information and requesting updated materials from the appropriate department. Campus principals, or their delegates, are responsible for checking their campus webpages for outdated material. However, district staff reported not knowing whether campus web page reviews were being conducted. A review of campus webpages shows that some contain outdated information or lack postings of required materials. Additionally, a review of Wharton ISD's website shows that various department webpages, including those for curriculum and instruction, human resources, business, and maintenance and operations, have outdated or incomplete information or documents posted.

In addition, districts are required by federal and state laws to post certain information on their website. The superintendent's administrative assistant checks required postings when possible and informs the PR coordinator of any updates. Additional updates are made as needed when the assistant learns of new required postings. **Figure 9–5** shows some of the rules, laws, or regulations that require the district to post certain information and whether Wharton ISD's website meets those requirements. A review of Wharton ISD's website shows that, out of 31 randomly selected required postings, the district is in partial compliance with two and out of compliance with 15 requirements.

Outdated information posted on the website limits the district's ability to communicate accurate and timely information to parents, staff, and community stakeholders. Additionally, by not maintaining the required postings, the district is in violation of state and federal requirements.

FIGURE 9–5
WHARTON ISD REQUIRED POSTINGS CHECKLIST, SCHOOL YEAR 2023–24

REQUIRED POSTING (1)	STATUTE	IN COMPLIANCE AS OF MARCH 2024
Administrative		
Main office contact information, including physical address, mailing address, main telephone number, and an email address	The Texas Local Government Code, §140.008(f)(2)	Partial – an email address is not posted
Posting of local innovation plan	The Texas Education Code, §12A.0071(a), and the Texas Administrative Code, Title 19, Part 2, Chapter 102, Subchapter JJ, §102.1305(e)	Yes
Family engagement plan	The Texas Administrative Code, Title 19, Part 2, Chapter 102, Subchapter AA, §102.1003(h)	Yes
Notice and agenda of a school board meeting	The Texas Government Code, §551.056(b)	Yes
School district employment policies	The Texas Education Code, §21.204(d)	Yes
Agreement between the district and a public institution of higher education to provide a dual-credit program	The Texas Education Code, §28.009(b-2) (11)	No
Notice regarding ability to refuse entry or eject certain individuals and the appeals process	The Texas Education Code, §37.105(g)	No
Accountability		
Texas Academic Performance Reports	The Texas Administrative Code, Title 19, Part 2, Chapter 61, Subchapter BB, §61.1022(f)	Outdated
Texas Education Agency (TEA) campus report cards	The Texas Education Code, §39.362(1)	Outdated
Performance report for district	The Texas Education Code, §39.362(2)	Outdated
Accreditation status and most recent performance rating	The Texas Education Code, §39.362(3)	Outdated
Definition of each accreditation status	The Texas Education Code, §39.362(4)	Outdated
Annual Federal Report Card	The U.S. Code, Title 20, §6311(h)(2)	Outdated
Early childhood literacy and mathematics proficiency plan, goals, and progress updates	The Texas Education Code, §11.185(a) and (e)	No
Annual report of progress toward goals set in college, career, and military readiness plans	The Texas Education Code, §11.186(c)	No
Academic		
Administration dates for PSAT/NMSQT and college Advanced Placement (AP) tests with procedures for home-schooled students to register (2)	The Texas Education Code, §29.916(c)	No – information regarding AP testing is not posted; the district offers ACT testing but does not offer the PSAT/NMSQT (2)
Information from TEA explaining advantages of the distinguished level of achievement and each endorsement	The Texas Education Code, §28.02121(b)	Yes – posted in the school year 2023–24 Student Handbook
Transition and employment guide for students in special education and their parents	The Texas Education Code, §29.0112(e)	Yes – however, two links appear on the website, and one is a broken link
Financial		
Summary of proposed budget	The Texas Education Code, §44.0041	Yes
Adopted budget	The Texas Education Code, §44.0051	Yes

**FIGURE 9–5 (CONTINUED)
WHARTON ISD REQUIRED POSTINGS CHECKLIST, SCHOOL YEAR 2023–24**

REQUIRED POSTING (1)	STATUTE	IN COMPLIANCE AS OF MARCH 2024
Health		
Policies and procedures that promote physical and mental health	The Texas Education Code, §28.004(k)(1)	Yes – posted in the school year 2023–24 Student Handbook
Policies adopted to ensure that students engage in physical activity	The Texas Education Code, §28.004(k)(2)	Yes – posted in the school year 2023–24 Student Handbook
Number of times the district health advisory committee met in the past year	The Texas Education Code, §28.004(k)(3)(A)	No – the School Health Advisory Council webpage states it is under construction
Policy regarding vending machines	The Texas Education Code, §28.004(k)(3)(B)	Yes – posted in the school year 2023–24 Student Handbook
Policies and procedures to penalize the use of e-cigarettes and tobacco products on school campuses or at school activities	The Texas Education Code, §28.004(k)(3)(C)	Yes – posted in the school year 2023–24 Student Handbook
Notice that parents can request their child’s physical fitness assessment results	The Texas Education Code, §28.004(k)(4)	Yes – posted in the school year 2023–24 Student Handbook
Statement reporting whether each campus has a full-time nurse or counselor	The Texas Education Code, §28.004(k)(5)	No
List of required and recommended immunizations	The Texas Education Code, §38.019(a)(1)(A) and (B)	No
Link to the Department of State Health Services website for parents to obtain information on claiming exemption from immunization requirements	The Texas Education Code, §38.019(a)(2)	No
Procedure for reporting bullying	The Texas Education Code, §37.0832(e)	Yes – the website contains a link to report bullying, and procedures are included in the school year 2023–24 Student Handbook
Email address and dedicated phone number of the Campus Behavior Coordinator (CBC)	The Texas Education Code, §26.015	Partial – the school year 2023–24 Student Handbook lists the names of CBCs but not their contact information
NOTES:		
(1) Not all state-required postings are shown.		
(2) College acceptance examinations include the following exams: PSAT=Preliminary SAT, formerly Scholastic Aptitude Test; NMSQT=National Merit Scholarship Qualifying Test; ACT=formerly American College Testing.		
SOURCES: Legislative Budget Board School Performance Review Team; Wharton ISD, March 2024.		

Effective school districts follow procedures to review required postings regularly and confirm that the published information is current and accurate. The Texas Association of School Boards (TASB) maintains a comprehensive list of statutorily required postings that can serve as a resource to districts for updating their websites.

Wharton ISD should develop a process to review and update its website.

To accomplish this recommendation the PR coordinator should perform the following activities:

- collaborate with the superintendent and department and campus staff to assign responsibility for reviewing

each department and campus web page, and maintain a list of these designated staff members;

- develop a checklist for staff to use when reviewing their web pages that includes such tasks as verifying and testing all links, checking dates of published documents and events, and reviewing campus directories and a contact information;
- send regular reminders to department and campus staff responsible for updating web pages to help ensure that posted information remains current; and
- consult TASB’s required postings list to audit the district’s website for missing or outdated postings and

**FIGURE 9–6
WHARTON ISD AND PEER DISTRICT TECHNOLOGY STAFF COMPARISON, SCHOOL YEAR 2023–24**

DISTRICT	TECHNOLOGY STAFF	STUDENT ENROLLMENT	STUDENTS PER TECHNOLOGY STAFF	TOTAL STAFF (1)	DISTRICT STAFF PER TECHNOLOGY STAFF
Wharton ISD	4	1,823	455.8	352.5	88.1
Atlanta ISD	7	1,926	275.1	353.3	50.5
Bay City ISD	5	3,514	702.8	550.4	110.1
El Campo ISD	6	3,326	554.3	479.8	80.0
Shepherd ISD	5	1,958	391.6	289.9	58.0

NOTE: (1) Total staff data shows school year 2022–23 data, the most recent available as of March 2024.
 SOURCES: Texas Education Agency (TEA), Texas Education Directory, school year 2023–24; TEA, Texas Academic Performance Reports, school year 2022–23; Atlanta ISD; Bay City ISD; El Campo ISD; Shepherd ISD; Wharton ISD, March 2024.

collaborate with the appropriate staff to gather and post the necessary updated information.

The district could implement this recommendation with existing resources.

ADDITIONAL FINDINGS

The Legislative Budget Board’s School Performance Review Team identified an additional opportunity for the district to enhance its information technology management functions. The review team presented this finding and the related recommendations directly to Wharton ISD leadership to preserve the security of the district’s information technology operations.

ADDITIONAL OBSERVATIONS

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

INTERNET

Wharton ISD’s Internet connection experiences intermittent interruptions that affect instruction and departmental operations. The district routes its Internet connection through the district administration office, which facilitates better cybersecurity management but results in districtwide outages if power fails at the district office. Staff reported several Internet outages during school year 2023–24, which some staff attributed to an unstable electricity grid, although the exact cause remains unclear.

Although the district has made progress in improving its Internet connection, such as upgrading its network and adding wireless access points at the campuses, the Internet

connection remains unreliable. The review team’s survey of campus staff shows that 55.4 percent of participants agreed with the statement “Students and staff have access to fast and reliable Internet service.” Outages disrupt instruction, especially during standardized testing, and prevent teachers from printing assignments.

Additionally, poor Internet connectivity often prevents students from entering their student identification numbers into the point-of-sale system during meal service in cafeterias. Food service staff then must record meals served manually, which may reduce reimbursement when the meal cannot be claimed due to an incorrectly recorded ID number.

As the district evaluates its Internet infrastructure, the executive director of technology should collaborate with the superintendent and other department heads to identify which operations are affected by outages and weak connectivity. The executive director should prioritize improving the network infrastructure in these areas. The district also should evaluate its power needs, consider backup solutions such as batteries or generators, and assess whether relocating the entire Technology Department to a more reliable area for connectivity is feasible.

TECHNOLOGY DEPARTMENT STAFFING

Wharton ISD does not use a formula to determine the number of staff needed to support the district’s technology needs. The district’s Technology Department has the fewest staff compared to peer districts. Peer districts are districts similar in size and other characteristics to Wharton ISD that are used for comparison purposes. They include Atlanta ISD, Bay City ISD, El Campo ISD, and Shepherd ISD. **Figure 9–6** shows Wharton ISD’s Technology Department staffing compared to its peer districts. Wharton ISD’s ratio of

students to technology staff is average among its peers; however, its ratio of district staff to technology staff is the second highest when compared to its peers.

The Technology Department has two technology specialists responsible for device maintenance and repair. TASB's school year 2023–24 staffing guide states that a district should employ one maintenance and repair technician for every 750 devices. The review team identified 1823 devices in use on the district's inventory, indicating that each specialist supports at least 161.5 devices in addition to the TASB recommendation. However, as noted earlier, the district's device inventory is incomplete, and technology staff likely support more devices than those included in the documentation.

Although staff did not express any concerns regarding the Technology Department's ability to address and resolve help-desk tickets, the addition of a fourth district campus facility, the new junior high school, may increase the time technology specialists spend traveling and responding to ticket requests and limit the number of tickets the specialists can resolve.

Wharton ISD should consider developing a staffing formula for the Technology Department based on the number of devices the district has, help-desk ticket data, and the number of campuses in the district.

PEIMS PROCEDURES MANUALS

Wharton ISD lacks formal, standardized public education information management system (PEIMS) manuals for both district and campus-level staff. The district's student data specialist is responsible for PEIMS submissions and has been in the role for five years. The PEIMS coordinator has developed an informal PEIMS manual, but it is not shared with staff and not used as a comprehensive training resource. Campus PEIMS staff, despite varying experience levels, lack standardized guidance, relying instead on individually developed procedures. The PEIMS coordinator offers support and training, yet some campus staff reported they do not have adequate PEIMS training. Additionally, Wharton ISD recently transitioned to a new student information system to submit PEIMS data. Staff reported that the training they received on the new system did not cover all their responsibilities. The lack of standardized procedures and training gaps increases the risk of errors in PEIMS submissions and may hinder the district's ability to fulfill reporting requirements accurately and efficiently.

FISCAL IMPACT

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

