

# *Oklahoma* **School Performance Review**

---

**Indiahoma**  
**WARRIORS**



Indiahoma Public Schools

**Office of Accountability**  
May 2011





## *Education Oversight Board / Office of Accountability*

*Susan Field, Chairman • Robert Buswell, Executive Director*

May 2011

Fellow Oklahomans:

The Education Oversight Board and the Office of Accountability are pleased to present this school performance review for Indianhoma Public Schools (IPS).

This review is intended to help IPS contain costs, improve management strategies and operations, and increase student performance. To conduct this review the office contracted with WCL ENTERPRISES.

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

We are grateful for the cooperation of IPS Board of Education, administration, staff, parents, and community members. They are to be commended for their dedication toward improving educational opportunities for their community.

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

For the Education Oversight Board,

Handwritten signature of Susan Field in cursive.

Susan Field

Handwritten signature of Robert Buswell in cursive.

Robert Buswell



# Oklahoma School Performance Review

## Indiahoma Public Schools

### May 2011



#### **Education Oversight Board**

Susan Field, Chairman  
Patrick Gilmore, Vice-Chair  
Dr. Sherry Labyer  
Ami Shaffer  
Edward A. Petersen  
Reed Downey  
Millard House II  
Senator John Ford  
Representative Ann Coody

#### **Office of Accountability**

Robert Buswell, Executive Director  
Jeff Wallace, Assistant Director  
Jerry (Yu-Chao) Hsieh, Database Design Analyst  
Dr. Lonnie Melvin, School Improvement Coordinator

#### **WCL ENTERPRISES**

Bill Lenhart, President and Project Director  
Debbie Smothermon, Assistant Project Manager  
Marvin Crawford – Chapter 1, Management & Communications  
Skip Baskerville – Chapter 1, Personnel Management  
Diana Leggett – Chapter 2, Instruct Programs/Services & Personnel Managemt  
Chuck Yaple – Chapter 3, Business Operations  
Ann Wade – Chapter 3, Business Operations  
Roy Sprague – Chapter 4, Facilities Assessment  
Archie Hayes – Chapter 4 Maintenance and Custodial Operations  
Mark Hopkins – Chapter 4, Safety & Security  
Beth Wallace – Chapter 5, Child Nutrition  
Skip Baskerville – Chapter 5, Technology  
Stephen Loveless – Chapter 5, Transportation

This publication was prepared by the Office of Accountability as authorized by Title 70 of the Oklahoma Statutes, Section 3-118 and 1210.5331. It was printed by the Oklahoma State Regents for Higher Education Central Services Department, as authorized by the Education Oversight Board. Fifty paper copies have been prepared at a cost of \$1,675.00. Copies have been deposited with the Publications Clearinghouse of the Oklahoma Department of Libraries, May 2011.



---

	Page
<b>Executive Summary</b>	1
Acknowledgements	1
Indiahoma Public Schools	1
Commendations	3
Recommendations and Projected Costs and Savings	4
<b>Chapter 1: Management, Personnel, and Communications</b>	1-1
A. Management and Planning	1-9
B. Personnel Management	1-14
C. Communications and Community Involvement	1-17
<b>Chapter 2: Instructional Delivery</b>	2-1
A. Instructional Delivery and Student Performance	2-2
B. Professional Development	2-17
C. Gifted and Talented Education	2-19
D. Special Education	2-23
E. Career and Technology Education	2-28
F. Guidance and Counseling	2-31
G. Federal Programs	2-34
H. Textbooks	2-37
<b>Chapter 3: Business Operations</b>	3-1
A. Auditing and Internal Controls	3-10
B. Financial Processes	3-15
C. Asset and Risk Management	3-20
D. Activity Funds	3-25
<b>Chapter 4: Facilities Use and Management</b>	4-1
A. Facilities Planning and Construction	4-2
B. Maintenance and Custodial Operations	4-15
C. Energy Management	4-25
D. Community Use of School Facilities	4-37
E. Safety and Security	4-40
F. Crisis Management	4-51
<b>Chapter 5: Support Services</b>	5-1
A. Food Service	5-1

---

B. Technology	5-12
C. Transportation	5-19

**Appendices:**

A. Professional Staff Survey Results	A-1
B. Teacher Survey Results	B-1
C. Support Staff Survey Results	C-1
D. Student Survey Results	D-1
E. Parent Survey Results	E-1
F. Enrollment Projections	F-1
G. Facilities Walk-through: Maintenance, Safety, and Security Needs	G-1
H. Thermal Images of Facilities	H-1

## ***EXECUTIVE SUMMARY***

The Oklahoma School Performance Review (OSPR) Program was authorized by the Oklahoma Legislature during the 2001 session and amended during the 2005 session. The responsibility to conduct School Performance Reviews was assigned to the Office of Accountability, which is under the direction of the Oklahoma Education Oversight Board. The purpose of a School Performance Review is to develop findings, commendations, and recommendations regarding (1) containing costs; (2) improving management strategies; and (3) promoting better education for Oklahoma children.

The Office of Accountability began the School Performance Review of Indianoma Public Schools (IPS) in September 2010. The Oklahoma Office of Accountability has contracted with *WCL ENTERPRISES* to assist with the School Performance Review.

The *WCL ENTERPRISES* consulting team conducted either individual or small group interviews with district personnel and Board of Education members. The team also reviewed operations by touring facilities, observing cafeteria operations, and riding school bus routes.

Parents, teachers, principals, support staff, and central office administrators also completed written surveys that were customized to the district. The completed surveys were tabulated and the results were used in the School Performance Review. Survey results are contained in Appendices A-E.

Data were received and used from the Office of Accountability, State Department of Education, State Regents for Higher Education, and State Auditor and Inspector. OSPR selected peer districts for comparisons based on similarities in student enrollment and demographics. The districts selected for comparison to Indianoma were Butner, Duke, Verden, Chattanooga, and Blair.

During the review, *WCL ENTERPRISES* developed 64 recommendations designed to improve operations. In some cases, these recommendations should result in a net savings to the district, in some cases a net cost, and in some cases should have no fiscal impact but should improve district effectiveness. A detailed list of costs and savings by recommendation appears in **Exhibit 4**.

### **ACKNOWLEDGMENTS**

The Office of Accountability and *WCL ENTERPRISES* wish to express their appreciation to the Board of Education of Indianoma Public Schools, its superintendent Barbalee Blair, and the district employees, students, parents, and others who helped during the School Performance Review.

### **INDIAHOMA PUBLIC SCHOOLS**

Indianoma Public Schools (IPS) is located in southwest Oklahoma just over 23 miles west of Lawton along US Highway 62, just south of the western end of Fort Sill Army Post in Comanche County. IPS includes grades EC-12 in one elementary school and one high school. The district

covers 123 square miles with 2.5 students per square mile and serves Indianhoma and the surrounding rural area.

**Exhibit 1** provides average daily membership (ADM), ethnicity, and eligibility for free or reduced price meals for IPS for both of its schools for 2008-09.

**Exhibit 1**  
**Student Enrollment and Socioeconomic Characteristics**  
**2008-09**

Campus	Grade Span	Average Daily Membership	Caucasian	Black	Asian	Hispanic	Native American	Eligible For Free or Reduced Price Meals
Elementary School	EC-8	111.6	59%	2%	0%	6%	33%	72%
High School	9-12	201.0	70%	4%	1%	7%	19%	19%
<b>IPS Totals</b>		<b>312.6</b>	<b>66%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>	<b>24%</b>	<b>38%</b>

*Source: Office of Accountability, Profiles Database*

IPS's average property valuation per student of \$14,924 is the lowest among all peer districts and less than the community group and state averages. IPS has the second highest percentage of Native American students among peers and is more than the state average. **Exhibit 2** displays demographic information for IPS, the peer districts, community group, and the state for 2008-09.

**Exhibit 2**  
**Demographics of IPS, Peer Districts, and State**  
**2008-09**

Entity	Average Daily Membership	Ethnic Group					Average Assessed Property Valuation Per Student	Eligible for Free or Reduced Price Meals
		Caucasian	Black	Asian	Hispanic	Native American		
<b>Indiahoma</b>	<b>312.6</b>	<b>66%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>	<b>24%</b>	<b>\$14,924</b>	<b>37.7%</b>
Blair	271.6	73%	3%	1%	17%	6%	\$22,350	55.0%
Butner	224.1	60%	2%	0%	1%	36%	\$30,916	65.5%
Chattanooga	277.0	86%	1%	2%	2%	9%	\$29,344	50.7%
Duke	180.5	68%	1%	0%	27%	4%	\$55,193	59.2%
Verden	287.9	71%	1%	2%	5%	21%	\$29,311	62.8%
<b>Community Group</b>	<b>339.6</b>	<b>75%</b>	<b>2%</b>	<b>1%</b>	<b>7%</b>	<b>16%</b>	<b>\$50,308</b>	<b>45.1%</b>
<b>State Average</b>	<b>1,194.3</b>	<b>57%</b>	<b>11%</b>	<b>2%</b>	<b>11%</b>	<b>19%</b>	<b>\$38,875</b>	<b>56.3%</b>

*Source: Office of Accountability, Profiles Database*

IPS’s ADM increased by 34.22 percent during the period from 2004-05 through 2008-09. This increase was by far the highest among all peer districts, was far less than the community group, and higher than the state average for this same period (**Exhibit 3**). The higher student count for IPS was due to the inclusion of students from the Oklahoma Virtual Academy program, which will affect IPS student counts through the 2009-10 year.

**Exhibit 3  
IPS, Peer Districts, and State Student ADM Trends**

Entity	Average Daily Membership					Percentage Change
	2004-05	2005-06	2006-07	2007-08	2008-09	
<b>Indiahoma</b>	<b>232.9</b>	<b>230.8</b>	<b>208.5</b>	<b>199.4</b>	<b>312.6</b>	<b>34.2%</b>
Blair	303.2	307.1	282.3	266.6	271.6	(10.4%)
Butner	268.6	286.2	287.7	250.7	224.1	(16.6%)
Chattanooga	261.5	263.0	280.9	260.2	277.0	5.9%
Duke	187.0	206.0	201.9	190.3	180.5	(3.5%)
Verden	318.1	323.5	328.0	321.6	287.9	(9.5%)
<b>Community Group</b>	<b>151.3</b>	<b>148.7</b>	<b>146.3</b>	<b>348.0</b>	<b>339.6</b>	<b>124.5%</b>
<b>State Average</b>	<b>1,153.5</b>	<b>1,162.2</b>	<b>1,172.2</b>	<b>1,176.7</b>	<b>1,194.3</b>	<b>3.5%</b>

*Source: Office of Accountability, Profiles Database*

**COMMENDATIONS**

The Oklahoma Office of Accountability identified “exemplary” or “best practices” in Indiahoma Public Schools that led to 40 commendations. This report highlights the model programs, services, and operations of the district. The Office of Accountability recommends that other school districts throughout Oklahoma examine these exemplary programs and services to see if they could be adapted to meet local needs of other communities. The commendations are listed below and in each chapter.

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

By using independently created and maintained financial analyses, based upon information contained on Indiahoma Public Schools automated financial system, the superintendent has been able to effectively manage finances and share this information with the School Board, district staff, and the public when necessary.

**Chapter 2: INSTRUCTIONAL DELIVERY**

IPS uses grant funds to provide a comprehensive after school program for students in grades 7-12 that compliment the academic program and support increased achievement.

IPS partners with the Great Plains Technology Center to supplement district programs and extend opportunities for career preparation and academic support.

IPS has a career exploration and job shadowing program that provides students with academic focus and direction for post-secondary planning.

**Chapter 4: FACILITIES USE AND MANAGEMENT**

By involving district staff, establishing a series of regular procedures, and enforcing district policies, IPS provides a safe and secure environment for students and staff.

**Chapter 5: SUPPORT SERVICES**

IPS utilizes spare parts to repair computers rather than purchase new or refurbished parts. Although the parts are harvested from broken computers, items such as a mouse, keyboards, speakers, or memory can be used in other systems. This saves the district time and money in repairing minor computer hardware problems.

IPS uses their insurance company's program on school bus safety to educate students PreK through grade 6 on proper school bus behavior and safety. This program is used at no cost to the district.

**ESTIMATED FISCAL IMPACT OF RECOMMENDATIONS**

WCL ENTERPRISES' recommendations would result in some savings that could be redirected into the classroom. The savings opportunities identified in this report are conservative and should be considered minimums.

Proposed investments of additional funds usually are related to increased efficiencies or savings, or improved productivity and effectiveness. All estimable savings and costs are listed in **Exhibit 4**.

**RECOMMENDATIONS AND PROJECTED TOTAL SAVINGS**

A detailed list of recommendations with costs and savings by recommendation appears in **Exhibit 4** and in each chapter. Detailed implementation strategies and the estimates of fiscal impact follow each recommendation in this report. The implementation section associated with each recommendation highlights the actions necessary to achieve the proposed results. Many of the recommendations have no costs or savings attached, but are designed to formalize, improve, and streamline operations.

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

WCL ENTERPRISES recommends that the IPS Board of Education ask district administrators to review the recommendations, develop an implementation plan, and monitor its progress. OSPR staff is available to help implement proposals.

**Exhibit 4  
Summary of Costs and Savings by Recommendations**

	Recommendation	Estimated (Cost)/Savings					Total 5-Year (Costs) or Savings
		2011-12	2012-13	2013-14	2014-15	2015-16	
<b>Chapter 1</b>	<b>Management, Personnel, and Communications</b>						
1	Indiahoma Public Schools should hold School Board workshops focusing on operations and educational achievement planning for students.	\$0	\$0	\$0	\$0	\$0	\$0
2	Indiahoma Public School Board members should receive a packet with appropriate contents in advance of all regular and Special Board meetings.	\$0	\$0	\$0	\$0	\$0	\$0
3	Subscribe to the OSSBA’s Maintenance Subscription Service and the Policy Review Service.	(\$1,500)	(\$500)	(\$500)	(\$500)	(\$500)	(\$3,500)
4	To ensure confidentiality, IPS should secure personnel records in locked file cabinets in an area with limited accessibility.	(\$390)	\$0	\$0	\$0	\$0	(\$390)
5	Develop a systematic process for making staffing decisions that includes careful consideration of the impact to district programs and services.	\$0	\$0	\$0	\$0	\$0	\$0
6	Develop a coordinated volunteer program that promotes parent and community involvement in the district’s schools.	\$0	\$0	\$0	\$0	\$0	\$0
	<b>Subtotal</b>	<b>(\$1,890)</b>	<b>(\$500)</b>	<b>(\$500)</b>	<b>(\$500)</b>	<b>(\$500)</b>	<b>(\$3,890)</b>
<b>Chapter 2</b>	<b>Instructional Delivery</b>						
1	Develop scope and sequence documents in all content areas and grade levels to define PASS objectives and determine the instructional sequence of objectives.	\$0	\$0	\$0	\$0	\$0	\$0
2	IPS should structure time to provide teachers opportunities to work together across grades to address curriculum, instruction, and assessment to ensure increased student performance.	\$0	\$0	\$0	\$0	\$0	\$0
3	The superintendent should work with the principal and counselor to develop a plan for using the EPAS EXPLORE and PLAN data to support student career planning and to increase student achievement.	\$0	\$0	\$0	\$0	\$0	\$0
4	Develop a plan for using professional development days to support curriculum	\$0	\$0	\$0	\$0	\$0	\$0

	Recommendation	Estimated (Cost)/Savings					
		2011-12	2012-13	2013-14	2014-15	2015-16	Total 5-Year (Costs) or Savings
	development, data analysis, and instructional delivery.						
5	Develop a gifted program for elementary students that includes a defined curriculum and an established schedule of services to ensure that learning experiences align across grades to maximize student learning.	\$0	\$0	\$0	\$0	\$0	\$0
6	Review the needs of the IPS Special Education Program each year to ensure that decisions regarding funding, staffing, and supporting interventions specifically address the needs and learning goals of all students.	\$0	\$0	\$0	\$0	\$0	\$0
7	Develop a Guidance and Counseling Plan that provides a comprehensive program for grades PreK-12th to address student needs across levels and provides guidance services for all students.	\$0	\$0	\$0	\$0	\$0	\$0
8	Develop a coordinated Indian Education program to ensure that students receive the supplemental educational support allowed by the allocated resources.	\$0	\$0	\$0	\$0	\$0	\$0
	Subtotal	\$0	\$0	\$0	\$0	\$0	\$0
<b>Chapter 3 Business Operations</b>							
1	Expand the Treasurer function to include the performance of necessary controls over all financial matters on a monthly basis.	(\$7,000)	(\$7,000)	(\$7,000)	(\$7,000)	(\$7,000)	(\$35,000)
2	Establish a budgetary process that is timely and easily understood, and involves all stakeholders.	\$0	\$0	\$0	\$0	\$0	\$0
3	Expand the current monthly financial reports to include specific types of revenues and expenditures, a comparison with the previous year's financial information, and a more detailed treasurer's report.	\$0	\$0	\$0	\$0	\$0	\$0
4	Itemize the total authorized appropriation (from the Estimate of Need) down to individual Project-Function-Object budgets as furnished to the Oklahoma State Department of Education for Federal Grant Summary Budgets.	\$0	\$0	\$0	\$0	\$0	\$0
5	Develop fixed asset tracking polices and track fixed assets acquired with district funds.	\$0	\$0	\$0	\$0	\$0	\$0

	Recommendation	Estimated (Cost)/Savings					Total 5-Year (Costs) or Savings
		2011-12	2012-13	2013-14	2014-15	2015-16	
6	Establish selection criteria for the local banking services contract and solicit proposals.	\$0	\$0	\$0	\$0	\$0	\$0
7	Make sure to compensate employees in accordance with the laws, rules, and regulations of the Fair Labor Standards Act.	\$0	\$0	\$0	\$0	\$0	\$0
8	Develop and implement a policy outlining the duties surrounding textbook issuance and maintenance.	\$0	\$0	\$0	\$0	\$0	\$0
9	A system should be developed whereby the sponsors bring the deposits, with an attached deposit reconciliation form, to the activity fund custodian on a daily basis.	\$0	\$0	\$0	\$0	\$0	\$0
	Subtotal	(\$7,000)	(\$7,000)	(\$7,000)	(\$7,000)	(\$7,000)	(\$35,000)
<b>Chapter 4 Facilities Use and Management</b>							
1	IPS Board of Education should organize a formal committee consisting of several School Board members, district patrons, business leaders, and district staff to help develop a long-range facilities master plan.	\$0	\$0	\$0	\$0	\$0	\$0
2	IPS should develop a comprehensive facilities database to maintain accurate records on all of its facilities.	\$0	\$0	\$0	\$0	\$0	\$0
3	IPS should evaluate and consider including the noted items from the site visits into the scope of work for future bond programs.	\$0	\$0	\$0	\$0	\$0	\$0
4	IPS should consult with other districts, as well as legal council, to obtain modified versions of the standard AIA design services and construction contract documents, and then change the standard general conditions and supplementary conditions to best meet district needs.	\$0	\$0	\$0	\$0	\$0	\$0
5	IPS should develop facility design and construction standards, along with educational specifications, so that equity between facilities can be obtained.	\$0	\$0	\$0	\$0	\$0	\$0
6	IPS should locate any facility related documents that may exist and create an environmentally conditioned and fire-rated space within an existing building to store all of its facility related documents for ready reference and to protect this critical information from	\$0	\$0	\$0	\$0	\$0	\$0

	Recommendation	Estimated (Cost)/Savings					Total 5-Year (Costs) or Savings
		2011-12	2012-13	2013-14	2014-15	2015-16	
	being damaged.						
7	IPS should include the noted items as part of their long-range facilities master plan for consideration as part of future bond election.	\$0	\$0	\$0	\$0	\$0	\$0
8	IPS should, at a minimum, develop a spreadsheet to track district maintenance work orders, equipment inventory, labor and material costs, purchase orders, and preventive maintenance requirements.	\$0	\$0	\$0	\$0	\$0	\$0
9	The IPS Maintenance Department should develop a preventive maintenance program and long-range facilities maintenance plan.	(\$2,500)	(\$2,500)	(\$2,500)	(\$2,500)	(\$2,500)	(\$12,500)
10	IPS should provide in-house training for its maintenance employee by bringing training materials and possibly trainers to the district or allowing him to team-up with neighboring districts to attend safety trainings.	(\$500)	(\$500)	(\$500)	(\$500)	(\$500)	(\$2,500)
11	IPS should explore the possibility of hiring at least a part-time employee to share the custodial responsibilities of the facility.	(\$5,500)	(\$5,500)	(\$5,500)	(\$5,500)	(\$5,500)	(\$27,500)
12	IPS should provide training for their custodian in the use and storage of cleaning chemicals as well as basic cleaning practices.	\$0	\$0	\$0	\$0	\$0	\$0
13	IPS should consider installation of a central air and heating system along with a comprehensive energy management control system.	\$0	\$0	\$0	\$0	\$0	\$0
14	IPS should consider purchasing one of the available energy accounting software programs.	(\$672)	(\$1,172)	(\$1,172)	(\$1,172)	(\$1,172)	(\$5,360)
15	IPS should develop a comprehensive energy management program to be adopted by the Board of Education.	\$0	\$0	\$0	\$0	\$0	\$0
16	IPS should consider either allocating funds within their current budget to replace the windows in the Jr/Sr High School Building or include this replacement cost in a future bond program.	\$0	\$0	\$0	\$0	\$0	\$0
17	IPS should evaluate its actual cost to operate buildings and develop a rental rate schedule and policy for facility use by community and outside groups to	\$0	\$0	\$0	\$0	\$0	\$0

	Recommendation	Estimated (Cost)/Savings					Total 5-Year (Costs) or Savings
		2011-12	2012-13	2013-14	2014-15	2015-16	
	ensure that IPS will be reimbursed for costs incurred in any facility rental.						
18	IPS should develop a formal rental agreement with legal counsel to address the risks associated with the leasing of district facilities to outside groups and recommend revisions to board policy for approval and adoption by the Board of Education.	\$0	\$0	\$0	\$0	\$0	\$0
19	The fall zones conditions around playground equipment should be brought into compliance with Oklahoma Department of Labor safety standards.	\$0	\$0	\$0	\$0	\$0	\$0
20	Video surveillance warning signs should be installed around the perimeter of all district owned or operated facilities.	\$0	\$0	\$0	\$0	\$0	\$0
21	Campus administrators should ensure that all hazardous material storage spaces are kept secure at all times.	\$0	\$0	\$0	\$0	\$0	\$0
22	The superintendent and campus principal should develop strategies and implement procedures that will mitigate the long-term use of extension cords and power strips in IPS.	\$0	\$0	\$0	\$0	\$0	\$0
23	An all-hazards emergency operations plan should be developed and implemented.	\$0	\$0	\$0	\$0	\$0	\$0
24	All district personnel should receive emergency management training, and the emergency response plan should be routinely exercised beyond fire, tornado, and lockdown drills.	\$0	\$0	\$0	\$0	\$0	\$0
25	The National Incident Management System should be adopted and used by Indianhoma Public Schools to manage all emergency incidents and events.	\$0	\$0	\$0	\$0	\$0	\$0
26	Students with special needs or disabilities should be specifically assisted during emergencies and evacuations.	\$0	\$0	\$0	\$0	\$0	\$0
	<b>Subtotal</b>	<b>(\$9,172)</b>	<b>(\$9,672)</b>	<b>(\$9,672)</b>	<b>(\$9,672)</b>	<b>(\$9,672)</b>	<b>(\$47,860)</b>
<b>Chapter 5 Support Services</b>							
1	Evaluate options for optimal organizational structure to ensure monitoring, compliance, and technical assistance in the kitchen operations.	\$0	\$0	\$0	\$0	\$0	\$0
2	IPS should only code food service	\$0	\$0	\$0	\$0	\$0	\$0

	Recommendation	Estimated (Cost)/Savings						Total 5-Year (Costs) or Savings
		2011-12	2012-13	2013-14	2014-15	2015-16		
	financial transactions from special revenue fund code 22.							
3	IPS food service program should comply with program regulations and implement the use of all required records and documents.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4	IPS should pre-cost menus in advance to determine the amount the district should charge to cover the cost of the meal being served.	\$21,912	\$21,912	\$21,912	\$21,912	\$21,912	\$109,560	
5	The Food Service Department should follow the <i>State Department of Education School Food Service Compliance Document</i> recommendation for meals per labor hour.	\$10,640	\$10,640	\$10,640	\$10,640	\$10,640	\$53,200	
6	IPS food service program should follow procurement regulation for the purchase of their food and non-food supplies.	\$6,884	\$6,884	\$6,884	\$6,884	\$6,884	\$34,420	
7	IPS' technology staff should revise and update its Internet filter content manager provided by Scholastic Communications to allow teachers access to appropriate sites in order to integrate technology into their lessons.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
8	IPS should develop and test a comprehensive disaster recovery plan that outlines the steps to take to insure timely recovery of district critical data.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9	IPS should develop and implement a software and hardware purchase and implementation plan that includes all parties involved in the assessment, purchase, implementation and evaluation of any requested technology product.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
10	IPS should centralize its servers to one location to better manage server content, optimize performance, and provide an efficient method of accessing servers.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11	IPS should develop a comprehensive professional development plan for technology that coordinates the training opportunities for all teachers to have the necessary skills for integrating technology into classroom instruction.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12	The principal should review the state requirements for pre-trip school bus inspections.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	The daily pre-trip inspection forms,	\$0	\$0	\$0	\$0	\$0	\$0	\$0

	Recommendation	Estimated (Cost)/Savings					
		2011-12	2012-13	2013-14	2014-15	2015-16	Total 5-Year (Costs) or Savings
	when completed, should be given to the school principal each day after the driver completes his or her route.						
14	A folder should be created for each school bus and district-owned vehicle. Whenever work is performed, a record should be kept of what repairs were made, the date of the repairs and the cost of the repairs. These records should be grouped by fiscal year to track annual repairs and related costs. Daily fuel records could also be included in tracking costs.	\$0	\$0	\$0	\$0	\$0	\$0
15	The school principal should review both routes. With each route bus starting from the school, describe the direction ventured, street name if available, and distance from one turn to the next and one stop to the next for the entire route. Also, identify each stop by address, name, and description.	\$0	\$0	\$0	\$0	\$0	\$0
	<b>Subtotal</b>	\$39,436	\$39,436	\$39,436	\$39,436	\$39,436	\$197,180
	<b>Total recurring savings</b>	<b>\$39,436</b>	<b>\$39,436</b>	<b>\$39,436</b>	<b>\$39,436</b>	<b>\$39,436</b>	<b>\$197,180</b>
	<b>Total recurring costs</b>	<b>(\$18,062)</b>	<b>(\$17,172)</b>	<b>(\$17,172)</b>	<b>(\$17,172)</b>	<b>(\$17,172)</b>	<b>(\$86,750)</b>
	<b>Total net savings and costs</b>	<b>\$21,374</b>	<b>\$22,264</b>	<b>\$22,264</b>	<b>\$22,264</b>	<b>\$22,264</b>	<b>\$110,430</b>



*Chapter 1:*

*Management, Personnel, and  
Communications*

---



## *Chapter 1*

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

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

- A. Management and Planning
- B. Personnel Management
- C. Communications and Community Involvement

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

Once the School Board adopts the goals and objectives of the district, it is the responsibility of the superintendent and staff to establish policies and procedures to achieve these end results. That achievement involves the hiring and retention of employees as well as ongoing communication with the community to ensure an understanding of those goals and the district's efforts to accomplish them.

### ***Background***

Indianhoma Public Schools (IPS) is located in southwest Oklahoma just over 23 miles west of Lawton along US Highway 62, just south of the western end of Fort Sill Army Post in Comanche County. IPS includes grades EC-12 in one elementary school and one high school. The district covers 123 square miles with 2.5 students per square mile and serves Indianhoma and the surrounding rural area.

According to the IPS Comprehensive Local Education Plan (CLEP) for 2007 through 2013, a committee of educators, and parents serving on the IPS CLEP Committee developed IPS's mission statement, goals, and plans. The IPS CLEP included the following sections:

- Mission Statement.
- Demographics, district profile and overview – student achievement.
- Extended learning opportunities.
- Goals, objectives, strategies, and resources.
- Action plan for parental involvement.
- CLEP Timeline.

- Reading sufficiency.
- Remediation plan.
- Professional development plan and professional learning activities for the past two years.
- Alternative education.
- Deregulation.
- Assurance statement.
- Quality time analysis.
- Title I site plans for all grades.

The district's mission statement is:

*The Indianhoma Board of Education, in partnership with our school and community, will provide a quality education for all children. This education will be provided in a safe, respectful environment and will maximize the potential of students to become effective, successful, productive citizens of tomorrow.*

The district's philosophy is:

*To expect the very best academically and behaviorally of our students. It is our belief that these ideals are an integral part of our lives as citizens living under the U.S. Constitution that affords each student equal educational opportunities to achieve their highest goals. We encourage all students to abide by a code of behavior that promotes good citizenship and compliments the educational process. We believe that all students can learn and by uniting together in this great endeavor, the results will be educated and disciplined young people prepared to meet the challenges of our ever-changing society. We are here to meet the needs of our children and our community, to help our students reach their highest potential educationally, and to cultivate citizens and leaders who will rise above mediocrity.*

### **Demographics**

**Exhibit 1-1** provides average daily membership (ADM), ethnicity, and eligibility for free or reduced price meals for IPS for both of its schools for 2008-09.

**Exhibit 1-1  
Student Enrollment and Socioeconomic Characteristics  
2008-09**

Campus	Grade Span	Average Daily Membership	Caucasian	Black	Asian	Hispanic	Native American	Eligible For Free or Reduced Price Meals
Elementary School	EC-8	111.6	59%	2%	0%	6%	33%	72%
High School	9-12	201.0	70%	4%	1%	7%	19%	19%
<b>IPS Totals</b>		<b>312.6</b>	<b>66%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>	<b>24%</b>	<b>38%</b>

*Source: Office of Accountability, Profiles Database*

Based on size, geography, and demographics, the Office of Accountability selected five Oklahoma school districts to serve as peer districts for comparative purposes: Butner, Duke, Verden, Chattanooga, and Blair. This report calls these five districts “peer districts” throughout this report. For further comparison, a community group average is also used throughout this chapter. IPS falls into Community Group G1 for the 2008-09 fiscal year, primarily due to the assignment of students from the Oklahoma Virtual Academy program. Community Group G1 includes districts with average daily memberships (ADM) of between 250 and 499 students. The “1” indicates that the percentage of IPS students eligible for free and reduced price meals was below the state average. For years prior to 2008-09, IPS fell into Community Group H2, which includes districts with average daily memberships (ADM) of fewer than 250 students. The “2” indicates that the percentage of IPS students eligible for free and reduced price meals was above the state average.

IPS’s average property valuation per student of \$14,924 is the lowest among all peer districts and less than the community group and state averages. IPS has the second highest percentage of Native American students among peers and is more than the state average. **Exhibit 1-2** displays demographic information for IPS, the peer districts, community group, and the state for 2008-09.

**Exhibit 1-2**  
**Demographics of IPS, Peer Districts, and State**  
**2008-09**

Entity	Average Daily Membership	Ethnic Group					Average Assessed Property Valuation Per Student	Eligible for Free or Reduced Price Meals
		Caucasian	Black	Asian	Hispanic	Native American		
<b>Indiahoma</b>	<b>312.6</b>	<b>66%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>	<b>24%</b>	<b>\$14,924</b>	<b>37.7%</b>
Blair	271.6	73%	3%	1%	17%	6%	\$22,350	55.0%
Butner	224.1	60%	2%	0%	1%	36%	\$30,916	65.5%
Chattanooga	277.0	86%	1%	2%	2%	9%	\$29,344	50.7%
Duke	180.5	68%	1%	0%	27%	4%	\$55,193	59.2%
Verden	287.9	71%	1%	2%	5%	21%	\$29,311	62.8%
<b>Community Group</b>	<b>339.6</b>	<b>75%</b>	<b>2%</b>	<b>1%</b>	<b>7%</b>	<b>16%</b>	<b>\$50,308</b>	<b>45.1%</b>
<b>State Average</b>	<b>1,194.3</b>	<b>57%</b>	<b>11%</b>	<b>2%</b>	<b>11%</b>	<b>19%</b>	<b>\$38,875</b>	<b>56.3%</b>

*Source: Office of Accountability, Profiles Database*

IPS's ADM increased by 34.22 percent during the period from 2004-05 through 2008-09. This increase was by far the highest among all peer districts, was far less than the community group, and higher than the state average for this same period (**Exhibit 1-3**). The higher student count for IPS was due to the inclusion of students from the Oklahoma Virtual Academy program, which will affect IPS student counts through the 2009-10 year.

**Exhibit 1-3**  
**IPS, Peer Districts, and State Student ADM Trends**

Entity	Average Daily Membership					Percentage Change
	2004-05	2005-06	2006-07	2007-08	2008-09	
<b>Indiahoma</b>	<b>232.9</b>	<b>230.8</b>	<b>208.5</b>	<b>199.4</b>	<b>312.6</b>	<b>34.2%</b>
Blair	303.2	307.1	282.3	266.6	271.6	(10.4%)
Butner	268.6	286.2	287.7	250.7	224.1	(16.6%)
Chattanooga	261.5	263.0	280.9	260.2	277.0	5.9%
Duke	187.0	206.0	201.9	190.3	180.5	(3.5%)
Verden	318.1	323.5	328.0	321.6	287.9	(9.5%)
<b>Community Group</b>	<b>151.3</b>	<b>148.7</b>	<b>146.3</b>	<b>348.0</b>	<b>339.6</b>	<b>124.5%</b>
<b>State Average</b>	<b>1,153.5</b>	<b>1,162.2</b>	<b>1,172.2</b>	<b>1,176.7</b>	<b>1,194.3</b>	<b>3.5%</b>

*Source: Office of Accountability, Profiles Database*

Among ethnic groups, IPS experienced the biggest change in the Caucasian category, increasing 12 percent for the period from 2004-05 through 2008-09 (**Exhibit 1-4**). During this same period, average assessed property valuation per student decreased by 13 percent and students eligible for free or reduced meals decreased by 19 percent. The higher student counts for IPS due to the inclusion of students from the Oklahoma Virtual Academy program, which will affect IPS student counts through the 2009-10 year, is the primary reason for these changes.

**Exhibit 1-4  
Change in Demographics of IPS**

School Year	Average Daily Membership	Ethnic Group					Average Assessed Property Valuation Per Student	Eligible for Free or Reduced Price Meals
		Caucasian	Black	Asian	Hispanic	Native American		
2008-09	312.6	66%	3%	1%	7%	24%	\$14,924	37.7%
2007-08	199.4	57%	1%	2%	5%	34%	\$21,731	64.7%
2006-07	208.5	55%	1%	0%	5%	38%	\$19,807	63.8%
2005-06	230.8	56%	0%	0%	6%	38%	\$17,660	62.8%
2004-05	232.9	54%	0%	0%	6%	39%	\$17,096	57.1%
<b>Change</b>	<b>34%</b>	<b>12%</b>	<b>3%</b>	<b>1%</b>	<b>1%</b>	<b>(15%)</b>	<b>(13%)</b>	<b>(19%)</b>

*Source: Office of Accountability, Profiles Database*

**School Board Governance**

Oklahoma state education laws, as codified in the Oklahoma School Law Book (OSLB) and district policies, establish the powers and responsibilities of the district board of education and the superintendent. The OSLB contains 12 chapters subdivided by applicable topic into articles that are further subdivided by sections (**Exhibit 1-5**). Each section provides legal guidance for school district governance and operations.

**Exhibit 1-5  
Oklahoma School Law Book Chapters, Articles, and Sections**

Chapter No. - Title	Articles	Sections
1 - Oklahoma School Code	I-XXIV	1-517
2 – Administration	I-VII	518-521
3 – Bonds	I-II	522-619
4 - Funds And Finance	I-V	620-707
5 - Elections And Ethics	I-II	708-727
6 – Personnel	I-V	728-802
7 – Students	I-III	803-841
8 – Instruction	I-IX	842-919
9 - Facilities And Equipment	I-VII	920-1005
10 - Career And Technology Education	I	1006-1016
11 – Transportation	I-III	1017-1027
12 - Safety And Security	I-VII	1028-1062
Appendix A	Appropriation Bills Relating to Education	
Appendix B	Senate Bill No. 1114	
Appendix C	Amendments, Repeals, and New Sections	
Appendix D	Table of Statutes	
Index		

*Source: Oklahoma School Law Book, Oklahoma State Department of Education*

OSLB Ch. 1, Art. V, Section 54 states, “Every school district shall be a body corporate and shall possess the usual powers of a corporation...” OSLB Ch. 1, Art. V, Section 55 states, “The governing board of each school district in Oklahoma is hereby designated and shall hereafter be known as the Board of Education of such district.”

Powers and duties of the Board of Education are contained in OSLB Ch. 1, Art. V, Section 68. These powers and duties cover all activities related to operating public school districts. Key powers and duties prescribed in OSLB include election of officers, establishing School Board policies, building and operating schools and related facilities, and contracting for an annual audit of all district funds and school activity funds.

OSLB Ch. 1, Art. V, Section 56 addresses the size and election of School Boards in Oklahoma, and Section 77 provides a description of the required officers for School Boards in Oklahoma. The IPS Board of Education consists of five members elected by the citizens of IPS, all serving five-year terms (**Exhibit 1-6**).

**Exhibit 1-6  
IPS Board Members  
March 2011**

<b>Board Member</b>	<b>Board Position</b>	<b>Term Expires</b>	<b>Occupation</b>
Ron Kenney	President	2014	Goodyear (manufacturing)
Skip Voegli	Vice-President	2015	Retired veteran
Chase Morgan	Board Clerk	2016	Fireman
Glenn Lonetree	Member	2012	Goodyear (manufacturing)
*		2013	

*Source: IPS Business manager, March 2011  
\*This position to be decided by runoff election on April 5, 2011.*

Elections are held each year in February on a date set by the state. At the first regular, special, or emergency meeting after the annual School Board election and certification of election of new members, the IPS School Board organizes itself by electing officers. OSLB Ch. 1, Art. V, Sections 78, 79, and 80 list the duties of each officer of the Board of Education. The School Board must also select a secretary, who may or may not be a member of the School Board. At IPS the superintendent’s assistant also serves as secretary for the Board of Education.

OSLB Ch. 1, Art. I, Sections 57 and 58 outline the training requirements for Oklahoma School Board members. New School Board members are required to complete 12 hours of instruction on education issues, including school finance; Oklahoma education laws and ethics; and duties and responsibilities of district Board of Education members within 15 months following election. Every member of a school district Board of Education elected to a full term of office of five years or more shall also be required to attend a minimum of 15 hours of continuing education. Authorized training may be taken in State Department of Education’s New School Board Member Workshops, State Board of Education approved workshops and seminars, or higher education institution workshops/seminars/classes.

**Board of Education Meetings**

The IPS Board of Education meets on the second Monday of every month at 6:00 p.m. in the school library. The meeting place and time may be changed by agreement of the majority of the School Board. Special meetings are held as needed, and School Board members receive their agendas and any supporting information in advance of the meeting. The superintendent’s assistant handles Board of Education secretary duties and prepares the School Board minutes for final approval by the School Board.

Oklahoma statutes and IPS School Board policy require all Board of Education meetings to be held in accordance with the Oklahoma Open Meeting Act (OOMA). The OOMA is included in Title 25 of Oklahoma Statutes Sections 301 through 314 (**Exhibit 1-7**). According to section 302 of OOMA, it is the public policy of the State of Oklahoma to encourage and facilitate an informed citizenry’s understanding of governmental processes and problems.

**Exhibit 1-7  
Oklahoma Open Meeting Act Sections**

Section	Section Subject
301	Citation.
302	Public policy.
303	Times and places — Advance notice.
304	Definitions.
305	Recording of votes
306	Circumvention of act — Teleconferences accepted.
307	Executive sessions.
307.1	Teleconference Exceptions.
308	Meeting between Governor and majority of members of public body.
309	Legislature.
310	Legislative committee members attending executive sessions.
311	Public bodies — Notice.
312	Minutes of meetings — Recording of Proceedings.
313	Actions taken in willful violation of act.
314	Violations — Misdemeanor — Penalty.

*Source: Title 25, Oklahoma Statutes, as amended, Forty-Ninth Oklahoma Legislature, First Regular Session, 2003*

All Oklahoma public Boards of Education are required to adhere to the OOMA. Section 307 of OOMA provides for requirements regarding executive sessions of School Boards and violations of which could lead to members facing criminal prosecution. Accordingly, executive sessions of the IPS School Board are convened only for specific purposes (**Exhibit 1-8**).

An executive session for the purpose of discussing the purchase or appraisal of real property is limited to IPS School Board members, the IPS attorney, and immediate IPS staff. No landowner, real estate sales person, broker, developer, or any other person who may profit directly or indirectly from a proposed transaction concerning real property under consideration may be present or participate in the executive session.

Executive sessions are noted on the IPS agenda, which contain sufficient information for the public to ascertain that an executive session will be held identifying the items of business and purposes of the executive session.

All executive sessions are required to be authorized by a majority vote of a quorum of the members present and the vote is recorded. Except for matters considered in executive session, which are required by state or federal law to be confidential, any vote or action on any item of business considered in an executive session is taken in the public portion of the Board of Education meeting with the vote of each member publicly cast and recorded.

**Exhibit 1-8**  
**Specific Purposes of School Board Executive Sessions In Accordance with Section 307 of The Oklahoma Open Meeting Act**

Item	Description
1	Discussing the employment, hiring, appointment, promotion, demotion, disciplining, or resignation of any individual salaried public officer or employee;
2	Discussing negotiations concerning employees and representatives of employee groups;
3	Discussing the purchase or appraisal of real property;
4	Confidential communications between a public body and its attorney concerning a pending investigation, claim, or action if the public body, with the advice of its attorney, determines that disclosure will seriously impair the ability of the public body to process the claim or conduct a pending investigation, litigation, or proceeding in the public interest;
5	Permitting district Boards of Education to hear evidence and discuss the expulsion or suspension of a student when requested by the student involved or the student’s parent, attorney, or legal guardian;
6	Discussing matters involving a specific handicapped child;
7	Discussing any matter where disclosure of information would violate confidentiality requirements of state or federal law;
8	Engaging in deliberations or rendering a final or intermediate decision in an individual proceeding pursuant to Article II of the Administrative Procedures Act; or
9	Discussing the following: a. the investigation of a plan or scheme to commit an act of terrorism, b. assessments of the vulnerability of government facilities or public improvements to an act of terrorism, c. plans for deterrence or prevention of or protection from an act of terrorism, d. plans for response or remediation after an act of terrorism, e. information technology of the public body but only if the discussion specifically identifies: (1) design or functional schematics that demonstrate the relationship or connections between devices or systems, (2) system configuration information, (3) security monitoring and response equipment placement and configuration, (4) specific location or placement of systems, components, or devices, (5) system identification numbers, names, or connecting circuits, (6) business continuity and disaster planning, or response plans, or (7) investigation information directly related to security penetrations or denial of services f. the investigation of an act of terrorism that has already been committed.

Source: Title 25, Oklahoma Statutes, as amended, Forty-Ninth Oklahoma Legislature, First Regular Session, 2003

**A. MANAGEMENT AND PLANNING**

An effective central office organization structure is essential to the efficient and effective delivery of services throughout a school district. Efficient central office structures have the appropriate spans of control for district leadership with clearly defined lines of authority that are reflected in the district's organization charts. Effective central office structures encourage communication at all levels.

The superintendent of a school district serves as the chief executive officer and is the administrative leader responsible for policy implementation and the day-to-day operation of the school district. IPS hired the current superintendent, Barbalee Blair, under a two-year contract covering the 2009-10 and 2010-11 school years. The IPS superintendent position is currently being advertised as being open for the 2011-12 school year.

Due to the district's size with approximately 200 onsite students, the superintendent and high school principal constitute IPS' district administration. The superintendent and high school principal direct the district's 36 staff members, including 22 certified personnel and 14 support personnel, on a daily basis.

In Oklahoma, school district planning requirements are included in OSLB. Ch. 1, Art. III, Section 31 requires that each school district board of education prepare and adopt a six-year Comprehensive Local Education Plan (CLEP). At a minimum, the plan must contain:

- A school improvement plan
- An alternative education plan (submitted annually)
- A reading sufficiency plan (submitted annually)
- A quality time analysis (submitted annually)

Instead of submitting the CLEP and any updates to the state, the state's regional accreditation officers (RAO) check with districts during the annual accreditation process to ensure that the plans and updates are being done properly.

**FINDING 1-1**

Despite the small size and staffing constraints IPS faces on an ongoing basis, including the limited availability of financial information from the current automated system, the IPS superintendent has taken steps to monitor the budget regularly by preparing independent financial analyses monthly for School Board review and for overseeing routine operations.

The superintendent maintains automated spreadsheets for budget measurement with actual revenue and expenditure information for all local funds, child nutrition, federal title, and federal Special Education programs in a format consistent with Oklahoma Cost Accounting System (OCAS) information for submission to the Oklahoma State Department of Education (SDE). The

superintendent shares this information with the School Board at monthly meetings and with the high school principal and other key staff in managing the district's finances.

By doing this, IPS has a plan to deal with reduced state funding in the short-term, primarily due to current and projected state funding cuts and further cuts of up to \$370,000 annually for the 2010-11, as well as future fiscal periods due to discontinued participation in the Oklahoma Virtual Academy program.

## **COMMENDATION**

**By using independently created and maintained financial analyses, based upon information contained on Indiahoma Public Schools automated financial system, the superintendent has been able to effectively manage finances and share this information with the School Board, district staff, and the public when necessary.**

## **FINDING 1-2**

The School Board is divided in policy setting and future educational objectives for IPS. The IPS Board of Education does not serve as a team of six with the superintendent. As a result, key management and planning issues are not addressed in a systemic manner. The IPS administration does not maintain records for state required School Board training.

Contributing to this lack of a coordinated approach are the following:

- The School Board does not seem overly concerned with instructional matters.
- The School Board has not participated in orientation as new members are elected.
- The School Board listens to complaints of the teachers as its main information gathering tool.
- The community is quite supportive of the school; however, change, even positive change, is discouraged by the teachers and the School Board.
- The School Board participates only minimally in professional development.
- School Board members sometimes fail to follow the chain of command protocol.
- The district does not use retreats or workshops to address issues.
- There is no evidence of organized goal setting activities.
- Task forces and committees are not frequently used by the district.

Expansion of new School Board members' orientation process would assist the School Board in their effectiveness in the operational areas, especially student performance goals, while ongoing School Board member instruction will enhance board oversight related to the main purposes of the district: student educational achievement. The School Board would benefit from periodic

retreats or workshops to address goal setting for current and future educational and operational plans held in a local setting.

Many school districts provide these opportunities to School Board members through in-depth workshops at least bi-annually through two to four hour workshops in a relaxed setting, either at the district's offices on a non-workday, or even at an offsite location. This gives all School Board members, including newly elected ones, an opportunity to learn in-depth what the major programs of the district are designed to achieve.

### **RECOMMENDATION**

**Indiahoma Public Schools should hold School Board workshops focusing on operations and educational achievement planning for students. These workshops should be held at least every six months and be of two to four hours in duration.**

The superintendent should coordinate this activity with the School Board for timing and content. This opportunity should give new board members a chance to gain a basic understanding of the district's operations and provide all School Board members an opportunity to be involved in planning educational objectives for the district's students. As a part of this activity, IPS administrators should maintain a record of each School Board member's hours fulfilled toward state training requirements.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 1-3**

The superintendent routinely communicates with the School Board members by phone, with little written communication other than what is on the agenda for regular and special meetings. As a result, School Board members are not cognizant of how the IPS budget is being affected by state funding problems. Board members do not know about policies that the district may have adopted.

Many districts prepare a packet for distribution to the School Board prior to all regular and special board meetings. Common contents of the board packets include:

- Detailed information on each agenda item with supporting information for all action requests.
- Current information on student achievement, including test scores and related data.
- Complete financial information for the year and month to facilitate discussion of short and long-term outlooks.
- Copies of all contracts and agreements that may be considered at the School Board meeting.

- Any other information that would be appropriate based upon the School Board meeting agenda items.

## **RECOMMENDATION**

**Indiahoma Public School Board members should receive a packet with appropriate contents in advance of all regular and Special School Board meetings.**

The superintendent should oversee the preparation of these packets. The School Board members should have these packets available to them in advance of all School Board meetings.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 1-4**

Although, IPS has used the OSSBA policy service subscription in the past, IPS School Board policies have not been reviewed comprehensively since 2004. As a result, the board is not familiar with IPS board policies and the district is at risk of noncompliance with federal and state laws.

A comprehensive update of School Board policies is part of the superintendent's initial goals for IPS and the superintendent desires to make policies available online for transparency purposes. The 2004 review was done under the Oklahoma State School Boards Association (OSSBA) School Board policy review service.

Through subscriptions to its Policy Service, OSSBA provides its members with up-to-date information regarding policies. Having policies up to date also allows them to be posted online on the school district website for easy access. The various levels of service the OSSBA provides are shown below. Costs range from \$300 annually to \$1,000 annually depending upon the services used. Information on these services may be found at the OSSBA web site at (<http://www.ossba.org/policy-services>).

### **Policy Subscription Service - \$300 per year:**

- New or newly revised mandated and SDE required policies - in generic format, hard copy only.
- Twelve generic format policies at your request. Any policies requested over 12 will be available for \$50/policy.
- Monthly policy newsletter, which features at least three sample policies.
- Annual policy revisions based on legislative action during subscription year (*generic format in hard copy only as published in the monthly newsletter; neither CD nor e-mail will be available at this service level*).

**Maintenance Subscription Service - \$500 per year:**

- Review School Board minutes monthly.
- Revise or develop new customized policies based on information from the School Board minutes (within the subscription period), A district may receive 12 new or revised policies per year, or any requested, Any policies requested over 12 will be available for \$50 per policy (also available on diskette).
- Registration for any two School Board members or administrators at any one workshop, which addresses policy, issues (OSSBA/CCOSA Annual Conference and Preconference not included).
- New or newly updated SDE required policies – customized.
- Monthly policy newsletter, which features at least three sample policies.
- Annual policy revisions based on legislative action during subscription year (customized; CD available at this service level). Policies customized during the subscription year are available on CD or by email.

**Policy Review Service \$1,000 for 10-hour analysis of existing manual:**

- Suggested policies may be purchased at the current per policy fee of \$50.
- If a current policy services subscriber, suggested policies may be provided up to 12 policies with additional policies available at the current per policy fee of \$50.

**Online Policy Service:**

Refer to the following website:

(<http://www.ossba.org/Websites/ossba/Images/Online%20Policy%20Service.pdf>). The initial conversion fee (one time cost) to set up a district website that can be linked in from the regular district website is based on the number of pages included in the district's policy: up to \$1,900 plus an additional \$100 per 30 pages over 700 pages. The annual hosting fee to maintain the website for online policy access is based on the number of pages included in the district's policy: up to \$1,300 plus an additional \$200 per 100 pages over 700 pages.

The Online Policy Service allows:

- Access to the Online Policy Service from the OSSBA website.
- A digital document platform to search for needed policy updates.
- Full text searching in policies accessed.

- References the texts of Oklahoma law cited as the legal basis for policy.
- High speed retrieval of information.
- A guarantee of password security.
- Content customization for specific districts.
- Enhanced understanding of district policies and their legal requirements on a real time basis.

**RECOMMENDATION**

**Subscribe to the OSSBA’s Maintenance Subscription Service and the Policy Review Service.**

Implementation of this recommendation will allow for inclusion of policies directly on the district’s website in electronic format. Although more costly, the superintendent should also contact OSSBA to find out more about the Online Policy Service for future consideration by the district.

**FISCAL IMPACT**

Recommendation	2011-12	2012-13	2013-14	2015-16	2016-17
Subscribe to the OSSBA’s Maintenance Subscription Service and the Policy Review Service.	(\$1,500)	(\$500)	(\$500)	(\$500)	(\$500)

Exact costs may vary depending on the number of policies reviewed or needed. The superintendent should contact OSSBA to make sure that costs are known prior to having the service performed.

**B. PERSONNEL MANAGEMENT**

The human resources function of a school district substantially impacts its educational services as payroll and benefits usually comprise the largest expenditure of a school district’s budget. The human resource functions include the recruitment and retention of quality staff, development of compensation and benefit plans, creation of job descriptions and job evaluations, and the compliance to personnel policies and procedures at the local, state, and federal level. In order to ensure the mission of a school district, it is important that the human resources function be efficient and effective.

Like most employers, public school districts must comply with federal laws governing human resources management. These laws include the Fair Labor Standards Act that governs wages and hourly payments as well as the Americans with Disabilities Act, which requires employers to provide reasonable accommodations to any employee or job applicant who has a disability.

These laws also include the Equal Employment Opportunity Act that prevents employers from making hiring and firing decisions based upon age, race, religion, gender, or other factors not related to performance. In addition, state laws govern school district human resource administration in areas such as grievances, due process, termination, and contract renewal.

Personnel management in IPS is the responsibility of the encumbrance clerk who is under the direct supervision of the superintendent. The encumbrance clerk manages the personnel files, employment logistics, sick leave, insurance benefits, and payroll.

### **FINDING 1-5**

IPS does not maintain personnel records in a secure location. If records are not secured, there is a risk that confidential information is lost or compromised.

The personnel files and medical records are maintained separately in unlocked file cabinets in the encumbrance clerk's office. This office is located adjacent to the superintendent's office and serves as a reception area for visitors. The consulting team noted that when the clerk and superintendent are out of the office area, the door sometimes remains open, and the office is accessible to students, staff, and the general public. This level of accessibility puts confidential files at risk.

According to Society of Human Resource Management (SHRM) guidelines, personnel files and medical records should be treated as private documents and maintained in locked file cabinets in a secure location. Files should only be accessible to those people with a legitimate need to access the files. Special guidelines apply to securing and handling medical information obtained through medical examinations and tests. The Americans with Disabilities Act (ADA) requires that medical records must be secured and accessible only for safety and health purposes ([www.shrm.org](http://www.shrm.org)).

### **RECOMMENDATION**

**To ensure confidentiality, IPS should secure personnel records in locked file cabinets in an area with limited accessibility.**

The superintendent should work with the encumbrance clerk to select and purchase locked fireproof file cabinets to store all personnel records properly. Personnel files should be stored in separate files from medical records. The locked file cabinets should be located in the superintendent's office. This allows accessibility by the encumbrance clerk but will put personnel records in a more restricted area.

### **FISCAL IMPACT**

A fire proof, lockable vertical file cabinet can be purchased at a minimum cost of \$390.

**FINDING 1-6**

IPS does not have a systematic process for making staffing decisions. Without a clear decision-making process, staffing decisions are made without consideration of the impact to programs and services.

For the 2010-11 school year, IPS reduced staffing in special education, library media, and secondary electives. In interviews with the consulting team, the superintendent and principal shared that staff reductions were made due to financial cutbacks in state funding and the decision to discontinue the virtual school program. The superintendent shared that there are no clear guidelines for making staffing decisions or for studying the potential impact of the decisions. As a result, the superintendent noted that teachers do not understand the staffing reassignments and reductions.

In interviews, the principal, counselor, and teachers indicated that providing quality elective courses is challenging in a district the size of IPS. Reductions in staff can impact the ability of the district to offer electives. Staff shared that reduction of the library media specialist position from 1.0 FTE to 0.5 FTE resulted in the loss of the service learning classes. The elimination of the 1.0 FTE position that provided two middle school language arts classes, a computer elective, and elementary special education services impacted three different program areas.

Districts often develop an objective process for determining staffing needs, reductions, and reassignments to ensure that the best possible decisions are made toward accomplishing district goals. In Hinton Public Schools in Oklahoma, the superintendent works with principals and teachers in developing district priorities and establishing options for budget reductions. The superintendent meets monthly with all district staff to discuss priorities and financial status. During times of financial constraint, the meetings generate options for staffing reductions or reassignments that have the least impact on student learning. This helps all staff understand how staffing and budget decisions are made, and that objective processes are used to minimize the negative impact of reductions on district programs and services.

Many associations provide guidelines and formulas for staffing specific positions. The North Central Association Commission on Accreditation and School Improvement (NCA-CASI) provides staffing guidelines for school administrators, counselors, and media specialists. The Southern Association of Colleges and School Council on Accreditation and School Improvement (SACS-CASI) and the Oklahoma State Department of Education (SDE) provide similar information for these and other positions. The National Clearinghouse for Educational Facilities (NCEF) and the Association of School Business Officials International (ASBO) also provide staffing guidelines for custodial and maintenance positions.

**RECOMMENDATION**

**Develop a systematic process for making staffing decisions that includes careful consideration of the impact to district programs and services.**

The superintendent should work with the principal and a representative group of teachers to develop a process for making staffing decisions. Consideration should be given to a workforce

planning process such as that suggested by the National Academy of Public Administration (NAPA) (<http://www.napawash.org>). According to NAPA, workforce planning is a continuous process that ensures an organization has the right people in the right positions to address goals, support programs, and services. Such planning for the district would involve:

- A systematic process that is integrated, methodical, and ongoing.
- The identification of the human resource needs required to meet organization goals.
- A determination of the number and skills of needed teachers and support staff, and where and when they will be needed.
- The development of strategies to attract and retain the number and types of staff needed to meet the goals of the district in addressing student learning.

As part of the process, the superintendent should consider engaging all staff in identifying needs and generating options that best aligns staffing resources to district goals. This methodical review should include a critical look at course offerings, scheduling, class size, and staff skills and credentials. Options and priorities should reflect the best possible solutions for addressing student programs and services within the existing financial constraints. The superintendent should consider a communication model similar to that used in Hinton Public Schools as a component of the workforce planning process.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## ***C. COMMUNICATIONS AND COMMUNITY INVOLVEMENT***

School districts are a vital part of communities and are often associated with their identity, sense of pride, quality, and growth. In order to maintain this role, school districts develop methods to communicate their policies and programs and to involve parents and residents in the activities of the district and the individual schools.

Robert Marzano's book, *What Works in Schools: Translating Research into Action*, ranks parental and community involvement as the third most critical factor affecting student achievement. It further states that "one of the defining features" of effective involvement is good communications.

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

Two-way communications are vital to the success of a district. Effective communications will lead to an informed staff and community, support for programs and bond issue elections, and an

atmosphere of openness in the district. They also contribute to effective leadership with the School Board and superintendent serving as a leadership team. Ineffective communications result in confusion, lack of support, conflicting messages and decision-making, and a sense of detachment in the district.

Effective community involvement programs should address the unique characteristics of the school district and the community. These programs can significantly affect citizen perceptions of the school system. Effective programs will garner public support and involvement in the form of parent and community volunteers, public participation in decision-making processes affecting the schools (e.g. bond issue and School Board elections), and productive business and community alliances.

**Exhibit 1-9** provides survey results from IPS teachers and professional staff regarding communications.

**Exhibit 1-9  
IPS Teacher and Professional Staff Survey Results**

Survey Group	Statement	Agree	No Opinion	Disagree
Teacher	My school regularly communicates with parents.	83%	11%	6%
Professional Staff	The district regularly communicates with parents.	100%	0%	0%

*Source: WCL ENTERPRISES survey, September 2010*

School districts’ web pages are often a source for communicating valuable information to the community that it serves. They also serve as a recruiting tool for prospective employees, homeowners, and businesses that are considering investing in the area. In this day and age, this tool may be the most efficient and economical method of conveying a district’s message to a broad audience.

School district websites should include the following:

- District information such as address, contact numbers, demographics, locations, etc.
- Dates of School Board meetings and an archive of School Board meetings and minutes.
- List of all the teachers and aides and email addresses for each.
- Breakfast and lunch menus for each day of the current month.
- Departmental staff and telephone listings.
- Campus web pages.
- Policies, procedures, and other critical internal information.
- A listing of current employment opportunities.

The current content of IPS’s website contains comparable information with that of its peer districts and is in the process of being updated (**Exhibit 1-10**).

**Exhibit 1-10  
Comparison of IPS and Peer District Web Page Content**

District	District Announcements and Other Information	School Board Meeting Dates	Staff Email Directory	Breakfast and Lunch Menus	Department and Staff and Telephone Campus Listing	School Web Pages	Policy and Procedures	Employment Opportunities
Indiahoma	X	X	X	X	X	X	X	X
Blair	X	X	X	X	X	-	-	-
Butner	-	-	X	-	X	X	-	-
Chattanooga	X	X	X	X	X	X	X	-
Duke	X	X	X	X	X	N/A	X	-
Verden	-	-	X	-	X	-	-	-

*Source: IPS and peer district Internet websites, November 2010*

**FINDING 1-7**

The district does not have a formal process for engaging parental engagement or soliciting, training, and using volunteers in the schools and classrooms. Most of the staff reported that parent involvement is greatest in athletics. Some parents volunteer for special events, such as the annual ice cream social. There is no Parent-Teacher Organization in any of the schools.

When IPS teachers were asked to respond to the following statement on the survey, “My school has sufficient volunteers to help student and school programs,” only 28 percent agreed with the statement, while 56 percent disagreed with the statement.

The Office of Accountability 2009 District Profile reports that only 33.6 percent of IPS parents attend at least one parent-teacher conference each year compared to a state average of 72.1 percent. **Exhibit 1-11** shows a comparison of IPS and peer district attendance at parent-teacher conferences. IPS has the lowest attendance rate of all peer districts by a wide margin.

**Exhibit 1-11  
Comparison of IPS and Peer Districts for Attendance at Parent-Teacher Conferences**

District	Percentage of Parents Attending at Least One Parent-Teacher Conference
Indiahoma	33.6%
Blair	85.0%
Butner	68.4%
Chattanooga	66.6%
Duke	88.1%
Verden	65.7%
State	72.1%

*Source: Office of Accountability 2009 Profiles*

According to the superintendent, the community is not involved in the schools, only with special events or programs. She has attempted to involve the community in the schools by posting information on the marquee in front of the schools and sending flyers and newsletters home with students.

Since there is no local newspaper, articles about the district appear only infrequently in the newspapers of surrounding communities. According to the superintendent, on average, articles about IPS appear about once per month between the Lawton *Constitution* and the Cache County *Times*.

These facts make parent involvement difficult but also make it critical for the district to develop innovative ways to reach out to parents and involve them in their children's education. Joyce Epstein at Johns-Hopkins University and others have documented research showing the positive effect that encouraging parental involvement has on schools and student achievement:

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

## **RECOMMENDATION**

### **Develop a coordinated volunteer program that promotes parent and community involvement in the district's schools.**

IPS should develop a volunteer program that promotes parent and community involvement. The superintendent should form a committee that includes administrators, teachers, parents, and community members to develop this program. The program should seek consistency in policies and practices throughout the district and should also be formally approved by the School Board. It should be flexible in thinking of opportunities for parents to be involved in the school outside of the traditional concept of classroom volunteering.

The National Parent Teacher Association's *Seven Steps to a Successful Volunteer Program* provides useful information for creating and maintaining an active school volunteer program. IPS should use these seven steps as a guide in developing their own program:

- Assessing volunteer needs each school has.
- Working with and training, principals, teachers, and school staff on effectively using and supervising volunteers.
- Setting goals and objectives for volunteer assignments.

- Recruiting volunteers.
- Training and orienting volunteers.
- Training and recognizing volunteers.
- Evaluating volunteer performance and program success.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.



*Chapter 2:*

*Instructional Delivery*

---



*Chapter 2*

## ***Instructional Delivery***

This chapter examines the instructional delivery of Indianhoma Public Schools (IPS) in the following sections:

- A. Instructional Delivery and Student Performance
- B. Professional Development
- C. Gifted and Talented Education
- D. Special Education
- E. Career and Technology Education
- F. Guidance and Counseling
- G. Federal Programs
- H. Textbooks

The primary purpose of any school system is educating children. Effective instructional delivery is based upon the district’s mission for educating students and requires policies and procedures to direct the instructional process, well designed programs to meet the needs of all students, and resources to support program implementation. The monitoring and evaluation of program effectiveness based on student performance data is also essential.

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

***Background***

**Exhibit 2-1** provides fall enrollment, ethnicity, and eligibility for free or reduced price meals for IPS and each of its schools for 2008-09 and comparative data for the state.

**Exhibit 2-1  
Student Enrollment and Socioeconomic Characteristics  
2008-09**

<b>Campus</b>	<b>Grade Span</b>	<b>Fall Enrollment</b>	<b>Caucasian</b>	<b>Black</b>	<b>Asian</b>	<b>Hispanic</b>	<b>Native American</b>	<b>Eligible For Free or Reduced Price Meals</b>
Indiahoma Elementary School	EC- 8	126	59%	2%	0%	6%	33%	72%
Indiahoma Secondary School	9-12	227	70%	4%	1%	7%	19%	19%
<b>District Totals</b>		<b>353</b>	<b>66%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>	<b>24%</b>	<b>38%</b>
<b>State Totals</b>			<b>57%</b>	<b>11%</b>	<b>2%</b>	<b>11%</b>	<b>19%</b>	<b>56%</b>

*Source: Office of Accountability, Profiles Database*

**Exhibit 2-2** provides ethnicity and eligibility for free or reduced price meals for IPS, each of the peer districts, the comparison community group, and the state.

**Exhibit 2-2  
Demographic Data  
2008-09**

Entity	Ethnic Groups					Percentage Eligible for Free or Reduced Price Meals
	Caucasian	Black	Asian	Hispanic	Native American	
<b>Indiahoma</b>	<b>66%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>	<b>24%</b>	<b>37.7%</b>
Blair	73%	3%	1%	17%	6%	55.0%
Butner	60%	2%	0%	1%	36%	65.5%
Chattanooga	86%	1%	2%	2%	9%	50.7%
Duke	68%	1%	0%	27%	4%	59.2%
Verden	71%	1%	2%	5%	21%	62.8%
<b>Community Group</b>	<b>66%</b>	<b>3%</b>	<b>1%</b>	<b>7%</b>	<b>24%</b>	<b>37.7%</b>
<b>State Average</b>	<b>57%</b>	<b>11%</b>	<b>2%</b>	<b>11%</b>	<b>19%</b>	<b>56.3%</b>

*Source: Office of Accountability, Profiles District Report*

From 2004-05 through 2008-09, IPS's average daily membership (ADM) increased, beginning and ending with a 34.2 percentage difference over the five year period. Compared to peer groups, only two districts experienced an increase in student population while the others had decreases. The community group noted a significant increase in ADM while the state experienced a slight increase (**Exhibit 2-3**).

**Exhibit 2-3  
Student ADM Trends**

Entity	Average Daily Membership					Percentage Change
	2004-05	2005-06	2006-07	2007-08	2008-09	
<b>Indiahoma</b>	<b>232.9</b>	<b>230.8</b>	<b>208.5</b>	<b>199.4</b>	<b>312.6</b>	<b>34.2%</b>
Blair	303.2	307.1	282.3	266.6	271.6	(10.4%)
Butner	268.6	286.2	287.7	250.7	224.1	(16.6%)
Chattanooga	261.5	263.0	280.9	260.2	277.0	5.9%
Duke	187.0	206.0	201.9	190.3	180.5	(3.5%)
Verden	318.1	323.5	328.0	321.6	287.9	31.7%
<b>Community Group</b>	<b>151.3</b>	<b>148.7</b>	<b>146.3</b>	<b>348.0</b>	<b>339.6</b>	<b>124.5%</b>
<b>State Average</b>	<b>1,153.5</b>	<b>1,162.2</b>	<b>1,172.2</b>	<b>1,176.7</b>	<b>1,194.3</b>	<b>3.5%</b>

*Source: Office of Accountability, Profiles District Report*

**A. INSTRUCTIONAL DELIVERY AND STUDENT PERFORMANCE**

Managing the instructional process to ensure academic success for all students is the responsibility of the school district. A district's instructional program, along with its allocation of

resources, determines the extent to which the district meets the educational needs of all students. A well designed and managed process for developing curriculum and directing instruction, collecting assessment data to evaluate and monitor programs, and providing the resources needed to support educational efforts is essential if a district is to meet the needs of its students.

Curriculum development and instructional delivery are critical components of student learning. The presentation of materials, concepts, skills, and new ideas greatly effect acquisition of knowledge. Curriculum content and instructional strategies must be properly aligned and regularly evaluated in order to promote improvement of student performance.

Local School Boards and superintendents must provide principals and teachers with the tools necessary to consistently deliver the state adopted curriculum, Priority Academic Student Skills (PASS), and to prepare students to be successful on state mandated assessments. Districts must provide curriculum documents that clearly define standards and learning objectives for each subject and each grade so that teachers know content expectations and instructional timelines for student mastery of objectives.

Starting in 1998, Tim Waters, Ed.D., Robert J. Marzano, Ph.D., and Brian McNulty, Ph.D. from Mid-Continent Regional Educational Laboratory (McREL) began synthesizing the body of research on the effects of leadership practices on student achievement. In *Balanced Leadership: What 30 years of research tells us about the effect of leadership on student achievement*, McREL identified 21 leadership responsibilities that are significantly associated with student achievement. They have translated the results of this research into a balanced leadership framework that describes the knowledge, skills, strategies, and tools leaders need to positively impact student achievement. The framework moves beyond abstraction to concrete responsibilities, practices, knowledge, strategies, tools, and resources that principals and others need to be effective leaders.

McREL's leadership framework is based on the idea that effective leadership means more than simply knowing what to do. Effective leadership means knowing when, how, and why to take action. A combination of knowledge and skills is the essence of balanced leadership ([www.mcrel.org/balanced\\_leadership](http://www.mcrel.org/balanced_leadership)).

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

Student assessment is an integral part of measuring student performance. The Oklahoma State Testing Program (OSTP) details the various standards-based tests that students must take during the school year. The Oklahoma Core Curriculum Tests (OCCT) consists of criterion-referenced tests designed to measure student attainment of skills established in core classes. These skills are guided by PASS. OCCT helps monitor student and school performance relative to state-mandated curriculum standards. The OSTP program used a phase in process to increase tested grades and subjects.

In 2008-09, Criterion Referenced Tests (CRT's) were administered in mathematics and reading in grades three through eight, writing in grades five and eight, science and social studies/U.S. history in grades five and eight, and geography in grade seven. End-of-Instruction (EOI) tests are administered in high school following completion of instruction for specified subject area

competencies: U.S. History, Geometry, English II and III, Algebra I and II, and Biology I.

On the 2008-09 CRTs, IPS grade three students performed above the community group in reading and math, above the state average in reading, and the state average in math. In reading, IPS student performance was the highest among the peer districts and the third highest in math (**Exhibit 2-4**).

**Exhibit 2-4**  
**Percentage of IPS and Peer District Grade 3 Regular Education,**  
**Non-High Mobility Students Scoring Satisfactory or Above**  
**2008-09**

Entity	Reading	Math
<b>Indiahoma</b>	<b>90%</b>	<b>70%</b>
Blair	73%	82%
Butner	25%	17%
Chattanooga	81%	44%
Duke	**	**
Verden	82%	76%
<b>Community Group</b>	<b>66%</b>	<b>63%</b>
<b>State Average</b>	<b>71%</b>	<b>70%</b>

*Source: Office of Accountability, Profiles District Report*

*\*\* Data Protected by Privacy Laws*

**Exhibit 2-5** shows 2008-09 test results of fourth grade students in IPS. Performance was lower than the average for the community group and the state in reading and math. Compared to peer districts, IPS reading and math scores were the third highest.

**Exhibit 2-5**  
**Percentage of IPS and Peer District Grade 4 Regular Education,**  
**Non-High Mobility Students Scoring Satisfactory or Above**  
**2008-09**

Entity	Reading	Math
<b>Indiahoma</b>	<b>57%</b>	<b>57%</b>
Blair	**	**
Butner	31%	15%
Chattanooga	64%	57%
Duke	86%	71%
Verden	53%	60%
<b>Community Group</b>	<b>70%</b>	<b>70%</b>
<b>State Average</b>	<b>68%</b>	<b>71%</b>

*Source: Office of Accountability, Profiles District Report*

*\*\* Data Protected by Privacy Laws*

The 2008-09 OCCT grade five tests included five content areas: reading, math, social studies, science, and writing. **Exhibit 2-6** shows the results for grade five students in IPS. Student performance was above the community group and the state average in math, social studies, science, and writing but fell below both groups in reading. Compared to its peer districts, IPS

student performance was the highest in math, social studies, science, and equaled the highest score in writing. Reading score was the second lowest among peer districts. IPS performance in both science and writing resulted in the highest score possible on both the science and writing tests.

**Exhibit 2-6  
Percentage IPS and Peer District Grade 5 Regular Education,  
Non-High Mobility Students Scoring Satisfactory or Above  
2008-09**

Entity	Reading	Math	Social Studies	Science	Writing
<b>Indiahoma</b>	<b>57%</b>	<b>86%</b>	<b>86%</b>	<b>100%</b>	<b>100%</b>
Blair	62%	46%	69%	92%	100%
Butner	13%	25%	38%	56%	80%
Chattanooga	67%	73%	80%	93%	93%
Duke	60%	67%	60%	93%	93%
Verden	75%	69%	69%	94%	71%
<b>Community Group</b>	<b>70%</b>	<b>66%</b>	<b>81%</b>	<b>91%</b>	<b>93%</b>
<b>State Average</b>	<b>70%</b>	<b>68%</b>	<b>75%</b>	<b>87%</b>	<b>89%</b>

*Source: Office of Accountability, Profiles District Report*

**Exhibit 2-7** shows 2008-09 test results for sixth grade students in IPS. In math, student performance was 100% and the highest among the community group and the state. Reading performance was below that of the same groups. Compared to peer districts, IPS’s performance for sixth grade in math equaled that of one district and was higher than all others. Reading performance was the second highest among peer districts.

**Exhibit 2-7  
Percentage IPS and Peer District Grade 6 Regular Education,  
Non-High Mobility Students Scoring Satisfactory or Above  
2008-09**

Entity	Reading	Math
<b>Indiahoma</b>	<b>64%</b>	<b>100%</b>
Blair	53%	100%
Butner	22%	80%
Chattanooga	53%	93%
Duke	67%	93%
Verden	46%	71%
<b>Community Group</b>	<b>70%</b>	<b>93%</b>
<b>State Average</b>	<b>69%</b>	<b>89%</b>

*Source: Office of Accountability, Profiles District Report*

Performance for students in grade seven is shown in **Exhibit 2-8**. The results show that IPS students scored below the community group and the state average in reading and math but above both groups in geography. Performance in geography resulted in 100 percent passing for students. Comparison to the peer districts shows IPS performance was the third lowest in reading, the lowest in math, and the highest in geography.

**Exhibit 2-8**  
**Percentage IPS and Peer District Grade 7 Regular Education,**  
**Non-High Mobility Students Scoring Satisfactory or Above**  
**2008-09**

Entity	Reading	Math	Geography
<b>Indiahoma</b>	<b>70%</b>	<b>40%</b>	<b>100%</b>
Blair	71%	65%	94%
Butner	42%	42%	83%
Chattanooga	60%	70%	90%
Duke	91%	55%	82%
Verden	68%	63%	89%
<b>Community Group</b>	<b>75%</b>	<b>71%</b>	<b>93%</b>
<b>State Average</b>	<b>74%</b>	<b>67%</b>	<b>88%</b>

*Source: Office of Accountability, Profiles District Report*

The 2008-09 grade eight tests included five content areas: reading, math, history/constitution/government, science, and writing. **Exhibit 2-9** shows the results for grade eight students in IPS. In reading and math, student performance was above the community group and the state average. Grade eight students scored below the community group and state in history/constitution/government and writing. Science performance was below that of the community group and above the state. Among peer groups, IPS student performance was the highest in reading and equaled the score of another peer district in math in scoring the second highest. Performance was the third lowest in history/constitution/government and science and the second lowest in writing compared to performance of peer districts.

**Exhibit 2-9**  
**Percentage IPS and Peer District Grade 8 Regular Education,**  
**Non-High Mobility Students Scoring Satisfactory or Above**  
**2008-09**

Entity	Reading	Math	History/ Constitution/ Government	Science	Writing
<b>Indiahoma</b>	<b>91%</b>	<b>82%</b>	<b>55%</b>	<b>91%</b>	<b>92%</b>
Blair	59%	82%	71%	94%	100%
Butner	38%	38%	75%	88%	100%
Chattanooga	75%	88%	63%	100%	100%
Duke	70%	40%	50%	100%	90%
Verden	53%	65%	41%	88%	100%
<b>Community Group</b>	<b>73%</b>	<b>68%</b>	<b>76%</b>	<b>94%</b>	<b>97%</b>
<b>State Average</b>	<b>72%</b>	<b>65%</b>	<b>76%</b>	<b>90%</b>	<b>95%</b>

*Source: Office of Accountability, Profiles District Report*

The EOI tests are administered to students taking the related high school level coursework. Eighth grade students taking the related coursework are included in the results of the testing program. IPS students scored above the community group in US History but below in all other tested subject areas. IPS students scored higher than state averages in Algebra I, equaled the state average in Biology I, and were below in all other tested subjects. Compared to the performance

of peer districts, students in IPS scored the highest in US History and the third lowest in Algebra I and English II. Performance was the second lowest in Biology I, Algebra II, and English III, and the lowest among peer groups in Geometry (**Exhibit 2-10**).

**Exhibit 2-10**  
**Percentage of IPS and Peer District Regular Education,**  
**Non-High Mobility Students Scoring Satisfactory or Above on EOI Tests**  
**2008-09**

Entity	Algebra I	English II	US History	Biology I	Algebra II	Geometry	English III
<b>Indiahoma</b>	<b>86%</b>	<b>73%</b>	<b>78%</b>	<b>75%</b>	<b>55%</b>	<b>61%</b>	<b>79%</b>
Blair	100%	73%	65%	76%	70%	71%	95%
Butner	64%	89%	60%	47%	10%	63%	43%
Chattanooga	95%	71%	63%	95%	95%	95%	92%
Duke	70%	100%	70%	78%	75%	100%	90%
Verden	100%	95%	65%	82%	71%	100%	100%
<b>Community Group</b>	<b>89%</b>	<b>84%</b>	<b>70%</b>	<b>76%</b>	<b>65%</b>	<b>82%</b>	<b>88%</b>
<b>State Average</b>	<b>83%</b>	<b>81%</b>	<b>73%</b>	<b>75%</b>	<b>66%</b>	<b>79%</b>	<b>84%</b>

*Source: Office of Accountability, Profiles District Report*

Under the accountability provisions in the No Child Left Behind (NCLB) Act, the federal government evaluates all public schools sites, school districts, and states for Adequate Yearly Progress (AYP). The NCLB annual report card for IPS in 2008-09 shows that the district met the AYP standard.

**Exhibit 2-11** shows the percentage of students from IPS who completed the Oklahoma State Regents for Higher Education (OSRHE) college bound curriculum from 04-05 through 2008-09. IPS was higher than the community group and state averages in all comparison years except 2004-05. A comparison of peer districts shows that the percentage of IPS students completing the college bound curriculum was the second lowest among peer districts in 2004-05 but was 100%, equaling that of peer districts, from 2005-06 through 2008-09.

**Exhibit 2-11**  
**Percentage of IPS and Peer District Graduates Completing Regents' College Bound Curriculum**

Entity	2004-05	2005-06	2006-07	2007-08	2008-09
<b>Indiahoma</b>	<b>73.3%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Blair	91.7%	100.0%	100.0%	100.0%	100.0%
Butner	78.3%	35.7%	*FTR	60.0%	38.9%
Chattanooga	95.0%	82.4%	92.0%	100.0%	100.0%
Duke	52.9%	*FTR	100.0%	71.4%	100.0%
Verden	100.0%	100.0%	100.0%	95.7%	100.0%
<b>Community Group</b>	<b>74.6%</b>	<b>78.3%</b>	<b>85.1%</b>	<b>88.9%</b>	<b>81.8%</b>
<b>State Average</b>	<b>77.9%</b>	<b>70.1%</b>	<b>78.0%</b>	<b>81.8%</b>	<b>81.9%</b>

*Source: Office of Accountability, Profiles District Report*  
*\*Failure to Report (FTR)*

---

**Oklahoma Educational Planning and Assessment System**

The Oklahoma Educational and Planning Assessment System (EPAS) was created by the state of Oklahoma and ACT, Inc. The system uses an integrated series of assessments and reporting services to support educators as they help students set and reach goals for life after high school. The components of EPAS are the EXPLORE, PLAN, and ACT assessments. EPAS assessments provide information about academic progress at crucial points in a student's educational career. Information provided by EPAS assessments is linked longitudinally to provide an academic information management system. These linkage reports can be used to monitor student progress overtime, detect trends, and evaluate instructional outcomes in support of school improvement efforts. The program is funded by the OSRHE and content guides are available online to assist districts in curriculum alignment and improvement efforts at: <http://okhighered.org/epas/>.

EXPLORE, the eighth grade assessment, is the entry point to EPAS. The EXPLORE test includes objective assessments in English, math, reading, and science reasoning. It also includes activities that help young students begin the process of career and educational exploration. EXPLORE provides baseline data for monitoring student progress through the high school years.

**Exhibit 2-12** shows how IPS students performed on the EXPLORE test as compared to their peers nationally. IPS scores were lower than that of peers across the nation in all tested areas.

**Exhibit 2-12**  
**IPS 8<sup>th</sup> Grade EXPLORE Scores**  
**Compared to the Nation**  
**2009-10**

Subject	IPS Score	National Score
English	13.5	14.2
Mathematics	12.7	15.1
Reading	12.8	13.8
Science	15.6	15.9
Composite	13.6	14.9

*Source: EXPLORE, Profile Summary Report*

PLAN, the tenth grade assessment, includes objective assessments in English, math, reading, and science reasoning. The educational and career planning activities are tailored to the needs of students who are preparing to make decisions about life after high school. PLAN provides a midpoint review of tenth grade students' progress toward their educational and career goals.

**Exhibit 2-13** shows how IPS students performed on the PLAN test as compared to their peers nationally. IPS scores were higher than those of national peers in English and Mathematics and lower in Reading and Science. In the Composite category, performance equaled that of peers across the nation.

**Exhibit 2-13  
IPS 10<sup>th</sup> Grade PLAN Scores  
Compared to the Nation  
2009-10**

Subject	IPS Score	National Score
English	18.3	16.9
Mathematics	18.7	17.4
Reading	16.6	16.9
Science	17.7	18.2
Composite	17.5	17.5

*Source: PLAN, Profile Summary Report*

The ACT assessment is designed to evaluate the general educational development of high school students and predict their ability to successfully complete college level work. The ACT assessment includes over 200 multiple choice questions covering English, math, reading, and science reasoning. It also includes an interest inventory that provides information for career and educational planning.

IPS student performance on the ACT has varied from year to year. Overall, student performance decreased from 2004-05 to 2008-09 (**Exhibit 2-14**). IPS student performance on the ACT was above the community group average for four out of the five years reported. IPS scores were above the state average in two of the five years reviewed. Compared to peer districts, IPS students recorded the highest score in 2004-05, 2005-06, and 2008-09 and the fourth highest in all other years.

**Exhibit 2-14  
IPS and Peer District Average ACT Composite Scores**

Entity	2004-05	2005-06	2006-07	2007-08	2008-09	Percentage Change
<b>Indiahoma</b>	<b>22.6</b>	<b>20.1</b>	<b>18.3</b>	<b>19.4</b>	<b>21.3</b>	<b>(5.8%)</b>
Blair	19.6	19.6	16.8	19.8	18.5	(5.6%)
Butner	21.3	18.1	23.0	19.1	18.0	(15.5%)
Chattanooga	18.7	20.6	20.7	20.6	21.2	13.4%
Duke	18.9	18.6	20.3	17.4	19.3	2.1%
Verden	18.9	17.6	17.2	20.1	20.7	9.5%
<b>Community Group</b>	<b>19.2</b>	<b>18.8</b>	<b>18.7</b>	<b>18.2</b>	<b>20.3</b>	<b>5.7%</b>
<b>State Average</b>	<b>20.6</b>	<b>20.6</b>	<b>20.8</b>	<b>20.8</b>	<b>20.8</b>	<b>0.9%</b>

*Source: Office of Accountability, Profiles District Report*

***Dropout and Graduation Rates***

**Exhibit 2-15** shows the four-year dropout and senior graduation rates for IPS, peer districts, the community group, and the state for 2008-09. IPS’s dropout rate was 0.0%, the lowest achievable, and equaled that of two other districts and was lower than both the community group and the state. The senior graduation rate for IPS and all comparison districts was the highest attainable rating and was above both the community group and the state graduation rates.

**Exhibit 2-15**  
**IPS and Peer District Four-Year Dropout and Senior Graduation Rates**  
**2008-09**

Indicator	Indiahoma	Blair	Butner	Chattanooga	Duke	Verden	Community Group	State
Dropout Rate	0.0%	0.0%	0.0%	8.3%	5.6%	17.9%	6.7%	12.4%
Graduation Rate	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	96.8%	97.8%

*Source: Office of Accountability, Profiles District Report*

**Classroom Teachers**

The ratio of students per classroom teacher in IPS decreased slightly over a three year period (**Exhibit 2-16**). The district's ratio in 2006-07 was slightly above the community group and the below the state averages. Compared to its peer districts, the ratio for students per teacher in IPS was the lowest in all years. This district ratio is no longer included on the district profiles report from the Office of Accountability so the percentage change is based on the analysis of data over three years.

**Exhibit 2-16**  
**IPS and Peer District Students per Regular Classroom Teacher**

Entity	2004-05	2005-06	2006-07	2007-08	2008-09	Percentage Change
<b>Indiahoma</b>	<b>12.0</b>	<b>12.0</b>	<b>11.9</b>	<b>*NA</b>	<b>*NA</b>	<b>(0.8%)</b>
Blair	13.7	13.0	12.5	*NA	*NA	(8.7%)
Butner	14.1	16.6	16.6	*NA	*NA	17.7%
Chattanooga	12.7	13.0	13.9	*NA	*NA	9.5%
Duke	12.5	13.7	12.6	*NA	*NA	0.8%
Verden	17.6	15.9	15.2	*NA	*NA	(13.6%)
<b>Community Group</b>	<b>12.2</b>	<b>11.8</b>	<b>11.8</b>	<b>*NA</b>	<b>*NA</b>	<b>(3.3%)</b>
<b>State Average</b>	<b>17.2</b>	<b>16.3</b>	<b>16.7</b>	<b>*NA</b>	<b>*NA</b>	<b>(2.9%)</b>

*Source: Office of Accountability, Profiles District Report*

*\*Data not available (NA) beyond 2006-07*

The average experience of IPS teachers increased 21.1 percent from 2004-05 through 2008-09. The community group average increased 10.2 percent, and the state average decreased 0.8 percent (**Exhibit 2-17**). IPS teachers average more years of experience than their community group in all years except 2004-05. As compared to the state, IPS teachers have more years of experience in three of five years comparison years. IPS teachers as a whole have the second lowest years of experience among their peer districts in 2004-05 and 2005-06 and rank fourth highest in 2006-07 through 2008-09.

**Exhibit 2-17**  
**IPS and Peer District Average Years of Experience of Regular Classroom Teachers**

Entity	2004-05	2005-06	2006-07	2007-08	2008-09	Percentage Change
<b>Indiahoma</b>	<b>12.3</b>	<b>12.8</b>	<b>14.1</b>	<b>15.2</b>	<b>14.9</b>	<b>21.1%</b>
Blair	15.9	15.5	16.3	16.3	15.6	(1.9%)
Butner	12.5	12.8	13.0	9.9	9.7	(22.4%)
Chattanooga	14.8	16.8	15.9	15.6	17.1	15.5%
Duke	9.6	10.5	12.1	12.6	13.3	38.5%
Verden	14.3	13.5	14.3	15.7	17.5	22.4%
<b>Community Group</b>	<b>12.7</b>	<b>12.7</b>	<b>12.7</b>	<b>12.8</b>	<b>14.0</b>	<b>10.2%</b>
<b>State Average</b>	<b>12.8</b>	<b>13.3</b>	<b>12.7</b>	<b>12.7</b>	<b>12.7</b>	<b>(0.8%)</b>

*Source: Office of Accountability, Profiles District Report*

The percentage of teachers in IPS with advanced degrees was below the community group and state percentages in 2004-05, 2005-06, 2007-08, and 2008-09 (**Exhibit 2-18**). IPS was above the community group and the state in 2006-07. Compared to its peer districts, IPS had the second lowest percentage of teachers with advanced degrees in two years, the third lowest in two years, and the third highest in 2006-07.

**Exhibit 2-18**  
**Percentage of IPS and Peer District Regular Classroom Teachers with Advanced Degrees**

Entity	2004-05	2005-06	2006-07	2007-08	2008-09
<b>Indiahoma</b>	<b>13.0%</b>	<b>16.4%</b>	<b>28.6%</b>	<b>22.9%</b>	<b>3.3%</b>
Blair	20.8%	24.7%	29.8%	27.3%	23.9%
Butner	15.8%	5.8%	17.4%	5.2%	10.9%
Chattanooga	19.6%	19.0%	18.4%	17.1%	16.5%
Duke	0.0%	0.0%	6.3%	6.3%	6.3%
Verden	28.9%	25.7%	30.1%	25.5%	32.7%
<b>Community Group</b>	<b>25.5%</b>	<b>25.4%</b>	<b>23.5%</b>	<b>23.5%</b>	<b>25.6%</b>
<b>State Average</b>	<b>27.8%</b>	<b>26.4%</b>	<b>26.7%</b>	<b>26.5%</b>	<b>25.7%</b>

*Source: Office of Accountability, Profiles District Report*

**Course Offerings**

Oklahoma high schools must offer a minimum of 34 courses per year including six core areas plus electives: four units of language arts, four units of science, four units of math, four units of social studies, two units of languages, two units in the arts, and 14 units of other electives. **Exhibit 2-19** shows the number of core units offered in IPS’s high school curriculum by subject from 2004-005 through 2008-09. According to the Oklahoma Office of Accountability Report Card, IPS increased the number of core curriculum units from 11.5 in 2004-05 to 34.0 in 2008-09.

**Exhibit 2-19**  
**IPS High School Core Curriculum Units by Subject**

<b>Courses</b>	<b>2004-05</b>	<b>2005-06</b>	<b>2006-07</b>	<b>2007-08</b>	<b>2008-09</b>
Language Arts	3.0	6.0	5.0	5.0	5.0
Science	2.5	4.0	4.0	4.0	5.0
Math	2.0	3.0	3.0	5.0	7.5
Social Studies	2.0	3.0	4.0	4.0	9.5
Fine Arts	0.5	1.0	1.0	0.0	3.0
Languages	1.5	3.0	3.0	2.5	4.0
<b>Total</b>	<b>11.5</b>	<b>20.0</b>	<b>20.0</b>	<b>20.5</b>	<b>34.0</b>

*Source: Office of Accountability, Profiles District Report*

**Exhibit 2-20** shows the number of units offered in IPS's high school core curriculum by subject in 2008-09 compared to the peer districts, community group, and state. IPS was below the community group and the state in language arts, science, and fine arts and above both groups in math and social studies. Compared to peer districts, IPS offered more core curriculum units than all peer districts.

**Exhibit 2-20**  
**IPS and Peer District Core Curriculum Units by Subject**  
**2008-09**

<b>Courses</b>	<b>Indiahoma</b>	<b>Blair</b>	<b>Butner</b>	<b>Chattanooga</b>	<b>Duke</b>	<b>Verden</b>	<b>Community Group</b>	<b>State</b>
Language Arts	<b>5.0</b>	7.0	6.0	6.0	6.0	5.0	<b>6.4</b>	<b>8.1</b>
Science	<b>5.0</b>	4.0	5.0	5.0	3.0	6.0	<b>5.2</b>	<b>6.4</b>
Math	<b>7.5</b>	3.0	7.0	6.0	5.0	4.0	<b>5.9</b>	<b>6.6</b>
Social Studies	<b>9.5</b>	4.5	3.0	3.0	3.0	4.0	<b>4.6</b>	<b>5.8</b>
Fine Arts	<b>3.0</b>	4.0	1.0	2.0	5.0	4.0	<b>4.4</b>	<b>6.9</b>
Languages	<b>4.0</b>	0.0	1.0	0.0	0.0	1.0	<b>1.7</b>	<b>3.1</b>
<b>Total</b>	<b>34.0</b>	<b>22.5</b>	<b>23.0</b>	<b>22.0</b>	<b>22.0</b>	<b>24.0</b>	<b>28.1</b>	<b>36.8</b>

*Source: Office of Accountability, Profiles District Report*

**FINDING 2-1**

IPS uses grant funds to provide a comprehensive after school program for students in grades 7-12. As a result, students have access to enrichment activities that complement the academic program and support increased achievement.

In 2007, IPS was awarded the competitive Title IV, Part B, 21<sup>st</sup> Century Community Learning Center (21<sup>st</sup> CCLC) grant resulting in \$600,000 in additional funds over five years. The district is currently in the fourth year of the grant, which is designed to provide academic enrichment opportunities for children during non-school hours. IPS teachers provide the majority of the after school activities and the counselor serves as program coordinator. Student activities are scheduled during a three-hour block, Monday through Friday of each week.

In interviews, the counselor shared that the district used the grant funds to create an after school program for students in grades 7-12 that offers a variety of instructional activities. These include tutorial support, academic enrichment, fine arts, physical education (PE), service learning, web design, chess, study of world cultures, and entrepreneurship. A review of the schedule noted that students are provided with an hour of academic tutoring, a snack break, 30 minutes of PE, and an hour of enrichment activities. A teacher shared that the 21<sup>st</sup> CCLC program promotes strong teacher-student relationships and provides enriched learning activities.

## COMMENDATION

**IPS uses grant funds to provide a comprehensive after school program for students in grades 7-12 that compliment the academic program and support increased achievement.**

### FINDING 2-2

IPS does not have a curriculum scope and sequence to guide instruction. Without such a document, instruction is not consistently aligned to ensure student success and teachers new to a course or grade level are left without clear direction.

In interviews, the principal and teachers indicated that PASS objectives and textbooks serve as the basis for curriculum for all grade levels. Teachers use PASS objectives and results of state mandated tests to guide instruction. According to the principal, teachers interpret PASS objectives, develop instructional strategies, and determine the sequencing and pacing of learning objectives. Comments to the consulting team by new teachers indicated that a curriculum document defining the instructional sequence and pacing for objectives was needed. Interviews with staff indicated that the district adopted textbook series provides alignment of instruction for elementary teachers. However, the adopted textbooks did not provide alignment between elementary and secondary instruction, and no other curriculum document was in place to ensure consistency from elementary to secondary grade levels.

The principal noted a need to emphasize the Common Core State Standards (CCSS) recently adopted by the State Department of Education (SDE). Time for teachers to work on developing the required transition plan, which must be based on the district's curriculum for teaching PASS, had not been allocated at the time of the review. According to the state timeline, districts should begin developing a transition plan for moving from PASS to CCSS in 2010 and continue the curriculum revision process until completion in 2014.

The SDE supports districts in aligning instruction through a technique called curriculum mapping, where teachers collaborate to create an operational curriculum rather than a static document of learning objectives. Curriculum maps include: learning objectives, what is actually taught, instructional timeline and sequence, assessment tools, instructional materials, student activities, and essential questions. This is an ongoing process that allows teachers to work together to make critical decisions about student learning and develop a clear scope and sequence for instruction.

The staff from the state Office of Standards and Curriculum will assist schools through the mapping process that will align district curriculum to PASS and provide a transition to CCSS.

Noble Public Schools in Noble, Oklahoma implemented curriculum mapping with support from the Oklahoma State Department of Education (SDE) by using a process phased in over a multi-year timeline.

## **RECOMMENDATION**

### **Develop scope and sequence documents in all content areas and grade levels to define PASS objectives and determine the instructional sequence of objectives.**

The principal should work with teachers to develop the scope and sequence documents or consider using resource consultants from SDE to facilitate the mapping process. Teachers from each grade level and content area should be involved in the process to discuss objectives taught, timeframe for teaching identified objectives, and to compare PASS to CCSS. Secondary teachers should develop plans for the cross content literacy strand found in CCSS.

The second phase in the process should focus on establishing the sequence of instructional objectives within each grading period and ensure alignment across grade levels in each content area. Assessments tools can also be included in scope and sequence documents.

Once the draft curriculum document is completed, the principal and teachers should engage in ongoing dialogue to continuously evaluate, revise, and update the instructional guides. Resulting scope and sequence documents should provide clear instructional timelines and alignment of PASS/CCSS related learning objectives for each content area across all grade levels.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 2-3**

IPS does not provide opportunities for teachers to work together across grades to address curriculum, instruction, and assessment. As a result, teachers are not able to collaborate to ensure increased student performance.

In interviews with the consulting team, the principal identified vertical communication across grade levels as an area for improvement. IPS has one teacher at each grade level in PreK through sixth grade, and one in each core content area at the secondary level. According to the principal, this staffing configuration means that the pacing and sequencing of curriculum is determined by the teacher at each grade level. Without structured times for vertical collaboration, there is no assurance that instruction is aligned across the district.

In focus group meetings, teachers stated that discussions about curriculum and instruction occur informally during lunch, except for the structured collaboration during the textbook selection process. Elementary teachers have planning time each day when students have PE, and this schedule allows common planning periods for Kindergarten and first, second and third, and fourth through sixth. According to elementary teachers, this plan time is usually used for personal plan time, and not for cross-grade collaboration. Secondary teachers have a plan time

each day that is determined by scheduling needs. The plan time is not used to discuss content curriculum with teachers from intermediate and elementary levels.

The principal and teachers noted that there were no structured opportunities for collaboration across the primary, intermediate, and secondary levels. According to the principal, teachers are asked to review assessment data on an individual basis. No time is provided for group discussion about district results. In interviews with the consulting team, teachers stated that communication between elementary and secondary teachers is limited, which results in fragmentation in curriculum and instruction, special services, and schedules for pull out programs. The principal and teachers stated that weekly faculty meetings are scheduled separately for elementary and secondary teachers.

Vertical communication is a critical component of continuous improvement. Teachers need time to meet routinely to discuss the sequencing of skills and assessment data in order to design instruction that improves student performance. It is necessary that teachers have the opportunity to share best practices and develop strategies to increase student performance.

## **RECOMMENDATION**

**IPS should structure time to provide teachers opportunities to work together across grades to address curriculum, instruction, and assessment to ensure increased student performance.**

The principal should convene secondary-elementary faculty meetings together to review current practices and explore ways of providing time for collaboration across all grade levels and content areas. Time should be provided for elementary teachers to connect with each other and with secondary teachers on a regular basis. Consideration should be given to:

- Designating at least one planning period per week for vertical collaboration in those grades with common plan time.
- Flexing the PE schedule to provide time for primary and intermediate teachers to meet or for intermediate teachers to meet with a designated secondary content teacher.
- Scheduling the special fine arts classes, which are provided by part-time or adjunct staff, to release pairs of teachers for collaborative planning.
- Planning professional development days to provide time and training for curriculum mapping.

The allocated time for vertical collaboration should support teachers in creating content curriculum maps to align instruction and assessments, and provide sequencing and pacing guides across all grade levels. IPS has a teacher with training and experience in the curriculum mapping process that can work with the principal to facilitate collaborative discussions. In addition, regularly scheduled meetings should provide time for vertical teams to develop transitions' plans for changing from PASS to CCSS, review of new state testing blueprints, analyze student performance on state tests, and align instructional strategies and units of study as a means of

increasing student performance.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 2-4**

IPS does not use EPAS EXPLORE and PLAN results to assist teachers in improving student achievement. As a result, students and teachers do not use this tool to improve learning, direct career and academic planning, and align curriculum.

EPAS is a comprehensive resource designed to assist students in assessing current academic development and exploring career/educational options, and to provide teachers with normative data for curriculum planning. EXPLORE and PLAN are important tools that focus attention on both career preparation and academic achievement. In interviews with the consulting team, the superintendent and counselor noted that the EPAS data from the EXPLORE and PLAN is not used to the maximum benefit.

The counselor indicated that EPAS results are shared with students and the career cluster information is used in career exploration. Consultants noted that the data is not shared with teachers. EPAS linkage reports can be used to monitor student progress over time, detect trends, and evaluate instructional outcomes in support of school improvement efforts. According to the counselor, these reports are not ordered for teachers.

The counselor attended training sessions on the use of EPAS and worked with Oklahoma State Regents for Higher Education (OSRHE) staff to develop a tentative plan to assist teachers in using the PLAN and EXPLORE results for curriculum alignment. According to the counselor, many teachers do not realize that the norm-referenced EPAS results provide a consistent source of student performance data.

In the 2006 *Journal of Oklahoma Association of Supervision and Curriculum Development* (OASCD), the Chancellor for the OSRHE wrote that the true value of EPAS will be attained when administrators and teachers use the data as curriculum tools. The rubric developed by OSRHE provides a framework for organizing curriculum, instruction, guidance, and leadership to work together to increase student achievement through academic and career planning. The continuity of the EXPLORE and PLAN data provides concrete evidence of the strength and weakness in the curriculum and instruction provided to students. It is the only norm-referenced data available to most schools.

## **RECOMMENDATION**

**The superintendent should work with the principal and counselor to develop a plan for using the EPAS EXPLORE and PLAN data to support student career planning and to increase student achievement.**

The superintendent and principal should meet with the counselor and a representative from

OSRHE to develop a plan that outlines strategies for using EXPLORE and PLAN as comprehensive tools for career and academic planning as well as curriculum planning. The tentative plan developed by the counselor should provide a starting point for introducing the benefits of EPAS to the teachers. The plan should outline ways to increase teachers' understanding of the tool and how the data can be used in conjunction with EOI results to improve student achievement and to improve academic planning for students.

Representatives from the OSRHE are available to provide customized professional development that presents the district's EPAS data, crosswalks the data with EOI results, and prepares teachers and counselors to fully utilize the tool for career and academic planning. A rubric is provided for districts to use in assessing where they are in the full implementation of the EPAS program. The rubric should be used by the district in developing a plan for utilizing EPAS to improve student learning and career planning.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources. The services of OSRHE are available at no cost to districts.

### ***B. PROFESSIONAL DEVELOPMENT***

According to the Oklahoma State Department of Education (SDE), the purpose of professional development is to ensure that all teachers continue their education beyond initial licensing and certification. Local Boards of Education, by Oklahoma statute, must establish professional development programs for all certified, licensed teachers, and administrators of the district. Such programs must be based upon recommendations of a professional development committee, of which the majority are teachers.

Since 2003, Oklahoma schools have been expected to adhere to the SDE guidelines based on the National Staff Development Council (NSDC) standards for quality and NCLB guidelines. In 2005-2007, the SDE issued major revisions to the professional development regulations based on legislative action. These regulations expanded requirements to include data-driven professional development plans that are based on state testing and accountability data. Programs must address the five student performance goal areas outlined by SDE and the topical categories; once required, but are now optional for districts. Each year districts are required to submit a report to SDE that shows the activities under each of the five goal areas and the staff development funds expended in each.

Due to reductions to the school finance budget, Oklahoma lawmakers passed House Bill 3029 in the 2010 legislative session, which waives existing professional development requirements for the years ending 2011 and 2012. Districts will have the option to continue providing ongoing learning opportunities or reallocate the state funds for alternative district needs. If schools opt to use funds for other purposes, they are not required to submit the annual state report on goal expenditures.

Professional development programs enhance the professional knowledge, skills, and attitudes of educators in order to improve student learning. The base of knowledge in education is growing

---

so rapidly in every academic discipline that educators must stay current and develop new expertise.

### **FINDING 2-5**

IPS does not have a coordinated plan for using professional development days to support curriculum development, data analysis, and instructional delivery. Without a defined plan, professional days are not used to provide teachers with quality experiences targeting increased student performance.

In interviews with the consulting team, administrators and teachers described professional development as driven by staff interests and non-academic requirements. Program content was not focused on student performance needs. No district plan for professional development was available for review, and the 2009-10 report to the state showed \$4,000 was spent on professional development activities. Teachers shared that professional development programs were predominantly planned by the principal and occasionally by the superintendent of schools. Due to current financial constraints, professional days and state sponsored workshops are the primary sources of professional development for teachers.

For the 2010-2011 school year, IPS allocated five days for professional development with three days before the start of school and the remaining two days in December and April. In interviews with the consulting team, the superintendent, principal, and teachers shared that professional days were used for trainings, updates, and awareness presentations. Areas of focus include: CPR training, OSHA, special education, drug awareness, and gang prevention. Staff indicated that some time on the designated professional development days was used to work in classrooms. During the three days before school, no time was devoted to the analysis of student data or curriculum discussions focusing on academic improvement. Teachers stated that student data was not available for them to review on those professional days. The superintendent shared that data reports were held and distributed to teachers a month after the start of school.

In interviews with the consulting team, the principal stated a primary instructional goal is to identify performance weakness and develop a plan for improvement. The principal shares and discusses data with individual teachers on a one on one basis. Teachers review individual student scores, but there have been no discussions of the collective data and improving student performance. According to the principal, the professional days are the only time for curriculum or data analysis related discussions; but days are not consistently used for that purpose. The principal identified the transition to the Common Core Curriculum Standards (CCCS) as a priority and emphasized the importance of providing teachers with appropriate training.

McREL's *Professional Development Analysis*, a research synthesis compiled in 2005, states that changes in instructional practice that impact student achievement depend on sustained and targeted professional development focused on particular content knowledge. Professional development that positively affects learning is of considerable duration, focused on specific content, characterized by collective participation, coherent, and infused with active learning. A fragmented program for professional development does not support improved student achievement across the district.

---

## RECOMMENDATION

### **Develop a plan for using professional development days to support curriculum development, data analysis, and instructional delivery.**

The district should establish a professional development committee that includes a representative group of district teachers and the counselor. The principal should work with the committee to develop a comprehensive multi-year plan for using professional development days that are focused on student achievement. The plan should initially address data analysis and curriculum related issues, and then be expanded to include appropriate instructional strategies. The days before the start of school should be targeted for data analysis discussions.

The SDE timeline and planning tools for implementing the Common Core State Standards (CCSS) are available as resources for planning professional days. A team that includes primary, intermediate, and secondary teachers should be identified to attend CCSS training with the principal. This team can be available to facilitate discussions that assist teachers in comparing CCSS with PASS in order to develop a framework for transition.

The planning process and plan should also consider partnerships to access professional development needs and possible grant funds to support training needs. Partnerships might include Cache and Lawton school districts and the Professional Development Center in Lawton, which serves schools in Comanche County. By coordinating school calendars with surrounding districts, IPS could schedule the same professional days and create the opportunity for sharing resources, such as SDE curriculum specialists. The Great Plains Museum is also a resource for curriculum support and professional development in inquiry-based science through the Oklahoma Museum network.

As McREL researchers point out in *Professional Development Analysis*, rural districts may have difficulty organizing centralized and high quality professional development. Partnerships, regional coalitions, and state funded professional development institutes are means of supporting quality professional development to address student achievement.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

### ***C. GIFTED AND TALENTED EDUCATION***

Article VII, Section 904 of the Oklahoma School Code defines gifted and talented children as those children identified at the preschool, elementary, or secondary level as having demonstrated potential abilities of high performance capabilities and needing differentiated or accelerated educational services. The definition includes students who scored in the top three percent on any national standardized test of intellectual ability or who excel in the areas of creative thinking ability, leadership ability, visual performing arts ability, and specific academic ability.

Section 910 of the Oklahoma School Code requires each school district to provide Gifted and Talented educational programs and to serve those identified students who reside within the

---

school district boundaries. The local School Board of each district is required to submit a plan to the State Board of Education for Gifted and Talented programs and to provide annual program reports to the Oklahoma State Department of Education (SDE). Required components for gifted child education programs include:

- A written policy statement which specifies a process for selection and assessment of children for placement in Gifted and Talented programs that is consistent for grades one through twelve.
- A description of curriculum for the gifted child educational program, demonstrating that the curriculum is differentiated from the normal curriculum in pace and/or depth and that it has scope and sequence.
- Criteria for evaluation of the gifted child educational program.
- Evidence of participation by the local advisory committee on education for gifted and talented children in planning, child identification, and program evaluation.
- Required competencies and duties of gifted child educational program staff.
- Number and percentage of students identified by the district as gifted children pursuant to *subparagraph g of paragraph 2 of subsection B of Section 18-201* of this title.
- A budget for the district gifted child educational programs.

Districts develop plans to identify and provide appropriate educational experiences for those students who give evidence of high performance capability in areas of intellectual, creative, artistic, or leadership capacity. In addition to the required components, districts provide professional development in order to provide teachers with instructional strategies that will maximize learning experiences for students.

From 2004-05 through 2008-09, IPS identified a higher percentage of Gifted and Talented education students than the community group and the state averages each year (**Exhibit 2-21**). In 2004-05 through 2007-08, IPS identified a higher percentage of gifted and talented students than its peer districts and the community and state averages. In 2008-09, IPS had the fourth highest percentage of gifted students among peer districts.

**Exhibit 2-21**  
**IPS, Peer Districts, Community Group, and State**  
**Percentage of Gifted and Talented Education Students**

Entity	2004-05	2005-06	2006-07	2007-08	2008-09
<b>IPS</b>	<b>21.0%</b>	<b>22.5%</b>	<b>22.1%</b>	<b>32.1%</b>	<b>17.9%</b>
Blair	12.2%	10.7%	11.0%	24.0%	25.7%
Butner	10.4%	9.8%	10.4%	16.4%	21.1%
Chattanooga	8.0%	8.0%	8.2%	20.8%	18.5%
Duke	8.0%	7.8%	7.9%	6.3%	8.9%
Verden	9.7%	9.3%	10.1%	8.1%	10.0%
<b>Community Group</b>	<b>10.8%</b>	<b>10.1%</b>	<b>10.2%</b>	<b>14.5%</b>	<b>13.8%</b>
<b>State Average</b>	<b>12.5%</b>	<b>12.6%</b>	<b>12.8%</b>	<b>17.0%</b>	<b>16.5%</b>

*Source: Office of Accountability, Profiles District Report*

IPS identifies students in grades 2-12 as gifted and talented by multi-criteria data that includes teacher/parent recommendation, state assessments, assessments of intellectual ability, and academic grades. The district has used the Otis-Lennon School Ability Test (OLSAT), Cognitive Ability Test (CogAT), and Slosson to identify the top 3 percent of the students. In some instances, a student in the first grade may be identified based on the Gates-MacGinitie test.

**Exhibit 2-22** shows the number of students in the Gifted and Talented program by grade and ethnicity as reported to SDE for 2009-10. Of the total 65 students reported, 35 are identified by multi-criteria, and 30 are identified in the top 3 percent by standardized test.

**Exhibit 2-22**  
**IPS Number and Percentage of Students in Gifted and Talented Programs**  
**2009-10**

Grade	African American	Native American	Hispanic American	Asian American	Caucasian/ Other	Total
Kindergarten	0	0	0	0	0	<b>0</b>
1	0	1	0	0	1	<b>2</b>
2	0	1	0	0	3	<b>4</b>
3	0	2	1	0	3	<b>6</b>
4	0	2	0	0	5	<b>7</b>
5	0	0	0	0	5	<b>5</b>
6	0	0	1	0	5	<b>6</b>
7	0	3	0	0	3	<b>6</b>
8	0	2	0	0	2	<b>4</b>
9	0	3	0	0	6	<b>9</b>
10	0	2	0	0	4	<b>6</b>
11	0	1	1	0	3	<b>5</b>
12	0	1	0	0	4	<b>5</b>
<b>Total</b>	<b>0</b>	<b>18</b>	<b>3</b>	<b>0</b>	<b>44</b>	<b>65</b>

*Source: OSDE, Gifted and Talented Report*

**FINDING 2-6**

IPS’s gifted program for elementary students is broad-based without a defined curriculum and

---

schedule of services for students. As a result, learning experiences are not aligned across grades to maximize student learning.

IPS employs a part-time teacher to coordinate the Gifted and talented program and to provide instructional services to students. The part-time teacher works three days per week on a flex schedule that includes not only gifted services, but fine arts instruction, English Language Learners (ELL) testing, and test coordination. In interviews with the consulting team, the gifted teacher identified the program components as:

- Pull out support for elementary students in first through fifth grades and after school academic teams for fourth and fifth grade students.
- Enrichment activities for grades seven and eight provided in the language arts classrooms by the gifted teacher.
- A secondary program with AP courses every other year, concurrent enrollment, and after school academic teams.
- Summer enrichment classes for first through fifth grade students.

The district has a Gifted and Talented plan but there were no dates on it. When asked, the superintendent stated it was at least two years or older. Interviews and observations indicate there is no standard structured curriculum for the elementary level pull out program. Without a plan and a standardized curriculum, the gifted and talented program at the elementary level would be sporadic. In interviews with elementary teachers, the consulting team noted that the elementary program had not started after six weeks of instruction. The gifted teacher stated that pull out activities would be scheduled for half a day one time per week for primary students and another half a day one time per week for intermediate students starting in October. In interviews with the consulting team, the superintendent, principal, and teachers stated there is no set schedule for students, and teachers often do not know when services will be provided.

The National Association for Gifted Children (NAGC), in a position paper on grouping gifted children, emphasized that what students do once they are grouped is most important to academic learning. Karen Rogers writes in *Reforming Gifted Education* that a pull out program must be linked to the content specific areas of the curriculum and should “systematically extend” the regular curriculum. Rogers noted that a pull out program can become a potpourri, doing critical thinking for a few weeks, followed by a study of mythology, and then followed by a little creative problem solving. It is highly unlikely that there is any substantial academic effect if this is the case ([www.giftedbooks.com/authors.asp?id=52](http://www.giftedbooks.com/authors.asp?id=52)).

## RECOMMENDATION

**Develop a Gifted and Talented Program for elementary students that includes a defined curriculum and an established schedule of services to ensure that learning experiences align across grades to maximize student learning.**

The principal should convene the Gifted Advisory Committee to create a district plan for providing gifted and talented services for elementary students. The written plan should define the program components and include a specific schedule for service delivery. The team should consider issues such as instructional delivery models, appropriate program activities, enrichment strands, and summer enrichment programs. The Oklahoma State Department of Education (SDE) offers program guidelines and program options that should be helpful in planning process ([www.sde.state.ok.us/Curriculum/GiftTalent/options.htm](http://www.sde.state.ok.us/Curriculum/GiftTalent/options.htm)).

Following the initial work by the advisory committee, the Gifted and Talented teacher should work in consultation with elementary teachers to develop a pull out curriculum that extends what is being taught in the regular classroom. A curriculum mapping process can be used to extend the classroom content so that the level of complexity and critical thinking is increased for gifted students. The SDE offers resources for a Gifted and Talented curriculum design ([www.sde.state.ok.us/Curriculum/GiftTalent/teachers.html](http://www.sde.state.ok.us/Curriculum/GiftTalent/teachers.html)).

According to Rogers in *Reforming Gifted Education*, teachers and specialists who design pull out curriculum should consider the scope and sequence of a given content area and develop extension learning activities that provide differentiated experience to the classroom instruction. Some of the specific resources for curriculum and lesson design suggested by SDE can be found at the following sites:

Education World: Lesson plan database in every subject area and monthly updates for teachers on specific topics ([www.educationworld.com/](http://www.educationworld.com/)).

WebQuest: A collection of inquiry-oriented activities in which most or all of the information is drawn from the web and used to increase the learners' level of thinking (<http://webquest.org/index.php>).

Teachers.Net Lesson Plan Exchange: Classroom tested lesson plans shared by teachers (<http://teachers.net/lessons/>).

The committee should review the current summer enrichment classes and consider establishing this as a program component in the design of a Gifted and Talented Summer Academy. The academy program curriculum should align to the elementary enrichment program offered during the school year and address the specific needs of the gifted learners.

A redefinition of the elementary Gifted and Talented program should provide students with an enriched curriculum, an expanded continuum of program services, and opportunities to address their individual needs. A redefined and clearly articulated elementary curriculum and set schedule of services would provide a foundation for program expansion at the secondary level.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

---

**D. SPECIAL EDUCATION**

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

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

The SDE maintains the responsibility for the general supervision of compliance with federal and state requirements for providing services for students with disabilities under IDEA and its amendments. Section 264 of the Oklahoma School Code states that each school district shall provide special education and related services for all children with disabilities who reside in that district in accordance with IDEA. This duty may be satisfied by:

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

Districts must develop an Individualized Education Plan (IEP) for each child receiving special education services under IDEA. The IEP must include input from the parent and regular education teachers, and be aligned with education plans for children in regular education classrooms.

IDEA requires districts to provide educational services in the “least restrictive environment” and to include students with disabilities in state and district assessment programs. Instructional arrangements for students may include:

- All instruction and related services in a regular classroom in a mainstreamed setting.
- A resource room where the student is removed from the regular classroom less than 50 percent of the day.

- 
- A self-contained classroom where the student is removed from the regular classroom more than 50 percent of the day.
  - A separate “self-contained” classroom for those whose disability is so severe that a satisfactory education cannot take place for any part of the day in a regular classroom.

In addition, a school district must be prepared to provide a more restrictive setting such as a day treatment program or residential treatment placements if the student’s needs and educational program requires a more restrictive placement.

The reauthorization of IDEA in 2004, which went into effect in July 2005, includes provisions significantly changing the way learning disabled students are identified. One change in the law addresses early intervention services and creating opportunities for scientific-based interventions to determine a student’s response to intervention (RTI). The RTI approach, as well as Positive Behavioral Interventions and Support (PBIS), is supported by the SDE as a means of identifying and serving special needs students.

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

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

- Pre-referral intervention in regular education.
- Referral to special education for evaluation.
- Comprehensive nondiscriminatory evaluation.
- Initial placement through an IEP meeting.
- Provision of educational services and supports according to a written IEP.
- Annual program review.
- Three-year re-evaluation.
- Dismissal from the Special Education Program.

The Special Education Program in IPS provides a service option within each program area in order to meet individual student needs. The district contracts for all related services that include speech therapy, occupational therapy, and physical therapy.

**Exhibit 2-23** shows comparison data on the percentage of special education students and the number of full-time equivalent (FTE) teachers in Special Education for 2008-09 in IPS, peer

districts, the community group, and the state. The percentage of IPS special education students is lower than the state, community group, and the peer districts. When comparing the number of Special Education teachers, IPS has the third highest number of teachers among peer districts. Compared to the community group and the state, IPS has a lower number of FTEs.

#### Exhibit 2-23

#### IPS and Peer District Students and Teachers in Special Education Programs 2008-09

Entity	Percentage of All Students	Teacher FTEs
<b>Indiahoma</b>	<b>11.3%</b>	<b>1.5</b>
Blair	14.5%	0.0
Butner	21.5%	1.9
Chattanooga	14.1%	1.3
Duke	13.4%	0.6
Verden	16.2%	2.0
<b>Community Group</b>	<b>14.1%</b>	<b>1.8</b>
<b>State Average</b>	<b>14.5%</b>	<b>8.2</b>

Source: Office of Accountability, Profiles District Report

From 2004-05 through 2007-08, IPS had a higher percentage of special education students than that of the peer group and the state. The percentage in IPS was lower than that of the community group in all years except 2007-08. In 2008-09, the percentage of Special Education students in IPS was lower than the peer group, community group, and state average (**Exhibit 2-24**).

#### Exhibit 2-24

#### IPS and Peer District Percentage of Special Education Students

Entity	2004-05	2005-06	2006-07	2007-08	2008-09
<b>Indiahoma</b>	<b>19.8%</b>	<b>19.5%</b>	<b>16.3%</b>	<b>22.6%</b>	<b>11.3%</b>
Blair	11.5%	11.4%	12.8%	16.1%	14.5%
Butner	16.4%	15.4%	17.4%	25.1%	21.5%
Chattanooga	13.4%	13.3%	12.5%	13.5%	14.1%
Duke	13.4%	12.1%	12.9%	15.2%	13.4%
Verden	14.5%	14.2%	14.3%	14.3%	16.2%
<b>Community Group</b>	<b>20.3%</b>	<b>20.9%</b>	<b>21.3%</b>	<b>21.2%</b>	<b>14.1%</b>
<b>State Average</b>	<b>15.2%</b>	<b>15.1%</b>	<b>15.1%</b>	<b>15.0%</b>	<b>14.5%</b>

Source: Office of Accountability, Profiles District Report

#### FINDING 2-7

IPS does not annually review the needs of the Special Education Program. A yearly review ensures that funding, staffing, and supporting interventions address the needs and learning goals of students.

The 2010 Special Education Child Count shows IPS with 42 students in eight different categorical areas. Of this number, 14 students are identified with Specific Learning Disability (SLD) and 18 as Speech and Language Impaired (SLI). In 2009, the Child Count showed 51 total

students with 20 identified as SLD and nine as SLI. The SLI students are served through contract services.

According to the superintendent, financial constraints of the district resulted in a staff reduction from 1.5 FTE and two assistants in 2009-10 to one teacher and an assistant for the 2010-11 school year. The one teacher serves as the director of Special Education and meets the highly qualified criteria in several content areas. In interviews with the superintendent and principal, the consultant team noted that financial constraints were the basis for reduction rather than on special education student needs in the established programs.

In interviews with the consultant team, teachers expressed concern about the Special Education Program and the broad spectrum of ages and multiple kinds of student disabilities assigned to the one teacher. The superintendent and principal shared that program challenges exist as the result of the staffing reduction. In 2009, the .5 FTE teaching position provided direct service to elementary students. With the elimination of this part-time position, elementary students are served in the resource room setting along with secondary students. The special education teacher shared with the consultant team that at some instructional times, early childhood students are in the resource room with secondary Algebra students. According to the special education teacher and the regular classroom teachers, the diversity of students served in one classroom with respect to age and service presents a significant challenge for meeting needs for students.

## RECOMMENDATION

**Review the needs of the IPS Special Education Program each year to ensure that decisions regarding funding, staffing, and supporting interventions specifically address the needs and learning goals of all students.**

The superintendent should convene a review team comprised of the principal, Special Education teacher, counselor, and general education teacher representatives to review and evaluate service delivery for each school year. A *Framework for Evaluation* is a possible resource for designing a process ([www.cdc.gov](http://www.cdc.gov)). The review process should consider an analysis of the existing services, program objectives, student demographics that include age, grade level, IEP requirements, staffing configurations, and certifications.

The principal should facilitate the process of analyzing the data, determining the findings, studying the implication of the findings, and developing recommendations for changes or improvements in the program. To determine staffing resources, all program areas should be reviewed and school-wide priorities established before Special Education staffing changes are made for the next school year.

Decisions regarding staff and funding allocations should be based on the annual review and address how available resources can best be used to serve students. Consideration should be given to issues of staff utilization, certification, and inclusive practices. Questions that might be posed as part of the process include: Is retaining a part-time reading specialist in 2011 a better use of resources than a part-time teacher in Special Education? What does the student performance data in reading show across the grade levels? What levels of service are prescribed

by IEPs? Can teachers reduce the need for pull out services by differentiating instruction or providing in class interventions?

The systematic review should result in a coordinated program of student support services. It should provide a means of adjusting the Special Education Program each year to address the needs of students and ensure successful program implementation.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### ***E. CAREER AND TECHNOLOGY EDUCATION***

The Oklahoma Department of Career and Technology Education (ODCTE) provides leadership and resources and assures standards of excellence for a comprehensive statewide system of career and technology education. With the goal to provide the world's best career and technology education system, ODCTE programs and services are offered in 29 technology center districts operating on 57 school campuses, 398 comprehensive school districts, 25 skill centers, and three juvenile facilities.

Most of Oklahoma's career and technology education students at the secondary level are enrolled in Career and Technology Education (CareerTech) programs in their local schools. In the 2010 fiscal year, a total of 1,355 CareerTech teachers in 398 comprehensive public school districts served a total enrollment of 139,675. These students were in grades six through twelve and were enrolled in CareerTech programs including family and consumer sciences, agricultural education, marketing education, business and information technology education, trade and industrial education, technology education, and health occupations education. In 2010, an additional, 17,080 secondary students enrolled at the CareerTech Centers for a variety of career and technology programs for high school and college credit.

The ODCTE programs and services as defined by the state board:

- Produce CareerTech graduates with marketable job skills and nationally recognized industry certification.
- Offer opportunities to nearly 75,000 students to gain leadership skills through program related student organizations.
- Collaborate with higher education for students to earn college credit.
- Use curriculum that meets the needs of and has been validated by business and industry.

CareerTech programs add value to students' high school careers. Not only do they meet the same academic standards required of all other students, they learn skills to manage the challenge of living and working in a diverse society. Their career and technology education classrooms provide a hands-on learning environment where they can increase technological proficiency, develop entrepreneurial skills, and gain practical experience. In addition, technology education

programs, designed for grades six through ten, also provide students the opportunity to explore and experience potential careers.

These comprehensive school programs focus on producing well-rounded students. Students learn theory in the classroom, practice their skills in labs and shops, and gain vital leadership and teamwork skills through their participation in one of seven career and technology student organizations. These organizations afford them the opportunity to participate in leadership and skill contests at the local, state, and national levels.

Since 1987, Oklahoma has been actively engaged in High Schools That Work (HSTW), the nation’s largest and oldest school improvement initiative for high school leaders and teachers. Both HSTW and CareerTech have a common goal to increase the number of students who meet the reading, math, and science performance goals. Most students are taught the essential content of college preparatory academic core and a career or academic concentration. The nation’s 1,200 school HSTW Network in 32 states focuses on raising student achievement. HSTW sites use *Making Middle Grades Work* framework of goals to raise student achievement and prepare them for further studies and careers. The CareerTech centers in the pilot will incorporate the HSTW framework as a means of increasing student achievement.

According to ODCTE, students who graduate from high school better focused on their future are more likely to succeed in college. In high school, CareerTech students begin assessing their strengths and thinking about what their competitive edge might be. They are much less naïve about the career they eventually select and can better think about long-term goals. While Career Tech helps students plan for the world of work, it also helps them prepare for further education and future success with “work-life readiness.”

IPS has two CareerTech teachers who offer high school students access to 11 courses with one computer course available to sixth grade students. Interviews indicated that the district is currently rebuilding and strengthening the current Agriculture Education program. The district hired a new teacher who is committed to increasing student enrollment, re-establishing community supported events, and improving parent involvement with the program.

**Exhibit 2-25** shows the high school courses and enrollment in the two available program areas of Agriculture Education and Technology Education.

**Exhibit 2-25  
IPS CareerTech Courses and Enrollment**

CareerTech Courses	Enrollment	CareerTech Courses	Enrollment
General Technology	10	Agriculture Orientation	6
Tech Ed I	7	Ag Communication	12
Tech Ed II	7	Intro to Agri Science	8
Computer Applications (2 classes)	18	Intro to Agri Mechanics and Power	5
Technology Education	9	Intro to Horticulture	8

*Source: IPS 2010-11 Enrollment Records*

Through Great Plains Technology Center, nine students participate in a variety of CareerTech programs. **Exhibit 2-26** shows the percentage of students in the graduating classes of 2007-2009 who participated in CareerTech occupationally specific programs in IPS, its peer districts, the community group, and the state. IPS has a participation percentage higher than three peer districts, the community group, and the state average.

**Exhibit 2-26**  
**IPS, Peer District, Community Group, and State**  
**CareerTech Occupationally Specific Program**  
**Participation Rate**  
**2007 through 2009**

Entity	Percentage of Students
<b>Indiahoma</b>	<b>75.8%</b>
Blair	48.3%
Butner	60.6%
Chattanooga	30.7%
Duke	95.1%
Verden	80.4%
<b>Community Group</b>	<b>34.4%</b>
<b>State Average</b>	<b>45.2%</b>

*Source: Office of Accountability, Profiles District Report*

## **FINDING 2-8**

Through a partnership with the Great Plains Technology Center, IPS students have access to career tech classes, remediation support, pre-engineering classes, and computer labs for online testing. The partnership supplements district programs and extends students' opportunities for career preparation and academic support.

In interviews with the consulting team, the superintendent and counselor described the district partnership with Great Plains Technology Center as an important academic program for students in the district. The Great Plains Technology Center provides not only the CareerTech classes, but offers IPS testing support, concurrent enrollment, career exploration activities for fifth grade students, campus tours, a pre-engineering program, and EOI remediation classes in mathematics. The Great Plains staff also visits the school campus to provide support and onsite assistance when requested by the district.

According to the counselor, the center facilitates regional collaboration by sponsoring area counselor meetings and area administrators' meetings on a regularly scheduled basis. This increases communication among districts and encourages regional partnerships and alliances.

## **COMMENDATION**

**IPS partners with the Great Plains Technology Center to supplement district programs and extend opportunities for career preparation and academic support.**

---

**F. GUIDANCE AND COUNSELING**

Oklahoma State Board of Education Accreditation Standards for guidance and counseling specify a written description of a guidance and counseling program with special provisions for at-risk students. According to standards, the program shall address assessed needs of all students, including those who are identified as at-risk and shall establish program goals, objectives, and evaluation. An organized program of Counseling and Guidance services includes: counseling services available to students; a planned sequential program of guidance activities that enhance students' development; appropriate referrals to other specialized persons, clinics, or agencies in the community; and coordinated services. Each counselor is to follow a planned calendar of activities based on established program goals and provide direct and indirect services to students, teachers, and/or parents.

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

The American School Counselor Association (ASCA) recommends that school counselors divide time between four components:

- Guidance Curriculum – The guidance curriculum is structured developmental lessons designed to assist students and infused systematically through K – 12 classrooms.
- Individual Student Planning – Counselors coordinate ongoing activities designed to assist students individually in planning.
- Responsive Services – Services address students' immediate needs for counseling.
- Systems Support – Counseling programs require administration and management.

Time allocated for each program component should depend on the developmental and special needs of the students served. While each district determines time allotments, ASCA recommends that school counselors spend 80 percent of their time in direct contact with students.

**Exhibit 2-27** shows the number of counselors and the Average Daily Membership (ADM) in 2008-09 for IPS and peer districts. The ADM for IPS includes the virtual school enrollment, which impacts comparison to peer districts. Data was not available to identify the (ADM) without considering virtual school enrollment.

**Exhibit 2-27**  
**Average Daily Membership and Counselor FTE**  
**IPS and Peer Districts**  
**2008-09**

Entity	Average Daily Membership	Counselor FTE
<b>Indiahoma</b>	<b>*312.6</b>	<b>0.5</b>
Blair	271.6	0.7
Butner	224.1	0.5
Chattanooga	277.0	0.2
Duke	180.5	0.4
Verden	287.9	1.0
<b>Community Group</b>	<b>339.6</b>	<b>0.8</b>
<b>State Average</b>	<b>1,194.3</b>	<b>3.1</b>

*Source: Office of Accountability, Profiles District Report*  
*\*Includes virtual school enrollment.*

In the Office of Accountability Report Cards for Indiahoma for 2007-08 and 2009, Indiahoma reported a 0.5 counselor. The 2006-07 Report Card had a self-report from Indiahoma of 0.0 counselor. The consulting team noted that IPS expanded the 0.5 position to a full-time position for 2009-10. The student to counselor ratio for 2010-11 indicates that one full-time counselor serves 210 students in grades PreK through 12th.

### **FINDING 2-9**

IPS provides a career exploration and job shadowing program based on interest inventories and organized around career clusters. Career exploration opportunities provide students with academic focus and direction for post-secondary planning.

In interviews with the consulting team, the counselor and teachers shared that high school students receive encouragement and support for exploring careers and setting post-secondary goals. The counselor works with each student to identify a career exploration focus by using an interest inventory, EPAS profiles, and career clusters framework. Once the student identifies a career focus, the counselor works with local businesses and professionals in the region to provide the student with job shadowing experiences in the chosen career cluster. In follow-up to the career exploration experiences, the counselor offers advisement sessions to assist students in selecting courses and making post-secondary decisions. According to the counselor, extensive counseling support is provided to seniors in conjunction with their career exploration activities.

### **COMMENDATION**

**IPS has a career exploration and job shadowing program that provides students with academic focus and direction for post-secondary planning.**

---

**FINDING 2-10**

IPS has no written guidance and counseling plan for grades PreK-12th. Without a comprehensive plan, student needs are not addressed across levels and guidance services are not available to all students.

IPS focuses guidance and counseling services at the secondary level by providing career exploration activities, college preparation support, transcript verification, and academic advisement. There is no written description of a guidance and counseling program or a counselor's schedule of activities to guide program activities for PreK-12.

In interviews, the superintendent, principal, and counselor shared that the district does not provide a balanced guidance and counseling program. Each staff member expressed that the counselor was overloaded with administrative and secondary level responsibilities. According to the superintendent and principal, these job duties increased over the past few years due to changes in administration at the secondary level. The principal shared that consideration is being given to the possible reassignment of test coordination duties to other staff in order to provide more time for the counselor to work with the elementary school. Interviews indicated that previous discussions with the counselor focused on the need to revise the job description in order to provide a balanced program for all students.

Counseling services are only provided to elementary students to address critical incidents and support students on as needed basis. The counselor and teachers stated there are no scheduled guidance activities for elementary students, but the counselor does schedule and coordinate their field trips, bus safety, and the Drug Abuse Resistance Education (D.A.R.E.) program.

Districts with a defined program and comprehensive Counseling Plan provide consistent guidance instruction in social skills, drug education, character education, conflict resolution, or other necessary skills and learning experiences. Duncan Public Schools has an articulated program with a written guidance plan that provides a consistent curriculum across grades levels and addresses student needs at all levels and could be used as a resource.

**RECOMMENDATION**

**Develop a Guidance and Counseling Plan that provides a comprehensive program for grades PreK-12th to address student needs across levels and provides guidance services for all students.**

The principal should work with the counselor to develop a district plan that coordinates the activities and programs across schools. *The School Counselor's Guide*, published by SDE, may be used as a guide for the planning process and as a framework for a written plan (<http://sde.state.ok.us/Schools/Counseling/pdf/CounselGuide.pdf>). The guide outlines "The Characteristics of Low-Performing and High- Performing Counseling Programs" and offers program assessment tools.

In planning a comprehensive program, the principal and counselor should:

- 
- Assess the current status of the counselor’s responsibilities by doing a Time-and-Effort study using the *School Counselor Activity Record*.
  - Survey teachers for ideas using the survey forms in the program guide.
  - Analyze time and effort records and survey responses to define program components, develop or select guidance curriculum, and revise the counselor’s job description.
  - Confer with elementary teachers in establishing the Guidance curriculum and a specific guidance schedule.
  - Meet with secondary teachers to share survey results and discuss program ideas that should include exploration of a teacher advisement process (<http://www.sreb.org>).
  - Write a draft plan that addresses the goals and activities outlined in the SDE guide.

Based on information from the above sources, the principal and counselor should explore options for redefining or reassigning responsibilities to develop a revised job description. Options might include the reassigning of test coordination responsibilities and developing a shared approach to student advisement as used in the High Schools That Work (HSTW) program. In high schools in HSTW programs, all teachers serve as advisors to students and parents to help set goals and select the right courses to prepare for post-secondary studies and careers (<http://www.sreb.org>).

In finalizing the plan, superintendent should work with the principal and counselor to ensure the program can be successfully implemented and includes services and a Guidance curriculum for all grade levels. A final copy of the plan should be shared with teachers before adoption and publication.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **G. FEDERAL PROGRAMS**

No Child Left Behind was a landmark education reform act designed to improve student learning and change the culture of schools. In addition, it changed the structures of federal funding to public schools. In exchange for the higher accountability imposed by the law, states, and school districts have more flexibility in how they can use federal funds.

The act also creates flexibility for state and local demonstration programs by allowing selected states and districts to consolidate federal funds to be used for any purpose authorized under the Elementary and Secondary Education Act, as amended by NCLB. This is to assist districts in meeting annual yearly progress (AYP) and narrowing the achievement gap.

The SDE requires all districts to submit a consolidated plan each year for the utilization of the federal funds that include Title I, Title II, Title III, Title IV, Title V, and Title VI depending on the eligibility of the district to access the funds. In addition to the consolidated plan funds,

districts are also required to submit plans for other funds such as those allocated for Title VII (Indian Education), Gifted Education, and Reading Sufficiency.

In rural districts, where the funds allocated under the Improving Teacher Quality (Title II-A), Educational Technology (Title II-D), Safe and Drug-free Schools (Title IV), and Innovative Programs (Title V) are minimal, they are combined into the Rural Education Achievement Program (REAP) allocation to any one of these programs. The REAP allocation is then available to be used in conjunction with the Title I program. This allows school districts to use funds to address particular needs, such as hiring new teachers, increasing teacher pay, and improving teacher quality through professional development.

IPS receives Title I funds and identifies the elementary and high school as school-wide Title I programs. For 2010-11 IPS received a total of \$58,602 in Title I funds with \$54,400 used for salaries. These funds provide salaries for two paraprofessionals, a part-time Title I reading teacher, and math tutorial support for middle school students.

As a rural district, IPS also received a REAP combined allocation of \$22, 131 for 2010-11, which was used for computers, contract services, and instructional supplies. Additional federal funding to the district includes a Title VII allocation of approximately \$12,000 for Indian Education.

The IPS operating budget is comprised of local, state, and federal funds. Compared to peer districts, IPS has the lowest percentage of local funds allocated for program support. The percentage of state funds for IPS is higher than both the community group and state averages. The percentage of federal funding for IPS is higher than funding in peer groups and the average of the community group and the state (**Exhibit 2-28**).

**Exhibit 2-28**  
**IPS, Peer Districts, Community Group, and State**  
**Percentage of Revenue from Funding Sources**  
**2008-09**

Entity	Percentage from Local Funds	Percentage from State Funds	Percentage from Federal Funds
<b>Indiahoma</b>	<b>17.3%</b>	<b>65.6%</b>	<b>17.1%</b>
Blair	22.4%	68.4%	9.2%
Butner	26.6%	58.3%	15.2%
Chattanooga	21.9%	69.1%	9.0%
Duke	39.4%	50.1%	10.6%
Verden	29.9%	55.8%	14.4%
<b>Community Group</b>	<b>35.4%</b>	<b>54.6%</b>	<b>10.0%</b>
<b>State Average</b>	<b>34.5%</b>	<b>52.0%</b>	<b>13.6%</b>

*Source: Office of Accountability, Profiles District Report*

**FINDING 2-11**

IPS does not have a coordinated Indian Education program. Without program coordination, students do not receive the benefit of resources allocated to provide educational support.

IPS student enrollment for 2008-09 indicates that 24 percent of the students are Native American. While funding for Indian Education is limited, financial records show Title VII allocations of \$11,808 for 2007-08 and \$14,779 for 2008-09. The principal reported that IPS does not have access to Johnson O'Malley (JOM) funds, making Title VII the only source of supplemental funds for targeted services. No program plan was available for review.

In interviews with the consultant team, the principal and superintendent stated that tutorial support for Native American students is integrated in the 21<sup>st</sup> Century Community Learning Center (21<sup>st</sup> CCLS) program. The principal emphasized the value of integrating support into existing tutorials rather than singling students out for targeted services. An effort was made by the superintendent to arrange a Comanche language class for elective credit, but an acceptable instructor was not available.

The superintendent indicated that the encumbrance clerk determines how the Title VII funds will be expended for services. According to the clerk, the funds for 2010-11 are used for partial payment of a teacher's salary that provides tutorial support to Native American students. In an interview with the consulting team, the teacher reported offering tutorial services as part of the 21<sup>st</sup> CCLC program, which is accessible to all students. The consulting team noted that the teacher was not aware of the specific responsibility to provide support to Native American students, and as a result, did not monitor their attendance or academic progress.

The mission of the Indian Education program, according to Title VII, Part A, is to meet the unique educational and culturally related academic needs of Native American students so they can be successful in meeting state standards. Each funded LEA is expected to provide services and activities that are designed to supplement and enrich the regular school programs with special regard to the language and cultural needs of Indian students. An LEA may submit a plan to provide services through an integrated approach or as part of a consolidated school-wide plan. Both approaches require that a district meet certain requirements and have special state and federal approval.

## **RECOMMENDATION**

### **Develop a coordinated Indian Education program to ensure that students receive the supplemental educational support allowed by the allocated resources.**

In developing a comprehensive program, the superintendent and principal should convene the District Title VII Parent Committee to review the current status of support services, study the provisions of the law (<http://www2.ed.gov/policy/elsec/leg/esea02/pg99.html>), and determine possible program goals. Establishing program goals should include an analysis of available resources including potential partnerships and funding sources. Parent committee members should work with tribal officials to explore the possibilities of IPS accessing the Comanche Nation Student Services K-12 Program for qualified students and develop a partnership with the Comanche Cultural Center ([www.comanchenation.com](http://www.comanchenation.com)).

As committee members explore possible program options, current student academic performance data should be reviewed. State data reports for grades 3-12 do not provide performance results for Indian students as a sub group because the number of students tested at a given grade is less

than 30. As a result, the principal should work with the core academic teachers to disaggregate the data to determine the cumulative performance of the students.

Using student performance data, attendance reports, and student grade reports, the principal and teachers should work with the parent committee to finalize program goals, identify support activities, and determine allocation of resources. In drafting the final program plans, the team should explore model programs such those coordinated by Oregon's Northwest Regional Education Service District. To provide an integrated approach, student services should be embedded in existing programs with designated staff assigned to promote and monitor student learning. The final plan should be submitted for approval of integrated services, and the approved plan should determine the expenditure of program allocations (<http://www.nwresd.k12.or.us/instrserv/indianed/index.html#FAQ3>).

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### ***H. TEXTBOOKS***

The State Board of Education determines the textbook allocation to be distributed to school districts across the state and adopts rules for the issuance and preservation of textbooks. Based on yearly legislative appropriations, the textbook allocation is calculated and distributed in July of each year and adjusted in December. The initial allocation is calculated based on the audited end-of-year average daily attendance of the preceding school year multiplied by \$55.

The allocations are required to be expended for textbooks unless legislative action suspends that requirement due to state school finance issues. In 2010, the legislature passed House Bill 3029, which waives the textbook selection and procurement process for the school years ending 2011 and 2012.

In the spring semester of 2010, IPS implemented the textbook review process to select mathematics textbooks as per the state adoption procedures and schedule. With the passage of HB 3029, the district chose not to purchase math books but to use the funds for other student needs. In interviews with the consulting team, teachers stated that they selected books by the same publisher as the previous math adoption, so foregoing the purchasing of books would not negatively impact instruction. Teachers were in agreement with the district's decision to not purchase new textbooks for 2010-11 due to financial constraints.



*Chapter 3:*

*Business Operations*

---



## *Chapter 3*

# ***Business Operations***

This chapter encompasses the following areas of business operations in Indianhoma Public Schools (IPS):

- A. Auditing and Internal Controls
- B. Financial Processes
- C. Asset and Risk Management
- D. Activity Fund

The financial planning and budgeting process of IPS must encompass district goals and include meaningful and measurable outcomes so that the district can accurately account for the use of their resources to their taxpayers and governmental funding sources. In order to monitor the progress of the budget and the programs supported by the adopted budget efficiently, IPS must provide its Board of Education with timely, accurate, and useful reports concerning its financial condition. This, in turn, allows the Board of Education to make informed decisions.

Members of the Board of Education, the superintendent, and other administrators of the district have a fiduciary responsibility to protect the publicly financed assets of the district in addition to efficiently accomplishing their daily financial management duties. Members must also ensure IPS's ongoing financial viability by ensuring that internal controls are in place and financial processes are efficient.

### ***Background***

Oklahoma law provides School Boards with specific responsibilities including the oversight of investments and activity funds. A School Board is allowed to contract with the county treasurer to manage its accounts, or it may choose to appoint someone locally. The IPS School Board has elected to appoint someone locally to serve as the district's treasurer. In addition to the treasurer function, a School Board must annually appoint an encumbrance clerk, activity fund custodian, and a minute's clerk. In IPS, the encumbrance clerk is also the minute's clerk for the Board of Education. They are responsible for School Board materials and minutes and act as activity fund custodian, whose primary responsibility is accounting for and reporting on activity fund transactions.

Based upon size, geography, and demographics, the Office of Accountability selected five Oklahoma school districts to serve as peer districts for comparative purposes: Butner, Duke, Verden, Chattanooga and Blair. For further comparison, a community group average is also used throughout this chapter. IPS falls into Community Group G1 for the 2008-09 fiscal year, primarily due to the assignment of students from the Oklahoma Virtual Academy program. Community Group G1 includes districts with average daily memberships (ADM) of between 250 and 499 students. The "1" indicates that the percentage of IPS students eligible for free and reduced price meals was below the state average. For years prior to 2008-09, IPS fell into community group H2, which includes districts with average daily memberships (ADM) of fewer

than 250 students. The “2” indicates that the percentage of IPS students eligible for free and reduced price meals was above the state average.

### ***Financial Statements***

Financial statements for IPS are prepared based upon the requirements of the State Department of Education that require funds to be combined by fund type and for the financial statements to be prepared on the basis of these combined funds. The accounts of the district are organized on the basis of funds, each of which is considered to be a separate entity. The operations of each fund are accounted for by providing a separate set of self-balancing accounts that comprise its assets, liabilities, fund balances, revenues, and expenditures. Therefore, the financial statements include only the four fund types illustrated in **Exhibit 3-1**.

**Exhibit 3-1**  
**Funds Contained in the IPS Annual Financial Report**

<b>Type</b>	<b>Purpose</b>
General Fund	Account for all revenue and expenditures applicable to the general operations of the district.
Special Revenue Fund	Account for the results of the Building and Child Nutrition Fund.
Sinking or Debt Service Fund	Account for the sinking funds for all revenue and expenditures of general long-term debt principal, interest and related costs.
Agency Fund	Accounts for the activities of various student groups

*Source: IPS Annual Financial Statements dated June 30, 2009*

The district’s financial statements demonstrate compliance with the cash basis and budget laws of the State of Oklahoma. Revenues are recorded as received in cash, except for revenues susceptible to accrual and material revenues that are not received at the standard time of receipt. Expenditures are recorded in the accounting period in which the fund liability is incurred and encumbered.

### ***Oklahoma Cost Accounting System***

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

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

OCAS requires districts to report expenditures in five broad areas on their annual financial report: instruction, non-instructional, support services, capital outlay, and other. Expenditures directly associated with student success in the classroom such as teacher salary, counseling and support, and nursing services are reported as instructional or support services. Non-instructional expenditures would be those expenditures associated with non-educational services to the students, community, and staff.

### ***Revenue Sources***

General fund revenues from state sources for current operations are primarily governed by the State Aid Formula under the provisions of Article XVIII, Title 70 of the Oklahoma School Code. The Oklahoma State Board of Education administers the allocation of state funding to school districts based on information accumulated from the district.

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

- No less than five mills of a total of 15 mills levied for county, municipal, and school district purposes;
- Fifteen mills levied specifically for school district purposes;
- An emergency levy of five mills; and
- Ten mills levied for local support.

A mill is the equivalent of \$1 per \$1,000 of net asset valuation. IPS had adopted permanent millage for the general fund and the building fund. Therefore, the emergency and local support mill levies are no longer subject to yearly voter approval, and IPS annually receives into its general fund the proceeds of 35 mills levied on the net assessed valuation of the property within the district boundaries.

Assessment ratios for real and personal property are determined locally by each county assessor within guidelines established by the State Board of Equalization and the Oklahoma Tax Commission. Property within the IPS district boundary had a net valuation of \$4,336,202 in 2009, consisting of assessed property located in Comanche, Kiowa, and Tillman Counties.

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

State funding is distributed via a weighted formula, which attempts to recognize the cost of providing an education, which varies with both the student and district. Students are weighted both upon grade level placement and the type of services needed. Student weights are calculated at 1.0 for grades four to six and at a higher rate for grade levels above and below this level. Students needing special services such as visually impaired, economically disadvantaged, and bilingual students receive further weighted funding ranging from 0.25 to 3.8 per student.

Ad valorem taxes for bond issues are required by statute to be collected by the County Treasurer and remitted to the school district for deposit into the sinking fund. The annual ad valorem tax rates for sinking fund purposes are determined by ascertaining the actual dollars of revenues required for payment of principal and interest on indebtedness, fees to fiscal and paying agents, and judicial judgments. The total debt service requirements may be reduced by any surplus from the prior fiscal year or any direct contributions made into the sinking fund. A reserve for delinquent taxes, in an amount of not less than five percent and not more than 20 percent of the net required tax collections, is added to the required debt service collections. The final total requirements for both debt service and general fund are then divided by the total net assessed valuation of all real, personal, and public service property in order to determine the appropriate tax rate for each property owner.

The amounts contained in the Estimate of Need are verified by the County Excise Board and upon verification, the levy is ordered to be certified to the County Assessor in order that the County Assessor may extend the levy upon the tax rolls for the year, which the Estimate of Need is submitted. While the County Excise Board may make recommendations with respect to the district's levy request, it only has authority to change the reserve for delinquent taxes.

The County Assessor is required to file a tax roll report on or before October 1 of each year with the County Treasurer, indicating the net assessed valuation for each municipality with the County. The County Treasurer has 15 days after receipt of the tax roll report to start collecting taxes. Fifty percent of the levy is due and payable on November 1<sup>st</sup> with the remainder due and payable on or before April 1<sup>st</sup>. In the event that the taxpayer does not remit their November 1<sup>st</sup> tax payment, the entire amount outstanding is declared delinquent as of January 1<sup>st</sup>.

Interest accrues on delinquent taxes at the rate of 1.5 percent monthly or 18 percent annually to a maximum of 100 percent of the taxes due and outstanding until such time as the delinquent taxes are paid. In the event that taxes are not paid, the property is sold at a tax sale on October 1<sup>st</sup> and the purchaser is issued a certificate of tax lien; however, the original owner of the property has two years in which to redeem the property by paying the outstanding tax, interest, and penalty. If, at the end of two years the original owner has not redeemed the property, the purchaser may then apply for a deed to the property. If there is no purchaser, then the county acquires the same lien and the property is auctioned after approximately two and one-half years.

The average assessed property value per student for IPS has increased with the exception of FY2009, but not at the rate of the majority of its peers. The average assessed property value per student of the district remains below the community group and state averages as illustrated in **Exhibit 3-2**.

**Exhibit 3-2**  
**Average Assessed Property Value per Student**  
**IPS, Peer Districts, Community Group, and State**

Entity	FY2005	FY2006	FY2007	FY2008	FY2009	Percentage Change
<b>Indiahoma</b>	<b>17,096</b>	<b>17,660</b>	<b>19,807</b>	<b>21,731</b>	<b>14,935</b>	<b>(12.6%)</b>
Blair	18,132	17,900	20,020	22,123	22,350	<b>23.3%</b>
Butner	24,636	24,531	23,684	29,385	30,916	<b>25.5%</b>
Chattanooga	26,659	27,362	26,655	29,415	29,344	<b>10.1%</b>
Duke	58,826	51,723	50,654	52,081	55,193	<b>(6.2%)</b>
Verden	30,751	27,023	31,567	29,790	29,311	<b>(4.7%)</b>
<b>Community Group</b>	<b>34,551</b>	<b>37,268</b>	<b>35,881</b>	<b>36,212</b>	<b>50,308</b>	<b>45.6%</b>
<b>State Average</b>	<b>31,431</b>	<b>33,063</b>	<b>34,815</b>	<b>37,366</b>	<b>38,875</b>	<b>23.7%</b>

*Source: Office of Accountability, Profiles Database and WCL ENTERPRISES calculations*

District enrollment and property values directly influence the amount of revenue received from local, intermediate, and state sources. A comparison of the historical ADM trends in IPS indicates that enrollment has increased by 34.2 percent, the highest among peers and higher than the state average (**Exhibit 3-3**). The increase includes the students enrolled in the virtual school program.

**Exhibit 3-3**  
**Student ADM for Selected Years**  
**IPS, Peer Districts, Community Group, and State**

Entity	FY2005	FY2006	FY2007	FY2008	FY2009	Percentage Change
<b>Indiahoma</b>	<b>232.9</b>	<b>230.8</b>	<b>208.5</b>	<b>199.4</b>	<b>312.6</b>	<b>34.2%</b>
Blair	303.2	307.1	282.3	266.6	271.6	<b>(10.4%)</b>
Butner	286.6	286.2	287.7	250.7	224.1	<b>(21.8%)</b>
Chattanooga	261.5	263.0	280.9	260.2	277.0	<b>5.9%</b>
Duke	187.0	206.0	201.9	190.3	180.5	<b>(3.5%)</b>
Verden	318.1	323.5	328.0	321.6	287.9	<b>(9.5%)</b>
<b>Community Group</b>	<b>151.3</b>	<b>148.7</b>	<b>146.3</b>	<b>348.0</b>	<b>339.6</b>	<b>124.5%</b>
<b>State Average</b>	<b>1,153.5</b>	<b>1,162.2</b>	<b>1,172.2</b>	<b>1,176.7</b>	<b>1,194.3</b>	<b>3.5%</b>

*Source: Office of Accountability, Profiles Database and WCL ENTERPRISES calculations*

IPS receives a lower percentage of local revenues as compared to the community group and state average. IPS receives a higher percentage of state and federal revenues as compared to the state average. In relation to its community group, IPS receives a higher percentage of state and federal funds as illustrated in **Exhibit 3-4**.

**Exhibit 3-4**  
**Sources of Revenue as a Percentage of Total Revenue, All Funds**  
**IPS, Community Group, and State**

Source of Revenue		FY2005	FY2006	FY2007	FY2008	FY2009
Local and	<b>Indiahoma</b>	<b>22.5%</b>	<b>21.9%</b>	<b>20.2%</b>	<b>20.5%</b>	<b>17.3%</b>
County	Community Group	24.5%	25.1%	24.3%	24.3%	35.4%
	State	34.1%	34.3%	34.8%	34.9%	34.5%
State	<b>Indiahoma</b>	<b>54.1%</b>	<b>61.9%</b>	<b>64.0%</b>	<b>61.6%</b>	<b>65.6%</b>
	Community Group	53.3%	54.6%	56.3%	57.2%	54.6%
	State	52.2%	52.2%	52.7%	53.3%	52.0%
Federal	<b>Indiahoma</b>	<b>23.4%</b>	<b>16.2%</b>	<b>15.8%</b>	<b>17.9%</b>	<b>17.1%</b>
	Community Group	22.2%	20.3%	19.4%	18.5%	10.0%
	State	13.8%	13.5%	12.5%	11.8%	13.6%

*Source: Office of Accountability, Profiles Database*

### Expenditures

In FY2009, the district expended 61.0 percent of its funds on instruction, which is higher than the amount expended within the community group and state averages. The district expenditure of \$7,598 per student, however, is lower than the community group and the state averages as illustrated in **Exhibit 3-5**.

**Exhibit 3-5**  
**IPS, Community Group, and State Categorical Expenditures, All Funds**  
**FY2009**

Expenditure Category	Indiahoma		Community Group Average		State Average	
	Percentage of Total Expenditures	Expenditure Per Student	Percentage of Total Expenditures	Expenditure Per Student	Percentage of Total Expenditures	Expenditure Per Student
Instruction	61.0%	\$4,635	55.5%	\$4,779	55.4%	\$4,310
Student Support	6.0%	458	5.6%	483	6.8%	529
Instructional Support	2.6%	194	2.2%	188	3.5%	270
District Administration	5.0%	379	5.4%	462	2.9%	228
School Administration	3.3%	247	5.1%	436	5.5%	429
District Support	15.1%	1,145	17.2%	1,480	17.3%	1,344
Other	7.1%	540	9.2%	789	8.6%	670
<b>Total</b>	<b>100%</b>	<b>\$7,598</b>	<b>100%</b>	<b>\$8,617</b>	<b>100%</b>	<b>\$7,780</b>
Debt service in addition to above		\$141		\$285		\$617

*Source: Office of Accountability, Profiles Database*

When comparing the dollar amount of funds expended on a per student basis within the general fund, IPS expended the second lowest per student amount as illustrated in **Exhibit 3-6**.

**Exhibit 3-6  
General Fund Expenditures per Student  
IPS, Peer Districts, and Community Group  
FY2009**

District	Salaries & Benefits	Contracted Services	Supplies	Other	Total
<b>Indiahoma</b>	<b>4,513.89</b>	<b>1,974.57</b>	<b>1,285.07</b>	<b>207.44</b>	<b>7,980.98</b>
Blair	5,833.00	410.79	998.61	569.24	7,811.63
Butner	7,002.51	2,047.28	2,671.49	400.64	12,121.91
Chattanooga	6,493.62	1,765.42	1,741.63	236.74	10,237.41
Duke	7,013.09	681.38	1,637.35	2,690.69	12,022.50
Verden	6,565.54	798.12	2,669.06	317.44	9,750.17
<b>Community Group</b>	<b>6,581.55</b>	<b>1,140.60</b>	<b>1,823.63</b>	<b>842.95</b>	<b>10,388.73</b>

*Source: Oklahoma Cost Accounting System and WCL ENTERPRISES calculations*

IPS expended less from general funds for salaries and benefits in the instructional, general administration, school administration, business and auxiliary functions and more in Guidance and Health and instructional staff functions than the group average. Also, IPS expended less in general funds than the group average for salaries and benefits in the business function as illustrated in **Exhibit 3-7**.

**Exhibit 3-7  
General Fund Salary and Benefit Expenditures per Student  
IPS, Peer Districts, and Community Group  
FY2009**

District	Instruction	Guidance & Health	Instructional Staff	General Adm.	School Adm.	Business	Auxiliary
<b>Indiahoma</b>	<b>3,131.27</b>	<b>154.36</b>	<b>166.70</b>	<b>330.74</b>	<b>247.30</b>	<b>56.92</b>	<b>380.10</b>
Blair	4,094.35	62.62	117.18	460.93	449.73	86.49	314.58
Butner	4,802.81	151.16	8.11	443.83	893.57	0.00	587.97
Chattanooga	4,365.54	83.71	136.80	474.72	628.92	130.90	673.03
Duke	4,794.97	128.21	236.81	550.86	440.41	86.14	305.16
Verden	4,358.16	245.99	157.31	417.42	593.32	130.53	271.88
<b>Community Group Average</b>	<b>4,483.16</b>	<b>134.34</b>	<b>131.24</b>	<b>469.55</b>	<b>601.19</b>	<b>86.81</b>	<b>430.52</b>

*Source: Oklahoma Cost Accounting System and WCL ENTERPRISES calculations*

**Fund Balance**

The fund balance, often referred to as “carryover,” is defined as the excess of assets over liabilities and is used in future years to offset any revenue shortfalls or negative mid-year adjustments that may occur. Fund balance is seen as the amount of cash that is not obligated to purchase orders, contracts, outstanding warrants, or unmatured obligations. A healthy fund balance is beneficial to a school district by permitting longer investment terms and bridging the

inevitable gaps of low cash flow, which are normally the first six months of the fiscal year before the ad valorem taxes are collected by the county treasurer and distributed to school districts.

A school district's fund balance policy provides guidance for the development and implementation of an annual budget. Oklahoma public school laws provide limits regarding the allowable year-end balance. Title 70, Section 18 of Oklahoma Statutes provides the maximum amount as a percentage of total general fund collections that a school district is allowed to maintain as a fund balance. **Exhibit 3-8** shows the table of maximum allowable balances.

**Exhibit 3-8**  
**Maximum Allowable General Fund Balances**  
**at Year End**

General Fund Collections	Allowable Percentage of Collections Held as End of Year Balance
Less than \$1,000,000	40%
\$1,000,000 - \$2,999,999	35%
\$3,000,000 – \$3,999,999	30%
\$4,000,000 – \$4,999,999	25%
\$5,000,000 – \$5,999,999	20%
\$6,000,000 – \$7,999,999	18%
\$8,000,000 – \$9,999,999	16%
\$10,000,000 or more	14%

*Source: SDE Technical Assistant Document, July 2009*

Based upon general fund collections of between \$1,000,000 and \$2,999,999 in FY2009, the district would be able to reserve up to 35 percent as a fund balance. **Exhibit 3-9** provides the IPS fund balances for the last five years. During this time period, IPS fund balances have stayed consistently between 12 and 17 percent. For FY 2009, state regulations would have allowed IPS to have a maximum year-end fund balance of \$842,124.

**Exhibit 3-9**  
**IPS General Fund Balance for Selected Years**

	FY2005	FY2006	FY2007	FY2008	FY2009
New Revenue	\$1,714,169	\$1,592,631	\$1,658,083	\$1,762,703	\$2,188,044
Fund Balance	\$193,398	\$266,483	\$222,927	\$287,513	\$215,733
Revenue + Fund Balance	\$1,907,568	\$1,859,113	\$1,881,010	\$2,050,216	\$2,403,776
Non-Revenue Receipts	\$1,683	\$1,826	\$6,061	\$4,008	\$2,293
Expenditures	\$1,642,841	\$1,638,040	\$1,599,558	\$1,838,630	\$2,146,964

*Source: IPS Financial Records and OCAS Data*

**Activity Fund**

Activity Funds are administered in accordance with Oklahoma State Statute, Title 70, Section 5.129, and can be defined as funds that consist of resources received and held by the school as trustee to be expended or invested in accordance with conditions of the trust. Specifically, they

are funds accumulated from various district approved fund raising activities, membership dues or fees, commissions, interest income, and donations. These funds are to be used to promote the general welfare of the school and the educational development and morale of students.

**Bonds**

Article X, Section 26 of the Oklahoma Constitution prohibits school districts from issuing debt without approval by “60 percent plus 1” of the district’s voters. A district’s outstanding debt is limited to 10 percent of its assessed valuation. The issued debt may be used for the purpose of acquiring or improving school sites, constructing, repairing, remodeling or equipping buildings, or acquiring school furniture, fixtures, or equipment.

The June 30, 2009 financial statement of the district indicated that the district had outstanding long-term debt of \$465,042 illustrated in **Exhibit 3-10**. The proceeds of these debt issues were used for facility construction and related improvements, and a capital lease to acquire a 2006 Ford F150 truck, and repair, remodel, or replace windows and roofs on existing buildings.

State statutes prohibit the district from becoming indebted in an amount exceeding the revenue to be received for any fiscal year without approval by the district’s voters. Bond issues have been approved by the voters and issued by the district for various capital improvements. These bonds are required to be fully paid serially within 25 years of the date of issue.

General long-term debt of the district consists of a capital lease and bonds payable. The following **Exhibit 3-10** is a summary of the long-term debt transactions of the district for the year ended June 30, 2009.

**Exhibit 3-10**  
**IPS Schedule of Outstanding Long-Term Debt**  
**As of June 30, 2010**

	<b>Bonds Payable</b>	<b>Capital Lease</b>	<b>Total</b>
Balance, July 1, 2008	\$200,000	27,102	227,102
Additions	\$0	289,016	289,016
Retirements	(35,000)	(16,076)	(51,076)
<b>Balance, June 30, 2009</b>	<b>\$165,000</b>	<b>300,042</b>	<b>465,042</b>

*Source: IPS June 30, 2009 Audited Financial Statements*

IPS’s debt service expense per student is the third lowest of its peers and is below the state average, as illustrated in **Exhibit 3-11**. The debt service expenditures per student are based upon the amount of outstanding debt and number of students a district has during a particular school year. Districts must balance facility and equipment needs with the amount of money requested of district taxpayers, which typically requires issuing debt.

**Exhibit 3-11**  
**Debt Service Expenditures per Student**  
**IPS, Peer Districts, Community Group, and State**  
**FY2009**

Entity	Debt Service per Student
<b>Indiahoma</b>	<b>\$141</b>
Blair	\$205
Butner	\$0
Chattanooga	\$0
Duke	\$841
Verden	\$174
<b>Community Group</b>	<b>\$285</b>
<b>State Average</b>	<b>\$617</b>

*Source: Office of Accountability, Profiles Database*

### **A. AUDITING AND INTERNAL CONTROLS**

Independent audits are required from every public school district in Oklahoma and must be performed by an auditing firm approved by the Oklahoma State Department of Education (SDE). External audits provide the local Board of Education and taxpayer's assurance that all state and federal areas of compliance have been followed by the school district and inform them of any exceptions to these laws that were found. Today's successful financial managers feel that the annual independent audit process, if received properly by school districts, can be a good way to find opportunities for improvement in financial operations and related internal controls.

Internal accounting control is a process affected by the School Board, administration, and other personnel. It is designed to provide reasonable assurance regarding the reliability of financial reporting, the effectiveness and efficiency of operations, and compliance with applicable laws and regulations.

A school district establishes internal accounting controls based upon judgments by its administration. Circumstances such as the size of the district and the number of personnel available for this function affect the administration's judgment regarding the extent of internal accounting controls. Furthermore, the administration must consider the relationship between costs and benefits when establishing internal accounting controls.

### **FINDING 3-1**

The WCL ENTERPRISES consulting team noted a number of internal control weaknesses during the site visit, some of which are considered serious. Without appropriate internal control over assets, financial reporting, and compliance with grants and other contracts, IPS risks the loss of funds.

Internal control weaknesses that were noted during the site visit, included:

- One employee handles both the accounting and payroll functions, creating an internal control

---

weakness with one person having access to both cash and the accounting records.

- The district does not have an accounting procedures manual. Lack of documented accounting procedures constitutes an internal control weakness.
- There are no written purchasing procedures, creating a number of operational, compliance, and internal control problems:
  - IPS does not obtain bids or quotes for any purchase.
  - IPS does not “piggy-back” on bids or quotes from larger school districts within the county (Lawton, Cache, or Elgin) to obtain better rates for services, supplies, or equipment.
  - IPS does not use appropriate OCAS codes on purchase orders to indicate local, state, or federal grant expenditures.
  - IPS does not use requisitions before issuing a purchase orders.
  - The district enters all purchase orders for a given month at the same time and without superintendent or designee approval.
  - IPS documentation controls for the receipt of materials and services is not present, creating an internal control weakness. The consulting team noted that IPS staff received materials or services without signing and dating either a receiving report (packing slip) or vendor invoice.
- Budgeting and financial reporting processes are inadequate for board and superintendent operational purposes:
  - The district does not present a final operating budget to the IPS Board of Education.
  - IPS monthly School Board reports do not include comparative data to the previous fiscal year to allow the School Board and the public to better understand the district’s finances.
  - There is no documented correlation of IPS Board of Education adopted goals and objectives to the annual budget.
  - IPS does not breakout appropriation amounts for the general and special revenue funds by the OCAS function codes as required by the Oklahoma State Department of Education. IPS enters the budget into the financial software as lump sum amounts for revenues and expenditures.
  - The superintendent has had to develop separate spreadsheets to track district revenue and expenditures rather than use the existing software system, MAS, Inc.
- The WCL consulting team could not find proof of IPS having written policies and procedures for receiving, issuing, and inventorying textbooks; collecting money from students for lost textbooks; and storing unassigned textbooks. The superintendent indicated they did have and the principal was working hard on this process this year. Lack of procedures and inventory control over textbooks can lead to losses of textbooks causing increased expenditures.
- IPS does not issue pre-numbered tickets to school events in order to facilitate a reconciliation process (Documented number of tickets sold x price of admission = total cash on hand).

- 
- IPS has two separate bank accounts for the Child Nutrition program with one considered a clearing bank account creating more work for the Treasurer and staff than is necessary and adding to the possibility of lost funds.
  - IPS pays and records the costs for two employees working in the Child Nutrition Program in the general fund. This creates an incomplete financial picture for the Child Nutrition Program because program expenditures do not include all appropriate costs.
  - IPS has not maintained a fixed asset management plan or a fixed asset listing. The OCAS procedures manual differentiates coding for equipment with a purchase price of \$2,500 or above.
  - Concerns involving payroll accounting are noted as follows:
    - IPS does not have a system in place to ensure proper compensation for the district's non-exempt employees in accordance with the Fair Labor Standards Act (FLSA). IPS Board of Education approved contracts that set forth an annual salary for non-exempt employees with no mention of the number of work hours per day or week.
    - Some employee contracts may not meet the minimum wage requirement under the current payroll process of spreading the salaries over 12-months.
    - IPS grants compensatory time off in-lieu of overtime pay to support employees working in excess of 40 hours per week, however, employee time sheets are not required.
    - IPS uses the automated payroll module as a check writing and data accumulation vehicle, rather than allowing the system to calculate and produce paychecks. IPS calculates each employee's pay manually and then enters it into the software.
    - IPS does not encumber payroll for all personnel at the beginning of the fiscal year, negating a good budgeting tool for the Board of Education and superintendent.

As a result of the WCL ENTERPRISES consulting team's findings, recommendations to be implemented on an immediate basis were given to the superintendent and generally included closing all unnecessary bank accounts and all activity fund bank accounts, if separate, and placing tight controls on access to these accounts by IPS staff members.

As confirmation of the consulting team's findings, IPS had changed independent auditors for FY2009 and it should be noted that IPS received several recommended courses of action or noted general observations pertaining to improvement of internal controls over financial reporting and asset management. **Exhibit 3-12** outlines the most recent audit findings.

**Exhibit 3-12  
General Observations from IPS Annual Financial Audit  
FY2009**

<b>General Observations</b>
<b>Activity Fund</b>
During the audit, we observed that the activity fund custodian was not depositing the revenue on a timely basis. Oklahoma Statutes require that, "Deposits of funds shall be made the next business day, however, if the deposit for a day totals less than \$100.00, a school district may accumulate monies required to deposit in the fund on a daily basis until the total accumulated balance of deposits equals or exceeds \$100.00. Provided, a school district shall deposit accumulated monies into the fund not less than one time per week, regardless of whether the monies total \$100.00." We observed some weeks during the year in which no revenue was deposited on any of the days where accumulated monies exceeded \$100.00. We recommend that the receipt be entered into the system when the collection is made by the activity fund custodian and then subsequently deposited.
We observed during the audit that the district is currently not keeping detailed supporting documentation for athletic events. All events held at the district should include the sale of pre-numbered tickets. At the point of entry (gate), the pre-numbered ticket should be torn in half with the customer keeping one half and the other half retained by the ticket taker.
We observed that receipt numbers were not recorded on the face of the deposit slips. We recommend that the receipt numbers of the revenue comprising each bank deposit is written, in summary, on the face of each deposit slip, e.g. 1131-1191, in order to facilitate the reconciliation of receipts to deposits.
Of the activity fund checks examined, many did not appear to have adequate supporting documentation for the entire amount of the purchase order, e.g. estimates not invoices were being paid, officials and gate workers were being paid without detailed support and itemized support was not included for meals and Christmas Store. We also noted that sales tax was being paid on several invoices and monetary rewards to students selling the most items did not appear to have adequate support. Lastly, gate and concession change was disbursed to sponsors, but no reference was made to the money being receipted back in or re-deposited.
<b>Purchase Orders</b>
Purchase orders were used in accordance with Oklahoma Statutes, however, there were several areas of concern which are as follows: 1) several invoices were not signed as received; 2) there were some warrant numbers not recorded on the purchase order or invoice; 3) several non-blanket purchase orders had an invoice date prior to the purchase order date; 4) credit card purchases did not include itemized receipts attached to credit card statements, and 5) no travel descriptions for many purchase orders, not all expenditure coding were correct, and several invoices were not original. We recommend: 1) that the district enforce its policies and procedures which require that the face of the purchase order reflect the total amount actually paid; 2) the warrant number(s) be recorded on the purchase order; 3) the invoices or delivery tickets be signed as received; and 4) all purchase orders are encumbered prior to the obligation being incurred (Reference: 70 P.O.S. 2001 § 5-135 C, D, E, F, and G).
We observed during the audit that additional compensation (i.e. food/meals) was paid to individuals from a purchase order rather than being processed through payroll. We recommend that any additional compensation which is paid to an employee who is already part of the payroll system also have those monies distributed through payroll, as required by the Internal Revenue Service.
<b>Equipment Inventory</b>
Inventory records are currently maintained on a yearly basis. We recommend that a perpetual system be established for equipment. Such a system should either be recorded on a computer file or on index cards. The recommended information to be maintained for each item is a description of the item, the date of purchase, the purchase order number, the cost of the item (if known, actual cost should be used, if not known, an estimate of present value should be made), the serial number and/or model number, and the location of the item. New purchases should be added to the records on the date the items are

received. When items are sold or scrapped, the disposition of the item should be recorded in the records of the fiscal year in which it was disposed, on the date of disposition. We recommend that a master list of equipment inventory be kept at the administration office and at the office of the insurance company that provides current coverage for buildings, contents, and transportation equipment.

*Source: IPS General Observations letter from Auditor, September 18, 2009*

**RECOMMENDATION**

**Expand the Treasurer function to include the performance of necessary controls over all financial matters on a monthly basis.**

Presently the district is paying \$6,758 annually for the Treasurer function and these activities are performed primarily in Lawton and include monthly School Board reports that are derived from IPS’ internally maintained automated accounting system. This recommendation contemplates upgrading this position to one that will perform a significant portion of internal control processes over assets, financial reporting, and compliance with grants and other contracts. Ideally, IPS should hope to implement this recommendation for approximately twice what it is currently paying for this function. The estimated cost for this recommendation is an additional \$7,000 annually.

The district has a number of options for implementing this recommendation. Three practical recommendations are included below.

**Outsource this function to a private provider**, such as a qualified CPA firm or a qualified accounting services provider. An independent CPA firm that has working knowledge in the school district industry generally provides a wealth of best practice information related to financial operations, including control processes and operational methods designed to make a district’s financial operations more efficient and effective.

**Use the County Treasurer for this function.** Recent studies have shown that these services are available and are not overly expensive. Generally, the fee for service is calculated annually and is based upon actual costs of school treasury services. A determination would have to be made as to whether the County Treasurer has the time and qualifications to perform these functions.

**Expand the current arrangement** to include additional duties and/or services from the present Treasurer to achieve appropriate levels of internal control. This assumes the current provider has the time and qualifications to perform these functions.

**FISCAL IMPACT**

Recommendation	2011-12	2012-13	2013-14	2015-16	2016-17
Expand the Treasurer function to include the performance of necessary controls over all financial matters on a monthly basis.	(\$7,000)	(\$7,000)	(\$7,000)	(\$7,000)	(\$7,000)

---

**B. FINANCIAL PROCESSES**

An organization's financial planning and monitoring, as well as its budget development and management, establish the foundation for all financial management operations. The budget process should be strategic in nature and consist of activities that encompass the development, implementation, and evaluation of a comprehensive plan for student success.

The National Advisory Council on State and Local Budgeting (NACSLB) has identified four essential principles of effective budgeting. The specific principles include the following tasks:

- Set broad goals to guide decisions.
- Develop strategies and financial policies.
- Design a budget supportive of strategies and goals.
- Focus on the necessity of continually evaluating goal achievement.

Budgeting for results and outcomes links strategic planning, long-range financial planning, performance measures, budgeting, and evaluation. It also links resources to objectives at the beginning of the budgetary process so that the primary focus is on outcomes rather than organizational structure.

The Government Finance Officers Association (GFOA) believes that the following steps can assist an entity in making a successful transition to this results and outcomes approach:

- Determine how much money is available and build a budget based upon expected revenues.
- Define the results and outcomes most desired by constituents.
- Allocate resources toward these desired results in a fair and objective manner.
- Conduct an analysis of operations to determine what strategies, programs, and activities will best achieve each desired result.
- Budget available dollars to these strategies, programs, and activities with the objective of maximizing the benefit of available resources.

**FINDING 3-2**

The superintendent prepares the annual budget in conjunction with the preparation of the Estimate of Need by the district's external auditor. However, IPS does not have a formal process for involving district employees in the budget development process.

Interviews indicate the school staff is not involved or consulted for input with the budget process. As such, the budget is developed in isolation and has little support from these

stakeholders. Involving these groups in budget development would help to ensure an understanding of and support for the adopted budget.

IPS has an opportunity to strengthen its standing with the staff and local community. Greater visibility would encourage more universal support for district initiatives. A feeling of involvement in a school district's budget development process helps ensure that employees and community members will better understand and support long-range planning and decisions.

## **RECOMMENDATION**

### **Establish a budgetary process that is timely and easily understood, and involves all stakeholders.**

The budgetary process and timeline should be communicated throughout the district in order to create a sense of openness and transparency. All stakeholder groups should have opportunities to provide input as the budget is developed. Certain Oklahoma public districts publish their budget materials and other related information on their websites to ensure that all stakeholders are fully informed of budget processes and decisions that are being made.

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

- Preliminary Budget – Prior to the end of the current fiscal year, the superintendent and other key administrators prioritize items for the following fiscal year. Many contributions for this process come from district employees and the public.
- Preparation of Proposed Budget – After the School Board approves the Estimate of Need, proposed budgets are devised within the approved revenues and expenditures for the budget year.
- Adoption of a Final Budget – This includes any revisions due to public comments and potential program allocations received prior to this date.
- Amending of Final Budget – Changes are made throughout the year to ensure that all expenditures have an appropriate amount of budgeted funds available and to adapt the current budget to reflect mid-term allocation changes.

The GFOA recommends that the budget be developed using a results and outcomes approach. Under this approach, the budget should be developed to address the highest priorities of the district that could be achieved with the available resources. For example, if the need for additional staff members was identified, the budget would be developed to incorporate this need and communicated clearly with the public and staff.

Budget discussions for the upcoming school year should begin early in the spring semester at the latest. Budget discussions should include opportunities for input from district and community stakeholders. Posting the budgetary process, timeline, and documents in public places and

newsletters will also facilitate better communication, understanding, and support of the adopted budget. A sample budget calendar, developed from one in use by a district of similar size to IPS, is provided in **Exhibit 3-13**. Each year, the district adjusts the dates by one or two days to match the new work calendar but otherwise follow this schedule.

**Exhibit 3-13  
Sample Budget Calendar**

Date	2009-10 Budget Calendar Activity
January 2009	Introduction of budget process to administrative staff
February 2009	Prepare Budget Calendar and budget plan for review with administrative staff. Submission of budget calendar to School Board (regular meeting)
March 2009	Hold budget meetings with administrative and/or professional staff and establish preliminary budget priorities
April 2009	Analysis of budget requests and review of preliminary budget priorities
May 2009	Refinement and alignment of projected expenditures Report to School Board on preliminary budget priorities (regular meeting)
June 2009	Review of projected state revenues based upon the state budget
July-August 2009	Prepare and submit to independent auditor revenue source allocations to prepare 2009-10 Estimate of Need
September 2009	2009-10 Estimate of Need presented to the Board of Education for approval and published in newspaper
October 2009	Estimate of Need approved by the county excise board Submit copy to SDE and state auditor office
November 2009	2009-10 Annual budget presented to the board of education for approval

*Source: WCL ENTERPRISES*

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 3-3**

Although financial reports to the Board of Education contain a significant amount of data pertaining to the current month, financial reports lack detailed comparison data for revenues, expenditures, and investment results. Without comparative data, the School Board and public lack information that enables them to assess current year operations as it relates to previous months and years.

As part of the monthly School Board reports, the treasurer provides a combined treasurer’s statement that shows a summary of revenues, warrants issued, cash balances for all funds, interest earned from investments, and detailed reports for warrants issued and purchases made (encumbrance register). The School Board receives a one-page report showing revenue collections, in total, and also shows information for expenditures, in total. There is no detailed reporting or comparative information provided.

The reports presented to the board provide sufficient detail for the current month; they provide the reader with a good understanding of financial transactions and balances at the end of the

month for all funds. However, there is no detailed year-to-date total for revenue and expenditures with a comparison to the same period from the previous year. A comparison of expenses by category, along with a comparison of revenues for the same period during the previous year would provide School Board members with benchmark data concerning the district's financial position. Year-over-year comparative information is helpful in demonstrating changes in operations, increased costs for specific items, unique expenditure items, and trends in revenues and expenditures.

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

### **RECOMMENDATION**

**Expand the current monthly financial reports to include specific types of revenues and expenditures, a comparison with the previous year's financial information, and a more detailed treasurer's report.**

The superintendent and treasurer should expand the monthly financial reports to include types of revenues and expenditures, and a comparison with the previous year's financial information.

An example or template of a detailed financial analysis, developed from one in use by a district of similar size to IPS, is provided in **Exhibit 3-14**.

**Exhibit 3-14  
An Example of a Detailed Financial Analysis**

<b>Indiahoma Public Schools General Fund Financial Analysis Month xx/xx/xxxx</b>			
<b>Description</b>	<b>Current Year</b>		<b>Previous Year</b>
	<b>Current Month Received/ Expended</b>	<b>Year-to-Date Received/ Expended</b>	<b>Year-to-Date Received/ Expended</b>
Revenues:			
Local Sources	\$x,xxx	\$x,xxx	\$x,xxx
Intermediate Sources	\$x,xxx	\$x,xxx	\$x,xxx
State Sources	\$x,xxx	\$x,xxx	\$x,xxx
Federal Sources	\$x,xxx	\$x,xxx	\$x,xxx
<b>Total Revenue</b>	<b>\$x,xxx</b>	<b>\$x,xxx</b>	<b>\$x,xxx</b>
<b>Expenditures</b>	<b>\$x,xxx</b>	<b>\$x,xxx</b>	<b>\$x,xxx</b>
Salaries	\$x,xxx	\$x,xxx	\$x,xxx
Benefits	\$x,xxx	\$x,xxx	\$x,xxx
Purchased Professional and Technical Services	\$x,xxx	\$x,xxx	\$x,xxx
Purchased Property Services	\$x,xxx	\$x,xxx	\$x,xxx
Other Purchased Services	\$x,xxx	\$x,xxx	\$x,xxx
Supplies & Materials	\$x,xxx	\$x,xxx	\$x,xxx
Property	\$x,xxx	\$x,xxx	\$x,xxx
Other	\$x,xxx	\$x,xxx	\$x,xxx
<b>Total Expenditures</b>	<b>\$x,xxx</b>	<b>\$x,xxx</b>	<b>\$x,xxx</b>

*Source: WCL ENTERPRISES, 2010*

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 3-4**

FY2009 financial transactions, as entered in the Oklahoma State Department of Education (SDE) approved Municipal Accounting Systems (MAS) software, revealed that appropriation entries had been made in amounts equal to the total authorized by the Estimate of Need. However, these entries were not assigned proper OCAS classifications with enough itemized detail to serve effectively as budget appropriations to drive the budgeting features of the software.

Assignment of proper OCAS classifications provides a manageable level of detail and facilitates both the close management of federal dollars required by the Federal Grant Series of the OCAS Project dimension, as well as the remainder of the general budget. The OCAS Project dimension should be detailed to all three digits to accurately track all state and federal grants requiring either the filing of claims for reimbursement (in the case of federal grants) or documentation of how grant money was spent (as with most state ear-marked funds).

## RECOMMENDATION

### **Itemize the total authorized appropriation (from the Estimate of Need) down to individual Project-Function-Object budgets as furnished to the Oklahoma State Department of Education for Federal Grant Summary Budgets.**

The assigning of OCAS function dimensions should be detailed to the third digit of the four digit field just like the Claim Summary Bolding File built into the MAS software; and it's OCAS object dimension should be detailed only to the first digit of the three digit field, again just like the Claim Summary Bolding File in the software.

Detailing appropriations to this level will not only provide excellent management of federal program budgets, minimizing the number of revisions needed to file payable claims, it will also provide a vehicle for more manageable and understandable financial reporting to the School Board and more responsible fiscal management of the resources available for the instruction of children.

Local projects can be assigned numbers to track any expenditure "cost centers" desired. The series of project numbers in the OCAS manual from 000 to 199 may be assigned for these purposes. The "cost centers" could be anything from building level allocations to tracking the local and state dollars required to implement partially funded federal mandates like special education, which is only minimally covered by the IDEA-B Flow Through (Project 621) federal funding you receive through the Oklahoma State Department of Education (SDE).

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

### ***C. ASSET AND RISK MANAGEMENT***

Asset management involves managing the district's cash resources and physical assets in a cost effective and efficient manner. Effective cash and investment management involves forecasting cash requirements timely and accurately so that funds are available when needed.

School districts are required to maintain and protect the publicly financed assets that are purchased to deliver education to students. These assets include fixed assets, such as property, plant and equipment, and risk management programs that protect against significant financial and physical losses.

Federal grant guidelines contained in the Office of Management and Budget (OMB) Circular A-87 defines equipment as, "An article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals the lesser of the capitalization level established by the governmental unit for financial statement purposes, or \$5,000." The Oklahoma State Board of Education recommends that all school districts maintain automated records of all equipment and removable fixtures, along with a history of infrastructure expenditures. This listing can be used for audit purposes and provides a basis for insurance valuations.

Risk management involves three major areas – property and casualty insurance, employee health insurance, and workers’ compensation insurance. The district risks incurring losses from lawsuits; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and acts of God. To limit losses, the district purchases commercial insurance including general and auto liability, property damage, and public official’s liability. Settled claims have not exceeded the commercial insurance coverage in any of the past three years.

For Workers’ compensation coverage, IPS participates in the Oklahoma School Assurance Group (OSAG). In that capacity, OSAG is responsible for providing loss control services and certain fiscal activities, including making contract arrangements for the underwriting, excess insurance agreements, claims processing, and legal defense for any and all claims submitted to it during the plan year. As a member of OSAG, the district is required to pay fees set by OSAG according to an established payment schedule. The district reports the fees paid (net of refunds) as an insurance expense and a portion of the fees paid by IPS go into a loss fund for the district. The fee for the loss fund is based upon the district’s losses for the last five years. OSAG provides coverage in excess of the Loss Fund so the district’s liability is limited to the balance of the loss fund. If IPS does not use its loss fund in three years, it is returned to them with no interest.

The district is also a member of the Oklahoma Public Schools Unemployment Compensation Program. In this program, the district is required to contribute 1.6% of its taxable payroll for unemployment insurance. The funds for each district are kept separate and districts can contribute more than 1.6% of their payroll if desired. The money contributed by each district earns interest and is fully insured. If the district has claims in excess of the amount in its account, it will be liable for the excess.

### **FINDING 3-5**

IPS does not complete physical inventories to determine if fixed assets are still in the custody of the district. As a result, fixed assets purchased by the district are at risk of loss without the knowledge of IPS administrators.

IPS does not have any formal policies or guidelines to direct the management of its fixed assets. The external auditor states in the comprehensive annual report that the district has not maintained the cost of fixed assets purchased in previous years. As a result, the General Fixed Asset Account Group, that is normally included in annual financial reports, is not presented for IPS.

Under current practice, each room occupant completes an inventory at the end of each school year. The teachers list all items that are located in their classroom and other staff list items located in their work areas. The listings normally do not receive any review or analysis and are kept in the principal’s office where they are filed.

In addition, IPS does not have a complete listing of its fixed assets where additions and deletions are made as they occur throughout the year, nor does the district have a policy that addresses individual accountability for fixed assets. There are no guidelines that require reimbursement for items lost due to negligence or that require documentation if an item is stolen, i.e. a police report or an employee affidavit.

Policies normally address many issues pertaining to fixed assets, such as:

- Who is responsible for accounting for the district's fixed assets and the system that is used for that accounting.
- Responsibility and accountability for the property and equipment owned.
- A requirement for annual physical inventories.
- Comparing maintenance expenses to replacement costs (capital improvement).
- Reporting junked, stolen, or missing property and what documentation is required to delete items from the inventory.
- Receiving of donated property.

### **RECOMMENDATION**

#### **Develop fixed asset tracking polices and track fixed assets acquired with district funds.**

The School Board should adopt a fixed asset policy to provide guidance on how fixed assets are to be managed. The OCAS procedures manual differentiates coding for equipment valued at or above \$2,500. Therefore, the district should consider adopting a threshold of at least \$2,500 to remain in compliance with the OCAS requirements. Establishing the district fixed asset threshold to correspond to the state accounting threshold will allow IPS to track fixed assets more easily. Once the School Board approves the policy, the superintendent should communicate the new policy to staff and begin implementation.

A physical inventory should be performed and the results used to create an inventory of all items with a cost over the established threshold. Consideration should be given to installing asset management software on either the encumbrance clerk's or activity fund coordinator's computer and assigning them the responsibility to maintain an inventory of items valued over the established threshold. A copy of these records should be forwarded to the district's insurance carrier to assure proper coverage of all fixed assets in the event of theft or disaster.

A system to track fixed assets and a set of fixed asset polices help ensure that the district's fixed assets are being managed as desired by the School Board. The system should protect investments by assigning responsibility and holding staff accountable for the proper care and protection of district assets.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 3-6**

The current banking arrangement has been in place for at least fifteen years and staff could not recall when, or if, the district had ever taken competitive bids for banking services. Without periodic bids for this service, IPS cannot be assured that they have the best cost alternative or the most current techniques available for banking services.

District funds are deposited in the Bank of the Wichitas located in Cache, Oklahoma. Three accounts are maintained at this bank:

- Account #1 – is a combined account for the general fund, building fund, child nutrition fund, bond fund, and sinking fund.
- Account #2 – is for the district’s child nutrition account (clearing account).
- Account #3 – is for the district’s activity fund.

Individual accounts are maintained in district financial software records that adequately separate the activity of the funds.

**RECOMMENDATION****Establish selection criteria for the local banking services contract and solicit proposals.**

Close Account #2 Child Nutrition Clearing Account and deposit collections directly into Account #1 – that contains the Child Nutrition Fund before the Request for Proposal for banking services is released. This procedure may save the district any fees that may be associated with maintaining a separate account and provide the district with better internal control procedures.

IPS should issue a Request for Proposal (RFP) for banking services in the region. The superintendent should review submitted proposals and make a formal recommendation to the School Board for approval. Once a bank is selected, the superintendent should direct the implementation of the banking services contract. IPS should also ensure that the district has a copy of the current depository contract and documentation of pledged securities that exceed FDIC insurance.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 3-7**

The district is not adhering to all facets of the employee compensation requirements of the Fair Labor Standards Act (FLSA). Non-exempt employees are paid based upon an annual salary rather than an hourly rate. Failure to compensate employees accurately can result in fines and penalties to the district, and possibly place employers in a judgment situation if such compensation is not paid during the fiscal year in which the service was rendered.

The FLSA, promulgated by the U.S. Department of Labor, institutes specific guidelines in which employers must compensate employees designated as non-exempt. The act requires that the district determine if an employee is exempt or non-exempt based upon the answers to a series of questions coupled with the level of education required for the position and the amount of compensation. One of the major factors in determining if an employee is placed in the exempt or non-exempt category is the ability of the employee to apply independent discretion and judgment in the workplace. Typical non-exempt employees in a school include teacher aides, bus drivers, food service workers, custodians, and non-degreed accounting personnel.

IPS's non-exempt employees are paid on a salaried basis and are not required to work an established schedule. Rather, the district allows the non-exempt employees to flex their hours and come and go as the work level dictates, and does not require employees to maintain written records of their hours worked. In addition, employees who perform duties similar to their permanent assignment as extra duty under a grant are paid at a different hourly rate.

The FLSA required the district to accurately compensate non-exempt employees for the hours actually worked and to compensate employees similarly for duties that could be considered an extension of their regular job description (i.e. a teacher's aide cannot tutor students after school for a different rate of pay).

Timecards or timesheets must be valid and accurately record the actual hours worked. Timecards or timesheets should record the actual starting and ending time worked by employees on a daily basis, and requires validation from both the supervisor and employee.

## **RECOMMENDATION**

### **Make sure to compensate employees in accordance with the laws, rules, and regulations of the Fair Labor Standards Act.**

The district should require all non-exempt employees to maintain timecards or timesheets reflecting the hours actually worked each day. Timecards or timesheets will require employees to accurately reflect their hours worked each day so that the district can schedule and plan their payroll budget and activities accordingly. Individual timecards or timesheets should be signed by the employee attesting to the accuracy of time reported, and be reviewed and approved by the principal or superintendent.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 3-8**

IPS does not currently have written policies and procedures for receiving, issuing, and inventorying textbooks; collecting money from students for lost textbooks; and storing unassigned textbooks. The lack of procedures and inventory control can lead to loss of textbooks and increases in expenditures.

Currently, each school principal coordinates activities to determine what textbooks need to be purchased. The process normally requires each teacher to inventory the textbooks at the end of the school year and submit the listing to the principal. Using pre-enrollment and other data on anticipated class sizes, the principals then determine what additional textbooks need to be ordered. Purchase requests are then sent to the superintendent for review and approval.

The principal handles the payment from students who have lost or damaged textbooks. Interviews with the principal indicated that there is not a standard method to determine the amount to collect for lost or damaged textbooks. If the textbook was relatively new, the original cost is used, but if the book is older, a reduced amount is collected. Staff reported that they attempt to collect the value of lost and damaged textbooks from parents, but there are no guidelines or records kept for lost or damaged textbooks. The superintendent stated that the new principal is working hard to develop a new process for handling textbook inventory.

## **RECOMMENDATION**

### **Develop and implement a policy outlining the duties surrounding textbook issuance and maintenance.**

The superintendent should meet with principal and develop a textbook policy to be approved by the School Board. Once approved, the superintendent should communicate and distribute the new policy to the principal, principal's secretary, and teachers.

A comprehensive textbook policy should include a process for an inventory of the number of books at the beginning of the year, the number of books lost, the number of books replaced, and the ending inventory. The implementation of this policy should be analyzed annually and compared to expenditures for textbook purchases, and money collected from lost textbooks. The principal and/or secretary should report any discrepancies with inventory and financial records to the superintendent. The superintendent or designee will investigate the discrepancies and will provide findings to the Board of Education.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## ***D. ACTIVITY FUNDS***

Activity funds are defined as funds of a district related organization received and held by the district as a trustee, to be expended or invested in accordance with conditions of the trust. Specifically, they are funds accumulated from various district fundraising activities, membership dues or fees, commissions, interest income, and donations. These funds are only to be used by the organization that generated them and designed to provide students such experiences as motivation, enjoyment, and improvement of skills. Activities normally supplement the regular instructional program.

Oklahoma State Statute Section 87 outlines the procedures to be used to account for activity funds. Specifically, the statute requires that the Board of Education of each school district shall

exercise control over all funds and revenues on hand, or hereafter received, collected from student or other extracurricular activities, or other revenue generating sources that are conducted on school campus. The statute further requires that deposits are to be made daily or when the cash on hand exceeds \$100. Under the law, the Board of Education is required to approve all school activity subaccounts, all fund raising activities, and all purposes for which monies collected in each subaccount can be expended.

**FINDING 3-9**

The activity fund custodian, who is also the business manager of the district, does not practice dual control when receiving activity fund deposits from sponsors. This places both the sponsor and the activity fund custodian in a tenuous position in the event the deposit is short.

The district appears comfortable with the integrity and commitment of the staff responsible for activity fund accountability. However, a lack of proper transfer documents creates a possibility for misunderstandings, false accusations, or blame in the event of a discrepancy. Dual control can provide a level of protection for the individuals responsible for activity fund accountability.

**RECOMMENDATION**

**A system should be developed whereby the sponsors bring the deposits, with an attached deposit reconciliation form, to the activity fund custodian on a daily basis.**

An example is provided in **Exhibit 3-15**.

**Exhibit 3-15  
Sample Deposit Reconciliation Form**

<b>Date</b>	<hr/>		
<b>Pennies</b>	<hr/>	<b>Ones</b>	<hr/>
<b>Nickels</b>	<hr/>	<b>Fives</b>	<hr/>
<b>Dimes</b>	<hr/>	<b>Tens</b>	<hr/>
<b>Quarters</b>	<hr/>	<b>Twenties</b>	<hr/>
<b>Halves</b>	<hr/>	<b>Fifties</b>	<hr/>
<b>Total</b>		<b>Hundreds</b>	<hr/>
<b>Coin</b>	<hr/>	<b>Total</b>	
		<b>Currency</b>	<hr/>
<b>Checks</b>	<hr/>		
		<b>Total</b>	
		<b>Deposit</b>	<hr/>
<b>Sponsor's Signature</b> <hr/>			
<b>Sponsor's Receipt number(s):</b> <hr/>			

*Source: WCL ENTERPRISES, 2010*

The activity fund custodian should establish regular business hours (e.g. before and after the school day, and during the lunch period) so that sponsors can deliver their deposits in a timely manner. The activity fund custodian should verify deposit amounts in the presence of the sponsors. If the activity fund custodian is unavailable, the deposits should be placed in a locking bag, safe, or locked file cabinet until both the sponsor and custodian can verify the deposit.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.



***Chapter 4:***

***Facilities Use and Management***

---



## *Chapter 4*

# *Facilities Use and Management*

This chapter addresses the facilities use and management of the Indianhoma Public Schools (IPS) in the following sections.

- A. Facilities Planning and Construction
- B. Maintenance and Custodial Operations
- C. Energy Management
- D. Community Use of School Facilities
- E. Safety and Security
- F. Crisis Management

Facilities use and management includes the planning, construction, and maintenance of buildings; the safety of students and staff using those buildings; and the security surrounding facilities when they are both in use and after school hours. More specifically, this area includes:

- Planning and designing facilities to meet educational standards and to provide a physical environment that enhances learning.
- Maintaining and cleaning facilities so that teaching and learning can take place in a healthy, non-distracting environment.
- Ensuring that the facilities are safe during the time students and teachers are in the school.
- Providing proper safeguards to ensure the security of the facilities after school hours.
- Having safety plans in place so that, in the event of a crisis or natural disaster, students and staff are protected.
- Providing for community use of facilities and maximizing the use and rental income to offset expenses.

### *Background*

IPS has twelve facilities located throughout the district on two separate campuses consisting of the main campus and one athletic complex. **Exhibit 4-1** shows the name of each facility, year built, year of renovations or additions, and their respective square footage:

**Exhibit 4-1  
IPS Facilities  
2009-10**

<b>Building</b>	<b>Year Built</b>	<b>Year Renovated/ Additions</b>	<b>Gross Square Footage</b>
Junior/Senior High School Building (Grades 11-12)	1941		24,477
Gym Addition with Principal Office	1960		17,500
Superintendent's Office and Lobby Addition	1967		2,793
Grade School Building (PK-3)	1960		4,000
5 <sup>th</sup> & 6 <sup>th</sup> Grade Building	1969		1,280
Special Education & 4 <sup>th</sup> Grade Building	1943		1,000
Cafeteria Building	1979		2,300
Media Center & Computer Lab Building	2001		3,731
Ag Building	1961		1,532
F.F.A. Building	NA		1,750
Bus Barn	NA		2,850
Baseball Complex	NA		0
<b>Total:</b>			<b>63,213</b>

*Source: IPS superintendent of Schools; IPS Building Records November 2010*

Based upon size, geography, and demographics, the Office of Accountability selected five Oklahoma school districts to serve as peer districts for comparative purposes: Blair, Butner, Chattanooga, Duke, and Verden. These five districts are called peer districts and will be used for comparison purposes throughout this report.

**A. FACILITIES PLANNING AND CONSTRUCTION**

Well planned facilities are based on the educational program and on accurate student enrollment projections. The design process should have input from stakeholders, including administrators, principals, teachers, security specialists, parents, students, and the maintenance and operations staff. The selection of building materials, interior finishes, hardware, mechanical, electrical, and plumbing systems, and other major building components should be made according to life cycle cost analyses and reflect an optimum total cost of construction, operations, and maintenance.

This, coupled with the functional need to provide the best possible learning space for the students, should lead a district to recognize the absolute necessity of developing, presenting, and implementing a long-range facilities master plan. Failure to plan will eventually lead to misdirected efforts, facility problems, and dissatisfaction.

A school district's long-range facilities master plan is a compilation of district policies, information, and statistical data, which provide a basis for providing educational facilities to meet the changing needs of a community. The long-range facilities master plan becomes the district's policy statement for allocating resources and offers alternatives for facility expansion and improvement. The capital improvement portion of the long-range facilities master plan should also be used to update the capital improvement section of the Comprehensive Local

---

Education Plan (CLEP).

Effective school long-range facilities master planning incorporates the following elements:

- **Facility Capacity:** Districts establish the capacity of each school facility by setting standards that govern student/teacher ratios and the amount of square feet required per student in a classroom. These standards deal with the minimum size of core facilities (e.g. classrooms, gyms, cafeterias, and libraries) so that schools do not overload these facilities or overuse portable classrooms.

The Oklahoma State Department of Education (SDE) publishes *Planning for Education: Space Guidelines for Planning Educational Facilities*, most recently revised in October 2004. The guidelines were developed by the School Plant Services Section to assist local School Boards, school administrators, architects, engineers, and planners in planning and designing educational facilities. The guidelines provide information under the major headings of instructional spaces, auxiliary spaces, and service and structure spaces for the various grade ranges. They also provide suggested methods of calculating preliminary net and gross square footage for school buildings by grade and major activity.

- **Facility Inventory:** An accurate facility inventory is an essential tool in managing the use of school facilities. The inventory identifies the use and size of each room, which enables planners to accurately establish the capacity of each school. Modifications to schools are noted in the inventory so it can be kept up to date.
- **Enrollment Projections:** Effective planning requires accurate enrollment projections at least five years into the future (**Appendix F**). Accurate projections require planners to examine district demographics and track new construction activity in the district. Many school planners work in coordination with county and city planners to track growth patterns.
- **Capital Improvement Master Plan:** Effective planning requires the district to anticipate its future needs and balance these against expected resources. A capital improvement master plan charts the need for future improvements to school facilities and identifies funding sources for them. An effective planning process involves the community at large, identifies district goals and objectives, and priority ranks projects based upon those goals and objectives.
- **Facilities Maintenance Plan:** School facilities' planning necessitates identifying links between facilities' maintenance and facilities' construction and renovation. Capital outlay for school construction is generally a more palatable proposition for taxpayers and public officials when a school system demonstrates that existing facilities receive appropriate care and maintenance. Good plans include short and long-term objectives, budgets, and timelines, all of which demonstrate organizational commitment to facilities maintenance.

#### FINDING 4-1

IPS has not developed a comprehensive long-range facility master plan using citizen, staff, and School Board member input. As a result, the district is not able to address the aging building

infrastructure and facility growth needs to support successful student achievement. During interviews conducted by the consulting team, the superintendent and principal have several ideas for addressing facility needs, but no formal long-range plan has been developed.

Having a long-range facilities' master plan will help ensure that building projects are prioritized and pursued according to a studied, developed, and logical process. As administrators, faculty, staff, and School Board members change, a long-range facilities master plan will add stability and cohesiveness to the district's future construction, use, and management of its facilities.

## **RECOMMENDATION**

**IPS Board of Education should organize a formal committee consisting of several School Board members, district patrons, business leaders, and district staff to help develop a long-range facilities master plan. The committee should determine the future facility needs of IPS by considering facility age and condition, enrollment projections, educational program needs, and district operational needs.**

The committee's recommendations should guide the School Board in its consideration of future building projects and/or bond elections. Based upon the elements listed above, the plan should be organized into projects, which should document the project name and description, estimated cost, urgency of need, and estimated year of completion. Having an architect participate in the planning may add validity to and expedite the process. During this process, a site master plan of each district owned property should be created with items such as existing and proposed buildings, parking lots, sidewalks, playgrounds, ball fields, etc., noted and/or drawn.

## **FISCAL IMPACT**

The recommendation to develop a long-range facilities master plan can be implemented with existing resources. There should be no cost in the formation of a citizen-led bond committee to obtain input during the development of future bond program proposals. The cost of retaining the professional services of an architect could be funded from the IPS building fund at the time a study is implemented. In some cases, fees could be negotiated on the basis that they would be included in the overall bond program and funded if the bond election is successful. The actual costs of implementing the various capital improvement and/or maintenance recommendations listed above can be determined during the long-range facilities master planning process.

## **FINDING 4-2**

IPS has not created a comprehensive facilities database of critical information related to each of its facilities, which includes: year built and square footage; building construction and bond history; work order history; furniture and playground equipment inventory; parking data; room utilization chart; demographics and building systems. As a result, IPS does not maintain accurate facility records which enable the district to be very effective in maintaining and updating the district's long-range facilities master plan.

IPS has very limited information available on each of the buildings within the district. Not having this critical information, IPS is at risk for incurring additional costs related to future

renovations/additions projects that may be included in a future bond election. In addition, IPS could increase its maintenance costs due to the lack of information on warranties, operations and maintenance manuals.

As an example, Broken Arrow Public Schools (BAPS) has developed a standard format for compiling historical records for each facility within the district. This critical information is inserted into three-ring binders and tabbed in a very organized format. Each of the sections contains various types of information including spreadsheets, photographs, etc. to document the history and condition of each BAPS facility. A typical binder is organized into fifteen sections as follows:

- **Executive Summary on Facility Needs:** An overall executive summary of the facility is included here along with recent recommendations/analysis performed.
- **Facility Analysis – Interior and Exterior:** A principal’s facility review form is included which lists the various facility functions and key design elements along with a rating from 1-5 (low to high) for each with a comment section.
- **Photo Analysis of School Site:** Photographs of the school site, buildings, etc. are included in this section.
- **Demographics:** Enrollment projections for campus.
- **Parking:** A Parking Assessment Spreadsheet that includes enrollment data, total staff, total number of visitor and handicap spaces; number of special events and number of cars on adjacent streets; comments; and a recommendation section.
- **Playground:** An Equipment Assessment Sheet that includes listing of playground equipment; brand name and model number; type of materials; year installed; cost; condition of equipment; type of fill material and border; comments; and recommendation section.
- **Furniture:** An inventory of the building’s standard classrooms that includes; type of furniture and equipment; quantity; age; condition; and estimated replacement costs.
- **Facility History:** This section includes copies of floor plans from original construction and additions; year of construction; square footage; and modular classroom locations.
- **History – Bond & Building Fund:** A spreadsheet that includes; the history of past bond issue projects; year of bond issue; project description; and estimated costs.
- **Work Order History:** Printouts of work order history for facility.
- **Current Room Utilization:** A spreadsheet is provided that includes; total number of classrooms; how each classroom is used; classroom analysis of per student occupancy per hour/per day; and a comments section.

- **Security Cameras:** A spreadsheet includes: quantity of existing cameras; future new cameras; locations and/or descriptions; and floor plan indicating locations.
- **HVAC/Painting:** An overall spreadsheet that itemizes HVAC/Electrical/Plumbing Systems which includes: year installed; last major replacement/upgrade; number of repairs over a three year period; and the next scheduled replacement year. A listing of painting projects that includes: age of building; year of last painting; area of building last painted; cost of painting project; and the next scheduled repainting.
- **Roofing:** Section includes a spreadsheet including: age of roof; year of last roof or roof section update; repair history over three year period; and the next scheduled replacement.
- **Insurance Analysis:** An analysis performed by the district's insurance carrier as to the buildings history, size, type of construction, and replacement cost analysis.

By maintaining facility records in this very organized format, IPS would be able to update information very efficiently when facility repairs, upgrades, etc. are performed. With up-to-date information available in both hardcopy and electronic record for their long-range facilities master plan, IPS can perform a bond issue needs assessment with accuracy and efficiency.

### **RECOMMENDATION**

**IPS should develop a comprehensive facilities database to maintain accurate records on all of its facilities which would enable the district to be very effective in developing, maintaining, and updating the district's long-range facilities master plan.**

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 4-3**

The average age of IPS facilities is forty-five years old and most are in need of extensive maintenance. The WCL ENTERPRISES consulting team conducted walk-throughs of each facility and noted various deficiencies. As a result, a general list of maintenance needs and safety concerns that should be addressed was developed by the consulting team. This general list is noted in **Exhibit 4-2**. An "X" means that the facility had a particular problem or need.

**Exhibit 4-2  
List of Maintenance and Facility Needs  
September 2010**

<b>Building Name</b>	<b>Site</b>	<b>Safety</b>	<b>ADA</b>	<b>HVAC</b>	<b>Plumbing</b>	<b>Electrical</b>	<b>Misc. Finishes/ Other</b>	<b>Water Leaks</b>
Jr/Sr High School Building with Auditorium	X		X			X	X	X
Gym Addition with Principal Office			X			X	X	X
Superintendent Office & Lobby Addition			X				X	
Grade School (PK-3)		X	X					
5 <sup>th</sup> & 6 <sup>th</sup> Grade Building			X					
Cafeteria	X	X	X				X	
Media Center & Computer Lab		X				X	X	X
Ag Building			X					X
FFA Building		X	X			X	X	
Bus Barn		X	X					X
Baseball Complex	X		X					

*Source: WCL ENTERPRISES Consulting Team Walk-through of existing facilities and sites, September 2010*

The deficiencies listed above are based upon a walk-through of IPS during the consulting team’s onsite visit in September 2010, along with interviews with district and campus personnel.

**Exhibits 4-3 through 4-8** provide specific examples of some of the conditions noted above:

**Exhibit 4-3  
Wood Rotting at Window Frames  
Jr/Sr High School Building  
September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-4**  
**Lack of weep holes in exterior brick veneer**  
**Jr/Sr High School Building**  
**September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-5**  
**Peeling Paint on Exterior Concrete Masonry Unit Wall**  
**Gymnasium Building**  
**September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-6**  
**Stained acoustical ceiling tile and exposed fluorescent bulbs**  
**Jr/Sr High School Building**  
**September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-7**  
**Lack of caulking at exterior windows**  
**Multi-Purpose Room - Exterior Wall**  
**September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-8**  
**Concrete Curb & Driveway Damage**  
**Cafeteria Building Service Drive**  
**September 2010**



*Source: WCL ENTERPRISES*

### **RECOMMENDATION**

**IPS should evaluate and consider including the noted items from the site visits into the scope of work for future bond programs.**

### **FISCAL IMPACT**

Some of these items could be handled as maintenance work orders and performed within existing approved budgets. Any items not able to be funded from current operating budgets should remain in the long-range maintenance plan for possible funding through future operating budgets or future IPS bond elections.

### **FINDING 4-4**

IPS does not use customized architectural, engineering, or construction contracts prepared by an architectural firm which address the specific needs of the district. Instead, the district has relied upon documents that are created by the American Institute of Architects (AIA) and are generic to the industry. Even though there is language in the standard contract that provides for protection of owners, it is in the best interest of the school district to develop revisions to the standard language that is district specific and will better protect them. The terms included in these generic documents would not always fully protect the district with regard to: cost overruns, delays in the schedule, changes in the work, insurance requirements, performance bond requirements, the determination of substantial completion, and other risks. This could result in additional cost to IPS and its construction program.

In reviewing a recent construction project agreement with a roofing contractor, the consulting

team noted there were no revisions made to the standard language included in these typical contracts. The only revisions noted were in locations where the contract allows for specific information to be provided by the owner. In addition, it was noted that a 1987 edition of this agreement was used, which is a very old edition. The American Institute of Architects has updated this document in 2007 which is the latest version.

Even though a professional architect or engineer was used for the project, the district was not able to locate copies of the agreement for the consulting team to determine if a standard AIA Agreement was used for the professional architectural services being provided for the project to determine if revisions are made to the standard clauses. Typically, the consulting team finds that there are no clauses added to the architect services agreement that address what happens if the cost of construction exceeds the agreed upon budget for the project, and who is responsible for the costs to redesign, if required, to modify the scope of the project to be within the established project budget. If this is not addressed within the contract language, additional costs could be incurred by IPS for any redesign work. If IPS elects to proceed with a given project even if the construction costs exceed the approved budget, the agreement does not address any limit to the amount of fees payable by IPS to the architect. Standard industry practice is to limit the fees payable based upon a previously established percentage multiplied by the construction budget stated in the contract or the final construction cost for the project.

One important AIA document that addresses specific requirements related to the construction contract administration is the General and Supplementary Conditions for the Contract for Construction. This document should be reviewed thoroughly by IPS staff and legal counsel to fully understand the terms and conditions related to the construction contract. Changes should be made to the terms and conditions that are in the best interest of the owner.

One area that typically needs to be addressed is requirements related to claims that may be submitted by either the owner or contractor during the course of the construction process. If claims are not resolved between the parties, typical contract language would have irresolvable claims be subject to arbitration or mediation. It is better to have the district's legal counsel determine which method would be in the best interest of IPS and then, based upon this determination, make appropriate revisions to the standard language to protect the school district.

## **RECOMMENDATION**

**IPS should consult with other districts, as well as legal council, to obtain modified versions of the standard AIA design services and construction contract documents, and then change the standard general conditions and supplementary conditions to best meet district needs.**

Many school districts have developed modified versions of these AIA documents for contracts to better protect the owner. IPS staff should contact other districts in Oklahoma or other surrounding states to obtain copies of their modified AIA documents that were developed for their building program. These sample modified documents should be reviewed by IPS staff for possible revisions that could be used to better protect IPS. Once these revisions have been selected, IPS should contact legal counsel to create a final version for use by IPS on all future construction projects.

---

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 4-5**

IPS has not established formal district facility design and construction standards, or educational specifications for its long-range facilities master plan. Without such standards, the district may have inconsistencies in the design and construction of renovations and new facilities that may be included in future bond program, which could result in inequities between facilities and potential operational cost inefficiencies.

Many districts in the state of Texas have developed design and construction standards as part of their overall long-range facilities master plan. These standards typically include requirements to use standard types of building materials for similar spaces such as carpet for certain type of classrooms, vinyl composition tile for science labs, etc. In addition, the state adopted numerous minimum facility standards and requirements for the construction of educational facilities that school districts must be in compliance, which includes minimum square footage requirements for classroom sizes for elementary and secondary schools.

A typical design/construction standard along with an educational curriculum program would include the following information about specific district requirements:

- Minimum square footage, dimensions of building programmed spaces such as classrooms, music, physical education, kitchen, and cafeteria.
- Number of students' space should be designed to accommodate.
- Types of spaces to be included in the overall building design such as workrooms, administration areas, classrooms, science labs, libraries, etc.
- Types of wall, floor, and ceiling material to be used in the various programmed spaces.
- Furniture and equipment to be furnished by district such as refrigerators, under the counter icemakers, etc.
- Fixtures, furniture, and equipment to be furnished in construction contract such as upper and lower cabinets and countertops.
- Specific HVAC, plumbing, and electrical requirements for various programmed spaces such as electrical outlets and sinks.
- Technology requirements to include number of computers, printers, data and voice networking, etc.
- Acoustical requirements including sound requirements for music rooms and gymnasiums.

- Space adjacency such as science prep rooms directly adjacent to science labs, art labs with window exposures to the north, etc.
- Material manufacturers and model numbers that are approved to be used in the district for door hardware, plumbing fixtures, HVAC equipment, lighting fixtures, communication systems, and security systems.
- General requirements such as total number of student, staff, and visitor parking spaces; bus driveway and canopy requirements, and special needs access requirements.

Districts that develop and establish these various types of standards for design, construction, and educational specifications are able to provide consistencies in the level of services across the district due to equitable school facilities. Educational specifications is a term referencing the programming of spaces needed to support the educational programs and curriculum to be taught within a school facility. Cost efficiencies are able to be achieved through the use of standard types of materials and systems that allow for efficient storage of spare parts inventory for building systems, etc. By standardizing on various building materials and components, it allows maintenance and custodial staff members to be more effective in the performance of their duties since they are very familiar with the maintenance, operational, and cleaning requirements of these systems and materials.

### **RECOMMENDATION**

**IPS should develop facility design and construction standards, along with educational specifications, so that equity between facilities can be obtained.**

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 4-6**

IPS does not have plans and/or specifications readily available for any of the facilities on campus. As a result, the district has a lack of critical facilities information to utilize in case of emergencies or performance of necessary repairs to the facilities.

Most school districts will provide a centrally located plan room for the storage and archiving of all facility documents, which include original drawings, prints, specifications, maintenance and operating manuals, warranties, material samples, etc. The plan room is typically located in the Maintenance Department Office so that the information is available for ready reference by the personnel that maintain, clean, and manage the facilities of the district and also for use in an emergency. These rooms are also usually protected by fire rated walls to minimize damage that could occur in the event of a fire.

## RECOMMENDATION

**IPS should locate any facility related documents that may exist and create an environmentally conditioned and fire-rated space within an existing building to store all of its facility related documents for ready reference and to protect this critical information from being damaged.**

The district should also consider scanning the existing documents so that they can be stored electronically as another layer of protection for this critical facility documentation. There are numerous companies that perform this service. In some cases, school districts have the technological resources internally to have these documents scanned and stored on servers.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 4-7

After a review of the facilities by the consulting team during our site visit, several items related to a proposed long-range facilities master plan and district facilities were noted and should be addressed in the plan, including:

- The district does not have a deferred maintenance replacement schedule for all specific existing mechanical, plumbing, and electrical equipment as part of a long-range maintenance plan. These items could be evaluated and options developed to consider including for funding in the proposed bond election. Any items not able to be funded from available funds included in the bond proposal should remain in the long-range maintenance plan for possible funding through existing budgets or for consideration for future proposed bond elections.
- Due to the significant age of the facilities, IPS should develop options of how to address Asbestos Containing Material (ACM) abatement that may be required to facilitate proposed needed improvements. One option to consider is to create an allowance within the overall bond program using bond sale interest earnings to address asbestos abatement and replacement costs if encountered during the performance of proposed renovations. The architect retained for design services for approved projects should address asbestos issues which may be identified as part of the overall project scope.
- Most buildings have not been modified to comply with current accessibility standards. The district should consider making necessary modifications for compliance using budgeted funds or include in a future bond program.
- The windows on most buildings are in poor condition and are in need of replacement, and would be beneficial in helping reduce energy costs which could be considered as part of a payback analysis to offset the replacement costs. Also, the buildings do not have vestibules at the entries and this should be considered as part of future bond program. The installation of enclosed vestibules could be another energy savings improvement to assist with lowering

utility costs for the district.

## **RECOMMENDATION**

**IPS should include the noted items as part of their long-range facilities master plan for consideration as part of future bond election.**

IPS should review the recommendations of the consulting team listed above and develop a plan to incorporate scope of work as part of the development of a long-range facilities master plan for consideration to include in future bond program. Any item that is not able to be funded through a bond election should still remain a part of the master plan for future consideration.

## **FISCAL IMPACT**

This recommendation would have to be funded from future approved bond elections.

### ***B. MAINTENANCE AND CUSTODIAL OPERATIONS***

The objective in maintaining and cleaning school facilities is to provide safe and cost-effective buildings, a sound educational environment, increased longevity of buildings and equipment, and protection of school property. The maintenance and cleaning of the facilities must be accomplished in an efficient and effective manner in order to provide a safe and secure environment that supports the educational program and efficiently utilizes the school district's resources.

Efficiencies and economies of maintenance and cleaning are critical to ensuring that resources for direct instruction are maximized. On the other hand, extreme actions to reduce the cost of maintenance and cleaning can result in higher than acceptable costs of repair and replacement in the years to come. Consequently, a balance must be achieved between reasonable economies and unreasonable cost-cutting.

The IPS maintenance staff is made up of one full-time maintenance position. This employee's job description includes all maintenance repairs needed in any area of the district. This includes plumbing, electrical, carpentry, HVAC, locks, painting, appliance, grounds, and bus repairs. This position is also responsible for maintaining the district softball field and driving a bus route when needed. The employee in this position does not hold a plumbing, electrical, or HVAC license. The district also employs one full-time custodian. Both of these employees report directly to the principal.

### ***Maintenance Operations***

The proper maintenance of facilities is critical to ensuring support for an effective instructional program. Research has shown that appropriate heating and cooling levels, building and room appearances, the condition of restrooms and other facilities, as well as occupant safety, all impact how students and staff are able to carry out their respective responsibilities. Ineffective or inadequate maintenance provisions have shown to lead to increased costs of facility operations

by shortening the useful life span of equipment and buildings. Many school districts have adopted rigorous preventive maintenance programs and maintain a record of the performance of equipment and the costs of regular maintenance by which they measure the effectiveness of these programs.

IPS had the lowest per-student maintenance and operations expenditures for the 2008-09 school year compared to the peer districts while also being lower than the peer district average (**Exhibit 4-9**) by 25 percent.

**Exhibit 4-9**  
**Maintenance and Operations Expenditures**  
**All Funds**  
**2008-2009**

District	Average Daily Membership	Annual Expenditures	Per Student Expenditures
<b>Indiahoma</b>	<b>312.6</b>	<b>\$248,843</b>	<b>\$796</b>
Butner	224.1	\$229,811	\$1,025
Duke	180.5	\$177,534	\$984
Verden	287.9	\$276,264	\$960
Chattanooga	277.0	\$329,214	\$1,188
Blair	271.6	\$224,120	\$825
<b>Peer District Average *</b>	<b>258.9</b>	<b>\$247,631</b>	<b>\$996</b>

Source: SDE, School District Expenditure Reports, 2008-09, Office of Accountability, Profiles Database, and WCL ENTERPRISES calculations

\* Peer district average does not include IPS

IPS maintenance and operations expenditures from all funds increased 8.6 percent for the five year period ending with the 2008-09 fiscal year (**Exhibit 4-10**). Supply costs increased 27.8 percent for this same period while purchased services decreased by 9.1 percent.

**Exhibit 4-10**  
**IPS Maintenance and Operations Expenditures**  
**All Funds**  
**2004-05 through 2008-09**

Expenditure Category	2004-05	2005-06	2006-07	2007-08	2008-09	Percentage Change
Salaries	\$27,991	\$31,606	\$35,974	\$32,270	\$38,289	<b>36.8%</b>
Employee Benefits	\$8,584	\$9,854	\$11,618	\$9,448	\$10,440	<b>21.6%</b>
Purchased Services	\$107,913	\$85,849	\$99,135	\$123,890	\$97,667	<b>(9.1%)</b>
Supplies	\$79,821	\$91,143	\$88,575	\$105,667	\$102,047	<b>27.8%</b>
Property	\$4,820	\$4,619	\$8,709	\$9,260	\$0	<b>(100%)</b>
Other	\$45	\$0	\$545	\$807	\$401	<b>79%</b>
<b>Total</b>	<b>\$229,174</b>	<b>\$223,071</b>	<b>\$244,556</b>	<b>\$281,342</b>	<b>\$248,844</b>	<b>8.6%</b>

Source: SDE, School District Expenditure Reports, 2004-05 through 2008-09 and WCL ENTERPRISES calculations

IPS maintenance and operations expenditures in the general fund increased by 5 percent for the five-year period ending with the 2008-09 fiscal year, while building expenditures increased by 34.9 percent (**Exhibit 4-11**). Overall, there was an increase of 8.6 percent in IPS maintenance and operations expenditures for this same five year period.

**Exhibit 4-11**  
**IPS M&O Expenditures by Funds**  
**2004-05 through 2008-09**

<b>Fund</b>	<b>2004-05</b>	<b>2005-06</b>	<b>2006-07</b>	<b>2007-08</b>	<b>2008-09</b>	<b>Percentage Change</b>
General Fund	\$204,594	\$179,926	\$207,511	\$250,764	\$215,685	5%
Building Fund	\$24,580	\$43,143	\$37,045	\$30,577	\$33,159	34.9%
Bond Funds	\$0	\$0	\$0	\$0	\$0	0%
Activity Fund	\$0	\$0	\$0	\$0	\$0	0%
Trust/Agency Funds	\$0	\$0	\$0	\$0	\$0	0%
<b>All Funds</b>	<b>\$229,174</b>	<b>\$223,069</b>	<b>\$244,556</b>	<b>\$281,341</b>	<b>\$248,844</b>	<b>8.6%</b>

*Source: SDE, School District Expenditure Reports, 2004-05 through 2008-09 and WCL ENTERPRISES calculations*

According to Oklahoma School Code, Chapter 1, Article I, Section 22, capital expenditures allowed from the building fund include:

- Purchase of land or existing buildings.
- Purchase of real property.
- Improvement of grounds for construction purposes.
- Construction of buildings.
- Additions to buildings.
- Remodeling of buildings, if remodeling involves changes to roof structures or load-bearing walls.
- Salaries and expenses of architects and engineers hired for capital projects, unless services are in preparation for a bond issue.
- Initial installation and extension of service systems and built-in heat or air equipment to existing buildings.
- Replacement of a building that has been destroyed.

- Installments and lease payments on property, excluding interest, that have a terminal date and result in the acquisition of property.
- Preliminary studies made prior to the time that authority to proceed with a construction project is given if authority is received within the same fiscal year that the expenditure was made.

Non-capital expenditures allowed in the building fund include:

- Maintenance, repair, and replacement of property and equipment.
- Initial or additional purchases of furniture and equipment.
- Direct expenses for maintenance of plant, including grounds.
- Salaries for maintenance of plant, including salaries for the upkeep of grounds.
- Repair and replacement of building structures which do not add to existing facilities and which do not involve changes to roof structures or load-bearing walls.

Reviewing comments from community forums, focus group meetings, and results of a written survey administered and distributed by the WCL ENTERPRISES consulting team to district employees, students, and parents (**Exhibit 4-12**), generally indicate that most students, parents, and support staff agree that school classrooms are clean. A total of 43 percent of support staff agree that the school facilities are well maintained compared to 66 percent of students. Also, 75 percent of the professional staff and 66 percent of the teachers agree that needed repairs are made in a timely fashion.

**Exhibit 4-12**  
**IPS Maintenance of School Facilities**  
**Survey Results**  
**September 2010**

Survey Statements	Agree	No Opinion	Disagree
<b>School facilities are clean</b>			
Parents	67%	11%	22%
Teacher	50%	6%	44%
Student	53%	33%	14%
Professional staff	50%	25%	25%
Support staff	67%	14%	29%
<b>School facilities are well maintained</b>			
Parents	63%	12%	25%
Students	66%	29%	5%
Support staff	43%	43%	14%
<b>Needed repairs are made in a timely manner</b>			
Professional staff	75%	0%	25%
Teacher	66%	6%	28%

*Source: Written survey administered by WCL ENTERPRISES*

**FINDING 4-8**

IPS does not use any type of work order system. As a result, the district does not have accurate data to plan and budget for maintenance type expenditures related to the performance of work orders.

There is very limited cost information available to plan work, budget to meet needs, or to anticipate maintenance costs that may arise periodically. Examples of data that are not being tracked include the following:

- Actual material and labor costs are not tracked on a per work order basis.
- There is no inventory data being tracked for the various pieces of equipment and building systems such as the serial number, original installation date, warranty information, preventive maintenance performance requirements, and the repair/warranty history.
- Purchase orders that are issued related to repairs being performed do not reference back to specific work orders or pieces of equipment.

The lack of information related to labor and material costs for performing needed repairs related to completed work orders could be detrimental in terms of decision-making in performing repairs versus replacement needs of various types of equipment and systems. Without accurate records related to work order history and costs, IPS is not able to identify situations needing to be addressed before they become problems, which could impact the classroom learning environment.

**RECOMMENDATION**

**IPS should, at a minimum, develop a spreadsheet to track district maintenance work orders, equipment inventory, labor and material costs, purchase orders, and preventive maintenance requirements.**

**Exhibit 4-13  
Example of a Maintenance Log Worksheet**

Work Order #	Date of Request	Requested by	Location	Job Description	Service Performed	Hours	Material used	Material cost	Date completed
1	1-10-11	Mr. Jones	Science Rm. 5	Leaking Sink	Replaced P trap	1.5	P trap	\$6.00	1-11-11
2									

**FISCAL IMPACT**

This recommendation can be implemented with existing resources. The district can experiment with information ideas that best serve IPS.

**FINDING 4-9**

IPS has not developed a formal preventative maintenance program and long-range facilities maintenance plan to address equipment and/or system replacements. As a result, the district could experience premature failure of equipment, risk a funding shortage at times of unexpected equipment failure, and suffer a lack of information needs that could be included in a future bond program.

Effective maintenance involves:

- Timely attention to emergency and corrective maintenance conditions. Emergency and corrective maintenance occur when equipment fails, typically requiring more time and resources to correct than preventive maintenance.
- A preventive maintenance program designed to avoid equipment breakdowns and prevent minor problems from escalating into major ones which keeps equipment running at peak efficiencies.
- A long-range plan to address HVAC mechanical, electrical, plumbing, and low voltage systems and/or component replacements required at the end of their useful life. The plan will typically indicate the current age of the components, what year to expect replacements to occur, and anticipated costs using a Consumer Price Index multiplier or estimated inflation rate.

As an example, Spring Independent School District (SISD) in Texas developed a comprehensive preventive maintenance program that includes the maintenance schedules shown in **Exhibit 4-14** below. This schedule could be modified to meet the needs of IPS.

**Exhibit 4-14  
SISD Preventive Maintenance Program Schedule**

Preventive Maintenance Activity	Activity Frequency
Clean A/C unit filters	Bi-monthly
Change A/C unit filters	3 to 12 week intervals
Clean chiller condenser coils	Bi-annually
Clean fan coil and air handler evaporator coils	Annually
Clean ice machine condenser coils	Every 4 months
Inspect and capacity test chillers	Annually
Change chiller compressor oil and cores	Every 2 years
Check chemical levels in closed loop chilled and Hot water piping	Monthly
Clean grease traps	Every 3 months
Inspect and test boilers	Annually
Check roofs, downspouts, and gutters	Monthly, repair as needed – 20 year roof warranty
Inspect exterior lighting	Semi-annually
Inspect elementary play gym lighting	Annually
Inspect and clean gym gas heaters	Annually

Inspect playground equipment	Monthly, repair as needed
Clean fire alarm system smoke detectors	Semi-annually
Inspect all interior and exterior bleachers	Annually, repair as needed
Clean, tighten, and lubricate roll out bleachers	Annually
Check exterior building and concrete caulking	Annually – 8 year replacement
Stripe exterior parking lots	Annually
Check condition of asphalt parking lots	Annually – 12 year replacement
Check carpet	15 year replacement
Check vinyl composition tile floors	20 year replacement
Spray wash exterior soffits and building	Every 2 years or as needed
Replace glass and Plexiglas	As needed
Paint interior of facilities	Every 5 years
Paint exterior of facilities	Every 8 years
Perform general facility inspections	Annually

Source: Spring ISD Facilities Department, September, 2010

**RECOMMENDATION**

**The IPS Maintenance Department should develop a preventive maintenance program and long-range facilities maintenance plan.**

Several computerized software systems are on the market but with consideration being given to the size of the district and limited funding available, a simple spreadsheet with equipment information along with scheduled maintenance dates would suffice. Specific equipment and system data would need to be obtained and recorded. Once this data has been entered into the spreadsheet, the district will then have the ability to generate work orders for the specific maintenance function required.

By employing a high school student on a part-time basis, building equipment and systems data could be gathered by this employee. He would also be able to provide help in the performance of actual preventive maintenance to the equipment.

**FISCAL IMPACT**

This recommendation can be implemented by employing a high school student on a part-time basis, 10 hours per week at the minimum wage. An annual budget cost of \$2,500 is recommended to secure this part-time position.

Recommendation	2011-12	2012-13	2013-14	2014-15	2015-16
IPS should employ a high school student to help with a district preventive maintenance program.	(\$2,500)	(\$2,500)	(\$2,500)	(\$2,500)	(\$2,500)

**FINDING 4-10**

IPS does not have a formal training program in place for its maintenance employee. This could

lead to improper use of tools and equipment and also compromise employee, staff, and student safety.

The IPS maintenance employee was hired on the basis of his existing skills. The district does not provide any type of additional training for this employee. Tools and equipment used by this employee can be costly and dangerous. Proper training is essential to safety and cost savings.

An in-house training program can be used to train staff on such topics as safety, work efficiency, etc. The purchase or rental of instructional videos are available for minor costs; also instructional trainers from equipment manufacturers will give presentations for no or minimal costs to the district.

## **RECOMMENDATION**

**IPS should provide in-house training for its maintenance employee by bringing training materials and possibly trainers to the district, or allowing him to team-up with neighboring districts to attend safety trainings.**

Maintenance training programs are available from a variety of private and public sources. The following sample from the Internet illustrates the many different types of training materials available:

- <http://www.schoolfacilities.com/> - This site features articles, products, and training program listings, plus an eNewsletter that covers current trends in building maintenance, school construction, school design, indoor air quality issues, etc.
- <http://nces.ed.gov/pubs2003/maintenance/chapter1.asp> - This site displays a complete *Planning Guide for Maintaining School Facilities*. It is available free of charge.
- <http://www.trainingservicesassoc.com/coursedesc.htm> - Training Services Association provides in-house training courses including courses on facilities maintenance.
- <http://www.grainger.com> – WW GRAINGER will arrange training by equipment manufacturer trainers for their customers at no or a very minimal cost.

The above training program sources are listed as examples. The administrator in charge of maintenance should conduct his own research by asking for information from his peers at other school districts and from the Internet. It is important to know that many maintenance and custodial training programs sponsored by product manufacturers or service providers may be biased in the direction of these products or services, and do not provide a balanced professional view of the role of these services in facilities operations. Unbiased and non-proprietary training programs usually require a nominal fee, as they are not underwritten by an industry or corporation.

**FISCAL IMPACT**

The costs of this recommendation include the cost of renting training materials and for the occasional outside trainer or other specific training opportunities that may be applicable. While some materials and trainers are offered at no charge, such offers are often laced with heavy bias toward a particular product or service and should be used with caution. An average annual budget cost of \$500 is recommended per year for training. IPS should investigate options to coordinate the training with other nearby public school districts to potentially share in the cost to conduct such programs.

Recommendation	2011-12	2012-13	2013-14	2014-15	2015-16
IPS should conduct formal in-house training for its maintenance staff by bringing training materials and possibly trainers to the district.	(\$500)	(\$500)	(\$500)	(\$500)	(\$500)

***Custodial Operations***

Safe, clean, and sanitary facilities are essential elements of the education environment. School systems across the United States use several means to address these elements. School Boards either contract out (outsource) custodial services or organize a comprehensive in-house system of services. Personnel may be employed by either the outsource company or the School Board.

Management responsibility, if the program is totally in-house, may reside either partially or wholly with the central office, the individual school, or the Maintenance and Operations Department. Determining the desired structure is usually based upon a number of criteria, including minimizing costs to the school district, improving services to schools, and reducing (or increasing) the span of control of district or school administrators.

Product vendors typically help to train maintenance/custodial staff. Custodial training programs are vitally important and are available from a variety of private and public sources. The following sample from the Internet illustrates the many different types of training materials available:

- [http://www.edfacilities.org/rl/custodial\\_staffing.cfm](http://www.edfacilities.org/rl/custodial_staffing.cfm) - The National Clearinghouse for Educational Facilities (NCEF) contains a resource list of links, books, and journal articles on custodial staffing guidelines, needs assessment, training, and procedures for K-12 school buildings and colleges.
- <http://nces.ed.gov/pubs2003/2003347.pdf> - The National Center for Education Statistics has compiled a very good handbook titled “*Planning Guide for Maintaining School Facilities.*”
- <http://www.trainingservicesassoc.com/coursedesc.htm> - The Training Services Association provides in-house training courses, including courses on custodial services.

- <http://www.cleaningconsultants.com/> - This site contains an online store with books, videos, reports, and software titles that include subjects such as basic cleaning, housekeeping, window washing, janitorial services, custodial maintenance, bidding, and estimating costs.

For further information, forums, professional development opportunities, and conferences concerning professional school facility management, maintenance, and cleaning, refer to, and consider membership in: the National School Plant Management Association (NSPMA) at <http://www.nspma.com/>, the Oklahoma School Plant Management Association (OSPMA) at <http://www.ospma.org/>, or American School and University at <http://asumag.com/about/>.

**FINDING 4-11**

In an effort to reduce costs, IPS currently employs one custodian to clean their entire facility. The cleaning consists of sweeping the floors and cleaning the restrooms. The teachers help out in their respective areas by doing their own dusting, emptying trash cans, and cleaning their chalk or white boards.

The Association of School Business Officials International (ASBO) bases custodial staffing on an expected average productivity of 2,500 square feet per staff hour of work for an 8 hour cleaning period, which equals 20,000 square feet per custodian. The IPS facility covers approximately 38,000 square feet which means they would need to employ one additional custodial employee to meet the ASBO standards.

**RECOMMENDATION**

**IPS should explore the possibility of hiring at least a part-time employee to share the custodial responsibilities of the facility.**

**FISCAL IMPACT**

By implementing this recommendation, IPS would need to determine the hours per week the part-time employee would be needed to work in order to meet the district’s custodial needs. This would be a minimum wage position. Based on this employee working 20 hours per week and working 38 weeks of the school year, an annual budget cost of \$5,500 is recommended.

<b>Recommendation</b>	<b>2011-12</b>	<b>2012-13</b>	<b>2013-14</b>	<b>2014-15</b>	<b>2015-16</b>
IPS should explore the possibility of hiring at least a part-time employee to share the custodial responsibilities of the facility.	(\$5,500)	(\$5,500)	(\$5,500)	(\$5,500)	(\$5,500)

**FINDING 4 –12**

IPS does not provide training for their custodial employee in the areas of job responsibilities or safety. Cleaning supplies and chemicals are not stored in a secured area which could compromise the safety of the staff and students.

**Exhibit 4-15** below indicates a typical condition the consulting team found within IPS facilities where supplies and chemicals were not being properly secured:

**Exhibit 4-15  
Unsecured Custodial Storage Closet  
September 2010**



*Source: WCL Enterprises Consulting Team site visit, September 2010*

**RECOMMENDATION**

**IPS should provide training for their custodian in the use and storage of cleaning chemicals as well as basic cleaning practices.**

**FISCAL IMPACT**

This recommendation can be implemented with little or no cost to the district. Several Internet sites provide many different types of training materials available as was listed above.

**C. ENERGY MANAGEMENT**

School facilities consume significant amounts of energy that translate into an ever growing and sometimes unpredictable component of the overall annual budget. With increased costs for energy and fuels for HVAC systems, water heating, office equipment, and other related activities, school districts establish policies, procedures, and methods for increasing efficiency in

energy consumption and reducing operating costs. Policies typically describe the School Board's specific desire to ensure that maximum resources are available for instructional purposes and charge the administration with developing related procedures.

Procedures generally prescribe a range of measures and activities to be implemented and a specific means for computing the results. Some School Boards develop incentive systems to reward employees for actions or recommendations which have resulted in substantial energy savings. Energy management methods range from sophisticated, centralized computer controls over HVAC systems and other energy consuming devices to simple manual procedures for turning thermostats down and lights off during periods of minimal facility utilization.

Proper energy management is a vital tool for the efficient use of a district's resources. Energy audits and other sources of data are essential to control energy costs. Districts use such data to monitor and evaluate the success of the energy management program. While the purpose of the energy management program is to minimize waste, the program should also ensure the comfort of the building occupants and encourage energy awareness across the district.

Many districts around the country use a number of techniques to keep energy costs down. Examples of these conservation efforts include:

- Entering monthly energy bill data into a spreadsheet to maintain a history of expenditures and use.
- Performing building checks to see if lights are turned off, doors are closed, water faucets are not dripping, etc.
- Leaving an "OOPS" note reminding teachers or staff of the proper procedure, if problems are found during building checks.
- Establishing set points for thermostats at 76 degrees in the summer and 69 degrees in the winter.
- Purchasing set-back thermostats and programming them to turn down cooling or heating in advance of daily adjournment and over the weekends.
- Setting water heaters or boilers at a maximum temperature of 140 degrees, except in areas requiring higher temperatures for sanitation purposes, such as kitchens.
- Replacing worn out and damaged equipment, windows, and lighting as needed, with more energy efficient units.

The cost of energy is a major item in any school budget. Thus, school planners generally embrace ideas that can lead to reduced energy costs. IPS has installed a computer controlled Energy Management System (EMS) that operates zoned HVAC units. These systems can automatically turn on and off air conditioning and boilers according to pre-programmed instructions entered by staff.

An Association of School Business Officials (ASBO) study suggests that costs associated with EMS are generally recouped within a few years of implementation. The study also suggests that the following guidelines will help a school system accomplish more efficient energy management:

- Establish an energy policy with specific goals and objectives.
- Assign someone to be responsible for the district’s energy management program and give this energy manager access to top level administrators.
- Monitor each building’s energy use.
- Conduct energy audits in all buildings to identify inefficient energy units.
- Reward schools that decrease their energy use.
- Install energy efficient equipment, including power factor correction units, electronic ballast, high efficiency lamps, night setbacks, and variable speed drives for large motors and pumps.
- Install motion detectors that turn lights on when a room is occupied and off when the room is unoccupied.

Results of the written survey administered by the consulting team show that 25 percent of professional staff and 27.8 percent of teachers agree with the statement, “The district has an effective energy management program,” as noted in **Exhibit 4-16**. The majority of the district staff surveyed does not believe the district is effective in this area.

**Exhibit 4-16**  
**IPS Energy Management Program Survey**  
**September 2010**

Survey Statements	Agree	No Opinion	Disagree
<b>The district has an effective energy management program</b>			
Professional Staff	25%	25%	50%
Teachers	27.8%	33.3%	38.9%

*Source: Written survey administered by WCL ENTERPRISES*

An August 2004 report prepared for the U.S. Department of Energy entitled *School Operations and Maintenance: Best Practices for Controlling Energy Costs, A Guidebook for K-12 School System Business Officials and Facility Managers*, stated that school districts pay an average of about \$1.00 per square foot annually for energy costs and as high as \$250 per student annually. The 38<sup>th</sup> Annual Maintenance & Operations Cost Study (April 19, 2009) prepared by American School and University Magazine states that the national median cost per square foot for energy in K-12 schools is \$1.19 per square foot and \$244.87 per student.

IPS's annual energy costs for fiscal year 2010 average \$0.82 per square foot or \$266.23 per student as shown in **Exhibit 4-17** below. The cost per square foot is well below these publications stated average, however, the cost per student is higher than the stated average. Although IPS energy costs have increased 5.3 percent since 2005-06, the district's energy costs are below the national average for school districts on a per square foot basis.

**Exhibit 4-17**  
**IPS Energy Costs**  
**2005-06 through 2009-10**

Category	2005-06	2006-07	2007-08	2008-09	2009-10	Percentage Change
Electricity Costs	\$27,561	\$ 29,034	\$27,415	\$25,361	\$24,360	(13.1%)
Propane Gas Costs	\$ 21,622	\$ 24,120	\$33,363	\$22,605	\$27,554	21.5%
<b>Total Energy Costs</b>	<b>\$49,183</b>	<b>\$53,154</b>	<b>\$60,778</b>	<b>\$47,966</b>	<b>\$51,914</b>	<b>5.3%</b>
<b>Total Square Feet of IPS Facilities</b>	<b>63,216</b>	<b>63,216</b>	<b>63,216</b>	<b>63,216</b>	<b>63,216</b>	<b>0.0%</b>
<b>Energy Cost per Square Foot</b>	<b>\$0.78</b>	<b>\$0.84</b>	<b>\$0.96</b>	<b>\$0.76</b>	<b>\$0.82</b>	<b>4.9%</b>
IPS Student ADM	230.8	208.5	199.4	**312.6	*195	18.4%
<b>Energy Cost per IPS Student</b>	<b>\$213.10</b>	<b>\$254.94</b>	<b>\$304.80</b>	<b>\$153.44</b>	<b>\$266.23</b>	<b>31.8%</b>

*Source: IPS Maintenance Department, September 2010; Office of Accountability Statistical Database*

*\*Virtual Students excluded from this ADM data as provided by IPS superintendent*

*\*\*2008-09 IPS Student ADM includes virtual students*

### FINDING 4-13

Most IPS classrooms have window unit air conditioning that is controlled individually by the teacher. As a result, teachers have control of temperature settings in their classrooms throughout the day, which creates the potential for increased cost to the district.

Currently, the district has no central HVAC or energy management control systems installed in their buildings, except for the Media Center Building, which utilizes a central system with a programmable thermostat. IPS started installing ceiling fans in some classrooms as funds were available in their operating budget to assist in providing a more efficient and comfortable environment. The use of window units is not a very energy efficient system. When window air conditioning units are utilized, districts will typically have higher electricity costs compared to facilities that utilize central air and heat type systems that control the temperature settings with programmable thermostats.

In many instances in educational facilities, the placement of programmable thermostats and the use of occupancy sensors have proven to be relatively inexpensive and effective energy conservation measures. Programmable thermostats allow for automatic temperature setbacks during both heating and cooling modes for times when a building is usually not occupied, such as at night and on weekends. This type of thermostat, however, can easily be overridden. By

utilizing Direct Digital Control (DDC) thermostats controlled through a central energy management control system, additional cost savings could be achieved and allow a district to standardize temperature control settings based upon a School Board adopted energy management policy.

As part of the system installation to help control energy costs, IPS should consider installation of energy management hardware and software on HVAC equipment in all buildings to provide zoned on/off control functions. These zones typically can be programmed to be turned off at the end of the school day unless written requests have been submitted for after hour use of spaces, such as sporting events and musical productions.

A recent study was performed for Caldwell, Texas Independent School District after the installation of energy conservation improvements, which included new automated building controls, high efficiency chillers, and lighting retrofits. In the energy modeling performed during design of the improvements, the model predicted a 10 percent reduction in energy use just from converting from pneumatic thermostat controls to DDC controlled programmable thermostats. In the first year after completion of the improvements, the district achieved a 33 percent reduction in energy use, which resulted in a cost savings of \$169,347.00

## **RECOMMENDATION**

**IPS should consider installation of a central air and heating system along with a comprehensive energy management control system to include installation of new DDC controlled programmable thermostats, occupancy sensors, and hardware on HVAC equipment to provide zoned on/off control functions.**

IPS should include, as part of its current long-range facilities master plan, installing a central air and heating system along with an energy management control systems to include the use of DDC temperature controls, occupancy sensors, and humidity sensors along with DDC control hardware on HVAC equipment to provide zoned on/off control functions in each of their buildings. This would allow IPS to standardize temperature control settings for the operation of the HVAC systems, and to also control lighting in classrooms and other support areas throughout the school day.

## **FISCAL IMPACT**

Costs for implementation of this recommendation would have to be included in future bond program.

## **FINDING 4-14**

IPS does not have computerized energy cost tracking system to monitor utility use and costs, thereby making it impossible to perform utility bill audits. As a result, the district may not be able to detect errors in billings from utility companies based upon adopted utility rate schedules. The district is currently only tracking its total district utility costs through the school district expense reports and spreadsheets. Tracking monthly utility use and cost data at each meter and at

each building is very important as it can assist IPS in evaluating where problems may exist in terms of consumption, such as a water main leak, a HVAC roof top unit set manually to run 24 hours a day, or a malfunctioning meter.

There is web-based energy accounting software available in the market for purchase. Most programs will allow districts to track their utility costs by meter and by building. In most cases, this type of program performs a utility bill audit function that compares the data that has been entered into the program to the utility company statement and can flag the bill if there is an error in the calculation. This function alone can help uncover billing errors that would normally not be detected, which can easily cover the cost of the software program.

Online utility tracking and analysis software such as School Dude UtilityDirect (<http://www.schooldude.com/products/utility-direct/>) offers a number of features, including:

- Tracks and monitors bills for electric, water, natural gas, sewer, trash/waste, telephone, etc.
- Enables fast and easy bill entry.
- Enables simple comparison and analysis of utility billing data.
- Checks bills different ways to identify use and cost problems.
- Provides an audit trail for tracking saving opportunities identified.
- Tracks various account and building attributes, including region, cost center, HVAC system and building construction types, operation hours, and more.
- Provides various weather analysis reports to normalize energy use according to weather data.
- Allows energy use and cost comparisons by square foot between similar buildings.
- Tracks basic utility information i.e. billing periods, total consumption, demand, and costs.

Typical benefits of using such software as published by the manufacturer, School Dude, include the following:

- Helps improve efficiency by identifying utility waste, cost, meter problems, billing errors, and saving opportunities.
- Allows user to check bills for accuracy prior to payment.
- Reduces utility use and costs by identifying savings opportunities.
- Enables quick comparison and analysis of utility data with customizable reports.

**RECOMMENDATION**

**IPS should consider purchasing one of the available energy accounting software programs.**

The superintendent and principal should identify potential web-based utility tracking and analysis software that is used in school districts for energy use management. Once the principal identifies available options and costs, the director should request a demonstration of the software options, contact user districts to determine their satisfaction with the product, and make a recommendation to the superintendent for purchase.

**FISCAL IMPACT**

A purchase price of \$1,098 would cover a one-year subscription to School Dude UtilityDirect with training and setup in the first year. The software manufacturer has published results from a typical cost/benefit analysis that results in reported savings of at least five percent of a district’s annual utility expenditures. For IPS, this could result in a savings of \$672 (\$35,404 in total energy costs for 2009-10, the most recent year of available data, x 5 percent = \$1,770 less cost of program of \$1,098 = \$672) for the first year based upon the utility expenditures for fiscal year 2010 and a net savings of \$1,172 for subsequent years. This initial investment will have a payback period of less than eight months.

Recommendation	2010-11	2011-12	2012-13	2013-14	2014-15
IPS should purchase one of the available energy accounting software programs	(\$672)	(\$1,172)	(\$1,172)	(\$1,172)	(\$1,172)

**FINDING 4-15**

IPS has not formally adopted or implemented a comprehensive energy management program (EMP). Without such a program, IPS runs the risk of costly energy inefficiencies taking budget dollars from instructional activities.

The principal is currently in charge of energy management who reports to the superintendent with the assistance of the one maintenance position. Per the WCL ENTERPRISES consulting team’s interview with the IPS staff, there have been no guidelines established for energy management and temperature control within the district.

The U.S. Department of Energy determined that at least 25 percent of all energy consumed in a school facility is due to energy inefficiency. This inefficiency can be caused by:

- Dry transformers.
- Location of light switches.
- Hallway lights.

- Plug loads and personal appliances.
- Phantom loads.

Energy Management Programs (EMPs) are an effective method for reducing the inefficiencies associated with energy use. An EMP should contain the following elements:

- Based upon the School Board policy, a goal for the program and established objectives.
- A responsible individual and means of implementing the program and an energy management team.
- A checklist for administrators, instructional personnel, and operators.
- Energy education materials for use by instructional personnel.
- Energy awareness training for all school personnel.
- An evaluation instrument and means of celebrating success.

As an example, Duncanville Independent School District in Texas successfully adopted and energy management plan in November 2007. The Duncanville EMP states at the outset:

“Awareness of conservation techniques is an important aspect of an energy conservation program. Establishing district guidelines is critical to the overall program because we will be able to judge the buildings based upon near identical operating procedures. Only then will we be able to determine the efficiency of the various buildings and therefore, be able to formulate a true general comparison of energy consumption levels at all buildings. Energy conservation is first a people concern and then a technical concern. Administrators should take a serious look at how their building operates in terms of normal daily routines and activities. By designating thermostat settings and reducing equipment run time and lighting operations, all building administrators will be able to significantly contribute to the district program.

An energy conscious attitude among all district personnel should prove to generate substantial savings and will cost essentially nothing to implement. The guidelines and procedures set forth are approved by the School Board. These are general guidelines, meaning that some of them will not directly pertain to every building because of varying unique characteristics associated with each building. However, all Administrators should implement these guidelines to the maximum possible level.”

The district’s plan components are shown in **Exhibit 4-18** below.

**Exhibit 4-18  
Duncanville Independent School District  
Energy Management Plan Components  
November 2007**

Plan Section/Subcomponents
Introduction
Letter, Superintendent, DISD announcing EC support
District Standard Operating Procedures (SOP) <ol style="list-style-type: none"> <li>1. Requests for Building Modifications Pertaining to Energy-Related Matters</li> <li>2. Standardized Temperature Settings for Water Heaters</li> <li>3. Standardized Settings of all Thermostats</li> <li>4. Authorized Adjustment of Thermostats</li> <li>5. Startup Procedure for Air Conditioning and Heating Equipment</li> <li>6. Shutdown Procedure for Air Conditioning and Heating Equipment</li> <li>7. Operation of Specific-Use Areas</li> <li>8. Obstruction of Supply Air Vents</li> <li>9. Elimination or Proper Use of Portable Electric Heaters</li> <li>10. Operation of Equipment During Non-Instructional Periods</li> <li>11. Schedule and Operation of After-Hour Events</li> <li>12. Proper Operation of Exterior Doors and Windows</li> <li>13. Proper use of Window Shading Devices</li> <li>14. Proper Operation of Interior Doors</li> <li>15. Operation of Interior Lights</li> <li>16. Area Lighting Controlled by Multiple Switching</li> <li>17. Lighting Procedures for Limited-Use Areas</li> <li>18. Ornamentation Lighting</li> <li>19. Exterior Lighting</li> <li>20. Incandescent Light Bulbs</li> <li>21. Lighting Used for Vending Machines</li> </ol>
Energy Saving Tips for the Classroom
Recommended Illumination Levels
Standard Operation Procedures for Custodial Personnel <ol style="list-style-type: none"> <li>1. Cleaning and Continual Upkeep of all Mechanical Rooms</li> <li>2. Light Fixture Inspection and Cleaning Program</li> <li>3. Replacement Procedure of Fluorescent Lights</li> <li>4. Supply and Return Air Vent Cleaning Program</li> </ol>
Daily Guidelines and Recommendations for Custodians.
Standard Operating Procedures for Food Service Personnel
Energy Saving Tips for the Kitchen/Cafeteria

*Source: Duncanville Independent School District Energy Management Plan  
adopted in November 2007*

As an example, the *Energy Savings Tips for the Classroom* section of the Duncanville plan is listed below:

**TURN OFF THE LIGHTS!!** When your classroom or adjacent rooms (such as restrooms or storage rooms) are not occupied, make sure the lights are turned off. If you are the only one

in the classroom, utilize the multiple light switches by only turning on the row of lights over your desk or use a desk lamp.

**CLOSE DOORS AND WINDOWS!!** If the air-conditioning or heating system is on, make sure all doors and windows are closed. This will help to provide a more comfortable environment within the classroom.

**BENEFIT FROM WINDOW SHADING DEVICES!!** If your classroom has some type of window shading device such as curtains, mini-blinds, shutters, etc., then take advantage of the sun on cold winter days by leaving them open to utilize the natural light and radiation heat to warm the room. Conversely, on hot days, leave them closed and allow the air-conditioning to work less.

**MONITOR THERMOSTAT SETTINGS!!** Make sure thermostats are set and maintained at the district mandated settings. Settings are 72 degrees in the heating season and 74 degrees in the cooling season.

**DON'T OBSTRUCT AIRFLOW!!** All classrooms are provided with a return air vent. This allows for room air to circulate through the conditioning unit. If the vent is obstructed (by a bookcase for example) the amount of conditioned air for the room will be decreased. The return air vent is the one that does not blow air into the room. Dirt and dust can build up around the return air vent. This will also restrict airflow and lead to an uncomfortable environment. Communicate with your head custodian and make sure all vents are dirt/dust free.

**REPORT BURNED-OUT LIGHT BULBS!!** Burned-out light bulbs create poor lighting as well as maintenance problems. If a bulb is burned out, have your administrator send a work-order to the Maintenance Department. Also, make sure the custodial staff wipe/clean the light cover. They get dirty and will restrict light output to your classroom.

**REFRAIN FROM USING PORTABLE ELECTRIC HEATERS!!** Portable heaters not only consume a lot of electricity, but also create a fire hazard within the classroom. If you do not feel that your room is adequately heated, contact the Maintenance Department - there may be a mechanical equipment problem.

**KNOW THE OPERATING SCHEDULE!!** All units providing heating and air-conditioning should be turned off no later than 15-30 minutes after the last scheduled period. Cafeteria and kitchen units can be turned off much earlier. If you notice them running, tell your principal or head custodian.

**CHECK FOR RUNNING WATER!!** The costs for a leaky faucet or running commode can add up. If you discover this problem, report it to your head custodian or principal to ensure that maintenance is notified to correct the problem.

**RECOMMENDATION****IPS should develop a comprehensive energy management program to be adopted by the Board of Education.**

Goals should be specific, realistic, and achievable, such as:

- Reduce energy consumption in each school facility by at least a (specified percentage) at the end of the (specific) school year and maintain the achieved level of consumption for five years after attainment.
- Establish energy awareness training for all school employees.
- Obtain and make available energy education materials for all teachers for incorporation into their subject matter.

In developing this program, IPS should adopt a set of energy guidelines for use in the design and construction of new and renovation of existing school facilities. Checklists should be developed for all segments of the school community for use on daily energy conservation actions and for special circumstances to control energy use. IPS should also develop energy awareness training to support stated objectives. As the results of energy audits and facility/systems inspections, develop an "energy conservation project list" in conjunction with planned capital projects.

Other things to consider in developing the EMP include:

- Developing a means to evaluate the success of the overall program.
- Developing a means for recognition of success in the program both internally and externally.
- Informing the community that the EMP exists, what has been accomplished, and how they can reduce their own energy bills.
- Regularly updating the program to reflect changing conditions, successes, and/or failures.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

IPS should pursue opportunities with vendors to investigate and implement measures, which could minimize utility consumption and shorten the payback schedule for the investment being made with capital expenditures. A good payback period for energy conservation upgrades will typically be from one to five years. Any upgrades that result in a longer payback period should be thoroughly analyzed to determine whether it's a feasible option or not based upon the current financial condition of the district.

**FINDING 4-16**

The windows on most buildings are in poor condition and are in need of replacement. As a result, IPS is incurring additional utility costs due to the heat gain/loss that is evident through these openings.

During the walk-through conducted by the consulting team, it was noted that the existing windows on the Jr/Sr High School Building were in very poor condition. Air infiltration is occurring at these window openings which impacts the environmental condition of the instructional and support spaces. This also increases the utility costs due to the increased heating and cooling needs resulting from this infiltration. Evidence of this infiltration is shown in the thermal images taken during an inspection of the buildings which are included in **Appendix H**.

By replacing these old windows, IPS would benefit by seeing a reduction in energy costs. This reduction in energy costs could offset the initial capital costs required to replace the windows. This could be determined as part of a payback analysis of the projected energy costs savings which would offset the replacement costs. Also, the buildings do not have vestibules at the entries and this should be considered as part of future bond program. The installation of enclosed vestibules could be another energy savings improvement to assist with lowering utility costs for the district.

**RECOMMENDATION**

**IPS should consider either allocating funds within their current budget to replace the windows in the Jr/Sr High School Building or include this replacement cost in a future bond program.**

**FISCAL IMPACT**

Based upon the measurements of the windows obtained from the Office of Accountability, the cost to remove the existing windows and replace with double paned insulating windows units would be approximately \$25.00 per square foot for an average type window unit. There is a wide range of options available that vary in cost that could result in a higher or lower cost per square foot cost estimate. Also, there were not plans available to review existing design details which could also result in additional costs to address window attachment and flashing details. The total estimated square footage of window replacement is approximately 1,058 square feet. Using the unit price of \$25 per square foot results in an estimated cost of \$26,450 for the window replacement. There are additional general condition costs that should be added to this amount which would vary, but typically, 15% is a good rule of thumb. Adding this additional 15% (\$26,450 x 15%) to the window cost would result in a final estimated cost of \$30,418.

IPS would need to evaluate their current budget allocation to determine if funds are available to replace a portion or all of the windows within the current fiscal school year. IPS could consider funding this over several fiscal years as one option or consider including this estimated cost in future bond program for consideration and approval by the voters. IPS should consider getting formal quotes from local area glass and glazing subcontractors in the vicinity.

**D. COMMUNITY USE OF SCHOOL FACILITIES**

The primary function of IPS facilities is to enhance the quality of education for all students. There is no Board of Education rental policy in place to address the use of IPS facilities by community or outside groups. IPS does not charge for the use of school facilities or equipment by school sponsored groups and other defined groups whose activity benefits IPS. The superintendent is responsible for the scheduling of all facilities use in IPS.

**FINDING 4-17**

IPS has not evaluated the costs to operate their facilities to develop rental rates for facilities used by community and outside groups. As a result, actual costs incurred by IPS, which include custodial, maintenance, utilities, and administrative expenses, are not reimbursed to the district by community or outside groups.

IPS has not established rental rate schedules for the rental of facilities by the community and outside groups. Even though there are very limited outside groups that would use the facilities, it would be beneficial for IPS to perform an evaluation and establish rates in the event an outside group would want to use any IPS facility so that the expenses would at least be covered.

As an example, Broken Arrow Public Schools (BAPS) located in the Tulsa, OK area recently completed an evaluation in 2009 of its rental rates for facilities used by outside groups. BAPS reviewed the policies, rates, and types of facilities available in adjacent school districts and compared them with their existing rental rates. After reviewing this data, a revised rate schedule and policy was developed, approved, and adopted by the Board of Education on July 13, 2009. This included additional charges for the use of any equipment stipulated in the School Board policy and rental rate schedule. These charges are in addition to the basic rental rates. Also, one custodian is included in the basic rental rate at the highest hourly rate being paid. This cost is included in the rental rates per the board of education adopted rate schedule. If additional custodians are needed to support an event, an additional charge of \$20 per hour for weekdays and \$25 per hour for weekend is applicable. BAPS also has included provisions in their regulations when security will be needed which would be an extra cost.

**Exhibit 4-19** sets forth the basic charges or cost reimbursements, and includes a base rental rate based upon the BAPS adopted School Board policy in July 2009.

**Exhibit 4-19**  
**Broken Arrow Facility Use Rental Rate Schedule**  
**July 2009**

Type of Facility	Base Rent Cost Per Hour	Facility Use Employee Cost Per Hour	Additional Information
<b>Performing Arts Center</b>			
Weekdays	\$1,000 per event up to five hours	Included in Base Rental Rate	\$130 per hour over five hours
Weekends/Holidays	\$1,175 per event up to five hours	Included in Base Rental Rate	\$175 per hour over five hours
Convention Rate	\$1,500 per event up to five hours	Included in Base Rental Rate	\$150 per hour over five hours
Lobby Rate	\$100		4 Hour Minimum
<b>North Intermediate HS Auditorium</b>			
Weekdays	\$100	Included in Base Rental Rate	3 Hour Minimum; \$75/hour over 3 hours
Weekends	\$125	Included in Base Rental Rate	3 Hour Minimum; \$100/hour over 3 hours
<b>Athletic Facilities</b>			
HS & IHS Wrestling Rooms	\$50	Included in Base Rental Rate	3 Hour Minimum
Elementary School Gymnasiums	\$75	Included in Base Rental Rate	3 Hour Minimum; \$20 each additional hour
<b>Elementary School Gymnasiums – Local Not for Profit</b>			
Weekdays	\$30	Included in Base Rental Rate	No Minimum
Weekends	\$50	Included in Base Rental Rate	3 Hour Minimum
Gymnasium	\$150	Included in Base Rental Rate	3 Hour Minimum; Locker Room access is \$50; \$100 each additional hour
<b>HS Gymnasium – Local Not for Profit</b>			
Weekdays	\$60	Included in Base Rental Rate	
Weekends	\$125	Included in Base Rental Rate	3 Hour Minimum; \$50 each additional hour
Playing Fields	\$50 for first hour; \$30 for each additional hour	Included in Base Rental Rate	One Hour minimum with a \$50 deposit

Source: Broken Arrow PS School Board Policy Section II, 16 - Use of School Facilities – July 13, 2009 adoption date

BAPS requires a 50% deposit for any events scheduled at the Performing Arts Center. Any event scheduled in the auditorium of North Intermediate High School requires the user to pay for the

rental in full by noon on the day the event is scheduled. The insurance certificates received by staff for scheduled events are sent over to the school district's local insurance agent for verification and approval to ensure compliance with the policy for the Board of Education.

## **RECOMMENDATION**

**IPS should evaluate its actual cost to operate buildings and develop a rental rate schedule and policy for facility use by community and outside groups to ensure that IPS will be reimbursed for costs incurred in any facility rental.**

The superintendent should contact other school districts in their vicinity to obtain sample rental rate schedules to develop their own rental rate schedule and policy. The rate schedule and policy should then be presented to the Board of Education for approval and adoption.

## **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

## **FINDING 4-18**

IPS does not have a formal rental agreement in place for facility use by community and outside groups which addresses the responsibilities of all parties including insurance requirements, costs reimbursements, damage incurred, utility use, cleaning requirements, etc. As a result, IPS may incur additional exposure to risk and costs related to such facility use due to these responsibilities and expectations not being outlined accordingly.

A formal rental agreement should be developed by the district's legal counsel so the district will be better protected against the risks associated with the leasing of district facilities to outside groups such as damage reimbursement, deposits, payment terms and conditions, etc, that are deemed appropriate.

As soon as it is practical after any facility use, the facility or equipment utilized should be examined for damage. Problems discovered should be reported to the superintendent and the user of the facility or equipment should be held responsible. Reimbursement by the user for any damage should be due immediately. If a deposit is collected at the time of lease, the deposit could be used to offset the cost of the damage to minimize the risk to IPS. No further use of school facilities or equipment should be allowed by the user until payment for damage is received by the district.

The responsibilities of the parties could be outlined in a formal agreement to address who is responsible for clean up during and after an event or rental; what parameters are allowed for temperature control of the rented space; and who is allowed to control or operate any building system or equipment such as electrical, sound, and HVAC.

---

## RECOMMENDATION

**IPS should develop a formal rental agreement with legal counsel to address the risks associated with the leasing of district facilities to outside groups and recommend revisions to board policy for approval and adoption by the Board of Education.**

Many school districts have developed lease agreements to better protect the interests of the district. The superintendent should contact other districts in Oklahoma to obtain copies of their facility lease agreements. These sample documents could be reviewed by IPS staff and then have legal counsel develop a final version of an agreement for use by IPS.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

### *E. SAFETY AND SECURITY*

According to the Justice Department's Bureau of Justice Statistics and the Department of Education's National Center for Education Statistics latest report, *Indicators of School Crime and Safety, 2009*, 75 percent of public schools recorded one or more violent crimes and 47 percent recorded one or more thefts in 2007–2008. Because incidents of school violence draw national attention, school systems must take proactive measures in safety and security even in incident free schools. Students, teachers, and other district employees deserve a safe school environment in which to work and learn. In whatever areas schools are not safe and disciplined, those environments work against academic achievement.

The WCL ENTERPRISES consulting team visited each facility within the Indiahoma Public Schools (IPS) making direct observations, interviewing personnel, and attending community forums during the review process. The findings, commendations, and recommendations made by the consulting team are provided in this report as a means to assist IPS with improving student safety, security, and learning.

### FINDING 4-19

IPS has undertaken a series of efforts to enhance the safety and security of students, staff, and facilities. These enhancements provide the students and staff with a level of safety and security that is conducive to teaching and learning, ultimately increasing student achievement. Those efforts begin with the superintendent and principal who consistently provide vigilance through campus visitations and leadership by encouraging staff members to discuss safety and security during regularly scheduled meetings.

Other aspects of this effort involve specific processes and procedures that are used, including the following:

- Competent authority inspected all fire alarm systems within one calendar year. This process ensures that the fire alarms are in good working condition and have the ability to warn

---

building occupants in the event of a fire.

- All fire extinguishers are inspected by a competent authority within one calendar year. This process ensures that fire extinguishers are in good working condition and have the ability to extinguish small fires before they become life threatening.
- Elementary school teachers supervise students while on the playground. Adult supervision during recess substantially reduces the chances of child abduction and accidental injuries.
- The landscaping around the buildings is adequately maintained, reducing the possibility of contraband and intruder concealment. Property damage and personal injury are less likely to occur when landscaping material is adequately pruned, hampering the concealment of contraband and intruders.
- Automatic Electronic Defibrillators (AEDs) are available within the buildings. The availability of an AED greatly increases the probability of surviving a life threatening cardiac event.
- Chemicals were securely stored in the high school science lab. The risk of vandalism and personal injury is decreased when chemical storage areas are secure.
- A closed circuit video surveillance system monitors public areas in and around the facility. Video monitoring enhances student safety and security.
- A single central administrator, the school principal, is responsible for the management of safety and security. As a result, there is one position that coordinates all processes, ensuring that those processes are being followed effectively and efficiently without duplication of effort.

## COMMENDATION

**By involving district staff, establishing a series of regular procedures, and enforcing district policies, IPS provides a safe and secure environment for students and staff.**

## FINDING 4-20

The fall zone surfaces under playground equipment do not meet the state minimum specifications. The risk of student injuries is increased when the loose fill of fall zone surfaces is not proportionate to the height of the equipment.

The condition of fall zone surfaces was discovered when the consulting team assessed the playground equipment during a walk-through in September 2010. The following exhibit provides an example of an unacceptable fall zone.

**Exhibit 4-20  
Playground Fall Zone Surface  
September 2010**



Source: WCL ENTERPRISES

### **RECOMMENDATION**

**The fall zones conditions around playground equipment should be brought into compliance with Oklahoma Department of Labor safety standards.**

The superintendent should ensure that loose fill surfaces are maintained in the fall zones of playground equipment. The fall zone surfaces are regulated by the Oklahoma Department of Labor.

The Oklahoma Department of Labor's *Fall Surfacing Guidelines for Playgrounds* (<http://www.ok.gov/odol/documents/SSDPlaygroundSafetyFallSurfacingGuidelines.pdf>) states, "Loose fill surfaces should be maintained to a depth proportionate to the height of the equipment. However, a 12-inch depth is a good guideline for equipment up to 8 feet in height."

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 4-21**

There are no signs posted warnings of video surveillance equipment being used in and around the facilities. Signs warning of the use of video surveillance prevent unwanted activity in and around school facilities.

Based upon a walk-through of each facility during the onsite visit in September 2010, the consulting team observed that no video monitoring warning signs were posted. Posted warning signs are an effective and cost efficient target hardening strategy. Target hardening is a principle of Crime Prevention through Environmental Design (CPTED). Using electronic surveillance helps to harden the target and warning of its use prevents crime.

**RECOMMENDATION**

**Video surveillance warning signs should be installed around the perimeter of all district owned or operated facilities.**

Video surveillance warning signs may be purchased from a variety of vendors and attached to existing or newly installed standards throughout the facilities. The signs should be prominently displayed where visitors are likely to enter the facilities.

Possible vendors include My Security Signs ([www.mysecuritysigns.com](http://www.mysecuritysigns.com)), Home Security Store ([www.homesecuritystore.com](http://www.homesecuritystore.com)), and USA Traffic Signs ([www.usa-traffic-signs.com](http://www.usa-traffic-signs.com)).

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 4-22**

Hazardous materials are accessible to students in custodial closets that are not kept locked or monitored. An increased risk of vandalism and personal injury exists when these materials are accessible to students.

During a walk-through of the facility during the onsite visit in September 2010, the consulting team observed conditions where cleaning supplies and chemicals were accessible to students. These materials, although safe when used appropriately, can cause serious personal injury and property damage when used inappropriately by students.

**RECOMMENDATION**

**Campus administrators should ensure that all hazardous material storage spaces are kept secure at all times.**

To ensure that hazardous materials are not easily accessible to students, the campus principal or designee should do periodic inspection of custodial closets and discipline employees who are responsible for allowing those materials to be accessible to students.

**FISCAL IMPACT**

This recommendation could be implemented with existing resources.

**FINDING 4-23**

There are concerns that general safety and security conditions have a potential to increase student, staff, and property vulnerability. Mitigating safety and security vulnerabilities decreases injury and property loss.

The following unsafe conditions are based on a walk-through of Indiahoma Public Schools during the consulting team's onsite visit in September 2010. Specific examples of these conditions include the following:

- There were emergency exit signs that were not lighted. Faulty emergency exit signs violate the health safety code and increase the chances of serious personal injury during emergency evacuations.
- Custodial closets where volatile chemicals are stored are not kept locked during the instructional day. The risk of vandalism and personal injury increases when chemical storage areas are not secure.
- Material Safety Data Sheets (MSDS) are not available to all personnel. The absence of appropriate MSDS information decreases the ability to mitigate improper exposure to hazardous materials.
- IPS emergency procedures provide for the use of codes instead of plain language instructions during emergency events. Using codes to communicate emergency instructions decreases the effectiveness of emergency response because building occupants may not understand the critical information being conveyed.
- Unlocked exterior doors create an opportunity for intruders to gain entry to the building.

**Exhibit 4-21**  
**Exterior Door Standing Open**  
**September 2010**



*Source: WCL ENTERPRISES*

- Electrical switches and receptacles that have missing or broken cover plates increase the risk of personal injury by electrocution.

**Exhibit 4-22**  
**Electrical Outlet Cover Missing in Classroom**  
**September 2010**



*Source: WCL ENTERPRISES*

- Unlocked electrical box covers increase the potential for unauthorized access and personal injury by electrocution.

**Exhibit 4-23**  
**Unlocked Electrical Boxes**  
**September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-24**  
**Unlocked Electrical Boxes**  
**September 2010**



*Source: WCL ENTERPRISES*

- Exposed wiring that is easily accessible increases the risk of personal injury and unintentional loss of power or communications.

**Exhibit 4-25**  
**Loose Exposed Wires**  
**September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-26**  
**Loose Exposed Wires**  
**September 2010**



*Source: WCL ENTERPRISES*

- Cluttered storage areas increase the risk of personal injury and property damage.

**Exhibit 4-27**  
**Cluttered Storage Areas -- Stage**  
**September 2010**



*Source: WCL ENTERPRISES*

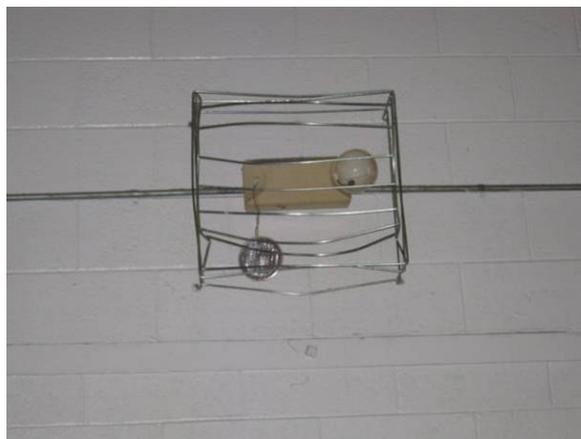
**Exhibit 4-28**  
**Cluttered Storage Areas – Agriculture Shop**  
**September 2010**



Source: WCL ENTERPRISES

- Emergency lighting fixtures were damaged, making them unusable. When the electrical service is interrupted and no natural light is present, there is an increased chance of personal injury without operational emergency lighting with battery backup.

**Exhibit 4-29**  
**Faulty Emergency Lighting – Gymnasium**  
**September 2010**



Source: WCL ENTERPRISES

- There were emergency egress routes obstructed. Obstructed emergency egress routes violate the health safety code and increases the chance of serious personal injury during emergency evacuations.

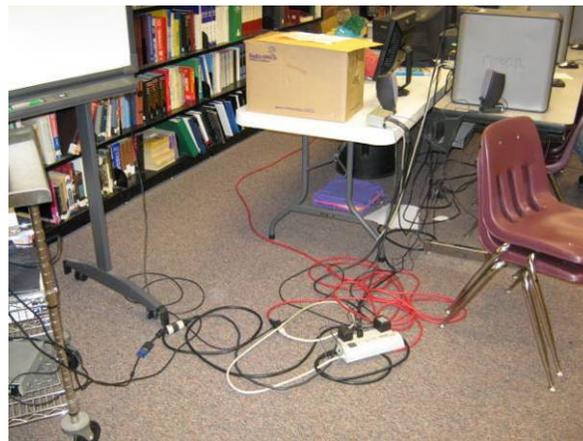
**Exhibit 4-30**  
**Obstructed Emergency Egress—Gymnasium**  
**September 2010**



*Source: WCL ENTERPRISES*

- Extension cords and overloaded power strips are being used to provide electricity to the computers and air conditioners. Overloaded power strips and extension cords, which are not approved as a permanent source of electricity, increase the risk of fire and personal injury.

**Exhibit 4-31**  
**Long-term Use of Extension Cords and Power Strips – Library**  
**September 2010**



*Source: WCL ENTERPRISES*

**Exhibit 4-32**  
**Long-term Use of Extension Cords and Power Strips – Classroom**  
**September 2010**



*Source: WCL ENTERPRISES*

### **RECOMMENDATION**

**The superintendent and campus principal should develop strategies and implement procedures that will mitigate the long-term use of extension cords and power strips in IPS.**

The superintendent and campus principal should develop a multi-step process to mitigate the safety and security problems cited in this report because each problem has a unique solution. The personnel responsible for mitigation should include the principal, teachers, and maintenance/custodial personnel. The steps taken to mitigate the unsafe conditions could include the following:

- Implement a policy prohibiting the unsafe conditions.
- Identify and document all affected areas.
- Train employees about the dangers involved with the unsafe conditions.
- Train employees how to identify unsafe conditions and how to report unsafe conditions for mitigation.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

---

**F. CRISIS MANAGEMENT****FINDING 4-24**

Indiahoma Public Schools does not have a comprehensive all-hazards emergency operations plan. Without a comprehensive all-hazard emergency operations plan agreed upon and practiced prior to an emergency, the result is a lack of coordination and delayed response during an actual emergency. Even though IPS has a basic emergency operations and response plan as required by the Oklahoma Department of Education and the Oklahoma Division of Emergency Management, further development and implementation of an all-hazards emergency operations plan would be beneficial.

**RECOMMENDATION****An all-hazards emergency operations plan should be developed and implemented.**

The superintendant should develop and implement an emergency operations plan that includes prevention, mitigation, response, and recovery for all types of hazards that could threaten IPS. A comprehensive all hazards emergency operations plan includes prevention, mitigation, preparedness, response, and recovery to weather, violence, chemical, biological, and radiological events. Also included in the comprehensive plan should be the following topics:

- Communications
- Health & Medical
- Vehicle Accidents
- Flooding
- Life Safety
- Evacuation

The U.S. Department of Education's Readiness and Emergency Management for Schools Technical Center (<http://rems.ed.gov/>), the Federal Emergency Management Administration (<http://www.fema.gov>), and the Department of Homeland Security (<http://www.dhs.gov>) provide resources for developing a comprehensive all-hazards emergency operations plan.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources; however, grant funds are available from the Readiness and Emergency Management for Schools Technical Assistance Center.

**FINDING 4-25**

The effectiveness of IPS' basic emergency planning and response is not tested beyond fire, tornado, and intruders. Without an effective multi-hazard emergency plan, the district weakens its ability to manage real emergencies successfully, increasing the risk of personal injury and property damage.

Although the oversight responsibility of safety and security is assigned to a single administrator, assistance from campus personnel is required to achieve the overall safety and security objectives. Other characteristics also inhibit the effectiveness of their emergency planning and procedures. The specific inhibiting characteristics include the following:

- IPS staff lacks the specific training needed to improve security awareness, threat assessment, all hazards emergency planning, mitigation, response, and recovery. Without this specific training, the students, staff, and facilities are more vulnerable to the consequences of natural, accidental, and created emergencies.
- IPS does not test the effectiveness of their emergency planning and response beyond fire, tornados, and intruders. Without developing performance standards for all hazards and emergency drills to include conducting "after action" reviews, developing corrective action plans based on the lessons learned from the drills, and hosting joint exercises with city and county emergency management personnel and first responders, the district's ability to successfully manage real emergencies of varying type and scope greatly decreases.

**RECOMMENDATION**

**All district personnel should receive emergency management training, and the emergency response plan should be routinely exercised beyond fire, tornado, and lockdown drills.**

The superintendent should ensure that all district personnel receive basic emergency management training and exercise their emergency response plans beyond fire, tornado, and lockdown drills. Emergency management training for school personnel can be obtained online from the Federal Emergency Management Administration (FEMA) (<http://training.fema.gov/IS/crslist.asp>). The recommended FEMA independent study courses include the following:

- IS-100.SCa Introduction to the Incident Command System for Schools
- IS-200.b ICS for Single Resources and Initial Action Incidents
- IS-700.a National Incident Management System (NIMS), An Introduction

The superintendent should also host joint exercises with city and county emergency first responders and district personnel, conduct "after action reviews," and develop corrective action plans based on the lessons learned from the drills and exercises. Resources for developing procedures and training staff can be obtained from the U.S. Department of Education's

---

Readiness and Emergency Management for Schools Technical Assistance Center  
(<http://rems.ed.gov/>).

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources; however, grant funds are available from the Readiness and Emergency Management for Schools Technical Assistance Center.

### **FINDING 4-26**

IPS has not adopted nor do they use the National Incident Management System (NIMS) as required by Homeland Security Presidential Directive-5. Failure to adopt and use NIMS jeopardizes the federal assistance required to respond to and recover from certain disasters.

In 2003, Homeland Security Presidential Directive-5 (HSPD-5) initiated the development of a National Incident Management System (NIMS). HSPD-5 requires public sector agencies, including school districts to use NIMS for managing emergencies. The intent of this system is to provide a common template and language for responding organizations to use in working together toward preventing, preparing for, responding to, and recovering from natural, man-made, and terrorist incidents.

As noted by the Federal Emergency Management Administration (FEMA), “NIMS represents a core set of doctrine, concepts, principles, terminology, and organizational processes that enables effective, efficient, and collaborative incident management.” NIMS emphasizes that true preparedness requires a commitment to continuous review and improvement. Most districts understand the continuous nature of emergency management, as well as the four phases that comprise the process circle: Mitigation and Prevention, Preparedness, Response, and Recovery.

Furthermore, O.S. §63-681 requires all political subdivisions to use NIMS as their system of managing emergencies. A sample adoption resolution may be found online ([http://www.ok.gov/homeland/NIMS/Sample\\_NIMS\\_Adoption\\_Documents/index.html](http://www.ok.gov/homeland/NIMS/Sample_NIMS_Adoption_Documents/index.html)).

### **RECOMMENDATION**

**The National Incident Management System should be adopted and used by Indianhoma Public Schools to manage all emergency incidents and events.**

The superintendent should prepare a resolution, adopting the National Incident Management System (NIMS) for the Board of Education to consider for approval. Upon School Board approval, NIMS should be the system used by Indianhoma Public Schools to manage emergencies.

### **FISCAL IMPACT**

This recommendation should have no fiscal impact.

**FINDING 4-27**

IPS has no written procedures related to how disabled students and students with special needs shall be assisted or evidence that the staff is trained to assist these individuals during emergencies. Without specific written procedures and trained staff, there is a greater risk that disabled students and students with special needs will sustain personal injury during emergencies.

**RECOMMENDATION****Students with special needs or disabilities should be specifically assisted during emergencies and evacuations.**

The superintendent should develop and implement procedures related to how students with special needs or disabilities shall be assisted during emergencies. The procedures should include, but not limited to, the following:

- Training
- Identify key personnel
- Identify types, levels, and categories of disabilities
- Communications
- Medications
- Special equipment

The U.S. Department of Education's Readiness and Emergency Management for Schools Technical Assistance Center (<http://rems.ed.gov>) provides great resources for developing procedures and training staff to assist disabled and special needs students during emergency operations.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources; however, grant funds are available from the Readiness and Emergency Management for Schools Technical Assistance Center.

*Chapter 5:*  
*Support Services*

---



## Chapter 5

# Support Services

This chapter reviews several areas of support services in Indianhoma Public Schools (IPS). It is divided into these sections:

- A. Food Service
- B. Technology
- C. Transportation

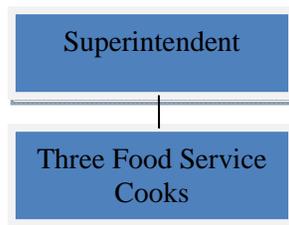
### A. **FOOD SERVICE**

#### **Background**

Indianhoma Public School (IPS) takes part in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). The Oklahoma State Department of Education (SDE) is the administering agency for school based Food Service Programs in Oklahoma. Districts that participate in the NSLP and SBP serve students meals that meet federal guidelines for nutritional value and offer free or reduced price meals to eligible students. When districts participate in the NSLP and SBP, they receive cash subsidies for each eligible meal served at schools. Schools, also receive donated commodities for lunch meals served that meet program guidelines. The funds for cash reimbursements and commodity allotments are issued from United States Department of Agriculture (USDA). Eligible meal categories are student free, student reduced price, and student paid. School districts do not receive federal reimbursement support for teacher or guest meals.

IPS has one full service kitchen and cafeteria that all students use for meal service. IPS' employs three full-time employees for food service operations. The superintendent oversees the food service program. On the day of the site visit, the consultant observed meal production and both breakfast and lunch meal service. **Exhibit 5-1** shows the structure for IPS Food Service Department. Food service employees work 175 days per year.

#### **Exhibit 5-1 IPS Food Service Organization September 2010**



*Source: IPS Superintendent, September 2010*

**Organization****FINDING 5-1**

The IPS Food Service Department organizational structure is not optimal to ensure that all appropriate monitoring, reporting, and regulations are followed for kitchen operations. The organizational and reporting protocol for the Food Service Department is also not a model of efficient program management, and the staff does not seem to be aware of who is in charge.

Without these elements in place, the food service program may face budget, compliance, and safety problems. During the onsite review in September of 2010, the consultant noted staff not knowing who was responsible for completing certain reports or job duties. The following is a bulleted list of observations made regarding program operations:

- The department lacks standardized food production records and standardized recipes.
- The menus are not pre-costed.
- Bids are not used for all food purchases.

These operational practices impact the efficiency of the Food Service Department. Alleviating these practices through proper planning, management, and training will increase the quality of the department, and more effectively meet the nutritional needs of IPS students, faculty, and staff.

**RECOMMENDATION**

**Evaluate options for optimal organizational structure to ensure monitoring, compliance, and technical assistance in the kitchen operations. Improved organizational structure should improve leadership, program management, and department organization, which will lead to standardized operations in the Food Service Department.**

The superintendent should evaluate the current organizational structure, roles, and job descriptions of the Food Service Department and appoint one person to be the program supervisor who is responsible for developing menus, program compliance, and regulations.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**Program Operation Management****FINDING 5-2**

IPS uses the General Fund Code 11 and Special Fund Code 22 to account for food service operating expenses rather than using Code 22 exclusively. Using the general fund rather than a

special revenue fund clouds the food service operations true financial picture in OCAS, as some funds can be combined with other non-food service related funds.

Additional accounting to break out food service expenditures from other general fund expenditures is necessary when food service is partially operated from the general fund. When the special revenue fund is the only fund used, no further accounting and reporting is needed.

The Oklahoma State Department of Education (SDE) School Food Service Compliance document states Child Nutrition Program (CNP) funds are to be deposited into a separate appropriated fund (Fund 22/Project Reporting 385) or into the General Fund account (Fund 11/Project Reporting 385). Fund 22 is a special revenue fund reserved exclusively for the receipt of CNP funds, including state revenue, federal revenue, and local collections. This fund is under the auspice of the State Food Authority (SFA) treasurer. CNP funds shall be used only for the benefit of the CNPs, whether using Fund 22 or Fund 11.

### **RECOMMENDATION**

**IPS should only code food service financial transactions from special revenue fund code 22. The cafeteria supervisor should ask the business office to establish all the necessary accounts in fund 22 and then budget accordingly.**

Recording all transactions for the food service program in fund code 22 gives the district and the School Board a true accounting of the financial picture of the program. The practice of using general funds for a portion of food service expenditures rather than making transfers from the general fund to the food service fund when fund code 22 runs out of money, does not provide a true picture of expenses for current use or budget trends.

To accomplish the recommendation, an end-of-year transfer should be made to the food service program from the general fund account. Rather than spending directly from the general fund, this single transfer should be made to cover expenses related to the CNP.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 5-3**

IPS food service program does not have all documents in place to meet program requirements. Therefore, that makes the food service program out of compliance with the federal requirements for program management.

During the site visit, the following program documents were not available for review:

- Hazard Analysis Critical Control Point (HACCP) Plan
- Wellness Policy

- Production Records
- Standardized Recipes

**Exhibit 5-2** shows the Child Nutrition Program’s required documents and background for program implementation.

**Exhibit 5-2  
Child Nutrition Program Required Documents**

<b>Child Nutrition Program Required Documents</b>	
HACCP Plan	Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265) amended Section 9(h) of the Richard B. Russell National School Lunch Act by requiring School Food Authorities (SFA) to implement a food safety program for the preparation and service of school meals served to children in the school year beginning July 1, 2005. The program must be based on HACCP principles and conform to guidance issued by USDA. All SFAs must have a fully implemented food safety program no later than the end of the school year 2005-2006. HACCP is a systematic approach to construct a food safety program designed to reduce the risk of food-borne hazards by focusing on each step of the food production process—receiving, storing, preparing, cooking, cooling, reheating, holding, assembling, packaging, transporting, and serving.
Wellness Policy	As part of their CNP local wellness policy, SFAs must establish nutrition guidelines/standards that address the types of food items that will be available to students on each school campus during the school year. The term <i>FMNV (foods of minimal nutritional value)</i> does not include foods such as potato chips, chocolate bars, donuts, snack cakes, and cookies. SFAs should promote student health and the prevention of childhood obesity by further restricting food items that parents, teachers, students, and the public consider to be <i>junk food</i> .
Production Records	Certain program records must be retained and made available to the State Agency for review to determine if the school is utilizing the ANSMP (approved nutritional system for menu planning) option as designed by the menu planner. The records include: Cycle Menus, <b>Standardized Recipes</b> , Food Product Specifications, Nutrition Label/Nutrient Data Form, Preparation Techniques, and Food <b>Production Records</b> .
Standardized Recipes	

*Source: Child Nutrition Programs Oklahoma State Department of Education School Food Service Compliance Document, July 2007*

## RECOMMENDATION

**IPS food service program should comply with program regulations and implement the use of all required records and documents.**

The purpose of a school food safety program (HACCP) is to ensure the delivery of safe foods to children in the school meals program by controlling hazards that may occur or be introduced into foods anywhere along the flow of the food from receiving to service (food flow). The requirement of a wellness policy is needed to counter the increasing obesity rate in students

across America. Production records and standardized recipes are the corner stone of the National School Lunch Program and are a necessary tool to guarantee students are provided the nutrients needed for healthy living and to confirm program compliance. The superintendent indicated that IPS has a wellness policy, but one was not provided for the consulting team while onsite.

If IPS does not have a wellness policy, the IPS food service department should contact the state Child Nutrition Program director and request a technical assistance visit to assist with the development and implementation of a HACCP plan, wellness policy, production records, and standardized recipes.

### FISCAL IMPACT

This recommendation can be accomplished with existing resources.

### FINDING 5-4

IPS food menus are not evaluated in advance to determine cost; therefore, the district does not know if it is charging enough to cover the cost of the meal being served.

In food service, menus are the most important aspect of the operation. Menus play several critical roles, from enticing students to participate in the program, to providing adequate nutrition for learning, controlling product use, and for determining labor costs. In IPS, a cycle menu is not used, but rather, planned by the week and posted in the Indiahoma School Newsletter.

Menu planning begins by understanding the resources the program has available to provide their meal service. **Exhibit 5-3** analyzes the available revenue for menu planning by calculating IPS's distributed revenue per plate to be \$2.71 at lunch and \$1.72 for breakfast. Therefore with 45% food costs (**Exhibit 5-4**), the food cost targets per meal are \$1.22 for lunch and \$0.77 for breakfast. The menu should be planned utilizing these standards to operate the most cost effective program possible. Please note that the 45 percent food cost used for these calculations is higher than the 40% national standard (**Exhibit 5-4**) and was used to accommodate the cost of large amounts of pre-processed food items and market increases in food costs.

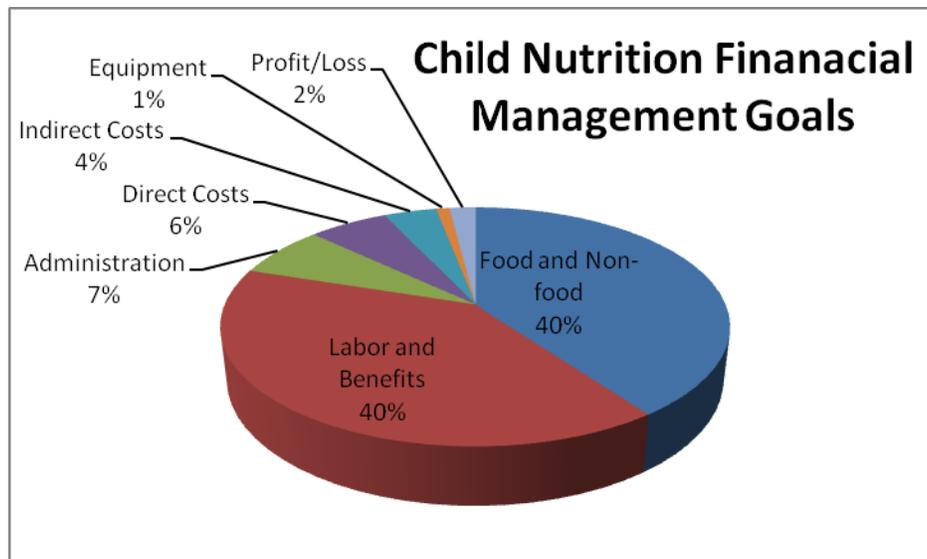
**Exhibit 5-3**  
**IPS Revenue Distribution for School Meals**  
**2010-11**

Breakfast	September Meals 2009	Distribution	Federal Reimbursement	Price	Commodity Revenue	Total Revenue	Distributed Revenue	Food Cost Target / Meal
Paid	315	16%	\$0.26	\$1.25		\$1.51	\$0.24	
Reduced	102	5%	\$1.46	\$0.30		\$1.76	\$0.09	
Free	1,526	79%	\$1.76	\$0.00		\$1.76	\$1.39	
<b>Total</b>	<b>1,943</b>						<b>\$1.72</b>	<b>\$0.77</b>

Lunch	September Meals 2010	Distribution	Federal Reimbursement	Price	Commodity Revenue	Total Revenue	Distributed Revenue	Food Cost Target / Meal
Paid	737	22%	\$0.28	\$1.38	\$0.20	\$1.86	\$0.41	
Reduced	191	6%	\$2.34	\$0.40	\$0.20	\$2.94	\$0.18	
Free	2,380	72%	\$2.74	\$0.00	\$0.20	\$2.94	\$2.12	
<b>Total</b>	<b>3,308</b>						<b>\$2.71</b>	<b>\$1.22</b>

Source: IPS Food Service Report for September 2010; WCL ENTERPRISES calculations  
 Note: There were 21 days of Food Service operations in September

**Exhibit 5-4  
 NFSMI Recommended Distribution of Food Service Expenditures**



Source: National Food Service Management Institute's Financial Management Information System  
 The National Food Service Management Institutes (NFSMI) Financial Management Information System recommends food/nonfood cost not exceed 40 percent and labor/benefits not exceed 40 percent. The remaining 20 percent of the budget is spent on administration, direct and indirect costs, and equipment. A small profit is made to provide a fund balance for emergencies.

Using the benchmarks calculated above, five current menu selections from the month of September 2010 were evaluated (**Exhibit 5-5**). The week of typical menus shown below have an average food cost for lunch of \$1.83 which is \$0.61 above the benchmark of \$1.22. Breakfast food cost's average \$1.08, which is \$0.31 above the benchmark of \$0.77.

**Exhibit 5-5  
Costing of IPS Menu Selections  
September 20-24, 2010**

Breakfast Menu Costs										
Monday	Cost	Tuesday	Cost	Wednesday	Cost	Thursday	Cost	Friday	Cost	Average
Biscuits	\$0.19	Donuts	\$0.35	Cereal	\$0.28	Cinnamon Rolls	\$0.66	Pancakes	\$0.55	
Sausage Patty	\$0.24			Sausage Link	\$0.40			Bacon	\$0.26	
Gravy	\$0.05			Toast	\$0.13			Syrup	\$0.10	
Juice	\$0.16	Juice	\$0.16	Juice	\$0.16	Juice	\$0.16	Juice	\$0.16	
Milk Variety	\$0.28	Milk Variety	\$0.28	Milk Variety	\$0.28	Milk Variety	\$0.28	Milk Variety	\$0.28	
<b>TOTAL</b>	<b>\$0.92</b>		<b>\$0.79</b>		<b>\$1.25</b>		<b>\$1.11</b>		<b>\$1.35</b>	<b>\$1.08</b>
Lunch Menu Costs										
Monday	Cost	Tuesday	Cost	Wednesday	Cost	Thursday	Cost	Friday	Cost	Average
Pizza Subs	\$0.72	Chicken Strips	\$0.94	BBQ Sandwich	\$0.62	Chicken Cheese Crispito	\$0.62	Sub Sandwich	\$0.78	
Corn	\$0.17	Mashed Potatoes	\$0.10	Chips	\$0.27	Ranch Style Beans	\$0.24	Chips	\$0.27	
Oranges	\$0.12	Gravy	\$0.05	Baked Beans	\$0.24	Pineapple	\$0.21	Strawberry Shortcake	\$0.33	
Peaches	\$0.22	Mixed Fruit	\$0.23	Orange Slices	\$0.12					
Salad Bar	\$0.41	Salad Bar	\$0.41					Salad Bar	\$0.41	
Milk Variety	\$0.28	Milk Variety	\$0.28	Milk Variety	\$0.28	Milk Variety	\$0.28	Milk Variety	\$0.28	
Chemical & Paper	\$0.06	Chemical & Paper	\$0.06	Chemical & Paper	\$0.06	Chemical & Paper	\$0.06	Chemical & Paper	\$0.06	
<b>TOTAL</b>	<b>\$1.98</b>		<b>\$2.07</b>		<b>\$1.59</b>		<b>\$1.41</b>		<b>\$2.13</b>	<b>\$1.83</b>

*Source: IPS Food Service director, September 2010 Menu; WCL ENTERPRISES calculations*

Based upon September 2010 reimbursement (**Exhibit 5-3**), average daily participation is approximately 158 lunches and 93 breakfasts. Annual overspending on lunch cost the district \$16,867 ( $158 \times \$0.61 \times 175 = \$16,867$ ) and annual overspending on breakfast cost the district \$5,045 ( $93 \times \$0.31 \times 175 = \$5,045$ ). This totals to overspending of \$125.21 daily and an approximate additional annual food cost of \$21,912 (\$5,045 breakfasts + \$16,867 lunches = \$21,912).

### **RECOMMENDATION**

**IPS should pre-cost menus in advance to determine the amount the district should charge to cover the cost of the meal being served.**

As discussed previously, to control cost within the food service program, you must control food/nonfood costs. Pre-costing menus is the first step to ensure you are not over spending when designing menus. Pre-costing meals will result in cost savings of \$21,912, annually.

Once several weeks of cost effective menus are developed, they can then be cycled (repeated) for efficient determination of costs. If menus are developed and cycling is planned at the beginning of each school year before bids are developed for procurement, the district can feel confident of the cost of food and non-food items for the upcoming school year. This method puts the district in charge of program expenses rather than leaving them to chance.

### FISCAL IMPACT

Recommendation	2011-12	2012-13	2013-14	2014-15	2015-16
IPS should pre-cost menus in advance to determine the amount the district should charge to cover the cost of the meal being served.	\$21,912	\$21,912	\$21,912	\$21,912	\$21,912

### Food Service Staffing

#### FINDING 5-5

The IPS Food Service Department is below the Oklahoma State Department of Education's *School Food Service Compliance Document's* recommendation for meals per labor hour (MPLH). Low MPLH is a sign of inefficiency and results in unnecessary expenditures in the Food Service program and prevents the department from covering costs. **Exhibit 5-6** shows the State's guidelines for MPLH. The guidelines are based upon total meal equivalents and a recommendation for total hours needed to achieve the recommended MPLH based on the conventional meal service method. Conventional meal preparation method describes meals made from a semi-scratch method rather than the convenience method of pan and bake.

**Exhibit 5-6**  
**Oklahoma Sample Staffing Guidelines for**  
**Conventional On-site Production**  
**September 2010**

Number of Meal Equivalents	Conventional System	
	MPLH	Total Hours
10 - 100	12	8
101 - 150	12	8 - 12
151 - 200	12	12 - 16
201 - 250	14	14 - 17
251 - 300	14	17 - 21
301 - 400	15	20 - 26
401 - 500	16	25 - 31
501 - 600	17	29 - 35
601 - 700	18	33 - 37

*Source: SDE School Food Service Compliance Document, July 2008*

Total Lunches Served = 1 Meal Equivalent      Total Breakfast Served / 2 = 1 Meal Equivalent  
 Total Snacks Served / 4 = 1 Meal Equivalent      Total A La Carte Sales Dollars / \$2.72 = 1 Meal Equivalent  
 Total Meal Equivalent / Total Labor Hours Worked = MPLH

**Exhibit 5-7** compares IPS staffing of kitchen facilities to the state's guidelines. Based upon the staffing at the time of the site visit, IPS has an excess of 8 labor hours per day. Observations of staff responsibilities and duties reinforce the data's indication that the kitchen is overstaffed.

**Exhibit 5-7**  
**IPS Daily Food Service Labor Hours vs. Target Labor Hours**  
**September 2010**

District	Total Meal Equivalents	IPS Hours	Target Hours	Difference (Hours)
Indiahoma Public Schools	209	22	14	+8.00

*Source: September 2010 Food Service Reimbursement Report; WCL ENTERPRISES calculations*

The IPS Food Service Department has kept up with current production and operation methods, which are more efficient; however, they have not reduced staff accordingly. The use of pre-prepared items offers opportunities for the department to reduce staff. From a management standpoint, it is important to not create an expectation of minimal workload in kitchens and overstaffing runs counter to this.

### RECOMMENDATION

**The Food Service Department should follow the State Department of Education School Food Service Compliance Document recommendation for meals per labor hour (MPLH).**

Using the recommended MPLH prevents overstaffing and can be used as a benchmark supporting reasoning for reduced staffing levels. Adjustments in staffing levels can be implemented through attrition or during the change of school years.

### FISCAL IMPACT

Current overstaffing of 8 hours per day costs the Food Service program \$10,640 annually. This number is determined by multiplying the daily excess hours of 8 by the current minimum wage for the Food Service program of \$7.60 per hour, and then multiplying by the number of work days for a helper/server of 175 (8 hours x \$7.60 rate of pay x 175 days worked = \$10,640).

Recommendation	2011-12	2012-13	2013-14	2014-15	2015-16
The Food Service Department should follow the <i>State Department of Education School Food Service Compliance Document</i> recommendation for meals per labor hour (MPLH).	\$10,640	\$10,640	\$10,640	\$10,640	\$10,640

**Procurement****FINDING 5-6**

According to the superintendent, the IPS food service department has had problems trying to get large providers to provide service for them since they are a small school district. Although the superintendent states that IPS has policies on procurement, IPS food service program does not participate in purchasing bids, quotes, or a local cooperative for the purchase of their food and non-food supplies due to their problems with trying to get providers. Although this is a problem, IPS should still bid their food products even if only one vendor replies so the program is receiving the most competitive prices for food and non-food products and is in non-compliance with federal program regulations. Collaborating with nearby schools on bulk ordering would probably be a good idea for IPS.

During the last two (2004 and 2009) CRE (Coordinated Review Effort) compliance audits conducted by the Oklahoma State Department of Education Child Nutrition Program, IPS was cited as not being in compliance with procurement requirements. Successful program management begins with good procurement procedures. Currently, the cafeteria staff calls the local vendors and places their order with those vendors who will deliver to Indianahoma. Invoices are received upon delivery and sent to the business office for payment.

The Oklahoma State Department of Education School Child Nutrition Compliance Document states, "Each school food authority (SFA) shall have on file a written procurement plan approved by the local School Board." The procurement plan identifies the SFA's purchasing periods for the goods, equipment, and services related to the CNP. In addition, the plan documents the various methods of procurement being practiced. The procurement plan should provide justification for using a certain procurement method to obtain an item. The scope of the plan is determined by the organization of the SFA. A new procurement plan does not need to be developed every year; however, an annual review of the approved plan is suggested to assure its relevance to current procedures. **Exhibit 5-8** is a Child Nutrition Program procurement self-review document for compliance while federal regulations.

**Exhibit 5-8**  
**Child Nutrition Program Procurement Self-Review**  
**Answer the Following Questions**

<b>Answer the following questions about your procurement practices. If the answer to any of the questions is "NO," your procurement practices are "NOT" acceptable and must be revised.</b>		
Yes	No	I. PROCUREMENT PLAN
		1. Is there a written procurement plan approved by the local School Board on file?
		2. Does the plan identify the school district's purchasing periods for the goods, equipment, and services related to the school food service program?
		3. Does the plan document the various methods of procurement being practiced to obtain the goods, equipment, and services related to the school food service program?
		4. Is there a written code of conduct that governs the performance of the school

		district's officers, employees, or agents who are engaged in the award and administration of contracts supported by school food service funds?
		5. Does the written code contain all the required statements?
		<b>II. SMALL PURCHASE PROCEDURES</b>
		1. Are all goods, equipment, or services to be purchased adequately and consistently described for each prospective supplier so that each one can provide price quotes on the same merchandise or service?
		2. Are an adequate number of qualified sources contacted to provide price quotes? <b>NOTE:</b> The term <i>adequate number</i> is defined as three by USDA.
		3. Are all responses to <i>requests for quotations</i> documented?
		4. Is cost-plus-a-percentage-of-cost method of purchasing prohibited?
		5. Are all price quotation responses retained by the school district with other school food service program documentation and records for a period of three years after the end of the fiscal year to which they pertain?
		<b>III. SEALED BIDS (FORMAL ADVERTISING)</b>
		1. Is the Request for Proposal (RFP)/Invitation to Bid (ITB) publicly advertised?
		2. Are bids solicited from an adequate number of known suppliers in sufficient time prior to the date set for the opening of the bids?
		3. Do the bids clearly define the goods, equipment, or services needed in order for the bidders to be able to properly respond? This includes product specifications and general purchasing conditions.
		4. Are all bids opened publicly at the time and place stated in the RFP or ITB?
		5. Is a firm, fixed price contract award made by written notice to the responsible bidder whose bid is lowest, assuming the bid conforms to the requirements in the RFP or ITB?
		6. Where specified in the bidding documents, are factors such as discounts, transportation costs, and life cycle costs (for equipment), if applicable, considered in determining which bid is lowest?
		7. Are payment discounts used to determine the low bid when prior experience of the school district indicates that such discounts are generally taken?
		8. Is there adequate explanation and documentation for each exception to awarding to the lowest bidder on file?
		9. Is cost plus a percentage of cost method of contracting prohibited?
		10. Do contracts contain all required provisions (remedy, termination, and record access clauses, Equal Employment Opportunity [EEO], and Energy Policy and Conservation Act, for any formal bid; Clean Air and Clean Water Acts if bid is over \$100,000)?
		11. When handling equally low bids, are acceptable guidelines used to determine the awards (e.g., small business, labor-surplus area, drawing by lot)?
		12. Are all bids received documented, and is such documentation maintained by the school district with other school food service program records for three years after the end of the fiscal year to which they pertain?
		<b>IV. PROCUREMENT MANAGEMENT</b>
		1. Are invoice prices the same as the bid prices?
		2. Are the products delivered the same as those listed on the bid?
		3. Are the quantities ordered consistent with the quantities estimated in the bid?
		4. Is the school system notified if a substitution has to be made?
		5. Is there a system in place to ensure receipt of rebates?

		6. Are rebates credited appropriately as stated in the RFP/contract?
		7. Do managers adequately document problems with deliveries and/or product acceptability?
		8. Does the SFA have protest procedures to handle any protest a district may receive concerning its procurement procedures?

*Source: Child Nutrition Programs Procurement Self-Review Oklahoma State Department of Education School Food Service Compliance Document, July 2007*

**RECOMMENDATION**

**IPS food service program should follow procurement regulation for the purchase of their food and non-food supplies even if they are a small school and only have one vendor at times supplying. Collaborating with nearby schools on bulk ordering would probably be a good idea for IPS.**

Following procurement regulation is not only a requirement of the program; it also results in efficient and cost saving purchasing practices. By controlling the costs of the food/non-food purchased for meal service, the district should reduce the cost of operating the Food Service program. Based on the 2009 OCAS report of school district expenditures, IPS spent \$76,489 on food and supplies. By following proper purchasing practices, the district could save eight to ten percent on their annual food and non-food supply cost. This could provide an annual savings of approximately \$6,884 (Average of eight to ten percent savings = nine percent.  $\$76,489 \times 9\% = \$6,884$ ).

The district should consider various options and investigate which would be the most advantageous. Possible options include the following:

- Contacting a larger district that is in close proximity to IPS and tagging on with their bids.
- Investigate joining purchasing cooperatives in the region for food/non-food purchases.
- Group with surrounding district to consolidate bids between the group members and use an inter-local agreement for purchasing.

**FISCAL IMPACT**

<b>Recommendation</b>	<b>2011-12</b>	<b>2012-13</b>	<b>2013-14</b>	<b>2014-15</b>	<b>2015-16</b>
IPS food service program should follow procurement regulations for the purchase of their food and non-food supplies for annual savings.	\$6,884	\$6,884	\$6,884	\$6,884	\$6,884

**B. TECHNOLOGY**

The No Child Left Behind legislation requires that teachers effectively integrate technology into the classroom. Meeting this mandate depends heavily on a state's technology implementation. Oklahoma is striving to further implement technology in its many classrooms. For example, the first goal of the 2004 Oklahoma Plan for Instructional Technology/Telecommunications was that all Oklahoma students would achieve technological literacy by the eighth grade.

Education Week's annual *Technology Counts* survey for 2009 gave Oklahoma a "C" on its state technology report card based on these component grades:

- A grade of "C" in access to technology
- A grade of "B-" in use of technology
- A grade of "C" in capacity to use technology

Oklahoma, with 3.7 students per high-speed internet connected computer, was ahead of the national average of 3.4. The state is one of just 27 that offers computer-based assessments, but is not one of the five states that now tests student on technology.

***Background***

IPS' technology landscape is one of collaborative efforts by school personnel and community. Due to limited resources, it has taken the team of the superintendent, a counselor, and a contracted person to manage the technology infrastructure of the district. The counselor and the contracted individual that is actually an assistant principal in a neighboring district, are working together to meet the technology needs of the district. Due to other responsibilities that each possess, technology needs are often addressed in an untimely fashion, usually once or twice a week during early morning or weekend hours.

A physical inspection of the technology infrastructure found the district possesses a hybrid of IBM and HP servers with Windows Server 2003 R2 operating system, a wireless router, HP Procurve 2524 switches, and a gigabyte backbone with Category 5-enhanced cabling. The district has been able to purchase SmartBoards from the K20 Center at the University of Oklahoma through a Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) Grant. There is a portable dedicated air conditioning unit located in the server closet to provide a climate controlled environment. The server closet also serves as a storage area for school supplies and some cleaning supplies. Access to this area is secured under lock and key.

Connectivity is intermittent due to the signal being transmitted over aging cables and poor signal balancing. Interviews with district staff revealed that the router is overloaded by network traffic whenever the district engages in Special Education required video conferencing. These video conference sessions provide speech intervention that is mandated in individual education plans or IEPs. This renders the network inoperable and requires staff (the counselor) to restart certain servers in order to bring the district back online.

**FINDING 5-7**

IPS has over 100 computers that, due to extensive use and aging parts, frequently need repair and/or replacement of parts. A high school Technology Applications class held in the media center rebuilds computers for classroom use. Due to limited resources, acquiring new computers is somewhat of a challenge for IPS. Repairing existing units saves the district money over purchasing new units, or worse, having students attend classes and labs without desktop computers.

**COMMENDATION**

**IPS utilizes spare parts to repair computers rather than purchase new or refurbished parts. Although the parts are harvested from broken computers, items such as a mouse, keyboards, speakers, or memory can be used in other systems. This saves the district time and money in repairing minor computer hardware problems.**

**FINDING 5-8**

IPS technology filtering/security systems block teachers from accessing educationally appropriate websites. By restricting websites that teachers can visit and incorporate into daily lessons, the current method of filtering is hindering teacher planning and technology lesson integration.

Teachers in various focus groups reported that in their day-to-day planning of instructional lessons, they have not been able to incorporate Internet sites, software programs, and use search engines such as Google. This technology barrier prevents teachers from enhancing their lessons. This restrictive environment has left the teachers feeling disenchanted with using the Internet for lesson enhancement.

While network security is essential and mandatory to prohibit access to inappropriate Internet sites, a balance must occur to allow educational content to be available to the classroom while providing adequate network security.

**RECOMMENDATION**

**IPS' technology staff should revise and update its Internet filter content manager provided by Scholastic Communications to allow teachers access to appropriate sites in order to integrate technology into their lessons.**

Teachers can request access through email to add commonly used websites for educational purposes. The technology staff can verify the content, and if approved, add the web address to their permissible domain on their filtering server.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 5-9**

IPS does not have a disaster recovery plan that addresses a medium to catastrophic data loss. As a result of not having a disaster recovery plan in place, IPS could not continue basic student and finance operations within a twenty-four hour period if its data became corrupt or lost.

The district backs up its data, but the stored data is overwritten each time a new backup occurs. In the event that the school district needs to recover its critical files and corruption exists in its most current backup, there is no backup archive that would allow the district to return to even its most basic level of operation. This process of overwriting during backup leaves the district vulnerable to a number of events that could paralyze the district's technology systems.

In the event of a tornado, flood, or any other catastrophic occurrence, there are no clear procedures to bring the district's systems and software programs back online. Although backup records exist, there is not a plan to execute the process of system restoration.

Realizing that these potential events can devastate the district's daily operation, IPS should have protocols and procedures in place to define the steps to take to recover critical data. That is the primary purpose of a disaster recovery plan. **Exhibit 5-9** lists the key elements of a disaster recovery plan.

**Exhibit 5-9**  
**Example of Key Elements of a Computer Disaster Recovery Plan**

Step	Details
Build the disaster recovery team.	Identify a disaster recovery team that includes key policy makers, building management, end-users, key outside contractors, and technical staff.
Obtain and/or approximate key information.	Develop an exhaustive list of critical activities performed within the system.
	Develop an estimate of the minimum space and equipment necessary for restoring essential operations.
	Develop a timeframe for starting initial operations after a security incident.
	Develop a list of key personnel and their responsibilities.
Perform and/or delegate key duties.	Develop an inventory of all computer technology assets, including data, software, hardware, documentation, and supplies.
	Set up a reciprocal agreement with comparable organizations to share each other's equipment or lease backup equipment to allow the system to operate critical functions in the event of a disaster.
	Make plans to procure hardware, software, and other equipment as necessary to ensure that critical operations are resumed as soon as possible.
	Establish procedures for obtaining off-site backup records.
	Locate support resources that might be needed, such as equipment repair, trucking, and cleaning companies.
	Arrange with vendors to provide priority delivery for emergency orders.
	Identify data recovery specialists and establish emergency agreements.
Specify details within the plan.	Identify individual roles and responsibilities by name and job title so that everyone knows exactly what needs to be done.
	Define actions to be taken in advance of an occurrence or undesirable event.

	Define actions to be taken at the onset of an undesirable event to limit damage, loss, and compromised data integrity.
	Identify actions to be taken to restore critical functions.
	Define actions to be taken to re-establish normal operations.
Test the plan.	Test the plan frequently and completely.
	Analyze the results to improve the plan and identify further needs.
Deal with damage appropriately.	If a disaster actually occurs, document all costs and videotape the damage.
	Be prepared to overcome downtime on your own; insurance settlements can take time to resolve.
Give consideration to other significant issues.	Do not make a plan unnecessarily complicated.
	Make one individual responsible for maintaining the plan, but have it structured so that others are authorized and prepared to implement if it is needed.
	Update the plan regularly and whenever changes are made to your system.

Source: National Center for Education Statistics, "Safeguarding Your Technology" (<http://nces.ed.gov/pubs98/safetech/>), April 2003.

## RECOMMENDATION

**IPS should develop and test a comprehensive disaster recovery plan that outlines the steps to take to insure timely recovery of district critical data.**

The technology staff should contact the Oklahoma State Department of Education (SDE) and several larger districts in Oklahoma to obtain copies of their disaster recovery plans. Then, the staff should make modifications to reflect the specific conditions at IPS. Once the plan has been prepared, the superintendent should present the plan to the School Board for approval.

## FISCAL IMPACT

This recommendation can be implemented with existing resources.

## FINDING 5-10

IPS does not have a software ordering process. Not having a software ordering process has led to incompatible software being ordered and software not being installed in a timely manner. Since software has a limited shelf life, as time passes, IPS experiences a reduction in the instructional impact for which the purchase was intended.

Information from the teacher focus groups revealed that software and hardware has been purchased and has either taken up to one year to install or has never been installed at all. This lack of communication has caused great frustration with the instructional staff, and they are becoming apathetic to the thought of technology integration in the educational process. Since there is also no process in place for the purchasing of hardware, this should be addressed in the same action as establishing a district-wide software ordering process.

**RECOMMENDATION**

**IPS should develop and implement a software and hardware purchase and implementation plan that includes all parties involved in the assessment, purchase, implementation, and evaluation of any requested technology product. This includes at the very least a teacher, campus administrator, and a previously identified technology staff member.**

The superintendent should establish a technology committee that can develop district standards for hardware and software purchases. This standard will help ensure that the district technology purchases and acquisitions are compatible with current systems and can be supported by the technology department.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 5-11**

IPS does not centralize their network servers. When servers are not centralized, managing the server content, backing up data and providing updates becomes a time consuming and tedious process. This requires technology personnel to travel to each server location to perform these duties, which costs IPS time and money.

IPS has five servers that allocate Internet Protocol (IP) addresses to each desktop computer. Servers are not centralized to a demarcation area for the technology staff to manage and support. For example, if the server at the library center needs to be restarted or software installed or reconfigured, someone must physically go to that server to access the server. Again, with limited personnel resources to address this issue, it can be very cumbersome and time consuming to manage so many machines.

The counselor estimates that on average, approximately 30 minutes is spent restarting various servers every day. The construction of a true Wide Area Network (WAN) for IPS would also facilitate the implementation of a disaster recovery plan, data backup process, and increased network efficiency.

**RECOMMENDATION**

**IPS should centralize its servers to one location to better manage server content, optimize performance, and provide an efficient method of accessing servers.**

The technology staff should develop a plan that centralizes servers in one location. This plan to relocate servers should be developed in concert with the development of the district's disaster recovery plan since the location of the servers is critical to the maintenance, security, and data integrity of the district's operations. Once the two plans are developed, the technology staff should relocate the network servers to the predetermined location and designate it as the Network Operations Center. The network should then be reconfigured so that all servers can be accessed

from the new Network Operations Center.

## **FISCAL IMPACT**

This recommendation could be implemented with existing resources.

### ***Instructional Technology***

The impact of technology on student achievement revolves around how well technology is integrated to support student instructional objectives. This requires placing computers into schools and classrooms, and providing the resources that are needed to incorporate technology into lesson plans and other educational activities. Substantial professional development, emphasizing both technology applications and its integration into curriculum and classroom instruction, is necessary to further technology integration. Teachers and administrators must have a clear vision of effective technology integration best practices and a clear path to achieve true integration of technology into instructional programs.

The process of integrating technology into the instructional programs of a school district involves providing the infrastructure and technology hardware, establishing curriculum for technology, training the staff on technology systems and curriculum standards, and monitoring implementation of this curriculum. Implementation strategies should focus on helping teachers acquire necessary knowledge and skills for using technology as a tool to enhance teaching and learning, and as a means of accomplishing educational goals.

To support the instructional program, teachers and students in IPS have access to technology and software applications. All campuses have access to at least one computer lab for student use in research projects, remediation of skills, and independent work.

## **FINDING 5-12**

IPS does not have a professional development plan for technology that coordinates the training opportunities for secondary teachers and provides comparable experiences for elementary and middle school teachers. Without a coordinated professional development plan, all teachers in the district will not develop proficiency in the use of technology to support instructional delivery.

The teachers and other staff in interviews with the WCL ENTERPRISES consulting team expressed concern about the quality and timing of professional development for technology. Some stated that technology training may be provided, but then teachers do not have access to the equipment. Teachers shared that they were trained in the use of SmartBoards, but the newly received pieces of equipment were not installed for teacher use in classrooms.

The teachers shared that the district partners with the K20 Center at the University of Oklahoma through a Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant. This grant provides technology and offers professional development opportunities for teachers in grades 8-12th. Teachers reported that little has been done to integrate the SmartBoards into daily classroom activities.

**RECOMMENDATION**

**IPS should develop a comprehensive professional development plan for technology that coordinates the training opportunities for all teachers to have the necessary skills for integrating technology into classroom instruction.**

The superintendent should establish a technology committee to develop a district-wide program for teacher training in technology integration. A comprehensive program should address the use of existing technology to provide authentic learning experiences in the classroom, the incorporation of the Priority Academic Student Skills (PASS) standards for instructional technology, and the inclusion of the secondary GEAR UP opportunities.

The committee should conduct a needs assessment, such as the one provided by the United States Department of Education to determine levels of basic skills and proficiency in using multi-media tools for all staff. With the analysis of survey results as baseline information, the technology committee should discuss and define technology integration for IPS classrooms. Using this information, a program should be designed to address an increase in teacher competencies in technology integration and strategies to prepare teachers for implementing PASS standards for technology. The plan should incorporate the GEAR UP training provided to the secondary teachers as a component of the total district training plan. In addition, the committee should consider expanding the K20 Center institutes by identifying a cohort of teachers from each grade K-12 to attend the eight day program and then provide in-district workshops for both secondary, middle school, and elementary teachers.

Training in various areas of technology is available to Oklahoma school districts through the Oklahoma State Department of Education (SDE) and another K20 Center grant program, Oklahoma Achievement through Collaboration and Technology Support (OK-ACTS).

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**C. TRANSPORTATION**

The primary objective of a district transportation function is to provide safe, timely, and efficient transportation services to the students. Oklahoma's 7,600 school buses travel more than 67 million miles a year and carry nearly 369,000 children every day. School districts collectively operate the safest form of transportation in the country, and school buses are safer than any other form of public or private mode of transportation.

The Oklahoma School Code (OSC) authorizes school districts to provide student transportation services between school and home, from school to Career Tech locations, and for approved extracurricular activities. The federal Individuals with Disabilities Education Act (IDEA) require districts to provide transportation services to students who must travel to receive special education services, if the schools provide school transportation services.

The Oklahoma State Department of Education (SDE) provides funding for regular transportation of students who live more than 1.5 miles from their assigned school. Oklahoma school districts receive a transportation supplement that is calculated based upon a per capita allowance, the district's student density, and the number of students who live more than 1.5 miles from their school (considered the average daily haul or ADH).

The average daily haul is multiplied by a state funding rate of \$1.39 (transportation factor), a figure that has not been updated since 1983. This level of funding does not begin to support all transportation expenses in a given Oklahoma school district. Statewide, the transportation supplement provides just 16 percent of the funding needed to operate a district transportation program.

### **Background**

IPS has an ADM of 313 and it covers approximately 123 square miles for an average student density of 2.5 students per square mile (**Exhibit 5-10**). Compared with its peer districts, IPS has the third highest student population density.

**Exhibit 5-10**  
**IPS and Peer District's Students per Square Mile**  
**2008-09**

<b>District</b>	<b>Student ADM 2008-09</b>	<b>District Square Miles</b>	<b>Students per Square Mile</b>
<b>Indiahoma</b>	<b>*313</b>	<b>123</b>	<b>2.5</b>
Blair	272	58	4.7
Butner	224	115	1.9
Chattanooga	277	265	1.0
Duke	181	157	1.1
Verden	288	101	2.9

*Source: Office of Accountability Profiles 2009 District Reports  
and WCL ENTERPRISES Calculations*

*\*IPS Student ADM of 313 includes virtual students*

IPS annual total miles for 2008-09 was 53,048 (**Exhibit 5-11**). Compared with its peer districts, IPS had the fourth highest annual mileage.

**Exhibit 5-11**  
**IPS and Peer District's Mileage Information**  
**2008-09**

District	Activity Miles	Route Miles	Total Miles	ADH
<b>Indiahoma</b>	<b>18,973</b>	<b>34,075</b>	<b>53,048</b>	<b>122</b>
Blair	4,871	20,167	25,038	108
Butner	20,000	69,600	89,600	141
Chattanooga	4,000	63,735	67,735	181
Duke	43,788	21,902	65,690	98
Verden	9,556	25,138	34,694	151

*Source: OCAS, School District Expenditures, 2008-09, All Funds*

**Exhibit 5-12** shows the district's general fund expenditures for transportation from 2004-05 through 2008-09. During the five-year period, transportation expenditures increased \$11,440 or 17.8 percent. The largest dollar increases were in benefits, purchased services, and other. There were notable decreases in property, supplies, and salaries.

It should be noted that there was a reduction in total expenditures from 2007-08 to 2008-09 of \$23,630 or 23.8 percent, bringing expenditures to slightly more than 2006-07 spending. This is mostly due to a reduction in spending on salaries and supplies.

**Exhibit 5-12**  
**IPS Student Transportation Expenditures**

Category	2004-05	2005-06	2006-07	2007-08	2008-09	Percentage Change
Salaries	\$25,001	\$25,061	\$25,951	\$25,933	\$22,231	(11.1%)
Benefits	\$7,016	\$7,072	\$10,868	\$9,995	\$9,502	35.4%
Purchased services	\$13,522	\$19,649	\$17,157	\$30,369	\$30,496	125.5%
Supplies	\$17,712	\$18,508	\$21,301	\$30,040	\$13,363	(24.6%)
Property	\$1,000	\$0	\$0	\$3,000	\$0	(100.0%)
Other	\$16	\$178	\$50	\$0	\$115	618.8%
<b>Total</b>	<b>\$64,267</b>	<b>\$70,468</b>	<b>\$75,327</b>	<b>\$99,337</b>	<b>\$75,707</b>	<b>17.8%</b>

*Source: OCAS, 2004-05 through 2008-09, All Funds*

For 2008-09, IPS's transportation cost per rider per day was \$3.55, which was the fourth highest cost per rider per day among IPS and its peer districts (**Exhibit 5-13**). This was also lower than the peer district average of \$3.74 per rider per day.

**Exhibit 5-13**  
**IPS and Peer District's Cost per Rider per Day**  
**2008-09**

District	Expenditures	ADH	Cost / Rider per Day
<b>Indiahoma</b>	<b>\$75,707</b>	<b>122</b>	<b>\$3.55</b>
Blair	\$85,761	108	\$4.54
Butner	\$90,108	141	\$3.65
Chattanooga	\$71,121	181	\$2.25
Duke	\$55,570	98	\$3.24
Verden	\$132,187	151	\$5.00
<b>Peer district average, excluding IPS</b>			<b>\$3.74</b>

*Source: OCAS, School District Expenditures 2008-09,  
All Funds and WCL ENTERPRISES calculations*

IPS' cost per mile was \$1.43 in 2008-09. This was the third highest of the peer group and lower than the peer district average of \$2.03 (**Exhibit 5-14**).

**Exhibit 5-14**  
**IPS and Peer District's Transportation Annual Cost Per Mile**  
**2008-09**

District	Expenditures	Total Miles	Cost Per Mile
<b>Indiahoma</b>	<b>\$75,707</b>	<b>53,048</b>	<b>\$1.43</b>
Blair	\$85,761	25,038	\$3.43
Butner	\$90,108	89,600	\$1.01
Chattanooga	\$71,121	67,735	\$1.05
Duke	\$55,570	65,690	\$0.85
Verden	\$132,187	34,694	\$3.81
<b>Peer district average, excluding IPS</b>			<b>\$2.03</b>

*Source: OCAS, School District Expenditures 2008-09,  
All Funds and WCL ENTERPRISES calculations*

Indiahoma has five buses, two are route buses and three are activity buses, of which one activity bus is leased. The lease bus is leased for three years and will then be exchanged for a new bus and lease contract. There are three pickup trucks, all former Ag trucks. One is used by the Ag teacher, one is used to pick up trash, and the other is used for miscellaneous school use. There is no repair shop for the fleet. There is no preventive maintenance program for the fleet. Once a year, the buses are sent to an authorized repair shop for a state inspection and any identified repairs needed at that time. No repair records are kept on file for the buses and trucks. Throughout the year, if a school bus needs replacement bulbs, headlights, fuses, belts or hoses, the part-time mechanic (full time maintenance man) performs those repairs. Should a bus break down, the authorized repair shop is called and a wrecker is sent out to bring the bus to the authorized repair shop for repairs.

The Transportation Department is not a separate department; rather, it is an assigned responsibility of the school principal. The principal creates routes based upon student need. Should a regular route driver call in sick, the principal chooses a substitute driver from the list of certified drivers. Indiahoma Public Schools has nine certified school bus drivers on file. Two of those drives are regular route drivers. The rest of the drivers drive activity trips or substitute as needed.

**FINDING 5-13**

IPS Transportation Department uses their insurance company's program on school bus safety to educate students PreK through grade 6 on school bus safety. This education, at no cost to the district, includes identifying school bus danger zones, getting on and off of the school bus safely, and proper school bus behavior.

**COMMENDATION**

**IPS uses their insurance company's program on school bus safety to educate students PreK through grade 6 on proper school bus behavior and safety. This program is used at no cost to the district.**

**FINDING 5-14**

IPS Transportation has no written procedures for pre-trip and post-trip school bus inspections. As a result there is no consistency in documenting these inspections. Having written procedures in place provides consistency in training and reference for enforcement.

**RECOMMENDATION**

**The principal should review the state requirements for pre-trip school bus inspections. This information can be found in the Oklahoma School Bus Drivers Manual.**

A copy of this manual can be downloaded at no cost from the Oklahoma State Department of Education website (<http://sde.state.ok.us/Schools/Transportation/pdf/Manual.pdf>) and the reference can be found on page 8 of that manual. Guidelines and procedures should be written to support the state requirements and having these procedures written as a transportation policy for the Indiahoma Public Schools will enable consistent training and can be used as a tool for enforcement if followed as outlined.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING 5-15**

IPS Transportation's filing of state required daily pre-trip inspection documents lacks organization and provides no opportunity for review by the Transportation supervisor. As a

result, some documents are allowed to be completed improperly and are difficult to find if key personnel are not available.

### **RECOMMENDATION**

**The daily pre-trip inspection forms, when completed, should be given to the school principal each day after the driver completes his or her route.**

These forms should be reviewed by the principal the same day. Should repairs be needed, the principal should make arrangements to complete the repairs. If the forms are not completed correctly, the principal should discuss the matter with the responsible driver. These forms are essential to limiting liability exposure on the part of the school and should be kept in the principal's office for reference and documentation for the required period of time.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 5-16**

IPS Transportation has no formal system for recording fuel and repair costs for individual fleet vehicles. Without a recording system, one cannot track the cost of operation for individual vehicles and effectively determine when it is more cost effective to purchase rather than repair.

### **RECOMMENDATION**

**A folder should be created for each school bus and district-owned vehicle. Whenever work is performed, a record should be kept of what repairs were made, the date of the repairs, and the cost of the repairs. These records should be grouped by fiscal year to track annual repairs and related costs. Daily fuel records could also be included in tracking costs.**

Tracking repair costs and fuel costs will assist in documenting an annual "cost of operation" for each vehicle. Should a cost of operation for a vehicle become excessive, as compared to the others, this documentation can provide information in support of retiring or replacing the vehicle.

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### **FINDING 5-17**

IPS Transportation has two bus routes; neither route has written "mile-by-mile and turn-by-turn" instructions. As a result, a substitute driver that is not familiar with the route could miss students waiting for the bus and/or arrive to school late.

This method is especially good when streets or roads have no names, multiple designations, or when the street sign has been lost or damaged. This method will also better document route length for determining route miles traveled each day and year.

### **RECOMMENDATION**

**The school principal should review both routes. With each route bus starting from the school, describe the direction ventured, street name if available, and distance from one turn to the next and one stop to the next for the entire route. Also, identify each stop by address, name, and description.**

### **FISCAL IMPACT**

This recommendation can be implemented with existing resources.



***Appendix A:***  
***Professional Staff Survey Results***

---



# **PROFESSIONAL STAFF SURVEY**

(n=4)

## **STATISTICAL DATA**

<b>If you work in a school, please indicate your position.</b>	<b>Principal</b>	<b>Assistant Principal/Dean of Students</b>	<b>Counselor</b>	<b>Librarian</b>	<b>Other</b>
	25%	0%	25%	0%	50%

<b>If you work in the central administration, please indicate your position.</b>	<b>Administrator (e.g., assistant superintendent, department head)</b>	<b>Coordinator or Supervisor</b>	<b>Professional, non-supervisory</b>	<b>Other</b>
	34%	0%	33%	33%

## **SURVEY STATEMENTS**

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

<b>Number</b>	<b>Statement</b>	<b>Agree</b>	<b>No Opinion</b>	<b>Disagree</b>
1.	The district has a plan that reflects the goals and needs of the district.	75%	25%	0%
2.	School Board members know and understand the educational needs of students in the district.	75%	0%	25%
3.	Central administration is efficient.	50%	25%	25%
4.	My job responsibilities are well defined.	50%	0%	50%
5.	My job description is current.	25%	25%	50%
6.	District salaries are competitive.	50%	25%	25%
7.	Professional development is targeted to the needs of students.	100%	0%	0%
8.	I receive an annual performance evaluation.	75%	0%	25%
9.	The district regularly communicates with parents.	100%	0%	0%
10.	The district works with business and community organizations to improve education.	50%	50%	0%

**Instructional Delivery**

Number	Statement	Agree	No Opinion	Disagree
11.	Education is the main priority in our school district.	100%	0%	0%
12.	The district has a plan to increase student performance.	100%	0%	0%

**Business Operations**

Number	Statement	Agree	No Opinion	Disagree
13.	Professional staff contribute to the development of the annual budget.	50%	0%	50%
14.	The district's budget reflects the goals of the district.	25%	25%	50%
15.	Central administrative staff are effective in managing district funds.	50%	25%	25%
16.	Campus administrative staff are effective in managing district funds.	75%	0%	25%
17.	Financial reports are distributed to professional staff on a regular basis.	0%	0%	100%
18.	The purchase order/requisition process is efficient.	25%	0%	75%

**Facilities Use and Management**

Number	Statement	Agree	No Opinion	Disagree
19.	The district has an effective energy management program.	25%	25%	50%
20.	School facilities are always kept clean.	50%	25%	25%
21.	Needed repairs are made in a timely manner.	75%	0%	25%
22.	Teachers and staff feel safe and secure.	75%	0%	25%
23.	Access to school buildings during school hours is well controlled.	50%	0%	50%
24.	Security procedures for visitors, such as reporting first to the office, are strictly enforced at my school.	50%	25%	25%
25.	Safety hazards exist on school grounds.	25%	0%	75%
26.	The district has a crisis plan with which I am familiar.	75%	0%	25%
27.	Practice drills are conducted regularly to ensure students & staff are prepared in case of a crisis.	75%	0%	25%

**Support Services**

<b>Number</b>	<b>Statement</b>	<b>Agree</b>	<b>No Opinion</b>	<b>Disagree</b>
28.	Discipline and order are maintained in the school cafeteria.	100%	0%	0%
29.	Cafeteria staff is helpful and friendly.	100%	0%	0%
30.	Cafeteria facilities are sanitary and neat.	100%	0%	0%
31.	Teachers and staff feel safe and secure.	75%	0%	25%
32.	Gangs are a problem in this district.	25%	0%	75%
33.	Drugs are a problem in this district.	25%	0%	75%
34.	Bullying is a problem in this district.	25%	0%	75%
35.	Computers are new enough to be useful for administrative purposes.	100%	0%	0%
36.	I receive sufficient training to know how to use my computer and the software needed for my job.	100%	0%	0%
37.	Technology staff responds quickly to requests for service or support.	75%	0%	25%
38.	Buses run on a timely basis.	100%	0%	0%
39.	Buses are readily available for activity and field trips.	100%	0%	0%
40.	The district has an effective discipline process for students riding buses.	75%	0%	25%



*Appendix B:*

*Teacher Survey Results*

---



# **TEACHER SURVEY**

(n=18)

## **STATISTICAL DATA**

<b>How long have you been employed by the school district?</b>	<b>5 years or less</b>	<b>6-10 years</b>	<b>11-15 years</b>	<b>16-20 years</b>	<b>20+ years</b>
	33%	28%	17%	11%	11%

<b>Indicate the grade level at which you teach.</b>	<b>Elementary (K-5)</b>	<b>Middle (6-7)</b>	<b>Junior High (8-9)</b>	<b>High (10-12)</b>
	39%	6%	11%	44%

## **SURVEY STATEMENTS**

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

<b>Number</b>	<b>Statement</b>	<b>Agree</b>	<b>No Opinion</b>	<b>Disagree</b>
1.	School Board members know and understand the educational needs of students in the district.	33%	22%	45%
2.	Central administrative staff is efficient.	56%	16%	28%
3.	Principals and assistant principals are accessible to teachers.	94%	0%	6%
4.	My school has a plan to increase student performance.	82%	6%	12%
5.	My school plan properly reflects the needs of students in my classroom.	94%	6%	0%
6.	Teacher turnover is low.	83%	17%	0%
7.	District teacher salaries are competitive.	33%	6%	61%
8.	Salaries are a key factor in retaining teachers.	33%	17%	50%
9.	Professional development for teachers in my school is targeted to the needs of students.	33%	22%	45%
10.	Teachers in my school help determine professional development needs.	67%	0%	33%
11.	Teachers in my school receive annual personnel evaluations.	100%	0%	0%
12.	My school regularly communicates with	83%	11%	6%

Number	Statement	Agree	No Opinion	Disagree
	parents.			
13.	My school has sufficient volunteers to help student and school programs.	28%	17%	55%
14.	The district works with business and community organizations to improve education.	45%	22%	33%

### Instructional Delivery

Number	Statement	Agree	No Opinion	Disagree
15.	Education is the main priority in our school district.	61%	17%	22%
16.	My principal is an effective instructional leader.	83%	0%	17%
17.	The district has effective programs to help all students learn.	72%	6%	22%
18.	My principal solicits input from teachers in making decisions for our school.	83%	6%	11%
19.	The district provides curriculum guides for all grades and subjects.	67%	5%	28%
20.	I use the curriculum guide on a regular basis.	67%	16%	17%
21.	The district has scope and sequence documents to ensure students achieve grade level objectives and are prepared for the next grade.	28%	45%	27%
22.	My school uses vertical teaming to ensure that students learn the necessary material to be prepared for the next grade.	22%	39%	39%
23.	The district uses a pacing calendar to determine when objectives are taught.	0%	61%	39%
24.	The district uses periodic assessments/tests to monitor student performance and identify performance gaps.	67%	22%	11%
25.	My principal observes teachers in my school on a regular basis to ensure that the curriculum is being taught consistently.	67%	11%	22%
26.	The school library meets students' needs for books and other resources.	56%	22%	22%
27.	I have the resources necessary to be an effective teacher.	61%	17%	22%
28.	The alternative education program, EDGE, is effective.	0%	89%	11%

Number	Statement	Agree	No Opinion	Disagree
29.	The student discipline process is fair for all students.	78%	11%	11%

**Business Operations**

Number	Statement	Agree	No Opinion	Disagree
30.	Teachers in my school participate in the budget process.	11%	0%	89%
31.	All my school’s instructional needs are addressed through the budget.	11%	33%	56%
32.	Teachers in my school receive the supplies and materials that they need in a timely manner.	39%	5%	56%
33.	Students are issued textbooks in a timely manner.	41%	24%	35%
34.	Textbooks are in good condition.	61%	17%	22%
35.	The purchase order/requisition process is efficient.	44%	28%	28%

**Facilities Use and Management**

Number	Statement	Agree	No Opinion	Disagree
36.	The district has an effective energy management program.	28%	33%	39%
37.	My school is always kept clean.	50%	6%	44%
38.	Needed repairs at my school are made in a timely manner.	67%	5%	28%
39.	I feel safe and secure at my school.	100%	0%	0%
40.	Access to my school during school hours is well controlled.	67%	0%	33%
41.	Security procedures for visitors, such as reporting first to the office, are strictly enforced at my school.	50%	6%	44%
42.	Gangs are a problem in this district.	0%	6%	94%
43.	Drugs are a problem in this district.	50%	17%	33%
44.	Bullying is a problem in this district.	44%	11%	44%
45.	Safety hazards exist on my school’s grounds.	28%	5%	67%

Number	Statement	Agree	No Opinion	Disagree
46.	My school has a crisis plan with which I am familiar.	94%	0%	6%
47.	Practice drills are conducted regularly to ensure students and staff are prepared in case of a crisis.	100%	0%	0%

### Support Services

Number	Statement	Agree	No Opinion	Disagree
48.	The cafeteria's food looks and tastes good.	78%	17%	5%
49.	Students have enough time to eat.	94%	0%	6%
50.	Students eat lunch at an appropriate time of the day.	100%	0%	0%
51.	Discipline and order are maintained in the school cafeteria.	89%	0%	11%
52.	Cafeteria staff is helpful and friendly.	94%	6%	0%
53.	Cafeteria facilities are sanitary and neat.	94%	0%	6%
54.	Vending machines are available for use when the cafeteria is open.	44%	17%	39%
55.	Food sales by booster clubs or other outside organizations are allowed when the cafeteria is in operation.	50%	33%	17%
56.	Teachers in my school know how to use computers to enhance instruction.	100%	0%	0%
57.	Teachers in my school have adequate staff development opportunities to support technology integration.	56%	11%	33%
58.	Support for integrating technology into instruction is adequate at my school.	78%	5%	17%
59.	Teachers in my school teach PASS standards for instructional technology.	72%	22%	6%
60.	Students in my class have regular access to computer equipment and software in the classroom or in labs.	83%	0%	17%
61.	Computers are new enough to be useful for student instruction.	71%	0%	29%
62.	Teachers and students have safe and appropriate access to the Internet.	89%	0%	11%
63.	Technology staff responds quickly to requests for service or support.	45%	33%	22%

Number	Statement	Agree	No Opinion	Disagree
64.	Buses run on a timely basis.	94%	0%	6%
65.	Buses are readily available for activity and field trips.	78%	0%	22%
66.	The district has an effective discipline process for students riding buses.	72%	17%	11%

**Principal as an Instructional Leader** (Please rate your principal on a 1-5 basis, with 1 being the lowest rating and 5 being the highest.) **My principal:**

Number	Statement	1	2	3	4	5
67.	Is an advocate and spokesperson for the school to all stakeholders.	6%	6%	11%	22%	55%
68.	Provides teachers with materials and professional development necessary for the successful execution of their jobs.	5%	11%	11%	17%	56%
69.	Recognizes and celebrates school accomplishments and acknowledges failures.	5%	11%	0%	5%	79%
70.	Protects teachers from issues and influences that would detract from their teaching time or focus.	11%	6%	0%	44%	39%
71.	Creates a high level of trust among teachers and other school personnel.	17%	0%	17%	22%	44%
72.	Fosters shared beliefs and a sense of community and cooperation.	11%	5%	6%	22%	56%
73.	Demonstrates an awareness of the personal aspects of teachers and staff.	5%	11%	0%	28%	56%
74.	Is knowledgeable about current curriculum, instruction and assessment practices.	11%	6%	0%	28%	56%
75.	Establishes criteria for evaluating teachers that are clear and understood by all.	6%	0%	11%	11%	72%
76.	Establishes clear goals and keeps these goals in the forefront of the school's attention.	5%	6%	17%	22%	50%
77.	Is organized and an effective manager of day-to-day operations of the school.	12%	0%	6%	41%	41%
78.	Involves teachers in the design and implementation of important decisions and policies.	17%	6%	11%	22%	44%

Number	Statement	1	2	3	4	5
79.	Is a good listener.	6%	6%	6%	17%	65%
80.	Is aware of the details and undercurrents in the running of the school and uses this information to address current and potential problems.	6%	11%	0%	33%	50%
81.	Has quality contact and interactions with teachers and students.	5%	11%	0%	28%	56%
82.	Recognizes and rewards individual accomplishments.	5%	11%	0%	28%	56%
83.	Is willing to and actively challenges the status quo.	5%	11%	6%	39%	39%
84.	Is directly involved in the design and implementation of curriculum, instruction, and assessment practices.	6%	11%	11%	33%	39%
85.	Monitors the effectiveness of school practices and their impact on student learning.	5%	11%	6%	28%	50%
86.	Ensures that faculty and staff are aware of the most current theories and practices and makes the discussion of these a regular aspect of the school's culture.	11%	11%	11%	22%	45%
87.	Establishes strong lines of communication with teachers and among students.	11%	5%	6%	28%	50%
88.	Inspires and leads new and challenging innovations.	11%	6%	22%	28%	33%
89.	Treats teachers and other school personnel with dignity and respect.	5%	6%	0%	17%	72%
90.	Is fair in dealing with all personnel and avoids any appearance of favoritism.	11%	5%	6%	17%	61%

*Appendix C:*  
*Support Staff Survey Results*

---



## ***SUPPORT STAFF SURVEY***

(n=7)

What type of job do you perform in the district?

a. Paraprofessional	b. Classroom aide	c. Cafeteria worker	d. Custodian	e. Maintenance worker	f. Bus driver or mechanic	g. Other
28%	29%	0%	0%	14%	0%	29%

### ***SURVEY STATEMENTS***

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

Number	Statement	Agree	No Opinion	Disagree
1.	My job responsibilities are well-defined.	71%	0%	29%
2.	My job description is current.	57%	29%	14%
3.	District salaries are competitive.	0%	43%	57%
4.	I receive overtime pay or compensatory time off for all hours worked beyond my normal work week.	29%	0%	71%
5.	The district provides ongoing training for me in my job.	28%	29%	43%
6.	I receive an annual personnel evaluation.	14%	29%	57%
7.	The district has a fair and timely grievance process.	29%	57%	14%

#### **Facilities Use and Management**

Number	Statement	Agree	No Opinion	Disagree
8.	School facilities are clean.	57%	14%	29%
9.	School facilities are well maintained.	43%	43%	14%
10.	School facilities are safe.	57%	0%	43%
11.	Safety hazards exist in my work area.	43%	14%	43%



*Appendix D:*  
*Student Survey Results*

---



# ***STUDENT SURVEY***

(n=21)

What year are you in school?	Junior	Senior
	67%	33%

## ***SURVEY STATEMENTS***

### **Instructional Delivery**

Number	Statement	Agree	No Opinion	Disagree
1.	Education is the main priority in our school district.	70%	20%	10%
2.	Students respect the administrators in our school.	67%	19%	14%
3.	Teachers are motivated and interested in teaching.	74%	21%	5%
4.	Class sizes are reasonable.	95%	0%	5%
5.	Textbooks are issued in a timely manner.	79%	16%	5%
6.	There are enough textbooks in all my classes.	63%	5%	32%
7.	The school library is a good resource.	63%	21%	16%

**Educational Programs: FOR ONLY THOSE HIGH SCHOOL PROGRAMS in which you are currently taking, or have previously taken, courses, please rate whether you thought that program was effective or not by placing an “X” in the appropriate box.**

Number	Program	Effective	Ineffective
8.	Gifted and Talented	45%	55%
9.	Advanced placement	50%	50%
10.	Career/technical	68%	32%
11.	Alternative School	21%	79%
12.	Career counseling	53%	47%
13.	College counseling	68%	32%
14.	Fine arts	42%	58%
15.	Languages, other than English	60%	40%
16.	Language arts/English	95%	5%
17.	Math	81%	19%
18.	Science	100%	0%
19.	History/Government/Social Studies	86%	14%

**Facilities Use and Management**

Number	Statement	Agree	No Opinion	Disagree
20.	My school is clean.	53%	33%	14%
21.	The school is well maintained, both inside and out.	63%	28%	5%
22.	I feel safe and secure at my school.	76%	24%	0%
23.	Access to my school during school hours is well controlled.	81%	9%	10%
24.	School disturbances are infrequent.	52%	38%	10%
25.	Gangs are a problem in my school.	5%	9%	86%
26.	Drugs are a problem in my school.	9%	24%	67%
27.	Bullying is a problem in my school.	19%	14%	67%
28.	Vandalism is a problem at my school.	0%	29%	71%
29.	Students receive fair and equitable discipline for misconduct at my school.	43%	24%	33%
30.	Safety hazards exist on school grounds.	43%	38%	19%

**Support Services**

Number	Statement	Agree	No Opinion	Disagree
31.	The cafeteria's food looks and tastes good.	76%	14%	10%
32.	Students have enough time to eat.	38%	10%	52%
33.	Discipline and order are maintained in the school cafeteria.	81%	14%	5%
34.	Cafeteria staff is helpful and friendly.	95%	5%	0%
35.	Cafeteria facilities are sanitary and neat.	91%	9%	0%
36.	Vending machines are available for use when the cafeteria is open.	24%	48%	28%
37.	Food sales by booster clubs or other outside organizations are allowed when the cafeteria is in operation.	52%	43%	5%
38.	Teachers in my school know how to use computers to enhance instruction.	91%	9%	0%
39.	Students in my class have regular access to computer equipment and software in the classroom or in labs.	86%	14%	0%
40.	Computers are new enough to be useful for student instruction.	90%	5%	5%
41.	Teachers and students have safe and appropriate access to the Internet.	90%	5%	5%
42.	Teachers and aides monitor student access to Internet websites.	57%	38%	5%

**If you ride a school bus, please answer the following:**

<b>Number</b>	<b>Statement</b>	<b>Agree</b>	<b>No Opinion</b>	<b>Disagree</b>
43.	Buses run on a timely basis.	76%	14%	10%
44.	The driver maintains discipline on the bus.	71%	29%	0%
45.	Buses are clean.	62%	24%	14%



*Appendix E:*

*Parent Survey Results*

---



# ***PARENT SURVEY***

(n=27)

## ***SURVEY STATEMENTS***

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

Number	Statement	Agree	No Opinion	Disagree
1.	School Board members listen to the opinions and desires of parents and community members.	22%	33%	45%
2.	District staff are accessible to parents.	45%	33%	22%
3.	School staff are accessible to parents.	89%	0%	11%
4.	The quality of teachers at my child's school is very high.	67%	11%	22%
5.	My child's school provides me with regular communications on school events and activities.	67%	0%	33%
6.	My child's school has sufficient volunteers to help student and school programs.	22%	11%	67%
7.	The district works with business and community organizations to improve education.	45%	22%	33%

### **Instructional Delivery**

Number	Statement	Agree	No Opinion	Disagree
8.	Education is the main priority in our district.	67%	0%	33%
9.	Students learn the necessary material to be prepared for the next grade.	67%	0%	33%
10.	I receive sufficient information from the district regarding academic expectations for my child (i.e., student testing, retention, etc.).	45%	11%	44%
11.	I receive timely communications from my child's teachers regarding his/her progress.	78%	0%	22%
12.	I receive sufficient information on programs offered by the district for which my child may be qualified (e.g., gifted and talented, career and technology, after school programs).	33%	22%	45%
13.	My child is issued textbooks in a timely manner.	67%	11%	22%
14.	My child's textbooks are in good shape.	78%	11%	11%

**Facilities Use and Management**

Number	Statement	Agree	No Opinion	Disagree
15.	My child's school is clean.	67%	11%	22%
16.	My child's school is well maintained.	63%	12%	25%
17.	My child feels safe and secure at school.	89%	0%	11%
18.	Access to school buildings during school hours is well controlled.	67%	11%	22%
19.	Security procedures for visitors, such as reporting first to the office, are strictly enforced at my school.	45%	22%	33%
20.	Gangs are a problem in this district.	11%	0%	89%
21.	Drugs are a problem in this district.	34%	33%	33%
22.	Bullying is a problem in this district.	78%	11%	11%
23.	Safety hazards exist on school grounds.	38%	50%	12%
24.	Discipline is fairly and equitably administered in my child's school.	78%	11%	11%

**Support Services**

Number	Statement	Agree	No Opinion	Disagree
25.	Discipline and order are maintained in the school cafeteria.	33%	45%	22%
26.	Cafeteria staff is helpful and friendly.	67%	22%	11%
27.	Cafeteria facilities are sanitary and neat.	56%	33%	11%
28.	Computers are new enough to be useful for educational purposes.	78%	11%	11%
29.	My child has regular access to computer equipment and software in the classroom or in labs.	63%	0%	37%
30.	Teachers and students have safe and appropriate access to the Internet.	67%	22%	11%
31.	School buses run on a timely basis.	89%	0%	11%
32.	Discipline is maintained on the school bus.	45%	33%	22%

*Appendix F:*  
*Enrollment Projections*

---



## Indiahoma Public Schools - Cohort Fall Enrollment Projection Model

SY	PK	KG	1	2	3	4	5	6	7	8	9	10	11	12	Class of	PK to 8	9 to 12	TOTAL
96-97	0	22	19	14	13	14	14	22	18	23	20	15	21	16	1997	159	72	231
97-98	0	27	17	18	16	11	14	12	22	17	23	14	15	21	1998	154	73	227
98-99	20	19	16	15	20	13	13	12	15	24	17	24	17	18	1999	167	76	243
99-00	13	22	19	14	16	14	12	14	10	16	20	20	23	15	2000	150	78	228
00-01	11	25	18	18	10	18	17	13	15	11	20	18	14	28	2001	156	80	236
01-02	11	13	18	11	15	9	16	18	15	13	12	16	18	15	2002	139	61	200
02-03	16	15	7	20	12	16	13	15	21	18	17	13	12	21	2003	153	63	216
03-04	10	19	15	9	21	9	12	13	16	21	21	19	14	15	2004	145	69	214
04-05	18	17	14	14	11	21	11	15	15	20	26	21	16	16	2005	156	79	235
05-06	9	19	12	12	16	14	22	14	16	14	19	30	21	15	2006	148	85	233
06-07	12	12	16	11	11	12	15	22	12	14	17	16	23	15	2007	137	71	208
07-08	4	13	13	16	12	9	12	14	20	12	11	18	23	28	2008	125	80	205
08-09	9	9	11	14	15	12	9	12	16	19	13	16	24	21	2009	126	74	200
09-10	13	7	8	13	11	18	18	10	13	16	20	13	16	19	2010	127	68	195
10-11	13	15	6	8	13	11	20	19	10	12	16	22	14	15	2011	127	67	195
11-12	12	13	13	6	8	13	12	22	19	10	13	18	24	13	2012	129	68	197
12-13	12	13	12	13	6	8	14	13	22	18	10	14	20	22	2013	132	66	197
13-14	18	13	11	12	13	6	9	15	13	21	19	11	15	18	2014	131	63	194
14-15		19	11	12	11	13	7	9	15	13	21	21	12	14	2015		68	
15-16			17	11	11	12	14	7	10	15	13	23	23	11	2016		70	
16-17				17	11	11	13	15	7	9	15	14	26	21	2017		76	
17-18					17	11	13	14	16	7	9	16	16	23	2018		65	
18-19						17	12	14	14	15	7	10	18	14	2019		50	
19-20							19	13	14	13	15	8	11	17	2020		51	
20-21								20	13	13	14	17	9	10	2021		49	
21-22									20	13	13	15	18	8	2022		54	
22-23										19	13	15	17	17	2023		61	
23-24											20	14	16	15	2024			
24-25												22	16	15	2025			
25-26													24	14	2026			
26-27														22	2027			

Enrollment projections based on five year retention rate.  
 Does not include non-graded or out-of-home placement.  
 2009-09 and 2009-10 9th through 12th grade numbers based on ADM due to the number of virtual students.

5 Year Retention	K to 1	1 to 2	2 to 3	3 to 4	4 to 5	5 to 6	6 to 7	7 to 8	8 to 9	9 to 10	10 to 11	11 to 12
	0.87	1.01	0.97	1.01	1.12	1.06	1.01	0.95	1.02	1.09	1.11	0.91



***Appendix G:***

***Facilities Walk-through:  
Maintenance, Safety, and  
Security Needs***

---



---

**Appendix G*****Facilities Walk-through: Maintenance, Safety, and Security Needs******Junior Senior High School Building w/Auditorium***

- The existing ceiling tiles and grid is in poor condition and should be replaced.
- They are numerous stained ceiling tiles from old roof leaks that have not been replaced.
- These tiles should be replaced to minimize the potential for any indoor air quality issues.
- It appears there is asbestos floor tile located in the teacher workroom and typical classrooms. The district should develop a long-range plan to remove and replace all asbestos containing material as part of an asbestos management plan.
- Typical classrooms contain wood paneling which is not a suitable fire retardant material for use in classrooms.
- In the boys' restroom, the handicap stall should be modified to reverse door swing to meet ADA requirements. There is no room to adequately maneuver a wheelchair.
- There were no noted gas valve shutoff valves located in the science lab.
- The drinking fountains located in the hallway are not ADA compliant fixtures.
- Vending machines were located in the main entry restricting the exiting width as may be required by the local Fire Marshall.
- The exterior brick lintel at front entry is rusting and should be painted.
- There are no weep holes installed in the brick veneer at the exterior of the building.
- It was noted that there is rotted wood at the plywood infill at window openings in the exterior walls.
- Electrical panels were installed in the corridors and were not locked allowing student access to these panels.
- There is no ADA wheelchair access to the stage in the Multi-Purpose room.
- The electrical panel at the stage was open and not properly labeled.
- Stained ceiling tiles were noted throughout the Multi-Purpose Room that have not been replaced from old roof leaks. These tiles should be replaced to minimize any possible indoor

air quality issues.

- The caulking around aluminum framed windows located at the exterior of the Multi-Purpose Room is in poor condition and should be replaced.
- The exterior doors are in need of repainting.

#### ***Gym Addition w/Principal Office***

- There is no ADA seating provided within the bleachers in the gymnasium.
- The electrical panels located in the dressing room are not labeled properly.
- The handrails at the bleacher seating are in need of repainting.
- The electrical light fixtures were not working in the visitor side dressing room.
- It was noted in several locations that there are stained ceiling tiles that have not been replaced. The roofing has been replaced, but the stained ceiling tiles have not been replaced.
- The exterior painting on the CMU wall is peeling off near the south elevation by the administration area tie-in. It appears the CMU block was not properly primed.

#### ***Superintendent Office & Lobby Addition***

- No items were noted.

#### ***Grade School (PK-3)***

- The first grade classroom floor tile appears to be asbestos containing floor materials. The Kindergarten classroom has new 12 x 12 vinyl floor tile.

#### ***5<sup>th</sup> and 6<sup>th</sup> Grade Building***

- The restrooms have grab bars installed within one stall, but there is no adequate turning radius for proper wheelchair access.

#### ***Cafeteria Building***

- Wood cabinets are utilized in the kitchen area and may not be suitable for a food service area.
- The kitchen restroom is not ADA accessible.
- It was noted that there appears to be an adhesion problem with the floor tile due to some tiles are pulling up from the concrete slab.

- The exterior double doors have gaps around the perimeter and will require adjustment and new weather stripping installed.
- There is no handrail installed at the exterior ramp installed at the rear of kitchen area.
- There is a cracked/broken PVC drain pipe for the courtyard that should be replaced.
- The concrete curbs at the delivery area are cracked and in need of replacement.
- It was noted that no weep holes were installed in the exterior brick veneer.

### ***Media Center & Computer Lab Building***

- The access to the Mechanical Closet located within the AV Storage is blocked and is typically against fire codes.
- The restrooms are ADA compliant within this building.
- Roof or condensation leaks were indicated by stained ceiling tiles located in the front foyer area.
- There is a wall crack in the CMU wall located by the Restroom off the entry foyer indicating some possible foundation movement. The district should monitor this crack for any further movement and widening. If further cracking or opening of the crack occurs, a structural engineer should be retained to further review this condition to determine if any repairs are needed.
- The light fixture lenses within the building need to be cleaned.

### ***Ag Building***

- Stained ceiling tiles were noted in the classroom areas indicating roof leaks.

### ***F.F.A. Building***

- Floor tile located in this facility appears to be asbestos containing floor tile material.
- Open electrical junction boxes were open in the Old Wood Shop.

### ***Bus Barn***

- The building has been converted to a wood shop for the district for a construction trades shop program.
- There are no exterior doors other than the old rollup doors to enter/exit the facility. This is in violation of fire codes. The district should install a proper exterior door/s to be in compliance

with fire code requirements.

- Evidence of roof leaks was noted during the walk-through visit.

### ***General Comments***

- Consideration should be given to replace the existing chalkboards with marker boards to provide greater flexibility for classroom instruction.
- Most schools are in need of substantial electrical service upgrades to support technology upgrades needed for student instruction.
- In general, 2 x 4 ceiling tiles are installed in most facilities and numerous tiles are stained. The district should develop a plan to replace these stained tiles and investigate if these conditions have been caused by condensation problems or whether they are roof leaks. It is extremely important that any moisture infiltration into building spaces should be reported so that these conditions can be investigated and corrected.
- Numerous Americans with Disability Act (ADA) compliance issues were observed at most campuses. The long-range facilities plan should evaluate and include options to install proper ADA access to building entries and access to restrooms. The district should consider adding signage at all building entries to indicate contacting the main office if someone is in need of assistance due to a disability. Each building should have a plan in place to address access assistance.
- The exterior windows of most buildings are in very poor condition and should be considered for replacement as part of any future bond program.
- The construction of vestibules at the Junior Senior High Building should be considered to provide protection at building entries and to minimize loss of heat and cooling to the exterior thereby increasing the energy efficiency for the building.

*Appendix H:*

*Thermal Images*

---

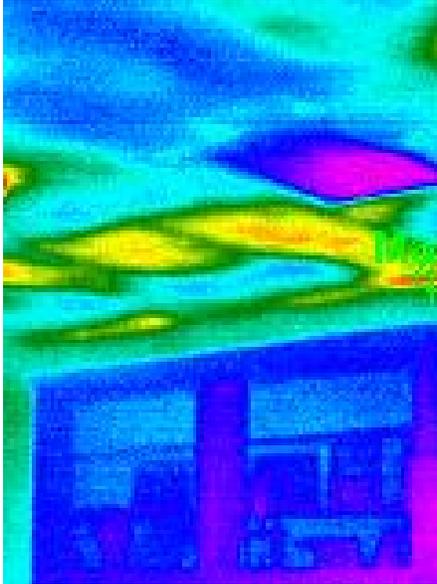


*Thermal Images of Facilities in Indianhoma Public Schools*

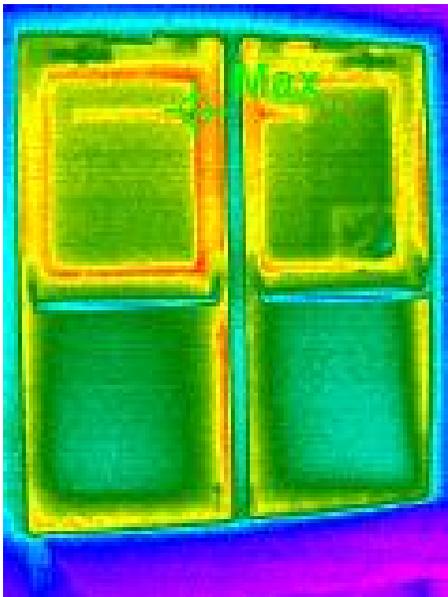
---

Temp. Scale = Hot [white, red, orange, yellow, green, lt. blue, blue, purple, black] Cold

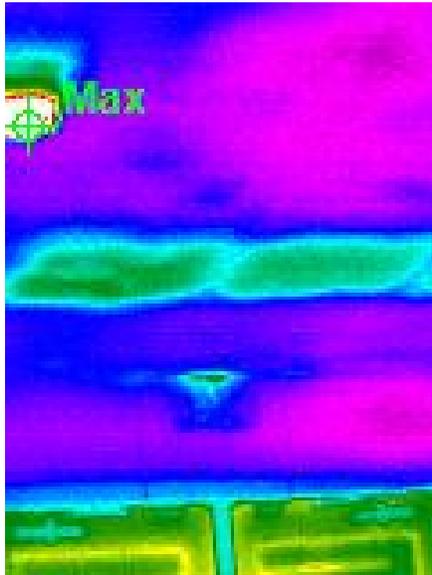
**Exhibit 1**  
**Insulation missing above ceiling on west side of Gym Lobby**



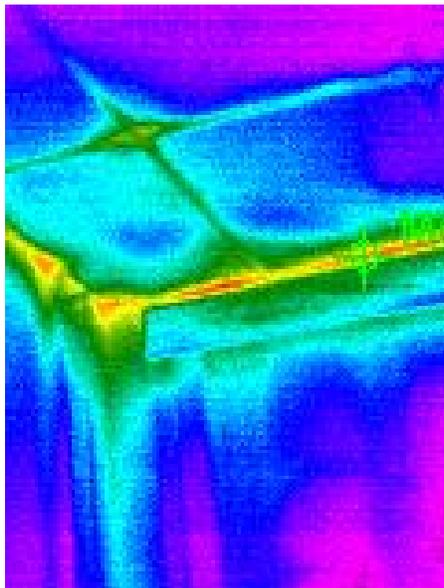
**Exhibit 2**  
**No thermal qualities to east doors of Gym Lobby**



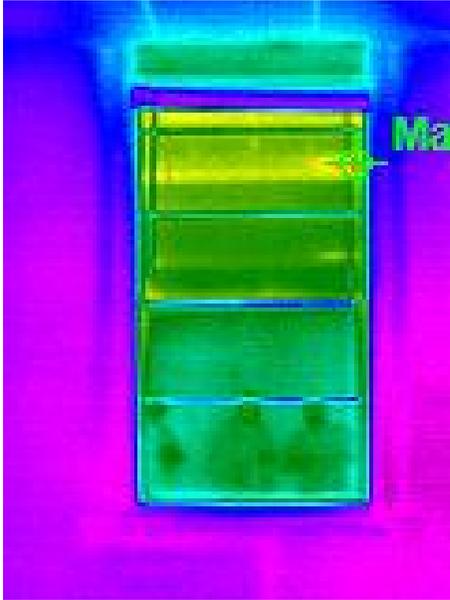
**Exhibit 3**  
**Insulation missing above ceiling above east doors to Gym Lobby**



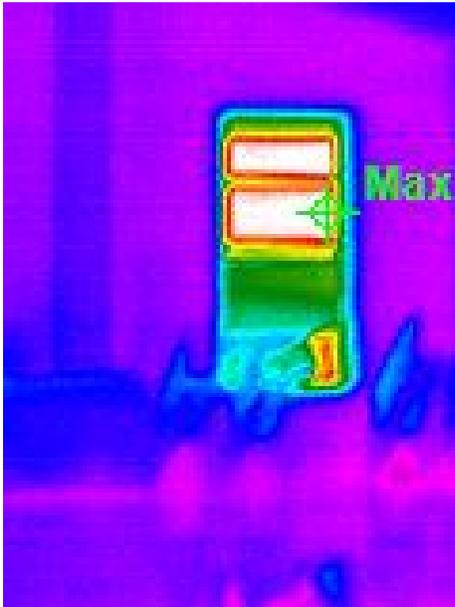
**Exhibit 4**  
**Heat gain at upper exterior wall and ceiling in Server Room**



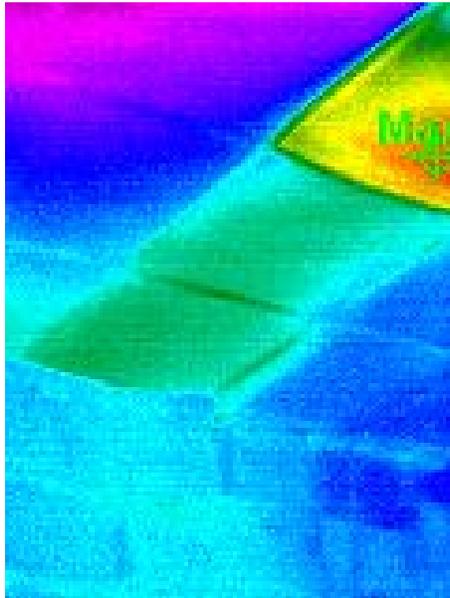
**Exhibit 5**  
**Heat gain through typical window of Jr-Sr High School**



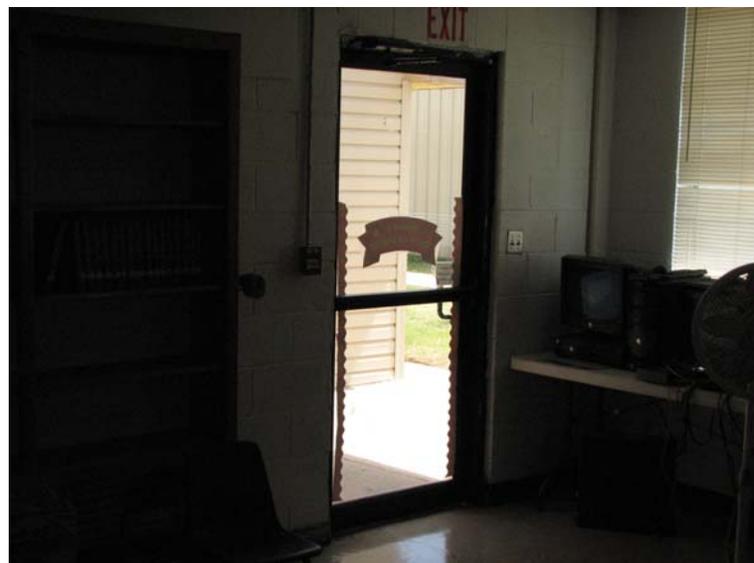
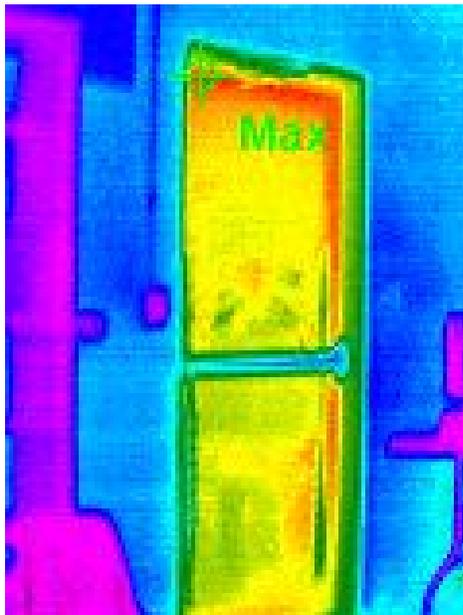
**Exhibit 6**  
**Heat gain through typical window of Auditorium**



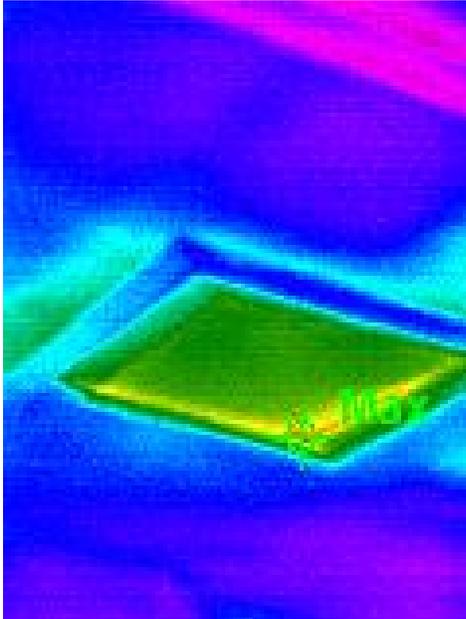
**Exhibit 7**  
**Insulation missing above ceiling tiles in Tech Ed – Library Building**



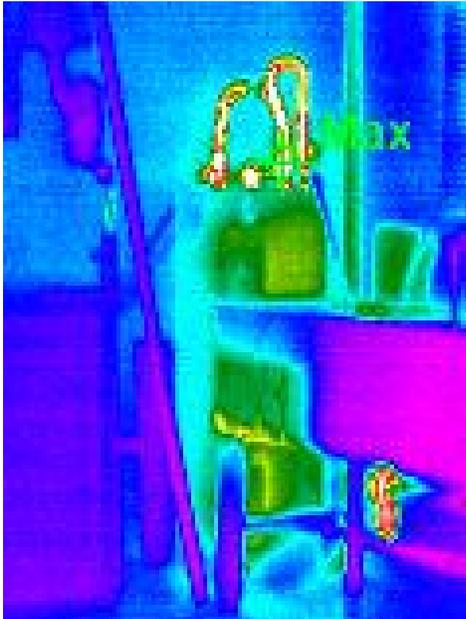
**Exhibit 8**  
**Heat gain through east door of Speech Room**



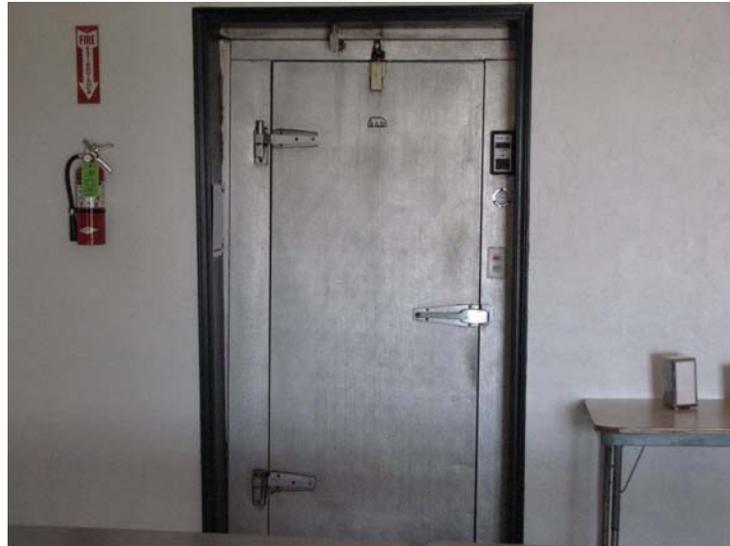
**Exhibit 9**  
**Insulation missing above ceiling hatch in Cafeteria Kitchen**



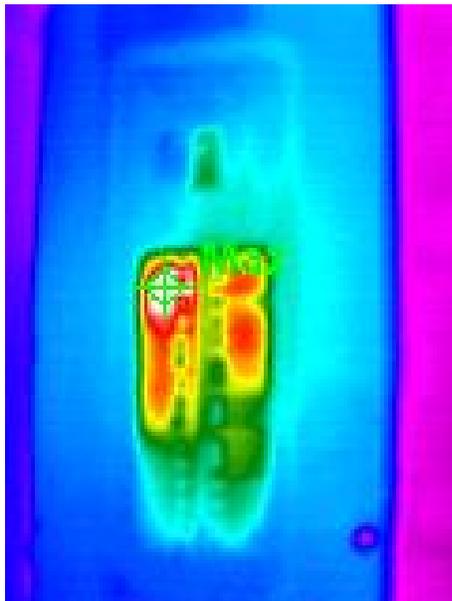
**Exhibit 10**  
**Insulation blanket needed on water heater in Cafeteria Kitchen**



**Exhibit 11**  
**Gasket needs to be replaced around door of Walk-In Freezer**



**Exhibit 12**  
**Breakers showing hot in main breaker box for Jr-Sr High School**





## Office of Accountability

655 Research Parkway, Suite 301  
Oklahoma City, OK 73104

---

(405) 225-9470

[www.SchoolReportCard.org](http://www.SchoolReportCard.org)

