



LEGISLATIVE BUDGET BOARD

Pilot Review of Charter Schools Southwest Schools

LEGISLATIVE BUDGET BOARD STAFF

EVERGREEN SOLUTIONS, LLC

DECEMBER 2012

Pilot Review of Charter Schools Southwest Schools

**Legislative Budget Board Staff
Evergreen Solutions, LLC**

December 2012



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January 18, 2013

Ms. Janelle James
Superintendent
Southwest Schools

Dear Ms. James:

The attached report reviews the management and performance of Southwest School's educational, financial, and operational functions.

The report's recommendations will help Southwest Schools improve its overall performance as it provides services to students, staff, and community members. The report also highlights model practices and programs being provided by Southwest Schools.

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

The Legislative Budget Board engaged Evergreen Solutions, LLC to conduct and produce this review, with LBB staff working in a contract oversight role.

The report is available on the LBB website at <http://www.lbb.state.tx.us>.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ursula Parks".

Ursula Parks
Director
Legislative Budget Board

cc: Mr. Hugh Conway
Mr. Rick Hargrove
Ms. Patti Kelly
Ms. Melva Martinez Meronek
Mr. Jorge Mancilla
Mr. Marcus Brewer

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EXECUTIVE SUMMARY

Southwest School's school performance review notes 9 commendable practices and makes 22 recommendations for improvement. This Executive Summary highlights the charter school's significant accomplishments and recommendations. The purpose of a management and performance review is to evaluate the effectiveness and efficiency of various areas of a charter school's operations and provide recommendations that can help improve these processes. Some recommendations in this report are based on state or federal laws, rules, and regulations, while others are based on comparisons to state or industry standards, or accepted best practices. A copy of the full report is available at www.lbb.state.tx.us.

SIGNIFICANT ACCOMPLISHMENTS

- ◆ Southwest Schools' leadership team and staff from individual school sites established successful strategic partnerships enabling the charter school to transform how it educates students. One example included a partnership between Southwest Schools and Chevron, which in turn evolved into an entire program that serves as a cornerstone of Southwest High School. Equilibria E-Colors is a communication coaching program supported by Chevron that helps students and staff identify different personality styles and better understand themselves and those around them. Another Southwest Schools partnership involved the JASON Project whose approach to science education immerses students in challenging, real-world situations.
- ◆ Through the Phoenix School, Southwest Schools partnered with community agencies and social service programs to provide the educational component of day treatment programs for students recovering from substance addictions and other challenges. The Phoenix School provides each contracted program with an educational program specifically designed to meet the needs of the facility and its students. Teachers assigned by Southwest Schools are part of each student's treatment team. Computer labs at each site, provided and maintained by Southwest Schools, allow for computer-based curriculum to supplement teacher-directed instruction and provide

opportunities for credit recovery. Depending on the program, students remain at a site from 30 days to several years. Although the average enrollment is just over 200 students, the Phoenix School serves many more individual students as a result of the short-term programs. The treatment-first, client-centered programs at the Phoenix School have been described as providing traumatized, delinquent, abused, and emotionally disturbed youth with the opportunity for a "new birth" and a "new beginning."

- ◆ Southwest Schools has taken an active role in providing a formal facilities master planning process for all of its campuses. The central office typically engages in its facility planning approximately 12 to 18 months in advance of any anticipated major facility changes. Southwest Schools proactively reviews existing leases at least two years before they expire. These reviews allow for discussions about the current facility and, if it meets the continued needs of the charter school based on enrollment projections (population changes), community conditions (total households, race and ethnicity demographic data), existing cost of the lease, and the condition of the existing facility for a geographic area covering one mile, three miles, and a five-mile radius. The central office conducts meetings every other Thursday, which are deemed an important component when discussing facilities and related issues.
- ◆ Evacuation plans for emergencies and appropriate checklists are implemented at the Southwest Schools middle/high school campus. The middle/high school campus makes use of its onsite safety committee, the Eagles Committee, to assist in outlining safety and security activities on campus. The committee assisted in developing and distributing copies of the contents of the emergency folders for the campus. The folders include exit strategies with alternative routes, student rosters, and a single sheet of emergency reference data. In addition to the emergency folder, each teacher is provided with a flashlight and an emergency kit, which includes basic first aid materials. In addition, the middle/high school campus continually improves its evacuation exit strategy. Campus staff pursued and

identified not only a secondary evacuation site but an alternative site to provide the campus with adequate options in the event of an actual emergency.

SIGNIFICANT RECOMMENDATIONS

STRATEGIC PLANNING AND MONITORING

- ◆ **Update and complete the strategic plan to be used as a management tool to support effective governance and ensure successful implementation of the charter's mission, vision, and values.** Southwest Schools does not have an updated, comprehensive multi-year strategic plan to monitor progress and evaluate the performance of the charter school. Documents provided to the review team indicated that Southwest Schools began the process of developing a long-term strategic business plan in 2007; however, the plan was not complete, as many goals did not have associated tasks or objectives, or timelines were incomplete. As presented, the Southwest Schools draft strategic plan represents a partial step in the right direction, but does not include critical elements essential for accountability, including prioritization of budget resources and performance measures for ongoing monitoring by the board. The board and superintendent should establish a strategic planning committee, including representatives from all stakeholder groups, to review the original strategic plan, and develop a comprehensive plan that addresses the charter school's highest priority strategies for the next three to five years.
- ◆ **Develop a detailed plan for monitoring improvement strategies to ensure implementation success.** Southwest Schools lacks a comprehensive process for monitoring the required improvement strategies developed as a result of the charter school's state accountability and accreditation ratings. From school years 2008–09 to 2010–11, Southwest Schools obtained a rating of Academically Unacceptable (AU) under the state's accountability system which resulted in the charter school being assigned Accredited-Probation status by the Texas Education Agency (TEA) in school year 2011–12. Southwest Schools has developed and begun to implement strategies to resolve the issues that resulted in its being rated as AU for three consecutive years. However, initial implementation of these strategies is not all that is needed. Without a detailed plan

for tracking the charter school's and individual campuses' implementation activities, Southwest Schools is at-risk of having its accreditation revoked due to the charter school's performance on the state assessment if improvement does not occur in school year 2012–13. The superintendent should assemble a working committee to develop a detailed plan for monitoring the required improvement strategies. To begin, the committee should identify what successful implementation of the identified strategies looks like at all levels; establish and adhere to a regular schedule for reviewing the identified indicators; consider plans for how to proceed if the implementation plan is not being fully implemented; and determine what steps to follow if indicators show the strategies selected by the charter school are not working.

ORGANIZATIONAL STRUCTURE

- ◆ **Regularly review all business office positions to ensure responsibilities are consistent with the roles of those positions and align with organizational best practices.** The organizational structure of the business office does not adequately support efficient and effective operations. At the time of the review, in May 2012, several issues were noted by the review team, including: a difference between the organizational chart and the actual reporting structure in the business office; use of inconsistent roles and titles within the business office; lack of alignment in the business office reporting structure; possible misclassification of positions within the business office; and potential conflict in reporting relationships within the business office. Additionally, the Payroll Manager/CFO position description does not support the most efficient reporting structure and does not align with organizational best practices. Following onsite work by the review team, central office staff indicated that the Payroll Manager/CFO position resigned from Southwest Schools in late June 2012. Instead of filling the position, the charter school eliminated the Payroll Manager/CFO position and distributed the position's responsibilities to other business office staff. As the needs of the organization change and business office positions are added or deleted, ensuring appropriate alignment with the existing positions is a key component of the department's effectiveness. The charter school should ensure that its business office is efficiently organized

and tasks are assigned appropriately to maximize organizational effectiveness. Additionally, the charter school should consider the relationships of all school officers, administrative positions, or positions with responsibilities at the administrative level, and consider the nepotism laws when developing its organizational structure.

STAFF EVALUATION

- ◆ **Review the newly developed superintendent evaluation to ensure it aligns with state standards and allows for an effective evaluation of the charter school's leadership.** Southwest Schools does not implement its board policy regarding the evaluation of the superintendent. Although open-enrollment charter schools are not required to evaluate the superintendent like independent school districts, the policy adopted by Southwest Schools provides for annual evaluation. In interviews with the review team, the superintendent and board members reported that a formal evaluation of the superintendent has not been conducted since coming to Southwest Schools in 2004. By not conducting a meaningful, structured, evidence-based evaluation of the superintendent, Southwest Schools puts at risk its ability to effectively move the school forward and meet its goals for enhanced student achievement. Following the onsite visit by the review team in May 2012, central office staff indicated that Southwest Schools developed an evaluation system for the superintendent prior to the beginning of school year 2012–13. Best practices indicate that superintendent evaluation system should incorporate student performance and outcome measures as well as assessment of charter school operations. As part of reviewing the newly developed evaluation instrument, the board should consider an annual evaluation cycle with the following components: an initial meeting to develop goals/expectations of the superintendent for the following year; a formative conference to review progress and discuss issues that need to be addressed; and a summative conference to evaluate the superintendent's performance at the end of the cycle.
- ◆ **Review the newly developed central office administrator evaluation to ensure it aligns with state standards and best practices and addresses the skills and characteristics required for the**

charter school to achieve its stated goals. Southwest Schools lacks an effective system for evaluating school principals and central office administrators. During interviews with the review team, the superintendent and principals reported that the Southwest Schools administrator evaluation system is a year-end self-evaluation that is conducted verbally and informally with the administrator and supervisor, with the job description as a guide. However, a standardized, systematic approach to evaluating principals and central office-level administrators is critical for communicating expectations and holding staff accountable for meeting expectations and established goals. The process of developing an evaluation tool provides an opportunity for discussion of the charter school's priorities and strategic plans for implementing the mission and the vision of the program. Following the review team's onsite visit, central office staff indicated that Southwest Schools identified and developed an evaluation system for all administrators prior to the beginning of school year 2012–13. Best practices indicate the evaluation instrument should be data-driven, standards-based, and take into consideration the unique challenges and needs related to charter school administration. As part of the process for reviewing the evaluation instrument, a representative workgroup of stakeholders (i.e., principal and central office administrators), with input from staff at multiple levels within the charter school, should review the required performance domains/descriptors and procedures to ensure the evaluation instrument aligns with state standards. Additionally, the stakeholder group should provide in-house training in the evaluation procedures prior to conducting principal and central office-administrator appraisals during school year 2012–13.

SPECIAL EDUCATION

- ◆ **Review the staffing plans at each school campus and at central office to identify processes that can immediately be implemented in the event students with more significant disabilities or special education needs enroll, and develop a communication plan to ensure school administrators, teachers, and parents are kept informed.** Southwest Schools lacks a detailed process to provide immediately upon enrollment the special education and related services required

to implement existing individualized education programs (IEPs) for students with disabilities who have high-level needs. During interviews with central office-level administrators and teachers, it was reported that Southwest Schools has experienced an increased enrollment in the number of students with significant special education needs. Some of these students have required specialized instruction and services that could not effectively be provided in a general education setting. In response, the charter school hired a special education teacher to staff a special education classroom to meet the needs of these students. However, in interviews with the review team, some instructional and administrative staff reported that the process took several weeks, and that communication between the school and the central office was not effective in meeting the needs of the students, the families, and the teachers within a reasonable amount of time. As an open-enrollment charter school, Southwest Schools is responsible for ensuring that all students with disabilities enrolled in the school are evaluated and, if eligible for special education services, an IEP is developed and implemented to provide the student with a free appropriate public education in the least restrictive environment. While the charter school is not required or expected to have in place a full continuum of services and placements, it should have a plan for meeting the immediate needs of any student who enrolls. Likewise, a communication system should be established to ensure that the director of Special Education and designated Admission, Review, and Dismissal (ARD) Coordinator are notified within one school day when a student known to have an IEP enrolls in a school, and the student's IEP from the sending school is reviewed within one day of receipt to determine if it can be implemented as written. Following onsite work by the review team, central office staff indicated that Southwest Schools hired a new director of Special Education prior to the beginning of school year 2012–13. According to the charter school, the new director of Special Education has updated the special education process which begins to address the issue of providing services to students immediately upon enrollment.

COMMUNICATING FINANCIAL INFORMATION

- ◆ **Post the adopted budget and improve the type of financial information provided on the website so that the charter school's financial position and priorities are communicated more clearly and concisely.** Southwest Schools prepares a detailed budget, but does not post the board-approved budget on its website. According to documents submitted to the review team, the adopted budget document for Southwest Schools includes detailed financial information and reflects the various service delivery models used by the charter school. However, Southwest Schools does not include on its website a budget document that adequately communicates the financial details of the school's budget. In addition, charter schools and ISDs are required to post the adopted budget on the district's website for three years from the adoption of the budget. The information provided on the Southwest Schools' website does not appear to be consistent with these requirements. Consequently, Southwest Schools is missing an opportunity to enhance its image in the community by demonstrating a commitment to financial accountability, transparency, and stewardship. Southwest Schools could significantly improve the budget document by summarizing its budgeted use of funds for planned priorities. The Business Administrator should work with the Business Coordinators to compile budget and finance information from the TxEIS reporting system and its board-approved adopted budget, and develop charts and graphs to more effectively communicate its budget. Further, the superintendent should ensure that more detailed budget and finance documents are posted on the school's website to improve transparency and accountability.

OPERATIONS

- ◆ **Identify key components of facilities management and centralize those responsibilities within the charter school.** Southwest Schools lacks a centralized facilities management structure with several positions overseeing components of the facilities organization, including facilities contract management, management/review of the leases, and operational support for the campuses. The organizational structure of the facilities operation consists of the superintendent, assistant superintendent for

Academics and Operations, Business Administrator, principals, and the support of outsourced contracts to address maintenance, grounds, custodial services, and pest control. Best practices indicate that facilities management may be more efficient if managed by one position given that many of the facilities operations are outsourced. Southwest Schools should identify key components of facilities management and centralize those responsibilities with one position to ensure the charter school receives the appropriate services should there be facilities-related issues.

- ◆ **Develop a formal process and plan to perform an annual evaluation of safety and security programs at all campus facilities.** Southwest Schools has no formal process and plan in place for an annual evaluation of safety and security programs and processes. Although charter schools are not statutorily required to conduct a safety and security evaluation, such a process is a necessary activity to evaluate the effectiveness of safety and security programs and to provide staff and students with a safe and secure environment. Existing current Emergency Operations Plan provided by the school campuses highlighted the need for the schools to readdress their procedures to be more all-inclusive with easier to follow data lists, and less narrative description. The magnitude of not assessing the effectiveness of a campus safety and security program and process is to place the safety and security of students and staff at potential risk. It is up to Southwest Schools to conduct its own evaluation of the security programs and develop a more thorough understanding of the total effectiveness of the process and the programs.

GENERAL INFORMATION

- ◆ Southwest Schools was awarded a charter by the State Board of Education in 1998 under Educational Leadership Inc., and opened in school year 1999–2000 with a single high school campus and a contract to provide educational programming to students housed in four residential treatment centers (RTCs).
- ◆ The school year 2011–12 district profile as listed in the Texas Education Agency’s (TEA) Public Education Information Management System (PEIMS) Student Enrollment reports reflects the following student demographics:

- an enrollment of 1,611 students;
- 10.8 percent White;
- 76.8 percent Hispanic;
- 9.9 percent African American; and
- 2.5 percent American Indian, Asian, and Two or More Races.
- ◆ In school year 2011–12, approximately 87.7 percent of students were economically disadvantaged, 79.8 percent were at-risk, and 44.1 percent were identified as limited English proficient (LEP).
- ◆ Under the state accountability system, the charter school received an *Academically Unacceptable* rating for school year 2010–11 from TEA and was rated *Academically Unacceptable* for three consecutive years, school years 2008–09 to 2010–11, under standard accountability. Prior to school year 2008–09, the charter school received an *Academically Acceptable* rating under the alternative education accountability system (AEA). ISDs and charter schools were not assigned state accountability ratings in 2011–12 due to the development of a new accountability system. In 2010–11, one campus was rated *Recognized*, one was rated *Academically Acceptable*, and one was rated *Academically Unacceptable* under standard accountability. Three campuses were rated in the AEA system: Two campuses were rated *Academically Acceptable* and one was rated *Academically Unacceptable*. One campus was not rated.
- ◆ Under the accountability provisions in the No Child Left Behind Act, all public school campuses, school districts, and the state are evaluated for Adequate Yearly Progress (AYP). Southwest Schools’ final 2010–11 results indicated that it Missed AYP for performance in reading (African American and economically disadvantaged subgroups) and mathematics (African American subgroup) which places the multi-campus charter school in Stage 3 Math of the School Improvement Program. Southwest Schools’ preliminary 2011–12 results indicate that it Meets AYP. However, the charter school will remain in Stage 3 Math for another year.
- ◆ In school year 2011–12, Southwest Schools was assigned Accredited-Probation status by the Texas

Education Agency (TEA) as a result of being rated as AU for three consecutive years, 2008-09 to 2010-11.

- ◆ The founder/Chief Executive Officer is Dr. Spyros Catechis who established Educational Leadership, Inc., the domestic nonprofit corporation doing business as Southwest Schools, in 1998.
- ◆ The superintendent is Janelle James, who came to the charter school in 2004 from Houston ISD, where she served as a central office administrator over charter schools in the district.
- ◆ The charter school is served by the Regional Education Service Center IV (Region 4) in Houston.
- ◆ The charter school is represented by Senator Rodney Ellis, Senator Joan Huffman, Senator John Whitmire, Senator Dan Patrick, Senator Larry Taylor, State Representative Alma Allen, State Representative Rick Miller, State Representative Jim Murphy, State Representative Hubert Vo, State Representative Borris L. Miles, State Representative Dwayne Bohac, State Representative Gene Wu, State Representative Beverly Woolley, and State Representative Wayne Smith.

SCHOOLS

In school year 2011-12, the charter school had 6 schools, including the following:

- ◆ Southwest Elementary – Bissonnet (K-Grade 5);
- ◆ Southwest Elementary – Mangum (K-Grade 5);
- ◆ Southwest Middle School (Grades 6-8);
- ◆ Southwest High School (Grades 9-12);
- ◆ The Phoenix School (K-Grade 12 serving students at seven RTCs); and
- ◆ Young Learners School (Pre-K serving students at three campuses).

FINANCIAL DATA

- ◆ Total actual fiscal year 2010-11 expenditures: \$27,378,291.
- ◆ Net assets were \$4.1 million in 2010-11; Net assets as a percent of total revenue was 15.2 percent (fiscal year 2010-11) compared to the state (charter schools only) at 38.0 percent.

- ◆ In fiscal year 2010-11, 73.7 percent of total actual operating expenditures were spent on instruction compared to the state at 58.1 percent.
- ◆ 2011-12 School Financial Integrity Rating System of Texas (FIRST) Rating: Standard Achievement.
- ◆ 2012 FAST (Financial Allocation Study for Texas) Rating: 3 Stars (1 percent composite progress percentile + very low spending index).

The chapters that follow contain a summary of the charter school's accomplishments, findings, and numbered recommendations. Detailed explanations for accomplishments and recommendations follow the summary and include fiscal impacts.

Each chapter concludes with a fiscal impact chart listing the chapter's recommendations and associated savings or costs for 2013-14 through 2017-18.

Following the chapters are the appendices that contain the results from the charter school surveys conducted by the review team.

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

FISCAL IMPACT

There was no fiscal impact as a result of the 22 recommendations in the performance review.

CHAPTER 1

CHARTER LEADERSHIP, ORGANIZATION, AND MANAGEMENT

SOUTHWEST SCHOOLS

CHAPTER 1. CHARTER LEADERSHIP, ORGANIZATION, AND MANAGEMENT

Charter schools were established in Texas in 1995 with the idea of ensuring fiscal and academic accountability without undue regulation of instructional methods or pedagogical innovation. Chapter 12 of the Texas Education Code (TEC) provides for the following classes of charter schools:

- home-rule school district charters established and operated in accordance with subchapter B;
- campus or campus program charters authorized by school districts in accordance with subchapter C, including schools or programs administered and staffed by district employees as well as schools or programs operated through contract with outside providers; and
- open-enrollment charters authorized by the Texas State Board of Education in accordance with subchapter D or, if operated by a public college, university, or junior college, authorized by the State Board of Education in accordance with subchapter E.

The purposes of charter schools, as stated in the TEC, are to: improve student learning; increase the choice of learning opportunities within the public school system; create professional opportunities that will attract new teachers to the public school system; establish a new form of accountability for public schools; and encourage different and innovative learning methods. Open-enrollment charters are operated in accordance with a contract between the State Board of Education (SBOE) and the charter holder. When considering what an individual open-enrollment charter school is required to implement, the contents of the application and the contract document itself apply. As stated in the contract, the terms of an open-enrollment charter include: (a) the contract; (b) applicable law; (c) the application submitted by the sponsoring entity; (d) any amendment or changes adopted or ratified by the SBOE or the Commissioner of Education; and (e) all statements, assurances, commitments, and representations made by the charter holder in the application. Actions inconsistent with the terms of the charter constitute a material violation of the charter.

In 1998, Educational Leadership, Inc., a domestic nonprofit corporation doing business as The Southwest High School under its founder and Chief Executive Officer (CEO) Dr.

Spyros Catechis, applied for an open-enrollment charter to operate a single high school campus. Southwest High School, now known as Southwest Schools, opened in school year 1999–2000 with 217 students in grades nine to 12. In addition, educational services were provided to approximately 100 students living in four area residential treatment center (RTC) facilities.

In 2001, Dr. Catechis established Leaders in Education as a domestic nonprofit corporation doing business as the Young Learners School. Through collaborative partnerships with Southwest Schools, the Houston Independent School District (HISD), Gulf Coast Community Services, AVANCE, Harris County Department of Education, and licensed early care and education programs throughout the Houston area, Young Learners School serves eligible three-, four-, and five-year-old children in existing Head Start and licensed early childhood centers.

While the two nonprofit corporations (Educational Leadership, Inc. and Leaders in Education, Inc.), are separate and unique, there is some overlap. In addition to Dr. Catechis being the founder and CEO of both, Janelle James is the superintendent for both Southwest Schools and the Young Learners School. In addition, Educational Leadership, Inc. and Leaders in Education, Inc. share administrative office space, located at 3333 Bering Drive, Houston, Texas.

Since opening in school year 1999–2000, Southwest Schools has expanded its services. During school year 2011–12, Southwest Schools operated a middle school and a high school on a shared campus; two elementary school campuses; and the Phoenix School, which provides educational services to at-risk students enrolled in seven residential and day treatment programs in the Houston area. Southwest Schools also operates three Head Start pre-Kindergarten programs (Young Learners School campuses) through an external charter school contract by HISD. An additional 34 non-HISD pre-Kindergarten programs that are not directly associated with Southwest Schools are listed on the website for the Young Learners School as partner sites.

Governance is the set of processes, customs, policies, laws and institutions by which an organization is controlled. It establishes the roles of stakeholders involved in and responsible for the organization's activities and outcomes,

and defines relationships within the organization. Although similar to independent school districts (ISDs) in many ways, charter school governance systems must adhere to state laws related to, and meet the unique needs of, charter schools.

The laws and rules authorizing and controlling open-enrollment charter schools in Texas are found in Chapter 12, Subchapter D of the TEC and Title 19 of the Texas Administrative Code (TAC). In accordance with TEC Section 12.121, open-enrollment charter schools are operated under the control of a governing body that is “responsible for the management, operation, and accountability of the school, regardless of whether the governing body delegates the governing body’s powers and duties to another person.” Each open-enrollment charter must include in its application a description of the governing structure of the program, including: the officer positions designated; the manner in which officers and other members are selected and removed from office; the manner in which vacancies are filled; the term for which members of the governing body serve; and whether the terms are to be staggered (TEC, Section 12.111).

A seven-member Board of Directors (board) governs Southwest Schools, with board members serving three-year terms. As a separate entity, the Young Learners School is governed by its own five-member board that is not involved in the charter operations of Southwest Schools. **Exhibit 1–1** identifies the school year 2011–12 Southwest Schools board members, their title, term expiration, and occupation.

The function of the board has evolved over time, from a founding board during the original planning and application period, to a working board devoted to getting the school open and operating, and then to a governing board. The board’s role is to establish goals and objectives for the charter

school in both instructional and operational areas, determine the policies that will govern the charter school, approve the plans to implement those policies, and ensure adequate funding is available to carry out the primary mission of the charter school. The board hires the superintendent, who is responsible for implementing the board’s vision by establishing the organizational structure, overseeing daily operations, providing administrative and instructional leadership, and recommending staffing and funding allocations to achieve established goals.

In accordance with its established policies, the Southwest Schools Board is committed to the following:

- Vision—ensuring creation of a shared vision that promotes enhanced student achievement;
- Structure—providing guidance and direction for accomplishing the vision;
- Accountability—measuring and communicating how well the vision is being accomplished;
- Advocacy—promoting vision; and
- Unity—working with the superintendent to lead Southwest Schools toward its vision.

In interviews with the review team, Southwest School administrators and board members described the process for monthly Board meetings held in July, August, September, October, and November, with bi-monthly meetings conducted during the remainder of the year. Meetings are held at 12:00 PM in the Southwest Schools boardroom on the designated date. The public can attend all meetings, with individuals allotted three minutes to voice opinions or concerns for a total of 30 minutes per meeting. Interested parties may address the board in writing at any time. Board

EXHIBIT 1–1
SOUTHWEST SCHOOLS BOARD OF DIRECTORS
SCHOOL YEAR 2011–12

NAME	TITLE	TERM EXPIRATION	OCCUPATION
Hugh Conway	President	7/30/2013	President, Cognition and Learning Services
Rick Hargrove	Vice President	12/17/2014	Vice President Steel Processing, MARINOWARE Texas Facility
Patti Kelly	Secretary	8/3/2013	Program Director, Avondale House
Melva Martinez Meronek	Treasurer	2/17/2013	Sales Manager, AUMA Actuators, Inc.
Jorge Mancilla	Board Member	8/3/2013	Director of Strategic Partnerships, Houston Hispanic Chamber of Commerce
Marcus Brewer	Board Member	2/15/2013	Manager, Local Accounts, Keller Center for Corporate Learning
Rita Ebach	Board Member	1/23/14	Director of New Program Initiatives, Genesys Works

SOURCE: Southwest Schools.

policy provides that members not make comments during the public forums, but they may request additional information during that time. Community members who wish to address the board about specific items on the agenda or other issues sign up with the board chairman or the superintendent prior to the meeting.

The superintendent, in consultation with the board chairman, prepares the agenda, and any board member may request an item be included. The agenda is posted at least 72 hours in advance of regular meetings in the main lobby of the administrative offices for Southwest Schools located at 3333 Bering Drive, Houston, Texas—a convenient place accessible to the public at all times. The superintendent prepares a letter to the board as part of each board agenda packet that outlines events since the last board meeting, upcoming events, and information about items on the agenda. Board packets are delivered to members via email on the Friday before the regularly scheduled Tuesday board meeting. Any board member may contact the superintendent with questions or clarification about information in the agenda packet.

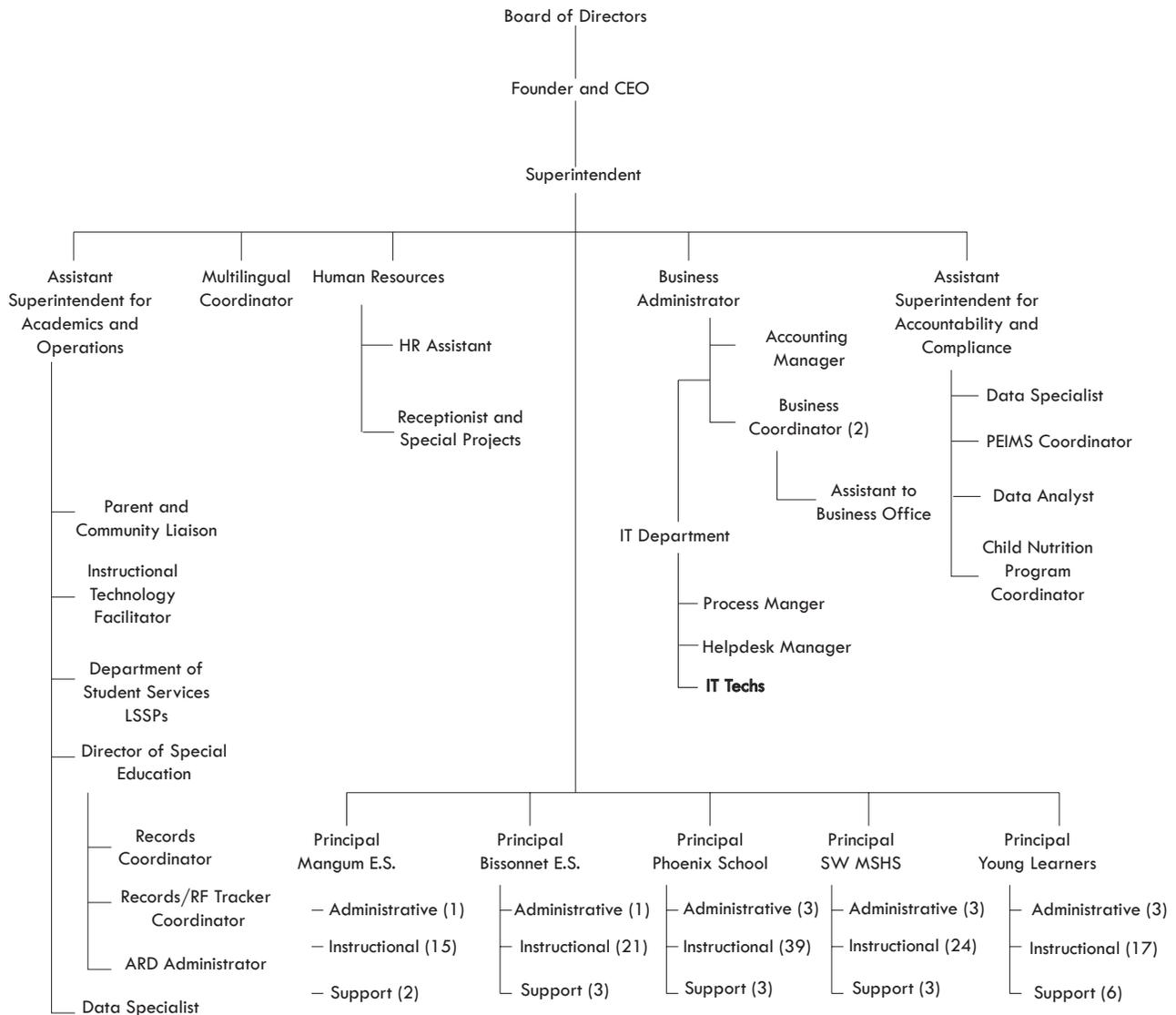
The superintendent is responsible for the leadership of the charter school, including implementing procedures needed to accomplish charter policy. In addition to being the instructional leader, the superintendent is responsible for planning, operating, supervising, and evaluating educational programs, services, and facilities of the charter; assuming administrative authority and responsibility for the assignment and evaluation of all personnel; managing the charter's daily operations; preparing and submitting to the board a proposed budget; and organizing the charter's central administration.

Prior to coming to Southwest Schools in 2004, the superintendent served as central office administrator over charter schools for the Houston Independent School District (HISD). The superintendent reports directly to the founder and chief executive officer (CEO) of Southwest Schools, who in turn reports directly to the board. During interviews with both the superintendent and CEO, both reported that they function more as equals reporting to the board. There was a clear level of mutual respect and trust between these individuals, which has a positive impact on communication and delegation of duties within the organization.

Southwest Schools organization also includes two leadership teams—management and instructional. The management leadership team (MLT) includes the business manager and representatives from the enrollment office, attendance office, and Information Technology (IT) department. The

instructional leadership team (ILT) includes the assistant superintendent for Academics and Operations and the principals from each of the schools. At the school level, principals work with teachers and staff to conduct planning activities such as developing campus improvement plans, and the principals then collaborate with the assistant superintendent for Academics and Operations to ensure the plans align with the district improvement plan and that resources are allocated as needed. Both the management leadership team and the instructional leadership team meet weekly with the superintendent. For efficiency in the event there are overlapping issues to be addressed, meetings are scheduled for the same day. Southwest Schools uses a shared access calendar system so team members have access to the agenda prior to the meetings and can add their own items. The organizational structure for Southwest Schools is provided in **Exhibit 1–2**.

**EXHIBIT 1-2
SOUTHWEST SCHOOLS ORGANIZATIONAL CHART
MAY 2012**



SOURCE: Southwest Schools.

ACCOMPLISHMENTS

- ◆ The Southwest Schools Board of Directors is composed of a diverse group of members of the community who bring a meaningful impact to the charter.
- ◆ The Southwest Schools’ leadership team and staff from individual school sites established successful strategic partnerships enabling the charter school to transform how it educates students.

FINDINGS

- ◆ Southwest Schools does not implement its board policy regarding the evaluation of the superintendent.
- ◆ Southwest Schools lacks an effective system for evaluating school principals and central office administrators.
- ◆ Southwest Schools does not have an updated, comprehensive multi-year strategic plan to monitor

progress and evaluate the performance of the charter school.

RECOMMENDATIONS

- ◆ **Recommendation 1: Review the newly developed superintendent evaluation instrument to ensure it aligns with state standards and allows for an effective evaluation of the charter school's leadership.**
- ◆ **Recommendation 2: Review the newly developed central office administrator evaluation to ensure it aligns with state standards and best practices, and addresses the skills and characteristics required for the charter school to achieve its stated goals.**
- ◆ **Recommendation 3: Update and complete the strategic plan to be used as a management tool to support effective governance and ensure successful implementation of the charter's mission, vision, and values.**

DETAILED ACCOMPLISHMENTS

GOVERNING BOARD

The Southwest Schools Board of Directors (board) is composed of a diverse group of seven members of the community who bring a meaningful impact to the charter.

The founding board members were community leaders and executives from business and industry recruited by the founder and CEO of Southwest Schools, Dr. Spyros Catechis. In interviews with the review team, Dr. Catechis and Southwest Schools administrators described their vision to establish and maintain a board that would guide the school in moving forward financially and managing the complexity of educational funding streams. In support of that vision, the governing board intentionally comprises business leaders rather than educators and chose to “leave the actual running of the school to the educational experts.” As board members have left and been replaced, this type of board composition has been continued.

Dr. Catechis' purpose in recruiting these board members was to bring together community leaders who wanted to make a difference for the students in community schools. Dr. Catechis started with a simple mission when looking to recruit board members, asking “How do we bring services into the community?” With experience as a school psychologist and then as a private practitioner, he realized

that there was a missing piece in how schools and clinics dealt with at-risk populations and wanted to act as a change agent for how these students were served. Dr. Catechis had been associated with many influential and dedicated members of the community who had access to resources and were willing to invest in a program that could transform future generations. One of the first partnerships that he formed was the American Leadership Forum. The forum helped to cultivate relationships, obtain funding, and begin a new way of thinking for Southwest Schools. During interviews with charter staff members, Dr. Catechis was praised by staff for his dedication to students and to the school, and was described as a “visionary” with the skills to positively impact children's lives forever.

STRATEGIC PARTNERS

The Southwest Schools' leadership team and staff from individual school sites established successful strategic partnerships enabling the charter school to transform how it educates students. It is clear from interviews with central office and school-based staff that the board and charter leadership believe that it is their job to facilitate the establishment of strategic partnerships and do whatever they can to help principals and teachers access those relationships.

The superintendent participated in a leadership development retreat and was introduced to a Chevron executive. That meeting led to the establishment of a partnership between Southwest Schools and Chevron, which in turn evolved into an entire program that serves as a cornerstone of Southwest High School. Equilibria E-Colors is a communication coaching program supported by Chevron that helps students and staff identify different personality styles and better understand themselves and those around them. As described on the Equilibria website, “knowledge of E-Colors leads to a heightened awareness that we do not all think and act the same and that we all have different communication styles and behavioral tendencies which are often largely linked to our personality.” Southwest Schools applies E-colors throughout its schools and the central office, developing a common way to communicate and interact with each other. Southwest Schools staff also have begun to work with Sweeny ISD to help it implement the program.

Southwest Schools also has a relationship with Junior Achievement, helping to build a bridge between education and business. Junior Achievement works closely with the high school's business club. It enables adults to share their

experience with students and show them what it takes to be successful.

Another Southwest Schools partnership involves the JASON Project. The JASON Project is managed by National Geographic Society in association with Sea Research Foundation, Inc. The JASON Project's approach to science education immerses students in challenging, real-world situations where they are connected with scientists from organizations like the National Aeronautics and Space Administration (NASA), the National Oceanic and Atmospheric Administration, the U.S. Department of Energy, and the National Geographic Society. JASON uses multiple technologies (i.e., educational games, videos, live interactivity, social networking) to embed cutting-edge research in rigorous curricula. During an interview with the high/middle school principal, it was described how a group of science teachers were able to go on a five-week trip on the Nautilus off the coast of Italy to explore and map the ocean floor.

In addition, Southwest Schools is involved with Project Lead the Way, one of the leading providers of rigorous and innovative Science, Technology, Engineering, and Mathematics (STEM) education and curricular programs in the country. Southwest Schools teachers received \$130,000 for training, a computer lab, and laptops for each teacher, and participation in a two-week institute during summer 2012 related to the courses they teach.

Southwest Middle School and Southwest High School have transformed the way they educate students through the program enhancements and expansion made available through these strategic partnerships.

DETAILED FINDINGS

SUPERINTENDENT EVALUATION (REC. 1)

Southwest Schools does not implement its board policy regarding the evaluation of the superintendent.

In its established governing policies, the board describes its role in creating a shared vision for the school that promotes enhanced student achievement. One of the methods used by the board to provide guidance and direction for the school to accomplish its vision described under the 'Structure' section of the Southwest Schools board policies is to oversee "the management of Southwest Schools by employing the Superintendent of Schools and evaluating the Superintendent's performance in providing educational

leadership, managing daily operations, and performing all duties assigned by law." More specifically, under the 'Accountability' section, the policies state that measuring and communicating how well the vision is being accomplished is done in part by "evaluat[ing] the performance of the Superintendent of Schools annually in compliance with state laws and regulations."

Local school boards in Texas are required by statute to complete a written evaluation of superintendent performance at least once a year according to TEC Section 21.354(c). Although guidance provided in the *Texas Open-enrollment Charter School Handbook* produced by the Texas Education Agency, Division of Charter School Administration (September 2011), states that "TEC Chapter 21 does not apply to open-enrollment charters," the policy adopted by Southwest Schools provides for annual evaluation.

In interviews with the review team, the superintendent and board members reported that a formal evaluation of the superintendent has not been conducted since coming to Southwest Schools in 2004. In accordance with its board policies, annual evaluations should have been conducted. Review of documents including job descriptions, board policies and meeting materials, and staff handbooks reveal no evidence that an evaluation process has been developed.

Central office-level leadership has been shown to have a statistically significant relationship to student achievement. Waters and Marzano (2006) found the following specific central office-level leadership responsibilities to be strongly correlated with student achievement:

- engaging in a collaborative goal-setting process;
- setting non-negotiable goals for teaching and learning;
- engaging the board in support of these goals;
- monitoring the success of these goals; and
- allocating resources effectively to support the goals.

By not conducting a meaningful, structured, evidence-based evaluation of the superintendent, Southwest Schools puts at risk its ability to effectively move the school forward and meet its goals for enhanced student achievement. Enrollment is growing, a new school campus is being built, and the charter school faces serious consequences as a result of being assigned a status of Accredited – Probation based on its 2009, 2010, and 2011 accountability ratings of Academically Unacceptable (AU). Revocation of accreditation is the next step if the charter school is unable to achieve an academic

accountability rating of Academically Acceptable or above in school year 2012–13. Structured goal setting and accountability at the central office level, accomplished in part through well-developed formative evaluation of those in leadership roles, can help focus and guide the charter school as it tackles the challenges ahead.

Recommended domains to be addressed in superintendent evaluations are provided in TAC Section 150.1022. While not required, they reflect the state's desired goals for district leaders. In addition to student performance, which is a required component of the evaluation, the following domains are suggested by the Commissioner of Education to use when assessing superintendent effectiveness and performance:

- instructional management;
- school or organization morale;
- school or organization improvement;
- personnel management;
- management (administrative, fiscal, and facilities);
- student management;
- school or community relations;
- professional growth and development;
- academic excellence indicators and campus performance objectives; and
- Board of Directors relations.

A variety of tools are available to assist schools and ISDs in developing customized superintendent evaluation systems. The Texas Association of School Boards (TASB) is a voluntary, nonprofit, statewide educational association that serves and represents local Texas ISDs. To maximize effectiveness, TASB proposes a two-part superintendent evaluation instrument that includes:

- priority performance goals for the superintendent that address major district initiatives the board feels merit special time, effort, and resources from the superintendent during the year; and
- a separate group of items that assess performance on the major, ongoing management responsibilities of the superintendent.

In a model such as this, the priority performance goals likely change from year to year based on the current needs of the charter school. In contrast, the items related to ongoing

management of the charter school generally remain the same for several years, since they assess the management of ongoing functions in the charter school.

TASB has developed an editable template called the *TASB New Sample Superintendent Evaluation Instrument 2006*, which incorporates the two-part evaluation process. The template and other supporting documents and technical assistance resources related to superintendent evaluations (e.g., the *Commissioner-Recommended Student Performance Domain*, a template designed to collect and summarize the student performance data component of an evaluation) are available free of charge on the TASB website.

The Oregon School Boards Association (OSBA) has developed a manual for districts to adapt as needed to their own requirements. The *Superintendent Evaluation Workbook 2009* proposes a three-part evaluation system to be completed by the superintendent as a self-evaluation and by the board itself. The system includes:

- professional performance standards based on those established by the American Association of School Administrators with the National School Boards Association;
- superintendent's goals, which are determined annually by the board in collaboration with the superintendent; and
- a 360-degree evaluation that addresses more subjective information gleaned from those that he or she works with directly.

In discussing why evaluation is so important, OSBA describes the role of superintendent as equivalent to the chief executive officer in the private sector and explains that:

As such, the superintendent is charged with leading and administering the organization according to the policies adopted by the school board. The purpose of evaluating the superintendent is not to micromanage the organization, but to provide oversight and public assurance that the policies are being effectively implemented. Another critical purpose is to provide input and feedback to the superintendent to help him or her continually improve.

Following the onsite visit by the review team in May 2012, central office staff indicated that Southwest Schools developed an evaluation system for the superintendent prior to the beginning of school year 2012–13. The new evaluation instrument is rubric-based and includes seven criteria

standards (i.e., planning, leadership, responsibility, alignment of resources, monitoring progress, transparency, and rewards/remedies). The evaluation includes a definition of low and high accountability, in addition to a rating category (i.e., 1 to 5) for each criterion. Development of an evaluation instrument is an important step for structured goal setting and accountability at the central office level.

The board should review the newly developed superintendent evaluation instrument to ensure it aligns with state standards and allows for an effective evaluation of the charter school's leadership. Best practices indicate that the superintendent evaluation system should incorporate student performance and outcome measures as well as assessment of charter school operations. As part of reviewing the newly developed evaluation instrument, board members and the superintendent should review examples such as those described above, identify components or procedures that will best support the long-term mission and vision of the school, and incorporate those elements into the evaluation if needed. Additionally, to ensure a complete evaluation system, the board should consider an annual evaluation cycle with the following components: an initial meeting to develop goals/expectations of the superintendent for the following year; a formative conference to review progress and discuss issues that need to be addressed; and a summative conference to evaluate the superintendent's performance at the end of the cycle. In addition, the board may inquire if member services or additional resources are available through the Texas Charter Schools Association (TCSA) of which Southwest Schools is a member.

This recommendation can be implemented with existing resources.

EVALUATION OF PRINCIPALS AND CENTRAL OFFICE ADMINISTRATORS (REC. 2)

Southwest Schools lacks an effective system for evaluating principals and central office-level administrators.

The 'Structure' section of Southwest Schools board policies related to providing guidance and accomplishing the charter school's vision states: "The Board adopts policies and standards for hiring, assigning, appraising, and compensating the personnel of Southwest School in compliance with state laws and rules." TAC, Section 150.1022 outlines the Commissioner-Recommended administrator appraisal process and procedures that allow for the principal and central office administrator evaluation procedures to be locally developed at district discretion, but they must be

reported to the Texas Education Agency (TEA) and posted to the agency's website. During interviews with the review team, the superintendent and principals reported that the Southwest Schools administrator evaluation system is a year-end self-evaluation that is conducted verbally and informally with the administrator and his/her supervisor, with the job description as a guide. The job description is updated annually to accurately reflect the administrator's duties.

The Southwest Schools procedure uses the term 'administrator' rather than principal, but as described during interviews with the review team, it applies only to principals, and there is not an established system for central office-level administrators. When asked about central office-level evaluations, the superintendent stated that all staff members are given an updated copy of their job descriptions each year and are required to sign off on it. This acknowledgement confirms that each staff member understands the expectations for the year and their role in impacting the charter school's performance.

Two survey items related directly to the evaluation process for central office-level administrators. In response to the item regarding annual personnel evaluations, 25 percent of administrators reported that they had been evaluated; 50 percent reported that they had not; and 25 percent had no opinion or indicated the item was not applicable. In response to the statement that "Employees are rewarded for superior performance or are counseled about less than satisfactory performance," 37.6 percent of administrators agreed or strongly agreed; 37.5 percent had no opinion; and 25 percent disagreed or strongly disagreed. Additionally, at the school level, 62 percent of teachers and staff agreed or strongly agreed that "Most administrative practices in our charter school are highly efficient and effective" while 12 percent had no opinion and 26 percent disagreed or strongly disagreed. This response is reflective of teacher perceptions about the effectiveness of their own school's principal.

A review of the history of the Southwest Schools campus-level administration since its inception reveals a high principal turnover rate. The number of principals assigned to each Southwest Schools campus from school years 2005–06 to 2011–12 is provided in **Exhibit 1–3**. "Retained" indicates that the principal from the prior year returned to the school. "New" indicates that a new principal (i.e., different from prior year) was assigned. "Open" indicates the first year the school was in operation. "N/A" indicates a principal was not assigned to the program in that year. Schools not in operations are designated by "-."

EXHIBIT 1–3
SOUTHWEST SCHOOLS ADMINISTRATION BY CAMPUS
SCHOOL YEARS 2005–06 TO 2011–12

SCHOOL YEAR	SCHOOL					
	SOUTHWEST HS	SOUTHWEST MS	BISSONNET ES	TEXAS VIRTUAL ACADEMY	PHOENIX SCHOOL	MANGUM ES
2005–06	Retained	Opened	Opened	-	N/A	-
2006–07	Retained	Retained	Retained	Opened	First Principal	-
2007–08	Retained	Retained	New	New	New	-
2008–09	New	New	New	New	Retained	-
2009–10	New	New	Retained	Retained	New	-
2010–11	Retained	Retained	New	Retained	Retained	Opened
2011–12	Retained	Retained	New	-	Retained	Retained*
Total	3	3	5	3	3	1

*Reported during interview that this principal was leaving at the end of the school year.

SOURCE: Southwest Schools History Since Inception Document.

As Southwest Schools increases enrollment and expands to a new campus, administrative oversight will become more challenging. More importantly, the charter school's probationary accreditation status requires an intensive, coordinated charter-wide effort to ensure continued operation. As with superintendent evaluations discussed in Recommendation 1, a standardized, systematic approach to evaluating principals and central office-level administrators is critical for communicating expectations and holding staff accountable for meeting expectations and established goals. The process of developing an evaluation tool provides an opportunity for discussion around the charter school's priorities and strategic plans for implementing the mission and the vision of the program. A transparent, stakeholder-developed evaluation system based on the unique needs and expectations of charter schools in conjunction with accepted standards in educational leadership would be a useful resource as Southwest Schools moves forward in its development.

Many states have developed rubrics for educator evaluations that can be used as examples or foundations on which to base district-specific systems. North Carolina is known nationally for its research in this field, and has developed comprehensive process manuals for evaluating superintendents, principals and assistant principals, and teachers. The vision of school leadership incorporated in *North Carolina School Executive: Principal and Assistant Principal Evaluation Process* requires:

A new type of school leader—an executive instead of an administrator. No longer are school leaders just maintaining the status quo by managing complex operations but just like their colleagues in business, they

must be able to create schools as organizations that can learn and change quickly if they are to improve performance. Schools need executives who are adept at creating systems for change and at building relationships with and across staff that not only tap into the collective knowledge and insight they possess but powerful relationships that also stir their passions for their work with children.

North Carolina's principal performance evaluation system includes a rubric based on seven standards, each of which is further broken down into critical elements. The evaluation results in a rating of "developing," "proficient," "accomplished," "distinguished," or "not evident/not demonstrated," based on the demonstrated presence or absence of specific skills, abilities, attributes, or actions (i.e., descriptors). Specific examples of practices (i.e., what one would see as an effective executive doing in each standard) and artifacts (i.e., evidence of the quality of the executive's work or places where evidence can be found) are provided for each standard. **Exhibit 1–4** provides an example from the school resources and budget standard.

**EXHIBIT 1-4
NORTH CAROLINA SCHOOL EXECUTIVE:
PRINCIPAL AND ASSISTANT PRINCIPAL EVALUATION RUBRIC**

School Resources and Budget: The principal/assistant principal establishes budget processes and systems which are focused on, and result in, improved student achievement.

DEVELOPING	PROFICIENT	ACCOMPLISHED	DISTINGUISHED	NOT DEMONSTRATED
<ul style="list-style-type: none"> • Is knowledgeable of school budget and accounting procedures • Uses input from staff to establish funding priorities and a balanced operational budget for school programs and activities. 	<p>...and</p> <ul style="list-style-type: none"> • Incorporates the input of the School Improvement Team in budget and resource decisions. • Uses feedback and data to assess the success of funding and program decisions. 	<p>...and</p> <ul style="list-style-type: none"> • Designs transparent systems to equitably manage human and financial resources. 	<p>...and</p> <ul style="list-style-type: none"> • Ensures the strategic allocation and equitable use of financial resources to meet instructional goals and support teacher needs. 	

SOURCE: North Carolina Department of Public Instruction.

The seven standards and associated critical elements for principals, which in many cases apply also to central office-level administrators, are provided in **Exhibit 1-5**. The rubric is completed by the central office administrator and then the principal meets with the administrator to identify targeted areas for improvement. Goals are developed for targeted areas, activities, measurable outcomes, and a timeline for achievement. The system includes documentation of mid-year progress and revised action/comments for each goal.

Following the review team’s onsite visit, central office staff indicated that Southwest Schools identified and developed an evaluation system for all administrators prior to the beginning of school year 2012–13. The new evaluation instrument, entitled Central Office Administrator Evaluation, is rubric-based and includes seven criteria standards (i.e., planning, leadership, responsibility, alignment of resources, monitoring progress, transparency, and rewards/remedies). The evaluation instrument also includes a definition of low and high accountability, in addition to a rating category (i.e., 1 to 5) for each criterion. Development of the evaluation instrument is an important step for communicating expectations and holding staff accountable for meeting expectations and established goals.

Southwest Schools should review the newly developed central office administrator evaluation to ensure it aligns with state standards and best practices and addresses the skills and characteristics required for the charter school to achieve its stated goals. Best practices indicate the evaluation instrument should be data-driven, standards-based, and take into consideration the unique challenges and needs related to charter school administration. Additionally, an effective system will be process driven, not “checklist” driven, and will

address the skills and characteristics required for Southwest Schools to achieve its goals.

As part of the process for reviewing the evaluation instrument, a representative workgroup of stakeholders (i.e., principal and central office administrators), with input from staff at multiple levels within the charter school, should review the performance domains/descriptors and procedures in the *Commissioner-Recommended Administrator Appraisal Process* found in TAC Section 150.1021 and Section 150.1022. As described in Recommendation 1, TAC Section 150.1021 outlines domains the Commissioner suggested to use when assessing administrator effectiveness and performance and requires the use of a student performance domain in the appraisal of principals. Further, TAC Section 150.1022 establishes minimum requirements for administrator appraisal including an annual appraisal calendar with the following activities for the administrator and appraiser: procedures for setting goals, expectations, and priorities; a formative conference; and a summative conference. Finally, to ensure successful implementation of the newly developed evaluation, the stakeholder group should provide in-house training in the evaluation procedures prior to conducting principal and central office-administrator appraisals during school year 2012–13.

This recommendation can be implemented with existing resources.

**EXHIBIT 1–5
NORTH CAROLINA SCHOOL EXECUTIVE:
PRINCIPAL AND ASSISTANT PRINCIPAL EVALUATION PROCESS**

LEADERSHIP STANDARD	CRITICAL ELEMENTS
Strategic Leadership	<ul style="list-style-type: none"> The school's identity, in part, is derived from the vision, mission, values, beliefs and goals of the school, the processes used to establish these attributes, and the ways they are embodied in the life of the school community. The principal/assistant principal articulates a vision, and implementation strategies, for improvements and changes which result in improved achievement for all students. The school improvement plan provides the structure for the vision, values, goals and changes necessary for improved achievement for all students. The principal/assistant principal creates and uses processes to distribute leadership and decision-making throughout the school.
Instructional Leadership	<ul style="list-style-type: none"> The principal/assistant principal leads the discussion about standards for curriculum, instruction and assessment based on research and best practices in order to establish and achieve high expectations for students. The principal/assistant principal creates processes and schedules which protect teachers from disruption of instructional or preparation time.
Cultural Leadership	<ul style="list-style-type: none"> The principal/assistant principal understands and acts on the understanding of the positive role that a collaborative work environment can play in the school's culture. The principal/assistant principal develops and uses shared vision, values and goals to define the identity and culture of the school. The principal/assistant principal acknowledges failures and celebrates accomplishments of the school in order to define the identity, culture and performance of the school. The principal/assistant principal develops a sense of efficacy and empowerment among staff which influences the school's identity, culture and performance.
Human Resource Leadership	<ul style="list-style-type: none"> The principal/assistant principal ensures that the school is a professional learning community. The principal/assistant principal establishes processes and systems in order to ensure a high-quality, high-performing staff. The principal/assistant principal evaluates teachers and other staff in a fair and equitable manner with the focus on improving performance and, thus, student achievement.
Managerial Leadership	<ul style="list-style-type: none"> The principal/assistant principal establishes budget processes and systems which are focused on, and result in, improved student achievement. The principal/assistant principal effectively and efficiently manages the complexity of human interactions so that the focus of the school can be on improved student achievement. The principal/assistant principal designs and uses various forms of formal and informal communication so that the focus of the school can be on improved student achievement. The principal/assistant principal develops and enforces expectations, structures, rules and procedures for students and staff.
External Development Leadership	<ul style="list-style-type: none"> The principal/assistant principal designs structures and processes which result in parent and community engagement, support and ownership for the school. The principal/assistant principal designs protocols and processes in order to comply with federal, state, and district mandates.
Micro-political Leadership	<ul style="list-style-type: none"> The principal/assistant principal develops systems and relationships to leverage staff expertise and influence in order to influence the school's identity, culture and performance.

SOURCE: North Carolina Department of Public Instruction.

STRATEGIC PLAN (REC. 3)

Southwest Schools does not have an updated, comprehensive multi-year strategic plan to monitor progress and evaluate the performance of the charter school.

Documents provided to the review team indicated that Southwest Schools began the process of developing a long-

term strategic business plan in 2007. A leadership team of principals, administrative program staff, and steering committee members was established. The team met to consider the need for a plan for growth and expansion of the charter school. Over a three-month period, working meetings were held with key staff and the school's leadership team, board members, and others to identify standards for success

for Southwest Schools. Focus groups were conducted with staff, including support staff, new and returning teachers, and collaborative partners. As the planning process evolved, the team identified a common theme emerging from the discussions – that there was a growing need for high-quality alternative education programs.

As a result of these planning meetings, the vision, mission, and value statements were developed and approved, and a three-year strategic plan was drafted in 2008. Selected values identified by the team include the following:

- create and maintain a unique, small community atmosphere that has been clinically proven to effectively educate children;
- create a funding structure that will meet current and future capital needs;
- be a leader in the creation of collaborative partnerships among agencies;
- learn from others and partner with others, while adhering to a “best practices model;”
- encourage and support innovative legislation and statewide initiatives; and
- make Southwest Schools a place known as welcoming the opportunity to serve as an incubator for innovative approaches in education.

The plan was to be implemented from 2008 to 2010. Marked “Draft 5/27/08,” the plan comprised strategies, goals, tasks, objectives, person responsible, timelines, and a place to document status. The plan was not complete, as many goals did not have associated tasks or objectives, or timelines were incomplete. **Exhibit 1–6** provides the strategies and goals that the team developed.

It is unclear from reviewing the document whether Southwest Schools met the goals set out in its plan. However, there is evidence that the charter school has upheld its values related to creating and maintaining creative partnerships among agencies. Examples include relationships such as those with Chevron and JASON, in addition to the educational programs provided through Phoenix School contracts with community agencies.

As a multiple campus charter school with an overall rating of Academically Unacceptable (AU), Southwest Schools is required to implement predefined targeted district- and school-level activities to analyze and address student

**EXHIBIT 1–6
SOUTHWEST SCHOOLS
STRATEGIES AND GOALS**

STRATEGY	GOAL
Fund Development	1.1 Develop fund development strategies
	1.2 Develop an advisory board
	1.3 Establish a fund development budget
	1.4 Provide regular training to staff on fund development
Campuses: Elementary, Middle, High	2.1 Maintain financial sustainability in all three campuses (Elementary, MS, HS)
	2.2 Increase student attendance
	2.3 Increase faculty and student accountability
	2.4 Define student population
	2.5 Expand elementary campus
RTC Southwest School	3.1 Maintain existing relationship with Residential Treatment Centers
	3.2 Expand sites for Residential Treatment Centers
	3.3 Maintain quality education program and look for enhancements
	3.4 Create opportunities for faculty to attend state-of-the-art training
	3.5 Archway Academy
Texas Virtual Academy at Southwest	None listed
Southwest Summer School 2008	5.1 Expand current Southwest site
	5.2 Expand additional sites to 1960 Area, Katy, Sugar Land, Clear Lake
	5.3 Explore the potential of the online campus
	5.4 Develop marketing plan
	5.5 Develop summer school operations manual

SOURCE: Southwest Schools, 2012.

performance. This is achieved through a focused data analysis (FDA) and district improvement plan as well as campus-specific improvement activities for each campus rated AU through campus improvement plans. A committee including campus and central office staff and parents conducted a comprehensive needs assessment to guide continuous improvement planning for school year 2011–12. The needs assessment was conducted to identify the charter school’s strengths as well as gaps in student achievement and other areas requiring improvement. The information used to conduct the needs assessment included data from AEIS—Texas Assessment of Knowledge and Skills (TAKS)

results—parent, staff and administrator interviews, as well as student attendance and disciplinary data.

Strategic planning is a process through which individuals knowledgeable about and intimately involved with an organization conduct an analysis of the organization's strengths, weaknesses, position within the external environment, and opportunities for improvement in order to develop a long-range plan for continual improvement. Without a long-range plan there is no assurance that long-term priorities will be identified and addressed. It is critical that the charter school engage in immediate and extensive planning for the improvement of student achievement.

As presented, the Southwest Schools draft strategic plan represents a partial step in the right direction, but does not include critical elements essential for accountability, including prioritization of budget resources and performance measures for ongoing monitoring by the board. In reviewing the content, the definition of tasks and objectives is not clear. For example, Goal 3.2 is to expand sites for residential treatment centers; the related task 3.2.1 is “due diligence,” and the objective is “perform due diligence for expansion.” The timeline is listed as “ongoing.”

Best practice indicates the strategic plan can serve as a living document that is linked to the charter school's budget so the superintendent and the board can appropriately prioritize and allocate financial resources to ensure the plan is successfully implemented. The strategies and expected results must include specific performance measures that will allow the board to continuously monitor the status of implementation of specific strategies during the long-term planning period. Those performance measures can also be used as a management tool to effectively govern the charter school. A comprehensive strategic plan will encompass all aspects of charter operations, including academic, operational, and financial, in addition to strategic objectives. Information gleaned from conducting the FDA as well as developing and implementing district and campus improvement plans should be used to inform the strategic planning process, particularly with regard to analyzing strengths, weaknesses, opportunities, and threats (SWOT analysis) and developing goals and objectives. For each goal, the plan should include the resources necessary (and allocated), clear staff responsibilities and timelines, performance indicators, and fund requirements.

Southwest Schools should update and complete the strategic plan to be used as a management tool to support effective

governance and ensure successful implementation of the charter's mission, vision, and values. The board and superintendent should establish a strategic planning committee, including representatives from all stakeholder groups, to review the original strategic business plan drafted five years ago and develop a comprehensive plan that addresses the charter school's highest priority strategies for the next three to five years. At a minimum, representatives from the board, central office staff across departments, school principals and teachers, and parents should be members of the group developing the plan.

Proposed steps for developing a comprehensive plan are provided in **Exhibit 1–7**.

EXHIBIT 1–7
STEPS IN THE STRATEGIC PLANNING PROCESS

STEP	PURPOSE
1 Vision	Reflect on Southwest Schools' vision statement. Does it echo the current overarching expectation of what the school should be? Revise if needed.
2 Mission	Reflect on Southwest Schools' current mission statement. Does it echo the intended purpose for the school? Revise if needed.
3 Values	Reflect on Southwest Schools' core values statements. Do they reflect the principles that guide the school's internal operations and relationships with external entities? Revise if needed.
4 Strategies	Identify and prioritize the most important strategies or areas of focus for the school (e.g., fund development; student achievement; expansion; climate; professional learning)
5 SWOT Analysis	Identify strengths and weaknesses (internal factors) and opportunities and threats (external factors) to explore possibilities for new efforts and solutions to problems.
6 Goals	Identify specific goals designed to assist the school in accomplishing its mission. Goals should reflect a desired outcome three to five years out, depending on the content (e.g., three years for student achievement; five years for expansion). One to three goals per strategy/priority are recommended to avoid overextending capacity.
7 Objectives	Identify measurable steps to achieving the goal. Three to five are recommended.
8 Action Plan	For each objective, develop a detailed action plan. The plan should include specific action items or tasks to be completed; resources to be allocated; the name or title of the responsible party; a timeline for implementation and completion; and measurable outcome(s) that will be used to evaluate progress. The action plan provides the day-to-day steps for implementing the overall strategic plan.
9 Evaluation	Establish a schedule for periodic status reporting and assessment of progress. The committee should meet at least annually to identify which objectives and goals have been met, identify obstacles, and identify solutions, if needed. Strategy/priority-specific workgroups should meet and communicate on a more frequent basis to ensure the plan remains on track.

SOURCE: Developed by the Review Team, 2012.

The plan should include goals for each strategy, objectives for each goal, and explicit action items and outcome measures for each objective. Periodically, and not less than annually, the plan should be revisited to assess progress; identify barriers; and revise goals, objectives, or action items as needed. A visual representation of a strategic plan outline is provided in **Exhibit 1–8**.

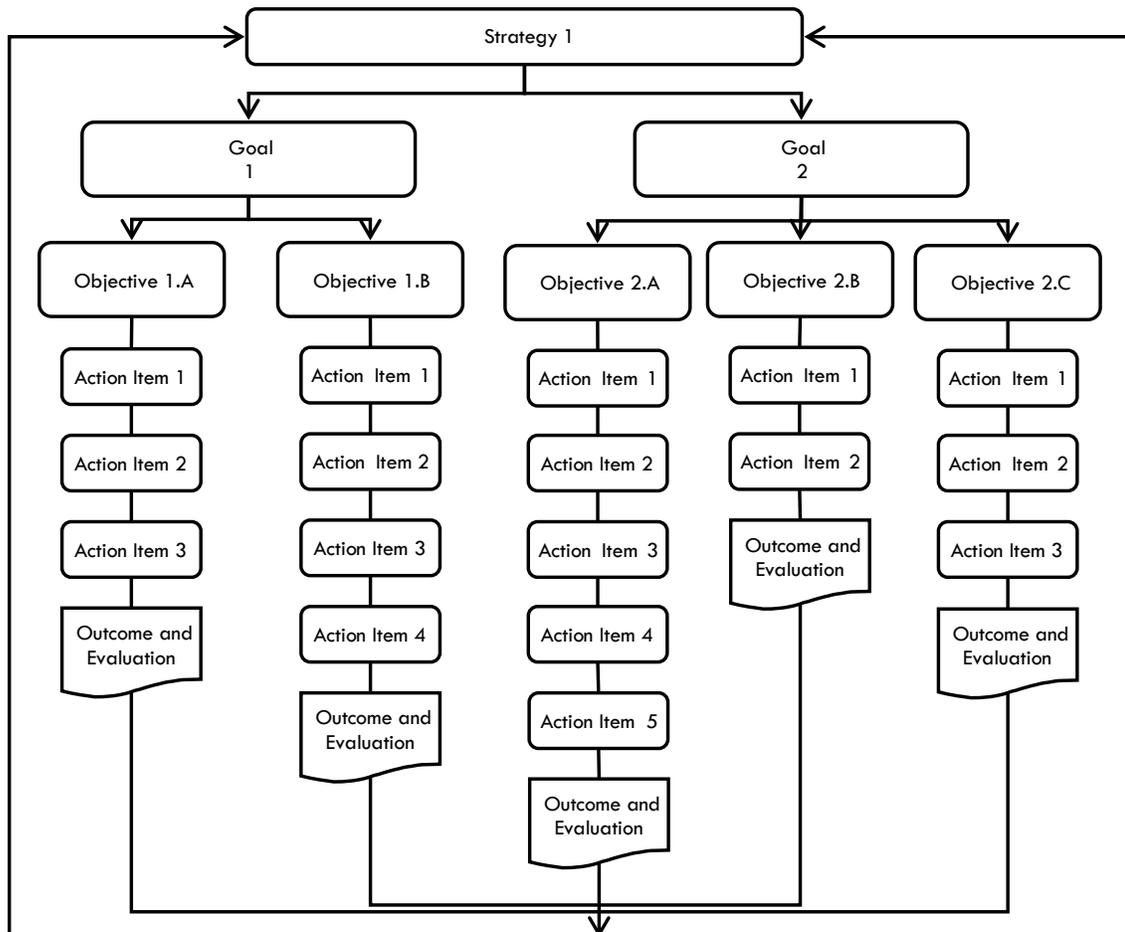
The Quality Framework, an online, continuous improvement tool developed by the Texas Charter Schools Association (TCSA), is a free resource for Southwest Schools and other TCSA members. The tool allows the charter to review their current policies/practices and compare them to guiding statements representing ideal policies/best practices in 10 areas—student success; mission, vision, and values; leadership; learning; safety and support services; staff; stakeholder; data driven; public accountability; and fiscal management. Other components of the Quality Framework include a data pack with summary and comparison reports of the charter's performance, in addition to tools and resources to address identified areas for improvement.

Southwest Schools has completed the Quality Framework process. However, its implementation as a critical component

of the strategic planning process has not been implemented. As a component in the strategic planning process, Southwest Schools should review previous results and consider completing the Quality Framework process again. The process may help the charter school to identify areas for improvement and benchmark progress, which is an important component of the strategic planning process.

This recommendation can be implemented with existing resources.

**EXHIBIT 1-8
OUTLINE FOR STRATEGIC PLAN**



SOURCE: Developed by the Review Team, 2012.

FISCAL IMPACT

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

RECOMMENDATION	2013-14	2014-15	2015-16	2016-17	2017-18	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 1: CHARTER LEADERSHIP, ORGANIZATION, AND MANAGEMENT							
1. Review the newly developed superintendent evaluation to ensure it aligns with state standards and allows for an effective evaluation of the charter school's leadership.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2. Review the newly developed central office administrator evaluation to ensure it aligns with state standards and best practices and addresses the skills and characteristics required for the charter school to achieve its stated goals.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3. Update and complete the strategic plan to be used as a management tool to support effective governance and ensure successful implementation of the charter's mission, vision, and values.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS-CHAPTER 1	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 2

EDUCATIONAL SERVICE DELIVERY

SOUTHWEST SCHOOLS

CHAPTER 2. EDUCATIONAL SERVICE DELIVERY

Southwest Schools is an open-enrollment multi-campus charter school located in Houston, Texas serving students from pre-Kindergarten through grade 12. Founded in 1999, Southwest Schools opened with a single high school campus with 217 students and a contract to provide educational programming to 103 students housed in four residential treatment centers (RTCs), known as the Phoenix School. The Phoenix School has since grown to seven RTCs, several of which serve students with substance abuse concerns. Southwest Middle School and Southwest Elementary – Bissonnet Campus opened in school year 2005–06, and in school year 2006–07 Southwest Schools entered into a contract to provide educational services for Texas Virtual Academy (TXVA). Southwest Schools chose not to renew its contract with TXVA at the end of school year 2010–11, so the charter school no longer operates a virtual campus. Young Learners School, a pre-Kindergarten program in which Southwest Schools provides degreed and certified teachers to 20 pre-Kindergarten programs through a contract with the Houston Independent School District (HISD) and three Head Start programs operated by Southwest Schools opened in school year 2009–10. Southwest Elementary – Mangum Campus opened in school year 2010–11.

Open-enrollment charter school districts are granted charters by the State Board of Education (SBOE) and operate like independent school districts (ISDs). However, open-enrollment charter schools are exempt from some of the laws governing ISDs. With regard to educational service delivery, open-enrollment charters are not required to employ certified teachers, except in cases of special education and bilingual education; they are exempt from disciplinary provisions of Chapter 37 of the Texas Education Code (TEC), as they design their own discipline policies; they are not required to offer pre-Kindergarten; and they are only subject to student-teacher ratios or class size limitations as contained in their charter.

A key element of an open-enrollment charter application is the educational plan. When it began as a high school in 1999, Southwest Schools' educational program was described as a "site-specific educational design that was developed to the special needs of at-risk students requiring a more structured, intimate learning setting." The program incorporated components of that used by Houston Learning

Academy, an award-winning educational program used by five for-profit private schools in the Houston area. As Southwest Schools has grown and expanded to include pre-Kindergarten, elementary, and middle school grades, the educational program has retained this focus, and is based on the needs of at-risk students with regard to the following domains:

- structure;
- curriculum relevant to the student's environment;
- meaningful dialogue concerning what is taught and learned;
- higher-order thinking;
- meaningful activities to support learning sequence; and
- social support for the learning process.

In the years since its inception, Southwest Schools developed an academic program dedicated towards college preparation, vocational education, and career and technology certifications. The college preparation program offers Advanced Placement courses, and relationships with technology companies that allow students to combine academic knowledge with practical skills in the area of career and technology programs. Southwest Schools emphasizes the Texas Recommended High School Program for graduation and integrates local credits in enrichment areas for mandatory graduation requirements. Local credits include study halls, tutorial courses, independent learning, and skill-based courses.

As an open-enrollment charter school, Southwest Schools operates programs in 13 sites throughout the Houston area and does not have a specific attendance boundary. In addition to the combined middle school/high school campus and two elementary school campuses, the charter school is the contracted educational service provider for three Head Start prekindergarten programs and seven community-based residential or day-treatment facilities. Student enrollment by school for school years 2008–09 to 2011–12, and Southwest Schools' projections for school year 2012–13 are provided in **Exhibit 2–1**.

EXHIBIT 2-1
SOUTHWEST SCHOOLS ENROLLMENT – BY SCHOOL
SCHOOL YEARS 2008-09 TO 2011-12 AND PROJECTED 2012-13

SCHOOL	GRADES	2008-09	2009-10	2010-11	2011-12	2012-13*
Southwest Elementary - Bissonnet Campus	K-5	294	369	325	366	396*
Southwest Elementary - Mangum Campus	K-5	N/A	N/A	85	197	378*
Southwest Middle School	6-8	134	133	119	107	250*
Southwest High School	9-12	248	224	238	214	250*
The Phoenix School**	K-12	183	218	253	266	222*
Texas Virtual Academy	3-9	1,440	2,120	2,407	N/A	N/A
Young Learners School	Pre-K	N/A	529	427	461	277*
Total		2,299	3,593	3,854	1,611	1,773*

*Denotes Southwest Schools projected enrollment for school year 2012-13.

**The Phoenix School serves students in seven Residential Treatment Center facilities; N/A = programs not in place during that school year.

SOURCE: Texas Education Agency Student Enrollment Reports and *Southwest Schools Enrollment Projections 2012-13.

As shown in **Exhibit 2-1**, Southwest Schools' enrollment was significantly impacted by the decision to no longer provide contractual services to TXVA in school year 2011-12.

Exhibit 2-2 shows the Southwest Schools enrollment by grade level for school years 2008-09 to 2011-12. The largest segment of the student population is pre-Kindergarten, with 461 children served representing 28.5 percent of total enrollment in school year 2011-12. Subsequent to nonrenewal of the TXVA contract, enrollment in grades

three through ten has been substantially reduced. Middle school enrollment reflects the smallest segment of the population, with 165 students across grades six, seven, and eight, representing just 10.2 percent of the charter school's student enrollment during 2011-12.

The Southwest Schools racial/ethnic distribution remained relatively stable from school years 2008-09 to 2010-11, with Hispanic and White students each making up 37 percent to 43 percent of the total population. However,

EXHIBIT 2-2
SOUTHWEST SCHOOLS ENROLLMENT – BY GRADE
SCHOOL YEARS 2008-09 TO 2011-12

GRADE LEVEL	2008-09	2009-10	2010-11	2011-12
Pre-Kindergarten	N/A	529	427	461
Kindergarten	73	80	84	120
Grade 1	66	86	88	101
Grade 2	51	66	99	105
Grade 3	242	315	239	103
Grade 4	227	337	339	84
Grade 5	266	386	381	72
Grade 6	314	406	445	34
Grade 7	342	482	505	60
Grade 8	331	302	438	71
Grade 9	119	318	373	110
Grade 10	108	110	275	100
Grade 11	87	89	95	97
Grade 12	83	92	79	97
Total	2,309	3,598	3,867	1,615

NOTE: N/A = programs not in place during that school year.

SOURCE: Texas Education Agency Student Enrollment Reports.

racial ethnic distribution changed significantly during school year 2011–12 with the percentage of Hispanic students almost doubling from approximately 40 percent to almost 77 percent, and the percentage of White students decreasing from approximately 40 percent to less than 11 percent. **Exhibit 2–3** provides enrollment by race/ethnicity over the past four years.

The student demographic has changed in other ways over the past four years as well. For example, the proportion of students with limited English proficiency (LEP) increased significantly from 13.5 percent in school year 2008–09 to 44.1 percent in school year 2011–12. Concurrently, the population of at-risk students increased from 39 percent to almost 80 percent, and economically disadvantaged students increased from 26.5 percent to 87.7 percent. Student enrollment by special programs for school years 2008–09 to 2011–12 is provided in **Exhibit 2–4**.

Charter schools operate under and receive academic accountability ratings from the Texas Education Agency (TEA). All charter students in Texas take the same State of Texas Assessments of Academic Readiness (STAAR) and End

of Course (EOC) tests as traditional public school students. Southwest Schools was one of 73 school districts, including 23 charter operators, to receive an Academically Unacceptable (AU) rating for school year 2010–11 from the TEA. The 2010–11 AU rating was the result of the charter school's performance in mathematics for the African American subgroup and its completion rate for all students, the Hispanic subgroup, and the White subgroup. Southwest Schools had also obtained AU ratings for school years 2008–09 and 2009–10. As a result of being rated as AU for three consecutive years, the charter school was assigned Accredited-Probation status by the TEA. ISDs and charter schools were not assigned state accountability ratings in 2011–12 due to the development of a new accountability system based on the STAAR tests and other indicators.

In addition to the state accountability system, under the federal accountability provisions in the federal No Child Left Behind Act, all public school campuses, ISDs, and the state are evaluated for Adequate Yearly Progress (AYP). Southwest Schools' final 2010–11 results indicated that it Missed AYP for performance in reading (African American and economically disadvantaged subgroups) and mathematics

EXHIBIT 2–3
SOUTHWEST SCHOOLS ENROLLMENT – BY RACE/ETHNICITY
SCHOOL YEARS 2008–09 TO 2011–12

	2008–09	2009–10	2010–11	2011–12
African American	15.2%	15.2%	11.9%	9.9%
Hispanic	36.9%	41.1%	40.2%	76.8%
White	42.9%	38.2%	40.7%	10.8%
American Indian	0.7%	0.4%	1.1%	1.3%
Asian/Hawaiian/Pacific Islander*	4.4%	5.1%	4.4%	0.6%
Two or more races	-	-	1.7%	0.4%

*Combined due to category changes across years and the Family Educational Rights and Privacy Act (FERPA).
SOURCE: Texas Education Agency Academic Excellence Indicator System Reports.

EXHIBIT 2–4
SOUTHWEST SCHOOLS ENROLLMENT – SPECIAL PROGRAM
SCHOOL YEARS 2008–09 TO 2011–12

PROGRAM	2008–09	2009–10	2010–11	2011–12
Limited English Proficient (LEP)	13.5%	17.0%	16.6%	44.1%
English as a Second Language (ESL)	5.0%	3.1%	5.1%	6.6%
Bilingual	6.8%	12.8%	11.1%	36.3%
At-Risk	39.0%	43.5%	51.8%	79.8%
Title I	36.9%	40.2%	26.7%	71.1%
Special Education	9.5%	7.9%	8.2%	8.2%
Economically Disadvantaged	26.5%	54.1%	32.9%	87.7%

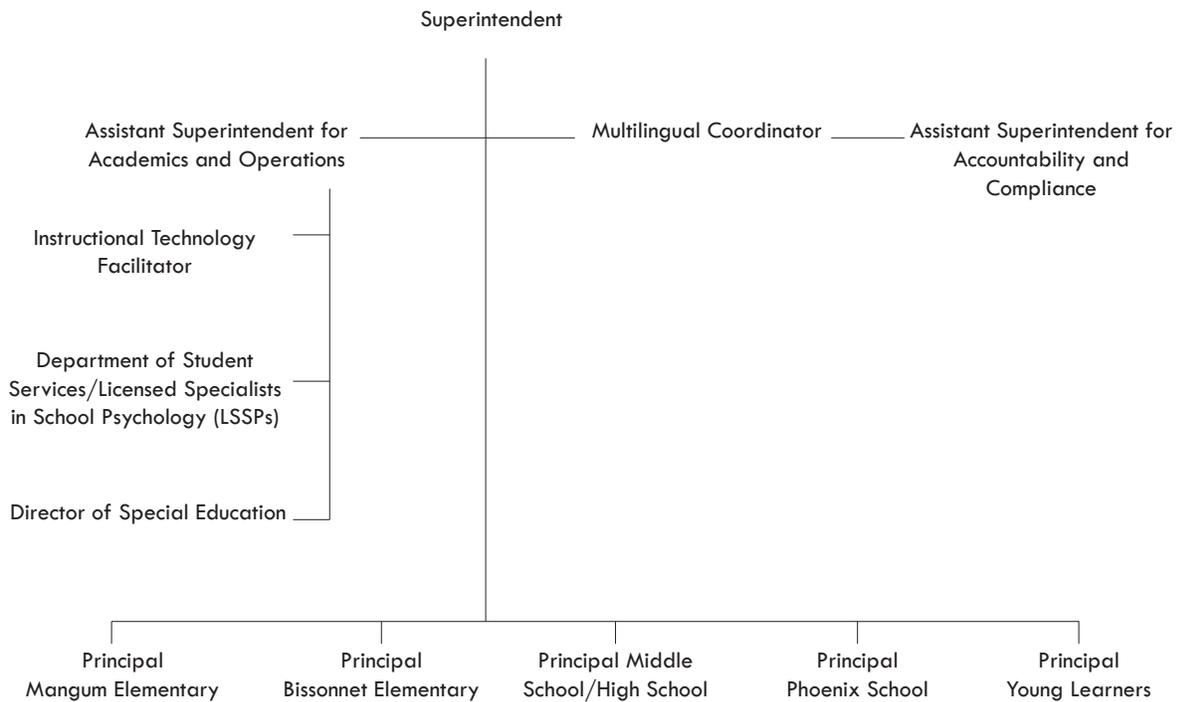
SOURCE: Texas Education Agency Student Enrollment Reports, school years 2008–09 to 2011–12.

(African American subgroup) which places the charter district in Stage 3 Math of the School Improvement Program. Southwest Schools’ preliminary 2011–12 results indicate that it Meets AYP. However, the charter school will remain in Stage 3 Math for another year.

The school’s educational program is overseen by the superintendent. Two assistant superintendents, an assistant superintendent for Academics and Operations and an

assistant superintendent for Accountability and Compliance, each school’s principal, and the Multilingual Coordinator report directly to the superintendent and are responsible for most educational and instructional decision making. In addition, the educational program includes a director of Special Education. **Exhibit 2–5** shows the Southwest Schools educational program organization at the time of the review team’s onsite visit in May 2012.

**EXHIBIT 2–5
SOUTHWEST SCHOOLS EDUCATIONAL PROGRAM ORGANIZATION
SCHOOL YEAR 2011–12**



SOURCE: Southwest Schools Administration, May 2012.

ACCOMPLISHMENTS

- ◆ Southwest Schools committed significant resources to address previously identified curriculum concerns with an infusion of training prior to implementation of a new curriculum, regularly scheduled ongoing training, and verification of implementation through principal and administrator walkthroughs.
- ◆ Through the Phoenix School, Southwest Schools partnered with community agencies and social service programs to provide the educational component of highly effective day treatment programs for students recovering from substance addictions and other challenges.
- ◆ Southwest Schools implemented effective anti-bullying procedures.

FINDINGS

- ◆ Southwest Schools lacks a comprehensive process for monitoring the required improvement strategies developed as a result of the charter school's state accountability and accreditation ratings.
- ◆ Southwest Schools does not consistently implement a structured, ongoing data analysis and Response to Intervention (RtI) process to meet the needs of all students.
- ◆ Southwest Schools lacks a detailed process to provide immediately upon enrollment the special education and related services required to implement existing individualized education programs (IEPs) for students with disabilities who have high-level needs.
- ◆ Central office-recommended practices for transitioning from instruction in Spanish to instruction in English are not implemented in a consistent way across Southwest Schools.

RECOMMENDATIONS

- ◆ **Recommendation 4: Develop a detailed plan for monitoring improvement strategies to ensure implementation success.**
- ◆ **Recommendation 5: Embed its current Response to Intervention (RtI) process in a more comprehensive problem solving framework to increase the identification of effective interventions, development of a plan to monitor**

RtI implementation, and provision of support to teachers.

- ◆ **Recommendation 6: Review the staffing plans at each school campus and at the central office level to identify processes that can immediately be established in the event students with more significant disabilities or special education needs enroll, and develop a communication plan to ensure school administrators, teachers, and parents are kept informed of progress.**
- ◆ **Recommendation 7: Continue monitoring of implementation of the bilingual program while further supporting staff who are English language learners to become more proficient.**

DETAILED ACCOMPLISHMENTS

CURRICULUM MANAGEMENT

Southwest Schools has committed significant resources to address previously identified curriculum concerns with an infusion of training prior to implementation of a new curriculum, regularly scheduled ongoing training, and verification of implementation through principal and administrator walkthroughs.

Concerns with the charter school's curriculum were identified through the Focused Data Analysis (FDA) that Southwest Schools conducted related to mathematics performance. Specifically, the FDA addressed mathematics performance districtwide for the African American subgroup, as this had factored into the charter school's AU rating for school year 2010–11. A pattern of consistently poor performance from school year 2008–09 to 2010–11 for this subgroup was noted. Staff conducted a thorough analysis of disaggregated Texas Assessment of Knowledge and Skills (TAKS) results, and determined that there were curriculum issues regarding certain objectives as well as concerns related to scope and sequence and, for specific classes, inadequate or inferior instruction. In interviews with the review team, staff stated that the CCAP curriculum tool previously used by Southwest Schools was not intuitive, did not have sufficient scope and sequence to meet Southwest Schools instructional needs, was not sufficiently aligned with the Texas Essential Knowledge and Skills (TEKS), and was not being implemented consistently within and across schools.

Based on its review of student performance data and feedback from teachers, Southwest Schools adopted the CSCAPE

curriculum in school year 2011–12 to provide systematic and consistent instruction aligned with the TEKS and STAAR, focus on increased rigor, and provide vertical alignment to support students’ progression from grade to grade. CSCOPE is a comprehensive online curriculum management system developed and owned by the Texas Service Center Curriculum Collaborative. This system uses an easily accessible online format that is supported by central office-level technical support and resources. The components and their respective purposes are provided in **Exhibit 2–6**.

During interviews with the review team, teachers in all schools and across all grade levels, including bilingual education classes, expressed enthusiasm for the increased rigor and faster pace of the new curriculum. Additional professional development from Margaret Kilgo on levels of questioning was highly valued, and teachers reported being able to apply the question stems model directly to their instruction. Elementary teachers reported that the curriculum has result in more academic engaged time for students and less off-task or disruptive behavior. Despite reports of some gaps in content at the secondary level, teachers reported that the new curriculum provides them with a good foundation

and is amenable to enhancements and supplemental activities in targeted areas.

Interviews with the review team indicate that Southwest Schools implemented multiple training opportunities prior to initial implementation of the new curriculum. For example, teachers were given training in the summer during pre-teaching days both at the central office and campus level. Additionally, the charter school sent representatives to all day workshops on the new curriculum, so that those teachers could serve as “trainers” during implementation during the fall. Southwest Schools also scheduled ongoing training for use of the new curriculum during school year 2011–12 to assist with implementation issues. Each campus held Professional Learning Communities (PLCs) every Friday. According to interviews with the review team, professional development on the new curriculum was provided through the PLCs and often targeted areas for improvement.

Finally, verification of curriculum implementation occurs through principal and administrator involvement. Interviews with the review team indicate that principals and administrators spend a significant amount of time in the classrooms and have both regularly scheduled and surprise

**EXHIBIT 2–6
CSCOPE – CRITICAL COMPONENTS**

COMPONENT	PURPOSE
Curriculum	<p>Vertical Alignment Documents present aligned standards (including the TEKS knowledge and skill statement and student expectations) among grade levels. CSCOPE ensures that each standard includes specificity for each student expectation so instruction and standards are truly aligned between and among grade levels.</p> <p>Year at a Glance presents a quick snapshot of the entire year’s instructional plan.</p> <p>TEKS Verification Matrix ensures that all of the state standards are fully accounted for in the CSCOPE curriculum system.</p> <p>Instructional Focus Documents logically group the specified standards into coherent units of instruction. These documents include a rationale to explain why the standards are bundled together, misconceptions, performance indicators, academic vocabulary, concepts, and key understandings.</p>
Assessment	<p>Performance Indicators are evidence of student attainment of, and/or progression toward an identified standard(s).</p> <p>Unit tests assess the specified student expectations as noted on the Instructional Focus Document.</p> <p>These assessments include a variety of items including ones which are written in the format of the state assessment.</p>
Instruction	<p>Exemplar Lessons provide a comprehensive resource of exemplar instructional activities. Based on the 5E model, the lessons are designed to ensure that students meet the performance indicators determined for the specified standards.</p> <p>The Lesson Planner is used to develop, share, and maintain plans for high quality instruction.</p>
Resources and Support Structures	<p>Leadership Tools include walkthrough forms, instructional focus monitoring data tools, resources for professional learning communities, and reports in the Developer to support monitoring of the curriculum.</p> <p>Each Education Service Center provides training, support, and technical assistance to districts according to district need.</p>

SOURCE: CSCOPE website.

walkthroughs. Principals also participate in weekly PLCs and provide weekly feedback to teachers through review of lesson plans.

STUDENT SERVICES

Through the Phoenix School, Southwest Schools has partnered with community agencies and social service programs to provide the educational component of day treatment programs for students recovering from substance addictions and other challenges. Teachers receive specialized training and use evidence-based behavioral interventions and trauma-informed practices in their work with significantly at-risk children, adolescents, and young adults. The treatment-first, client-centered programs at Phoenix have been described as providing traumatized, delinquent, abused, and emotionally disturbed youth with the opportunity for a “new birth” and a “new beginning.”

Since its inception in 1999, Southwest Schools provides educational programming to at-risk students and students with disabilities through contractual agreements with inpatient hospital programs, residential care and treatment facilities, adjudicated youth programs, alcohol and drug rehabilitation programs, and day treatment programs. The Phoenix School provides each contracted program with an

educational program specifically designed to meet the needs of the facility and its students. Teachers assigned by Southwest Schools are part of each student’s treatment team. Computer labs at each site, provided and maintained by Southwest Schools, allow for computer-based curriculum to supplement teacher-directed instruction and provide opportunities for credit recovery. The Southwest Schools administrative support team works with each student and site to recover course credits and create a graduation plan for each high school student. The average student-to-teacher ratio is 10:1, and all teachers are certified.

Depending on the program, students remain at a site from 30 days to several years. Although the average enrollment is just over 200 students, the Phoenix School serves many times more individual students as a result of the short-term programs. Sites being served are provided in **Exhibit 2–7**.

EFFECTIVE ANTI-BULLYING INITIATIVES

Southwest Schools has implemented effective anti-bullying procedures. Southwest Schools has incorporated a separate section within the Parent/Student Handbook related to harassment, intimidation and bullying. The handbook defines each of these categories. The material requires each school to educate its student population and staff concerning

EXHIBIT 2–7 SOUTHWEST SCHOOLS – PHOENIX SCHOOL SITES

FACILITY	LOCATION	GRADES SERVED	DESCRIPTION
A Child is Born	Alvin, Texas	3–12	Residential treatment facility for children with emotional disturbance.
Archway Academy	Houston, Texas	9–12	Recovery High School (i.e., sober high school) supporting the educational needs of teens in recovery.
The Center for Success and Independence	Houston, Texas	6–12	Residential treatment program for adolescents whose psychological, emotional, and/or substance abuse disorders have impaired their behavioral functioning and adversely impacted their everyday home, school and community environments.
Three Oaks Academy	Houston, Texas	9–12	High school and college bound programs provide a safe and sober fully accredited educational component for the effective intervention, recovery, and support of young people in early and ongoing recovery.
Carter’s Kids	Richmond, Texas	3–12	Residential treatment facility offering long-term emotional and behavioral treatment to children whose conduct would otherwise prevent them from placement in foster care or adoption.
Unlimited Vision	Pasadena, Texas	6–12	Adolescent residential treatment facility that meets the spiritual and physical needs of chemically dependent adults and adolescents on their journey of recovery.
Memorial Hermann Prevention & Recovery Center (PaRC)	Houston, Texas	9–12	Drug rehabilitation center and alcohol treatment facility for adults and teenagers and dual-diagnosis patients.
Boys and Girls Harbor	LaPorte, Texas	K–8	Comprehensive care in a residential setting for children who are experiencing family hardship, neglect, abandonment or abuse.

SOURCE: Southwest Schools, May 2012.

the charter school's intolerance of such harassment and requires that students and staff report any such behavior to the principal or designee. Elementary principals indicated that selected staff and teachers at their sites participated in a local anti-bullying training session.

During the onsite interviews with the review team, administrators noted that bullying had been somewhat of an issue at the middle school level. The campus implemented a process to require those involved in the bullying activity to conduct research on the subject and to prepare a formal presentation to present to the students at the school. In addition, the campus has conducted ongoing assembly programs, some of which have been specifically targeted to increase awareness, discussion and presentation of materials related to bullying and to reinforce the charter school's stance that there is no tolerance for bullying in Southwest Schools. The middle school and high school have also used a video presentation entitled *Cyber Bullying* to share with the student body. The focus of the video is to increase student awareness of what cyber bullying entails and to reinforce the need to avoid engaging in this activity.

DETAILED FINDINGS

MONITORING IMPROVEMENT STRATEGIES (REC. 4)

Southwest Schools lacks a comprehensive process for monitoring the required improvement strategies developed as a result of the charter school's state accountability and accreditation ratings. From school years 2008–09 to 2010–11,

Southwest Schools obtained a rating of Academically Unacceptable (AU) under the state's accountability system which resulted in the charter school being assigned Accredited-Probation status by the Texas Education Agency (TEA) in school year 2011–12. According to TEA, "if the current accreditation concerns for the charter school are not addressed, the charter school may be assigned an accreditation status of Not Accredited-Revoked. A Not Accredited-Revoked status means that the TEA no longer recognizes the charter school as a Texas public school. Charter schools with an accreditation status below Accredited also may be subject to additional accreditation sanctions as referenced in statute and rule."

The state accountability ratings for the charter school and each campus are provided in **Exhibit 2–8**. A Recognized rating under state accountability is designated by "R," Academically Acceptable rating is designated by "AA," and Academically Unacceptable rating is designated by "AU." In addition, "AEA" designates evaluation under the alternative education accountability system.

As indicated in **Exhibit 2–8**, Southwest Schools has been evaluated under both the standard and alternative education accountability (AEA) systems due to its student population. Eligibility for evaluation under AEA is limited to campuses that offer nontraditional programs rather than programs within a standard campus; campuses that meet the at-risk registration criterion; charters that operate only alternative education campuses (AECs); and charters that meet the AEC enrollment criteria.

EXHIBIT 2–8
SOUTHWEST SCHOOLS STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2006–07 TO 2010–11

	2006–07	2007–08	2008–09	2009–10	2010–11
Southwest Schools – District	AEA AA	AEA AA	AU	AU	AU
Southwest Elementary Bissonnet	AEA AA	AEA AA	AEA AA	AEA AA	AEA AA
Southwest Elementary Mangum	-	-	-	-	R
Southwest Middle School	AEA AA	AU	AEA AA	AEA AA	AA
Southwest High School	AEA AA	AEA AA	AEA AA	AEA AA	AEA AA
Phoenix School	AEA AA	AEA AA	AEA AA	AEA AA	AEA AU
Texas Virtual Academy	AA	AA	AU	AA	AU
Young Learners	Not Rated				

NOTE: Bold and shaded indicates Academically Unacceptable results; "AEA" designates evaluation under the alternative state accountability system; "-" indicates a campus was not part of Southwest Schools' Accountability for the given year.

SOURCE: Texas Education Agency Academic Excellence Indicator System Reports; school years 2006–07 to 2010–11.

A review of Southwest Schools' AEIS results by school and at the district level does not reveal a significant pattern of difficulty with a specific content area as is often the case. For example, a school or district may struggle with math across several years. Instead, the common areas of concern for Southwest Schools during this time period were completion rate at district level, for all students, and with one or more subgroups in school years 2008–09 to 2010–11. Additionally, the charter school had an issue with dropout rate at the district level and across varying groups in school years 2008–09 and 2009–10.

Exhibit 2–9 shows the district/campus, applicable rating system, and reason for the AU rating for school years 2007–08 to 2010–11.

In addition to the state accountability system, under the federal accountability provisions in the federal No Child Left Behind Act, all public school campuses, ISDs, and the state are evaluated for Adequate Yearly Progress (AYP). **Exhibit 2–10** shows Southwest Schools' district and individual campus federal accountability ratings for school years 2006–07 to 2011–12.

As a part of requirements associated with its Academically Unacceptable status, Southwest Schools' staff reviewed the charter school's performance and conducted a multi-campus level Focused Data Analysis (FDA) to identify possible causal

factors for the low completion rate and high dropout rate. The following notable factors were identified through the FDA:

- The charter school had not consistently conducted follow-up activities to track students no longer enrolled to ensure that accurate leaver codes are reported to TEA. As a result, some students who left Southwest Schools and enrolled in another school were coded as dropouts, inflating the data.
- Attendance tracking and intervention procedures established at the high school and middle school beginning in school year 2009–10 and at one of the Phoenix sites in 2010–11 have proven effective. Therefore, attendance is no longer a factor in dropout or completion rates.
- Disciplinary removals are not a factor impacting dropout or completion rates at Southwest High School or Southwest Middle School. However, at the Phoenix School's "sober high school" program, a student's ability to maintain sobriety has been a factor for removal from the school program, putting these students at greater risk of dropping out or failing to timely complete high school. Completion rates for this campus have been consistently low.

EXHIBIT 2–9

SOUTHWEST SCHOOLS STATE ACCOUNTABILITY RATINGS – EXPLANATION FOR AU RATING SCHOOL YEARS 2007–08 TO 2010–11

SCHOOL YEAR	DISTRICT/ SCHOOL	RATING SYSTEM	REASON FOR AU RATING
2007–08	Southwest Middle School	Standard	Mathematics – All students; Hispanic subgroup; economically disadvantaged subgroup Science – All students; Hispanic subgroup
2008–09	Southwest Schools - District	Standard	Science – African American subgroup Completion rate – All students; Hispanic subgroup; White subgroup; economically disadvantaged subgroup Dropout rate – Hispanic subgroup
	Texas Virtual Academy	Standard	Science – African American subgroup
2009–10	Southwest Schools - District	Standard	Completion rate – All students; White subgroup; economically disadvantaged subgroup Dropout rate – All students; African American subgroup; Hispanic subgroup
2010–11	Southwest Schools - District	Standard	Mathematics – African American subgroup Completion rate – All students; Hispanic subgroup; White subgroup
	Texas Virtual Academy	Standard	Economically disadvantaged subgroup
	Phoenix School	Alternative	Science – African American subgroup

SOURCES: Southwest Schools; Texas Education Agency Academic Excellence Indicator System Reports; school years 2007–08 to 2010–11.

EXHIBIT 2–10
SOUTHWEST SCHOOLS FEDERAL ACCOUNTABILITY RATINGS
SCHOOL YEARS 2006–07 TO 2011–12

	2006–07	2007–08	2008–09	2009–10	2010–11	2011–12*
Southwest Schools – District	Missed AYP Math (P) & Grad	Missed AYP Math (P)	Missed AYP Grad Stage 1	Missed AYP Math (P) Stage 2	Missed AYP Reading & Math (P) Stage 3	Meets AYP Stage 3
SW Elementary Bissonnet	Meets AYP	Meets AYP	Missed AYP Math (P)	Missed AYP Math (P) Stage 1	Missed AYP Reading (P)	Meets AYP
SW Elementary Mangum	-	-	-	-	New	Missed AYP Reading & Math (P)
SW Middle School	Meets AYP	Missed AYP Math (P)	Meets AYP	Meets AYP	Missed AYP Math (P)	Missed AYP Math (P) Stage 1
SW High School	Missed AYP Grad	Missed AYP Math (P)	Meets AYP	Meets AYP	Meets AYP	Missed AYP Math (P)
Phoenix	Meets AYP	Missed AYP Math (P)	Missed AYP Grad	Meets AYP	Missed AYP Reading (P)	Meets AYP
Texas Virtual Academy	New	Meets AYP	Meets AYP	Missed AYP Math (P)	Missed AYP Reading & Math (P)	-
Young Learners	Not Rated	Not Rated	Not Rated	Not Rated	Not Rated	Not Rated

*Preliminary results included for school year 2011–12.

NOTES: Shaded indicates Missed AYP; Bold indicates School Improvement Program stage;

"New" indicates when a campus was opened; "-" indicates a campus was not part of Southwest Schools' Accountability for the given year. Texas Virtual Academy was not a Southwest Schools campus in school year 2011–12.

SOURCE: Texas Education Agency; Adequate Yearly Progress District and Campus Data Tables; Final AYP Results for school years 2006–07 to 2010–11; Preliminary AYP Results for school year 2011–12.

- With the inclusion of the Texas Virtual Academy (TXVA), Southwest Schools was evaluated under the standard accountability system from school years 2008–09 to 2010–11. All current campuses, with the exception of Mangum Elementary School and Southwest Middle School, are evaluated under the AEA system due to their size and large at-risk populations. Interviews with the review team indicated that unclear data calculations by TEA with regard to TXVA and the impact of TXVA on Southwest Schools being evaluated under the standard accountability system rather than AEA were largely responsible for the charter school's status as AU for one or more of the years in question.

Working Systemically, a process for school improvement provided by the Texas Comprehensive Center (TCC), identifies a five-phase process to help ISDs and charter schools make sustainable, long-term improvements in their systems. This process involves the development of components (i.e., standards, curriculum, instruction,

assessment, resources, professional staff, policy and governance, and family and community) and competencies (i.e., creating coherence; collecting, interpreting, and using data; ensuring continuous professional learning; building relationship; and responding to changing conditions) across the charter school, campuses, and classrooms. The five phases include:

- Phase 1: Scanning the System
- Phase 2: Analyzing the System
- Phase 3: Planning Action
- Phase 4: Taking Action and Monitoring Progress
- Phase 5: Assessing and Reflecting on Outcomes

Substantial evidence was provided to the review team which indicated that Southwest Schools has developed and begun to implement strategies to resolve the issues that resulted in its being rated as AU for three consecutive years. It appears that Southwest Schools has already completed Phase 1 (Scanning the System) through Phase 3 (Planning Action) of

the Working Systemically process, and has begun Phase 4 (Taking Action and Monitoring Progress). In general, actions are related to moving the charter school from the standard accountability system to the AEA, given the nature of its student population; ensuring accurate data collection and reporting; and significantly revising curriculum and instruction. In addition, beginning in school years 2010–11, the charter school added a counselor to the Phoenix School to evaluate transcripts and develop recovery plans and implementation of a central office response to intervention (RtI) team.

The strategies appear to be appropriate and reasonable to address the stated goals. In addition, it is important to note that the ultimate goal of any charter school or ISD should be that no students drop out, that all students complete high school within the expected timeline, and that all students meet or exceed the state performance standards. These goals are not separate or discreet—students who are actively engaged in meaningful and appropriate classroom instruction perform better, are more likely to remain on track to graduate, and are less likely to drop out than students who are provided ineffectual instruction.

However, initial implementation of these strategies is not all that is needed. Without a detailed plan for tracking the charter school's and individual campuses' implementation activities, Southwest Schools is at-risk of having its accreditation revoked due to the charter school's performance on the state assessment if improvement does not occur in school year 2012–13.

Southwest Schools should develop a detailed plan for monitoring improvement strategies to ensure implementation success. This recommendation complements Phase 4 (Taking Action and Monitoring Progress) and Phase 5 (Assessing and Reflecting on Outcomes) of the Working Systemically process. The superintendent should assemble a working committee composed of the Instructional Leadership Team (ILT), the assistant superintendent for Academics and Operations and the principals from each school, and other staff involved in the improvement efforts including the assistant superintendent of Accountability and Compliance.

To begin, the committee should identify what successful implementation of the identified improvements strategies looks like at all levels (i.e., the charter school and individual campuses). For example, the committee should identify what indicators show the charter school is engaging in accurate data collection and reporting. After determining what

successful implementation looks like for each of the strategies identified through the FDA, the working group should establish and adhere to a regular schedule for reviewing the identified indicators. These discussions may become a component of the ILT's regularly scheduled weekly meetings, or the working committee may determine that these monitoring meetings should be held on their own.

Additionally, development of a monitoring plan should consider plans for how to proceed if the implementation plan is not being fully implemented. For example, the committee could determine why there are issues and how to make changes so that the plan is followed. Further, the committee must determine what steps to follow if indicators show the improvement strategies selected by the charter school are not working.

This recommendation can be implemented with existing resources.

DATA ANALYSIS AND RESPONSE TO INTERVENTION (REC. 5)

Southwest Schools does not consistently implement a structured, ongoing data analysis and Response to Intervention (RtI) process to meet the needs of all students. Prior to school year 2011–12, Southwest Schools' RtI process primarily focused on evaluating students who may be eligible for special education under the Individuals with Disabilities Education Act (IDEA). In response to its status as AU for three consecutive years, beginning in 2011–12, Southwest Schools developed the Southwest Schools Response to Intervention Handbook (RtI Handbook) and rolled out multi-campus implementation. Interviews with central office-level staff, principals, and teachers verified that all staff were aware of the expectations regarding data analysis and RtI, but “buy-in” regarding the importance and potential impact of the process was not always evident.

RtI is defined in the RtI Handbook as:

...a three-tiered intervention process focused on identification and assisting struggling students in an effort to make them successful in the classroom. The process is based on the following principles: teach all children effectively; intervene early; use a multi-tier model of service delivery; and adopt a problem-solving methodology.

The handbook also states that the following practices must be implemented: school-wide screening; progress monitoring; tiered instruction; high-quality research-based instruction

and intervention; collaboration among school staff members; and fidelity of implementation.

Southwest Schools’ revised RtI system includes guidelines for team members regarding their roles and responsibilities; an extensive matrix of potential interventions for both academic and behavioral concerns; and forms or suggestions to document the process. The RtI system includes three tiers:

- Tier 1 (Universal)—Interventions intended for all students. This tier is defined in the RtI handbook as CSCOPE and other support programs, i.e., Every Day Counts.
- Tier 2 (Targeted Group)—Interventions intended for at-risk students. This tier is defined in the RtI handbook as Read Well, Successful Readers, Achieve 3000, Accelerated Math, Math Facts in a Flash, Moving with Math, and Study Island.
- Tier 3 (Intensive, Individual)—Interventions intended for individual students and determined by assessment. This tier is defined in the RtI handbook as the same supports as Tier 2, but more intensive and one-on-one.

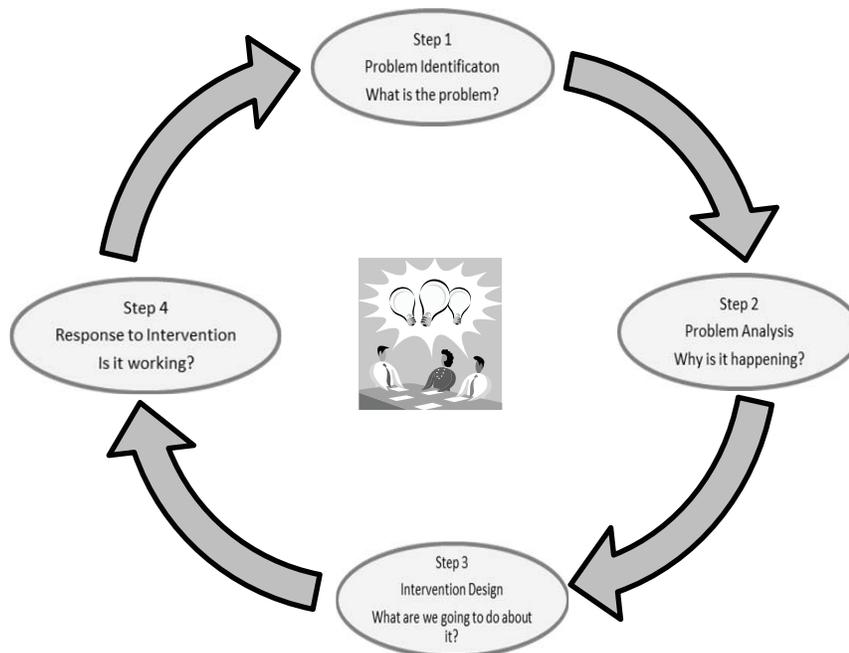
The use of consistent procedures and forms across the charter school are designed to improve implementation fidelity for

the system itself. The intent is that instruction and materials should be used in the way intended to be most effective. Interviews with staff indicate that much time, effort, and resources have been committed to ensuring that a full range of interventions, including appropriate core and supplemental curricula, are available to all schools. However, the Southwest Schools RtI handbook only minimally addresses certain practices including the problem-solving process itself—hypothesis development, and the implementation of a systematic process for monitoring fidelity of instruction or intervention. For example, the RtI handbook mentions the use of Eduphoria, a data analysis system used by Southwest Schools, to monitor the fidelity of implementation and progress of RtI. However, specific procedures are not included in the RtI handbook related to how this should occur, how to determine if interventions are not successful based on the data, and steps to take if interventions are not working. These components are often the most difficult to implement.

A comprehensive problem solving model of data analysis that includes RtI as one component is illustrated in **Exhibit 2–11**.

Fully functioning RtI operates within a systematic problem-solving model. The sequential and cyclical four steps of the problem solving process are completed in all situations,

EXHIBIT 2–11
FOUR-PHASE PROBLEM SOLVING MODEL



SOURCE: Adapted from University of South Florida Problem Solving/Response to Intervention Project by Review Team, 2012.

whether addressing large groups (district or school-wide), smaller groups (grade level or classroom), or individual students. RtI is the final phase in the problem solving model and occurs after determining the problem, why it's occurring, and how to address the underlying issues. **Exhibit 2–12** provides actions and guiding questions for each step in the problem solving model.

Southwest Schools should embed its current Response to Intervention (RtI) process in a more comprehensive problem solving framework to increase the identification of effective interventions, development of a plan to monitor RtI

implementation, and provision of support to teachers. The framework should examine the support offered at Tiers 1, 2, and 3 to determine the effectiveness of the interventions offered and necessary changes. The superintendent should assemble a workgroup that comprises the instructional leadership team (i.e., Assistant Superintendent of Curriculum and Operations and principals from each of the schools) as well as representatives from the Student Services/LSSPs and Special Education Departments to complete the development and revision of a comprehensive RtI system.

EXHIBIT 2–12

FOUR-PHASE PROBLEM SOLVING MODEL: ACTIONS AND GUIDING QUESTIONS

STEPS	ACTIONS/GUIDING QUESTIONS
<p>STEP ONE:</p> <p>Problem Identification—Accurately identifying the problem and the desired behavior for student(s) experiencing academic or behavioral difficulty</p>	<p>Define the problem by determining the difference between what is expected and what is occurring.</p> <p>Ask, “What specifically do we want students to know and be able to do when compared to what they do know and are able to do?”</p> <p>When engaged in problem solving at the individual student level, the team should strive for accuracy by asking, “What exactly is the problem?”</p>
<p>STEP TWO:</p> <p>Problem Analysis—Analyzing why the problem is occurring by collecting data to determine possible causes of the identified problem; developing and testing hypotheses regarding possible causes.</p>	<p>Analyze the problem using data to determine why the issue is occurring.</p> <p>Generate hypotheses (i.e., reasons why students are not meeting performance goals) founded on evidence-based content area knowledge, alterable variables, and instructionally relevant domains.</p> <p>Gather assessment data to determine valid/invalid hypotheses. Link validated hypotheses to instruction/intervention so that hypotheses will lead to evidence-based instructional decisions.</p> <p>Ask, “Why is/are the desired goal(s) not occurring? What are the barriers to the student(s) doing and knowing what is expected?”</p> <p>Design or select instruction to directly address those barriers.</p>
<p>STEP THREE:</p> <p>Intervention Design and Implementation—Selecting or developing, and then implementing, (a) evidence-based interventions based upon data collected previously; (b) a fidelity plan designed to systematically assess fidelity of implementation of the intervention or instruction; and (c) a support plan to ensure that the implementer has the skills and resources needed to implement the intervention as required.</p>	<p>Develop and implement an intervention plan, a fidelity check plan, and a support plan driven by the results of the team’s problem analysis by establishing a performance goal for the group of students or the individual student and developing an intervention plan to achieve the goal.</p> <p>Delineate how the student’s or group of students’ progress will be monitored and implementation integrity will be supported.</p> <p>Ask, “What are we going to do?”</p>
<p>STEP FOUR:</p> <p>Response-to-Intervention—Evaluating the effectiveness of interventions; measuring the student’s or group of students’ response to implemented intervention to evaluate the effectiveness of the instructional efforts.</p>	<p>Measure response to instruction/interventions by using data gathered from progress monitoring at agreed upon intervals to evaluate the effectiveness of the intervention plan based on the student’s or group of students’ response to the intervention.</p> <p>Review results of fidelity check.</p> <p>Progress-monitoring data should directly reflect the targeted skill(s).</p> <p>Ask, “Is it working? If not, is the instruction/intervention plan being implemented as expected? If so, how will the instruction/intervention plan be adjusted to better support the student’s or group of students’ progress? If not, what can be done to assist the implementer?”</p> <p>Team discussion centers on how to maintain or better enable learning for the student(s).</p>

SOURCE: Adapted from the University of South Florida Problem Solving/Response to Intervention Project by Review Team, 2012.

A useful resource for developing and implementing a comprehensive multi-tiered system is the *Building Capacity for Response to Intervention (RtI) Project* at the Meadows Center for Preventing Educational Risk (MCPER) within the College of Education at The University of Texas at Austin. Funded by TEA, the project's goal is to build capacity for Texas schools to implement RtI as a means for improving student achievement. The project's website states that the focus is on disseminating information, resources, and tools designed to enhance the use of an instructional decision-making model in the areas of reading, mathematics, and behavior.

A second useful resource for schools or ISDs is the *Problem Solving/Response to Intervention Evaluation Tool Technical Assistance Manual – Revised*, developed by the University of South Florida in collaboration with the Florida Department of Education. The manual is designed to assist all educational stakeholders tasked with implementing and evaluating problem solving and RtI practices. Each section describes in detail a school- or multi-campus level instrument found to be effective in implementing RtI and in evaluating its impact on educational outcomes. It includes tools such as the Self-Assessment of Problem Solving Implementation (SAPSI), which can be used as a formative measure to evaluate individual campus and multi-campus progress.

Following the review team's onsite visit, charter school staff indicated that Southwest Schools has addressed some of the issues with RtI implementation. For example, beginning in school year 2012–13, central office staff conducted the first six weeks RtI data meetings in October 2012. Based on the schedule provided, the charter school conducted the RtI data meetings at each main campus (i.e., Southwest School Middle School/High School campus, Mangum Elementary, and Bissonnet Elementary) and most of the Phoenix School sites during the last weeks of October 2012.

This recommendation can be implemented with existing resources.

SPECIAL EDUCATION (REC. 6)

Southwest Schools lacks a detailed process to provide immediately upon enrollment the special education and related services required to implement existing individualized education programs (IEPs) for students with disabilities who have high-level needs.

Based on Public Education Information Management System (PEIMS) data for school year 2011–12, 132 of the

students enrolled in Southwest Schools (8.2 percent) were students with disabilities receiving services under IEPs. The disabilities represented included: other health impairment, auditory impairment, intellectual disabilities, emotional disabilities, specific learning disability, speech impairment, and autism. Central office staff, principals, and teachers reported that the majority of students with disabilities are served in inclusive settings, receiving special education support in the general education classroom and some amount of pullout service when needed. With few exceptions, school staff reported having access to appropriate special education support, although concerns were expressed regarding turnover in special education positions. In response to the survey item "The charter school has effective educational programs for special education," 93.8 percent of administrators, 76.9 percent of teachers and school staff, and 65.5 percent of parents strongly agreed or agreed (SD/A). The highest rate of disagreement was among teachers and school staff, with 14.3 percent responding with SD/A; 6.6 percent had no opinion. Only 1.7 percent of parents responded with SD/A, while 27.6 percent had no opinion.

The *Individuals with Disabilities Education Act* (IDEA) states that, when a student with a disability transfers from one ISD in the state to another, the student's IEP must be fully implemented until such time as the new ISD adopts the current IEP or develops a new one that meets the needs of the student. Some students with significant or unique disabilities require intense or specialized services that are not easily available. During interviews with central office administrators and teachers, it was reported that Southwest Schools has experienced an increased enrollment in the number of students with significant special education needs. Some of these students have required specialized instruction and services that could not effectively be provided in a general education setting. In response, the charter school hired a special education teacher to staff a special education classroom to meet the needs of these students. However, in interviews with the review team, some instructional and administrative staff reported that the process took several weeks, and that communication between the school and the central office was not effective in meeting the needs of the students, the families, and the teachers within a reasonable amount of time.

At the central office level, the Southwest Schools organizational chart reflects the following positions with responsibilities related to implementing special education programs: Department of Student Services and Licensed

Specialists in School Psychology (LSSPs); director of Special Education; Records Coordinator; Records/RF Tracker Coordinator; and multiple Special Education Admission, Review, and Dismissal (ARD) Coordinators. The director of Special Education position was vacant during spring 2012, and another director was filling in on an interim basis.

As an open-enrollment charter school, Southwest Schools is responsible for ensuring that all students with disabilities enrolled in the school are evaluated and, if eligible for special education services under IDEA, an IEP is developed and implemented to provide the student with a free appropriate public education in the least restrictive environment. This can be very challenging, especially when the charter school has not previously needed a full-time special education program. The competing requirements of not delaying the student's enrollment while also ensuring that appropriate services are provided by qualified staff put the charter school in a difficult situation. While it is clear that Southwest Schools did due diligence by hiring a special education teacher and opening a separate special education classroom within a very short amount of time, the experience had a negative impact on the morale of some staff who felt unsupported.

Southwest Schools should review the staffing plans at each school campus and at the central office level to identify processes that can immediately be established in the event students with more significant disabilities or special education needs enroll, and develop a communication plan to ensure school administrators, teachers, and parents are kept informed of progress. While the charter school is not required or expected to have in place a full continuum of services and placements, it should have a plan for meeting the immediate needs of any student who enrolls and that student's teachers.

At a minimum, a communication system should be established to ensure that the director of Special Education and designated ARD Coordinator are notified within one school day when a student known to have an IEP enrolls in a school, and the student's IEP from the sending school is reviewed within one day of receipt to determine if it can be implemented as written. If not, an ARD team must convene as soon as possible to develop a new IEP that meets all of the student's educational needs, including the provision of appropriate special education and related services within a general education classroom to the extent necessary. If the team determines that additional modifications to the charter school's special education program is needed, the student's principal, teachers, and parents should be kept apprised of

the charter school's progress in making those modifications through weekly or more frequent communication.

Following onsite work by the review team, central office staff indicated that Southwest Schools hired a new director of Special Education prior to the beginning of school year 2012–13. According to the charter school, the new director of Special Education has updated the special education process which now begins to address the issue of providing services to students immediately upon enrollment.

This recommendation can be implemented with existing resources.

BILINGUAL EDUCATION/ENGLISH AS A SECOND LANGUAGE (REC. 7)

Central office-recommended practices for transitioning from instruction in Spanish to instruction in English are not implemented in a consistent way across Southwest Schools.

During school year 2011–12, approximately 44.1 percent of the Southwest Schools student population was eligible for the limited English proficient (LEP) subgroup; 36.3 percent of students participated in bilingual education, and 6.6 percent participated in English as a second language (ESL). The majority of LEP students were enrolled in pre-Kindergarten programs or in kindergarten through grade five at Southwest Elementary – Bissonnet Campus. Within the organizational chart, the charter school has a position of Multilingual Coordinator, which reports directly to the superintendent.

Southwest Schools implements a late exit bilingual program (LXBP) in pre-Kindergarten through grade five and an ESL program for grades seven through 12. The LXBP model allows students to fully develop and maintain Spanish language while learning in English. Language arts, mathematics, science, and social studies are taught in Spanish in kindergarten through grade two. Instruction in English increases gradually throughout the elementary grades until reaching a level of proficiency in both languages that leads to a 50 percent Spanish and 50 percent English curriculum in grade four. By grade five, 100 percent of the curriculum is to be taught in English through a “sheltered English” model. Sheltered instruction is an approach for teaching English language learners in English while ensuring they understand the concepts being taught as well as expanding their English language development. Examples of tools used by teachers to “shelter” their English is to use simple sentences when giving explanations and directions. This allows students to focus on

the content of the lesson rather than the procedures of the lesson. Another effective tool is to speak at a normal rate, but lengthen the pauses between sentence boundaries (i.e., normal pauses that would be punctuated by commas or periods if written down) and check frequently for comprehension by observing students' body language and comments in addition to direct questioning.

During interviews with the review team, central office and school staff voiced concern regarding inconsistent implementation of the expected timeline for the LXBP. Multiple respondents indicated that, in some cases, instruction in Spanish is retained as the primary language of instruction even as instruction in English is supposed to be increasing. This results in students not being adequately prepared for the transition to an ESL program and assessment in English that occurs when the student articulates to middle school.

In an effort to address this issue, in school year 2011–12, the Multilingual Coordinator developed a guide to assist schools and teachers in implementing the transition from Spanish instruction to English as required. The guide includes graphic representations of what instruction at a given grade level should look like across subjects and throughout the school year. An example is provided in **Exhibit 2–13**. Instruction in Spanish is indicated by unshaded boxes while instruction in sheltered English is indicated by gray boxes. Central office monitoring of adherence to this timeline and model has consisted primarily of incidental observations by the Multilingual Coordinator. A formal monitoring and feedback system has not yet been developed.

In addition to supporting the transition to English language instruction in bilingual classes through tools such as the timeline in **Exhibit 2–13**, in school year 2011–12 Southwest Schools implemented computer-based instruction for teachers in the Young Learners pre-Kindergarten program and at Bissonnet Elementary School to help them improve their own English language proficiency. Teachers can access the program from home or school, and usage reports are prepared by the facilitator.

The purpose of transitioning from LXBP to ESL is to provide students the opportunity to learn critical content in their primary language while also being taught English. The state's accountability system allows for assessment in Spanish for elementary grades, but requires assessment in English once a student is in middle school. Adherence to a transition schedule that allows for ample instruction in English in

grades four and five is essential for students to successfully make that transition.

Following the review team's onsite visit, central office staff indicated that Southwest Schools has expanded monitoring of the bilingual program. At the beginning of school year 2012–13, the charter school hired a new Multilingual Coordinator and has implemented an observation schedule for the bilingual program which includes a feedback process. According to staff, the Multilingual Coordinator meets with the teacher, as well as the principal, for feedback regarding instruction and then returns for observations regarding the feedback given.

Southwest Schools should continue monitoring of the bilingual program while further supporting staff who are English language learners to become more proficient. To ensure that the recommended combination of Spanish and English language instruction is being implemented at each grade level, unannounced or incidental observations as well as document reviews (i.e., lesson plans; lesson artifacts) should be conducted by school principals as well as the Multilingual Coordinator. Principals and staff at each school should clearly understand the expectations and intent of the guidelines, and commit to actively supporting students' successful transition to English-only instruction in higher grades. Participation and successful performance in computer-based instruction should be incorporated into terms of employment contracts for teachers and tied to evaluations and incentive programs, with continued employment tied to outcomes.

This recommendation can be implemented with existing resources.

**EXHIBIT 2-13
SOUTHWEST SCHOOLS LATE EXIT BILINGUAL PROGRAM (LXBP)**

CLASS	SEM	DAY	KG	GRADE 1	GRADE 2	GRADE 3	GRADE 4	GRADE 5	
Reading	I	Mon							
		Tue							
		Wed							
		Thu							
		Fri							
	II	Mon							
		Tue							
		Wed							
		Thu							
		Fri							
Language Arts	I – II	Mon							
		Tue							
		Wed							
		Thu							
		Fri							
Math	I	Mon							
		Tue							
		Wed							
		Thu							
		Fri							
	II	Mon							
		Tue							
		Wed							
		Thu							
		Fri							
Science	I – II	Mon							
		Tue							
		Wed							
		Thu							
		Fri							
Social Studies	I - II	Mon							
		Tue							
		Wed							
		Thu							
		Fri							

SOURCE: Southwest Schools, 2012.

FISCAL IMPACT

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

RECOMMENDATION	2013-14	2014-15	2015-16	2016-17	2017-18	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 2: EDUCATIONAL SERVICE DELIVERY							
4. Develop a detailed plan for monitoring improvement strategies to ensure implementation success.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
5. Embed its current Rtl process in a more comprehensive problem solving framework to increase the identification of effective interventions, development of a plan to monitor Rtl implementation, and provision of support to teachers.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6. Review the staffing plans at each school campus and at the central office level to identify processes that can immediately be established in the event students with more significant disabilities or special education needs enroll, and develop a communication plan to ensure school administrators, teachers, and parents are kept informed of progress.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7. Expand monitoring of implementation of the bilingual program while continuing to support staff who are English language learners to become more proficient.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS-CHAPTER 2	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 3

FINANCIAL MANAGEMENT

SOUTHWEST SCHOOLS

CHAPTER 3. FINANCIAL MANAGEMENT

Charter schools face the task of carefully balancing the dual demands of educating children while balancing their budgets with available resources. Now more than ever, charter schools must demonstrate innovative teaching methods and identify resourceful means of obtaining more and better value for their money. Success depends on their ability to establish innovations in the delivery of academic services and manage business affairs wisely and efficiently. Sound financial management, asset and risk management, and sound purchasing techniques provide some of the tools charter schools need to meet that challenge. These functions are collectively referred to as business services.

Financial management ensures that charter schools receive and manage revenue from varied sources; develop balanced budgets for effective spending; and issue timely, accurate, and relevant financial reports. Asset and risk management uses efficient banking structures to manage cash and liquidity; employs a variety of cash management techniques; maximizes investment earnings; ensures the health and well being of school employees; reduces the risk of loss from unforeseen, catastrophic events; and safeguards fixed assets. Effective procurement practices ensure that the “right” goods are acquired, at the “right” time, in the correct quantities, at the “right” price, all in accordance with state and local purchasing regulations and guidelines.

Southwest Schools is a nonprofit corporation under the Texas charter Educational Leadership, Incorporated. In 1998, the State Board of Education granted the organization an open enrollment charter pursuant to Chapter 12 of the Texas Education Code. At that time, Southwest Schools was organized to provide educational services to students in grades 9–12 at a single high school campus and to students living in four area residential treatment center (RTC) facilities. By school year 2011–12, the charter school expanded its services, including kindergarten to grade 12, and served students in seven RTCs. Southwest Schools’ Board of Directors (board) governs their programs, services, activities, and functions and has the primary accountability for the fiscal affairs of the charter school.

Like independent school districts (ISDs), charter schools in Texas participate in the Foundation School Program (FSP) for student funding. Pursuant to FSP, charters receive revenues based upon student enrollment and average daily

attendance. Each charter school is required to file enrollment and attendance reports at the close of each six-week reporting period. Charter schools are also eligible for state and federal grant programs, including federal funding pursuant to the Public Charter Schools Start-Up grant. Overall, charter schools derive a majority of their revenue from the state since they do not have taxing authority and do not generate property taxes. In addition, charter schools do not have access to state facilities funding.

During the fiscal year ending August 31, 2011, Educational Leadership, Inc. (Southwest Schools) received \$24.6 million in FSP revenues and approximately \$27.1 million in total revenues. **Exhibit 3–1** shows the financial statements for Educational Leadership, Inc. for fiscal years 2011 and 2010.

As shown in **Exhibit 3–1**, there was an increase in both total revenues and total expenses from fiscal year 2010 to fiscal year 2011. Additionally, in fiscal year 2011, total expenses exceeded total revenues by \$225,205. This contrasts with fiscal year 2010, in which total revenues exceeded total expenses by approximately \$2.1 million. In addition, Educational Leadership, Inc. noted a decline in ending net assets in fiscal year 2011 similar to the amount in which expenditures exceeded revenues. In fiscal year 2010, Educational Leadership, Inc. had ending net assets totaling \$4.3 million, but that amount declined to \$4.1 million in fiscal year 2011.

Exhibit 3–1 also shows Southwest School’s top three expenditures by function in fiscal year 2011: instruction (approximately \$20.1 million), general administration (approximately \$1.7 million), and plant maintenance and operations (approximately \$1.6 million). Functions define how a school spends its money. Texas Education Agency’s *Financial Accountability System Resource Guide (FASRG)* provides the following definitions for these expenditures:

- Instruction (11)—used for activities that deal directly with the interaction between teachers and students and includes expenses such as salaries and benefits for classroom teachers, teacher aides and assistants, instructional materials, field trips, etc.
- General administration (41)—used for purposes of managing or governing the nonprofit charter school and includes costs such as expenses for the

EXHIBIT 3-1
EDUCATIONAL LEADERSHIP, INC. – COMPARATIVE FINANCIAL STATEMENTS
FISCAL YEARS ENDED AUGUST 31, 2011 AND 2010

		TOTALS	
		2011	2010
REVENUES			
Local Support			
5740	Other revenues from local sources	\$521,005	\$678,506
5750	Revenue from co-curricular or enterprising	\$11,863	\$8,924
	Total local support	\$532,868	\$687,430
State program revenues			
5810	Foundation school program act revenues	\$24,604,288	\$22,345,127
5820	State program revenues distributed by Texas Education Agency	\$134,669	\$126,461
	Total state program revenue	\$24,738,957	\$22,471,588
Federal program revenues			
5920	Federal revenues distributed by the Texas Education Agency	\$1,881,261	\$1,662,960
Net assets released from restrictions			
	Restricted satisfied by payments	\$0	\$0
	Total Revenues	\$27,153,086	\$24,821,978
EXPENSES			
11	Instruction	\$20,053,583	\$17,325,321
12	Instructional resources and media services	\$44,186	\$0
13	Curriculum development and instructional staff development	\$136,113	\$0
21	Instructional leadership	\$0	\$29,223
23	School leadership	\$1,511,592	\$953,989
31	Guidance, counseling and evaluation services	\$1,334,247	\$1,196,479
33	Health services	\$15,603	\$13,119
34	Student (pupil) transportation	\$13,999	\$19,753
35	Food services	\$456,926	\$486,916
36	Extracurricular activities	\$1,925	\$0
41	General administration	\$1,686,180	\$1,329,694
51	Plant maintenance and operations	\$1,574,891	\$979,095
52	Security and monitoring services	\$9,857	\$6,793
53	Data processing services	\$511,666	\$302,471
71	Debt services	\$27,523	\$18,985
	Total Expenses	\$27,378,291	\$22,661,838
	Change in Net Assets	(\$225,205)	\$2,160,140
	Beginning net assets	\$4,318,772	\$2,158,632
	Ending Net Assets	\$4,093,567	\$4,318,772

SOURCE: Southwest Schools Annual Financial Report, 2010 and 2011.

board of directors, salaries and benefits related to the administration, and bonding of administrative personnel.

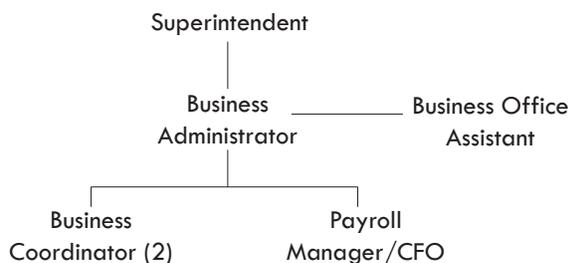
- Plant maintenance and operations (51)—used for activities to keep the facilities and grounds open, clean, comfortable and in effective working condition and repair.

The financial statements for Southwest Schools were prepared in accordance with Generally Accepted Accounting Procedures (GAAP). Southwest Schools, as a nonprofit corporation, is governed in accordance with accounting established by the Financial Accounting Standards Board (FASB). The FASB is the accepted standard setting body for establishing nonprofit accounting and financial reporting principles.

Southwest Schools is audited annually by an external auditor, Belt Harris Pechacek, LLLP Certified Public Accountants of Houston Texas. The school's latest audit report indicated an unqualified opinion that the Southwest Schools financial statements are an accurate representation of the charter school's financial condition. The budget and financial statements are prepared in the business office. The business and finance functions include accounting and purchasing and are under the supervision and oversight of the Business Administrator. The Business Administrator has four direct reports, including the Business Office Assistant, two Business Coordinators, and the Payroll Manager/Chief Financial Officer (CFO).

Exhibit 3–2 provides an overview of the organization of the business services functions.

EXHIBIT 3–2
SOUTHWEST SCHOOLS BUSINESS SERVICES
ORGANIZATION
SCHOOL YEAR 2011–12



SOURCE: Southwest Schools Business Office, 2012.

FINDINGS

- ◆ The organizational structure of the business office does not adequately support efficient and effective operations.
- ◆ Southwest Schools has not adopted policies and procedures for critical accounting functions and processes.
- ◆ Southwest Schools prepares a detailed budget, but does not post the Board of Directors-approved budget on its website.
- ◆ Southwest Schools has a decentralized contracting process and lacks written guidelines for effective contract management.
- ◆ Southwest Schools does not adequately manage the list of vendors approved for purchasing activities.
- ◆ Southwest Schools lacks adequate internal controls for certain financial transactions.
- ◆ Southwest Schools lacks a process for internal funds cash collection at the campus level.

RECOMMENDATIONS

- ◆ **Recommendation 8: Regularly review all business office positions to ensure responsibilities are consistent with the roles of those positions and align with organizational best practices.**
- ◆ **Recommendation 9: Update policies and develop written procedures for critical business and accounting processes and activities.**
- ◆ **Recommendation 10: Post the adopted budget and improve the type of financial information provided on the website so that the charter school's financial position and priorities are communicated more clearly and concisely.**
- ◆ **Recommendation 11: Develop written guidelines for centralized contract management.**
- ◆ **Recommendation 12: Analyze and update the vendor listing to ensure an accurate listing of valid vendors.**
- ◆ **Recommendation 13: Evaluate internal controls over key business processes.**

- ◆ **Recommendation 14: Develop a standardized process for cash collection at the campus level.**

DETAILED FINDINGS

BUSINESS OFFICE STRUCTURE (REC. 8)

The organizational structure of the business office does not adequately support efficient and effective operations. At the time of the review, in May 2012, several issues were noted by the review team, including:

- A difference between the organizational chart and the actual reporting structure in the business office;
- Use of inconsistent roles and titles within the business office;
- Lack of alignment in the business office reporting structure;
- Possible misclassification of positions within the business office; and
- Potential conflict in reporting relationships within the business office.

The organizational structure of the business office as reported to the review team does not align with the overall organizational chart posted on its website. As reported to the review team, the positions in the business office are a Business Administrator, two Business Coordinator positions, a Payroll Manager/CFO and Business Office Assistant as shown in **Exhibit 3–2**. However, the Payroll Manager/CFO position does not appear on the overall organizational chart. Instead, the organizational chart shows an Accounting Manager position in lieu of the Payroll Manager/CFO position.

The Payroll Manager/CFO position description does not support the most efficient reporting structure and does not align with organizational best practices. For example, the duties of the position, as reported to the review team, do not align with the typical responsibilities of a CFO position. Interviews with the review team indicate that the authorization of all payments occurs at the Payroll Manager/CFO. In this case, the duties assigned to this position are aligned with an administrator/school officer position, not a general business office position.

The reporting structure for the Payroll Manager/CFO position, which is at a lower-level of the reporting structure in the business office, does not align with the typical reporting structure for a CFO position. In most cases, a CFO position would be chief administrator/school officer of the business

office. However, according to the organizational chart, the Payroll Manager/CFO position reports to the Business Administrator.

The Payroll Manager/CFO position is not reported on the Annual Governance Reporting Forms for Open-Enrollment Charter Schools submitted to the Texas Education Agency (TEA). The forms are required for three types of individuals within all open-enrollment charter schools: (1) members of the governing body of the charter holder/sponsoring entity; (2) members of the governing body of the charter school; and (3) school officers. As defined on the form, school officers include the superintendent/CEO or other chief operating officer, assistant superintendent, principal, assistant principal, and the person charged with managing the finances of an open-enrollment charter school. As specified by the title of the position, the Payroll Manager/CFO may be considered a school officer as defined by the Annual Governance Reporting form.

The reporting relationship between the Payroll Manager/CFO and the Founder/CEO may not be consistent with state rules and regulations. During onsite work in May 2012, it was reported that the Payroll Manager/CFO is the spouse of the Founder/CEO. Nepotism laws are defined in Texas Government Code, Chapter 573 and Texas Local Government Code Section 171.003–171.007 and prohibit a public official from appointing, confirming the appointment of, or voting on the appointment of a close relative to a paid public position. Close relatives include someone who is related within a prohibited degree by birth (i.e., consanguinity or relationship by blood) or by marriage (i.e., affinity). Under Texas Education Code Section 12.1012, a chief operating officer of an open-enrollment charter school is considered a public official. Charter schools that have received a satisfactory rating (above Academically Unacceptable) for at least two of the preceding three school years are exempt from these nepotism laws. However, Southwest Schools has received Academically Unacceptable ratings as a charter school for three consecutive school years, 2008–09 to 2010–11 which may negate the nepotism exemption.

Following onsite work by the review team, central office staff indicated that the Payroll Manager/CFO position resigned from Southwest Schools in late June 2012. Instead of filling the position, the charter school eliminated the Payroll Manager/CFO position and distributed the position's responsibilities to other business office staff. For example, central office staff indicated that authorization of all payments now occurs with the Business Administrator.

Southwest Schools should regularly review all business office positions to ensure responsibilities are consistent with the roles of those positions and align with organizational best practices. The charter school should ensure that its business office is efficiently organized and tasks are assigned appropriately to maximize organizational effectiveness. As the needs of the organization change and business office positions are added or deleted, ensuring appropriate alignment with the existing positions is a key component of the department's effectiveness. Additionally, the charter school should consider the relationships of all school officers, administrative positions, or positions with responsibilities at the administrative level, and consider the nepotism laws when developing its organizational structure.

This recommendation can be implemented with existing resources.

ACCOUNTING POLICY AND PROCEDURES (REC. 9)

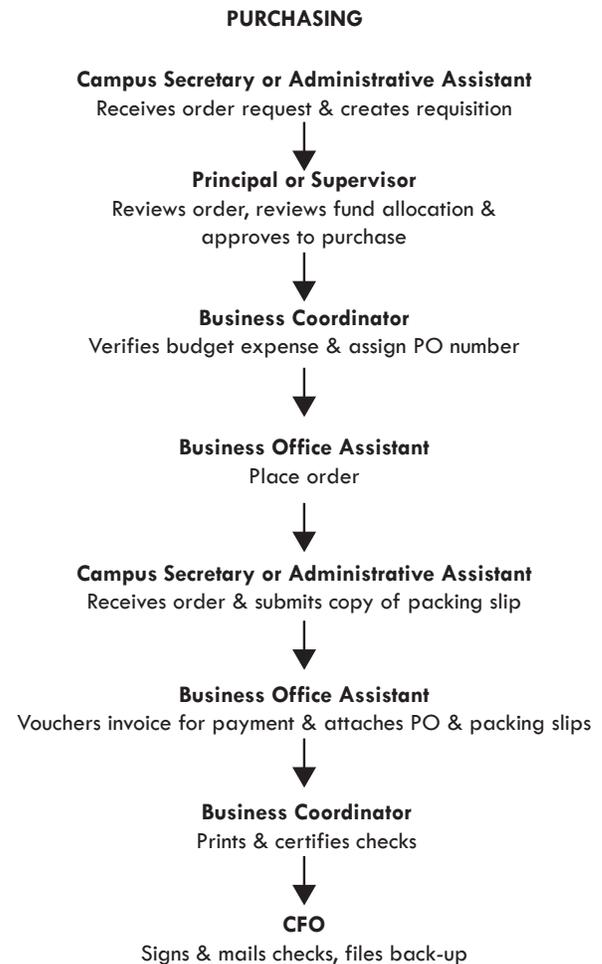
Southwest Schools has not adopted policies and procedures for critical accounting functions and processes. During interviews with the review team, business office staff indicated that the charter school uses the Enterprise Information System of Texas Schools (TxEIS) as general guidelines for financial accounting and reporting functions. General procedures for transactions, including accounts receivable, asset management, budget, and finance, are established by TxEIS. Business office staff then customize the TxEIS procedures for internal processing when necessary. For example, the Business Administrator recently reorganized the business office and updated impacted functional processes to reflect the current duties and responsibilities.

Exhibits 3–3 and 3–4 show flowcharts of Southwest Schools' processes for purchasing and payroll.

These flowcharts are valuable in showing the steps in the process, but lack detailed information regarding each unique position. As indicated by interviews with the review team, much of the day-to-day functions are performed from procedures included in TxEIS. Critical functional knowledge of specific positions, however, has not been documented in the form of procedures.

Moreover, the review team noted that business office staff use verbal communication and various forms as guidance and documentation for procedures. In some instances, the form is included in or procedures are described on the form. Although a component of comprehensive procedures,

EXHIBIT 3–3 SOUTHWEST SCHOOLS PURCHASING FLOWCHART



SOURCE: Southwest Schools Business Office.

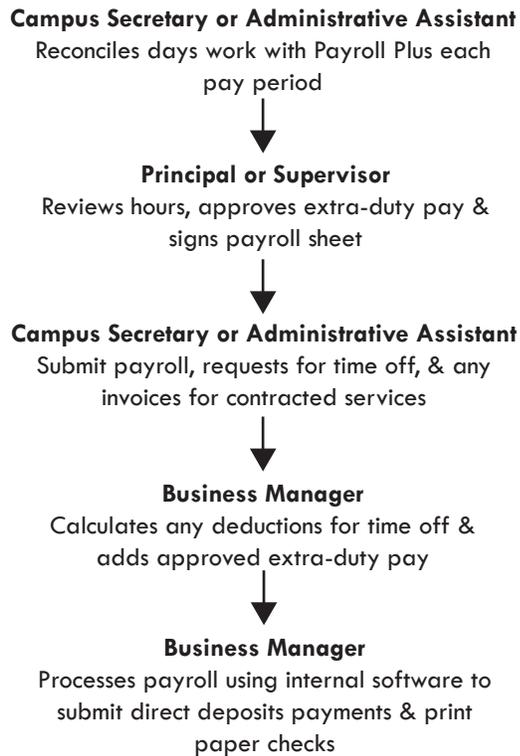
individual forms are no substitute for a current and documented procedures manual.

Further, while the charter school has developed certain financial policies, interviews with the review team indicate that those policies have not been updated since about 1999. In addition, a review of policies indicates that Southwest Schools lacks current policies for critical business functions such as:

- investments;
- budget;
- payroll; and
- purchasing.

EXHIBIT 3-4
SOUTHWEST SCHOOLS
PAYROLL FLOWCHART

PAYROLL PROCESSING



SOURCE: Southwest Schools Business Office.

Written policies and procedures are key components of a strong system of internal control. Knowledge of critical business processes will be lost if it is not documented while experienced employees are still employed by the charter school. Written procedures are critical to ensuring that accounting and finance operations are executed correctly and timely.

Written procedures are critical components of institutional memory and continuity. Effective written procedures are an important component of internal control because they provide:

- a permanent record of critical functions and processes;
- directions for performing critical departmental tasks;
- a reference for existing employees;
- a training tool for new employees; and

- uniformity and continuity of transaction processing when regular employees are unavailable and tasks must be performed by individuals not familiar with the processes.

The Texas Education Agency provides a *Special Supplement to the Financial Accountability System Resource Guide (FASRG) for Charter Schools* which provides very detailed guidance on requirements specific to charter schools. Section 1.5.5, entitled “Accounting Policies and Procedures,” discusses policies and procedures as critical elements of a strong system of internal control. **Exhibit 3-5** compares the FASRG for Charter Schools-recommended components for accounting procedures with the Southwest Schools accounting procedures provided to the review team.

As shown in **Exhibit 3-5**, Southwest Schools has not addressed or has limited procedures for many of the FASRG for charters-recommended areas. Without clearly defined policies and procedures in this area, the charter school is less likely to ensure that accounting functions are consistent with state and federal laws, rules, and regulations. Additionally, a strong system of internal control is more difficult to achieve without well-documented policies and procedures.

At the time of the review, the Business Administrator was facilitating a contract for model policies from the Texas Charter Schools Association (TCSA). The TCSA model board policies for charter schools “is a series of publications by the Texas Charter Schools Association” that serve as an “educational tool for charter school leaders to aid in the operation and management of open-enrollment charter schools in Texas.” The table of contents for the financial operation module includes the following topics:

- Annual Operating Budget (Legal Authority);
- Use of State Funds;
- State Fiscal Compliance;
- Federal Fiscal Compliance;
- Cash Management and Credit Card Procedures;
- Capital Assets;
- Investment of State Funds (Legal Authority);
- Payroll;
- Property; and
- Purchasing and Contracting.

**EXHIBIT 3–5
TEXAS EDUCATION AGENCY SUGGESTED ITEMS FOR CHARTER SCHOOL ACCOUNTING PROCEDURES COMPARED TO
SOUTHWEST SCHOOL DOCUMENTS**

FASRG FOR CHARTER SCHOOLS RECOMMENDED ITEMS	SOUTHWEST SCHOOLS ACCOUNTING PROCEDURES
The budgeting process including preparation, amendment, and board approval;	present
The accounting reports prepared for management and the governing body of the charter school;	present
The review and approval of the annual financial and compliance report by the governing body of the charter school;	present
The issuance and appropriate use of credit and/or debit cards including the reimbursement process and approval of expenditures;	not addressed
The control and confidentiality of accounting, business, contractual, financial, legal, operating, payroll, personnel, and program records;	limited
The release of accounting, business, contractual, financial, legal, operating, payroll, personnel, and program records to the general public pursuant to open records statutes;	present
The data and/or reports needed to ensure that state and federal reporting requirements are met (e.g., PEIMS, Single Audit, expenditure reports);	limited
The duties performed by administrative and/or business office personnel with particular emphasis on the segregation of key responsibilities and duties;	limited
The individuals authorized to initiate, approve, and record transactions;	present
The procedures to be followed for the different accounting, business, contractual, financial, legal, operating, payroll, personnel, and programmatic transactions conducted on behalf of the charter school by employees of the charter school, the charter holder, and/or affiliates of the charter holder;	limited
The charter school's chart of accounts with particular emphasis on compliance with and accurate use of the account codes discussed in the Special Supplement To Financial Accounting and Reporting;	limited
The charter school's purchasing functions with an emphasis on compliance with state and federal statutes and regulations; and	present
The types of documents (e.g., purchase requisition, purchase order, invoice, receipt, utility billing statement) required for the disbursement of funds.	limited

SOURCE: Texas Education Agency's Special Supplement to the Financial Accountability System Resource Guide for Charter Schools, 2012, assessment by Review Team.

Southwest Schools should update policies and develop written procedures for critical business, and accounting processes and activities. The development of policies and procedures can be addressed through an organized, systemic approach. Critical processes should be identified and placed on a schedule showing when procedures for that function will be documented. The superintendent should instruct employees responsible for critical processes to document the steps incrementally while they are being performed during the normal work routine. It would not be necessary to complete all of the procedures in one work session. The procedures could be documented in as many sessions as required consistent with the established schedule.

The superintendent should assign the Business Administrator to follow through the policy updating process and subsequent policy implementation. In conjunction with the policies, specific procedures should be documented, including desk

procedures unique to each position. After proper communication and board approval, the Business Administrator should ensure implementation and documentation of the guidance system. A systemic schedule of monitoring and updating should be established and followed.

The fiscal impact assumes that since Southwest Schools had begun facilitating a contract for model policies from TCSA at the time of the review, no additional costs would result from this recommendation.

BUDGET DOCUMENT (REC. 10)

Southwest Schools prepares a detailed budget, but does not post the board-approved budget on its website. According to documents submitted to the review team, the adopted budget document for Southwest Schools, marked "confidential," includes detailed financial information and

reflects the various service delivery models used by the charter school. For example, the adopted budget provides detailed information on revenues and expenditures for the multiple campuses served by Southwest Schools. **Exhibit 3–6** shows the general format of Southwest Schools’ board-approved budget document.

While not directly shown on the sample budget provided in **Exhibit 3–6**, Southwest Schools’ internal, approved budget document reflects comprehensive financial information about the operations of the charter school. Detailed information is included for all campuses in the charter school– the high school, middle school, two elementary campuses, seven residential treatment centers (the Phoenix School), and Young Learners School. Further, the internal budget document shows thorough account descriptions under both Entitlements & Revenues in addition to Disbursements & Expenditures.

However, Southwest Schools does not include on its website a budget document that adequately communicates the financial details of the school’s budget. At the time of the review, the only budget information provided on the charter school’s website was information from the Texas Education Agency Academic Excellence Indicator System (AEIS) 2010–11 District Profile, which includes revenues and expenditures information for Southwest Schools, as well as state level information. Nonetheless, this financial information does not explain the details of the functions or readily identify changes from previous years. **Exhibit 3–7** shows Southwest Schools financial information that was included in the Department Accountability Section of the charter school’s website.

In addition, Texas Education Code (TEC), Section 39.084 requires charter schools and ISDs to post the adopted budget on the district’s website for three years from the adoption of the budget. TEC, Section 39.084 further states that “the

district’s Internet website must prominently display the electronic link to the adopted budget.” The information provided on the Southwest Schools’ website does not appear to be consistent with the TEC requirements.

Consequently, Southwest Schools is missing an opportunity to enhance its image in the community by demonstrating a commitment to financial accountability, transparency, and stewardship. The charter school’s website lacks financial and budgetary information in a format that readily communicates the budget story through the use of graphs, charts, analyses, and financial assumptions for the charter school’s priorities. There is no discussion of financial or budget goals, priorities, or objectives in the online financial documents. Someone unfamiliar with school accounting and finances will not fully understand the meaning of the school’s financial situation or have knowledge of the adopted budget. Users not somewhat familiar with school finances could become confused or misinterpret the data.

IDEA Public Schools, a charter school operator with approximately 20 campuses across multiple communities in Texas, provides a financial report card as a component of its annual report which is posted on its website. The financial report card includes the operator’s financial position (i.e., assets, liabilities and net assets), revenues, and expenses in addition to an expense analysis chart showing the charter’s expenditures. The expense analysis chart shows expenditures by categories including personnel, instruction and curriculum, campus administration, general administration and debt service. The information provided in the financial report card helps the charter operator communicate its financial details to a larger audience.

Southwest Schools could use the model provided by IDEA Public Schools to improve its budget document. For example, Southwest Schools could significantly improve the budget document by summarizing its budgeted use of funds for

**EXHIBIT 3–6
SOUTHWEST SCHOOLS’ BOARD-APPROVED BUDGET DOCUMENT –SAMPLE
SCHOOL YEAR 2011–12**

ACCOUNT ID	ACCOUNT DESCRIPTION	SOUTHWEST HIGH SCHOOL	SOUTHWEST JUNIOR HIGH	THREE OAKS ACADEMY	ARCHWAY ACADEMY
Entitlements & Revenues					
xxxxxx	High School Allotment	\$XXXX	\$XXXX	\$XXXX	\$XXXX
xxxxxx	ADA Entitlements – Regular	\$XXX	\$XXX	\$XXX	\$XXX
Disbursements & Expenditures					
xxxxxxx	Salaries – Teachers/Regular	\$XXXXXX	\$XXXXXX	\$XXXXXX	\$XXXXXX

SOURCE: “Confidential” Southwest Schools Adopted Budget Document; Created by the Review Team, 2012.

EXHIBIT 3–7
SOUTHWEST SCHOOLS ACADEMIC EXCELLENCE INDICATOR SYSTEM (AEIS)
SCHOOL YEAR 2010–11 DISTRICT PROFILE

	SOUTHWEST SCHOOLS						STATE		
	GENERAL FUND	PERCENT	PER STUDENT	ALL FUNDS	PERCENT	PER STUDENT	ALL FUNDS	PERCENT	PER STUDENT
By Source									
Total Revenue									
Local Tax	\$23,057,020	100.0%	\$6,415	\$24,821,977	100.0%	\$6,907	\$49,825,397,308	100.0%	\$10,328
Other Local and Intermediate	\$0	0.0%	\$0	\$0	0.0%	\$0	\$20,702,046,899	41.5%	\$4,291
State +	\$573,938	2.5%	\$160	\$687,429	2.8%	\$191	\$2,065,867,106	4.1%	\$428
Federal	\$22,483,082	97.5%	\$6,256	\$22,613,649	91.1%	\$6,292	\$21,076,094,948	42.3%	\$4,369
	\$0	0.0%	\$0	\$1,520,899	6.1%	\$423	\$5,981,388,355	12.0%	\$1,240
By Function (Objects 6100-6400 only)									
Total Operating Expenditures	\$20,703,396	100.0%	\$5,761	\$22,642,852	100.0%	\$6,300	\$42,460,965,540	100.0%	\$8,802
Instruction (11, 95)	\$16,368,991	79.1%	\$4,555	\$17,325,323	76.5%	\$4,821	\$24,805,113,325	58.4%	\$5,142
Instructional –Related Services (12, 13)	\$0	0.0%	\$0	\$0	0%	\$0	\$1,520,261,151	3.6%	\$315
Instructional Leadership (21)	\$28,658	0.1%	\$8	\$29,223	0.1%	\$8	\$633,472,153	1.5%	\$131
School Leadership (23)	\$854,017	4.1%	\$238	\$953,982	4.2%	\$265	\$2,350,497,427	5.5%	\$497
Support Services-Student (31, 32, 33)	\$816,934	3.9%	\$227	\$1,209,601	5.3%	\$337	\$2,031,024,489	4.8%	\$421
Student Transportation (34)	\$19,752	0.1%	\$5	\$19,752	0.1%	\$5	\$1,156,289,200	2.7%	\$240
Food Services (35)	\$17,042	0.1%	\$5	\$486,914	2.2%	\$135	\$2,223,522,112	5.2%	\$461
Co-curricular Activities (36)	\$0	0.0%	\$0	\$0	0%	\$0	\$1,115,331,069	2.6%	\$231
Central Administration (41, 92)	\$1,329,696	6.4%	\$370	\$1,329,696	5.9%	\$370	\$1,299,666,358	3.1%	\$269
Plant Maintenance and Operations (51)	\$979,097	4.7%	\$272	\$979,097	4.3%	\$272	\$4,405,080,294	10.4%	\$913
Security and Monitoring Services (52)	\$6,793	0.0%	\$2	\$6,793	0%	\$2	\$327,376,988	0.8%	\$68
Data Processing Services (53)	\$282,416	1.4%	\$79	\$302,471	1.3%	\$84	\$593,331,074	1.4%	\$123

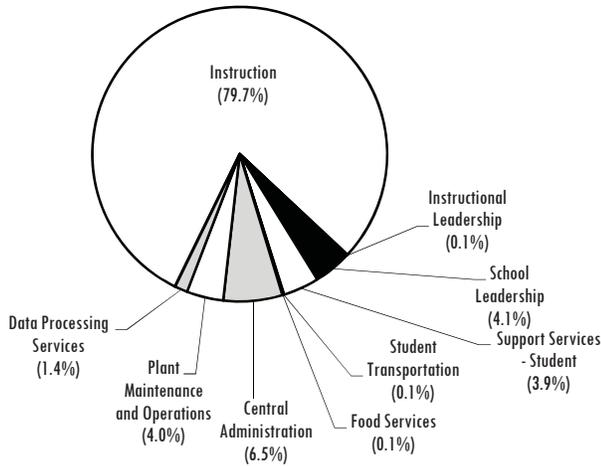
NOTE: Academic Excellence Indicator System (AEIS) data and Annual Financial Report data may vary due to the timing of data collection.
SOURCE: Southwest Schools Website, July 2012.

planned priorities. **Exhibit 3–8** presents an example of a chart that could be used to graphically show how the school plans to spend its funds. As the chart shows, Southwest Schools uses the majority (79.1 percent) of its funds on instruction.

Southwest Schools should post the adopted budget and improve the type of financial information provided on its website so that the charter school's financial position and priorities are communicated more clearly and concisely. The

Business Administrator should work with the Business Coordinators to compile budget and finance information from the TxEIS reporting system and its board-approved adopted budget and develop charts and graphs to more effectively communicate its budget. The documents should clearly show the planned use of funds and include information to provide more insight such as charts, written analysis, and summaries. The superintendent should ensure that more detailed budget and finance documents are posted on the school's website to improve transparency and accountability.

**EXHIBIT 3–8
BEST PRACTICE BUDGET SUMMARY**



SOURCE: Developed by the Review Team, June 2012.

This recommendation can be implemented with existing resources.

CONTRACT MANAGEMENT (REC. 11)

Southwest Schools has a decentralized contracting process and lacks written guidelines for effective contract

management. During interviews with the review team, business office staff indicated that contracts are managed at the point of origination and are monitored by the position responsible for the contract performance. Thus, contracts are administered and monitored individually rather than at a central location and employees using contracted goods or services manage their respective contracts. For instance, the position responsible for the curriculum and instructional area monitors curriculum- and instruction-related contracts while the business office monitors finance-related contracts. As a result, Southwest Schools lacks a comprehensive list of contracts as well as a central location to file contract documentation.

Exhibit 3–9 shows examples of contracts and the reported school contact.

As shown in **Exhibit 3–9**, multiple individuals are listed as contacts for contracted services. This type of reporting system leads to a decentralized contracting process which makes coordination and control of contracts more onerous and less effective.

Further, Southwest Schools does not have a systemic methodology to monitor contract performance to ensure contract provisions are met. A review of documents also

**EXHIBIT 3–9
CONTRACT EXAMPLES AT SOUTHWEST SCHOOL**

SERVICE	NAME	SOUTHWEST SCHOOLS CONTACT
Space and Related Infrastructure	Carter’s Kids	CEO
Space and Related Infrastructure	Archway Academy	CEO
Space and Related Infrastructure	Center for Success and Independence	CEO
Space and Related Infrastructure	Boys and Girls Harbor	CEO
Space and Related Infrastructure	Unlimited Visions	CEO
Space and Related Infrastructure	Memorial Hermann Hospital System	CEO
TxEIS Support Services	Region 4 Service Center	Superintendent
Professional Development	Region 4 Service Center	Instructional Liaison
Safe Schools Project	Region 4 Service Center	HR Administrator
Professional Development	Region 4 Service Center	Dean of Instruction
Professional Development	Region 4 Service Center	Executive Director of Special Education
Professional Development	Region 4 Service Center	Principal Mercado-Garza
Professional Development	Region 4 Service Center	Executive Director of Special Education
Professional Development	Region 4 Services Center	Interim Principal Sailors
Accounting	Robert Lee, Consultant	Business Administrator
Auditing	Belt, Harris, Pechacek	Business Administrator
Legal	Thompson and Horton	CEO or Superintendent

SOURCE: Southwest Schools business office, May 2012.

indicates that Southwest Schools does not have written procedures for developing contractor work plans or schedules, conducting inspections, or reviewing vendor contractual expectations. As a result, the charter school cannot ensure that contractors/vendors are providing all of the services promised on a timely and efficient basis which makes it difficult to enforce contract terms and conditions.

Exhibit 3–10 shows the total value of contracted services for Southwest Schools for school years 2008–09 to 2010–11. The exhibit shows an overall trend of the charter school spending more in contracted services during the three-year period and that expenditures more than doubled from school year 2009–10 to 2010–11.

Contract management includes developing, managing and monitoring contracts. Effective contract monitoring helps ensure that vendors fulfill all contractual obligations on a timely basis with the delivery of expected outcomes. Effective contracts include measures and deliverables that provide for expected outcomes such as:

- deliverables;
- deliverable completion dates;
- schedule of vendor invoices and payments;
- dispute resolution;
- insurance requirements; and
- common vocabulary of terms and conditions.

Centralized contract management helps ensure a consistently applied monitoring process and increased control of

expenditures. Terms, conditions and payment schedules can be routinely monitored centrally by personnel trained in contracts management. Such monitoring provides an added level of control of the contracting process.

Southwest Schools should develop written guidelines for centralized contract management. The superintendent should work with the Business Administrator to establish a contracts management procedure. The Business Administrator should identify all contracts and compile into a master file documenting the pertinent information such as contract period, contracted services, contract contact(s), contract price, and renewal provision. The Business Administrator should develop written guidelines for developing, managing, and monitoring contracts.

This recommendation can be implemented with existing resources.

PURCHASING MANAGEMENT OF VENDOR LISTS (REC. 12)

Southwest Schools does not adequately manage the list of vendors approved for purchasing activities. Purchasing controls rely on the management of the vendor list to help ensure vendors and related vendor information is valid and accurate to ensure the integrity of the Southwest Schools purchasing function. The finance component of the TxEIS provides a section on vendors that includes:

- vendor labels;
- vendor list; and
- vendor W9 reference listing.

EXHIBIT 3–10 SOUTHWEST SCHOOLS ACTUAL EXPENDITURES –PROFESSIONAL AND CONTRACTED SERVICES SCHOOL YEARS 2008–09 TO 2010–11

EXPENDITURE TYPE	OBJECT CODE	2008–09	2009–10	2010–11
Legal Services	6211	\$20,347	\$40,336	\$76,521
Audit Services	6212	\$0	\$11,050	\$10,600
Professional Services	6219	\$8,733,038	\$7,502,098	\$16,451,651
Staff Tuition and Fees	6221	\$3,000	\$0	\$0
Education Service Center Services	6239	\$38,426	\$15,616	\$62,796
Contracted Maintenance and Repair	6249	\$237,620	\$88,184	\$242,264
Utilities	6259	\$280,637	\$353,722	\$251,980
Rentals - Operating Leases	6269	\$729,571	\$737,475	\$1,089,078
Miscellaneous Contracted Services	6299	\$5,041	\$15,153	\$20,847
Total		\$10,047,680	\$8,763,634	\$18,205,737

SOURCE: Texas Education Agency, Public Education Information Management System (PEIMS), school years 2008–09 to 2010–11.

The vendor list, however, includes inactive vendors. Interviews indicate that vendors are not removed from the vendor list because some vendors are not consistently used. For instance, Scholastic reportedly had not been used for two or three years until school year 2011–12.

Purchasing controls rely on the accuracy of vendor management to help ensure vendors are valid, and adequate contracts management to help ensure appropriate expenditure of funds for contracted goods or services. Proper vendor management is important to maintain a system of internal control. Such control, over the vendor list and, the ability to add vendors or change addresses, is especially important in a small school where distinct segregation of duties can be difficult.

The Business Administrator should analyze and update the vendor listing to ensure an accurate listing of valid vendors. The Business Administrator should establish a schedule to periodically purge the vendor list of stale vendors and update the list with current vendor contact information. The superintendent should ensure that authority to change the vendor list is restricted and changes are documented to help assure internal control.

This recommendation can be implemented with existing resources.

INTERNAL CONTROLS (REC. 13)

Southwest Schools lacks adequate internal controls for certain financial transactions. A proper segregation of duties can be challenging for small schools with limited staff. Employees perform multiple tasks, and in many cases, serve as back up for several functional areas. As such, employee duties overlap.

An area of concern is that all controls regarding accounts payable disbursements reside with one position. During interviews with the review team, it was reported that the Business Administrator has access to add vendors, print checks, and sign checks. There is some segregation of duties in the business office that allows more than one employee to authorize vendors. Control over authorization of vendors is an important step in the purchasing control process. Although Southwest Schools' computer log provides a compensating control that could establish responsibility for transactions, timely detection must be considered. Further, interviews with the review team indicated a concern with the payment approval process. Authorization of payments occurs

at the Payroll Manager/Chief Financial Officer (CFO) who is the spouse of the Founder/CEO.

Following onsite work by the review team, central office staff indicated they had made some changes regarding internal controls. For example, the Payroll Manager/CFO position resigned from Southwest Schools in late June 2012 and authorization of all payments was delegated to the Business Administrator. Additionally, the charter school reported that the Business Administrator position does not have access to TxEIS, the business system, and has other positions within the business office run reports from this system. However, the potential for internal control issues extends to all staff within the business office.

A proper segregation of duties is a critical component of internal control because it ensures that no one person has complete access to a process or function that would allow them to both perpetuate and conceal improper activities. Accounts payable functions are controlled with separation between the authorizations of new vendors and check preparation and approval. Controls for segregation of duties are imperative for prudent management of financial transactions.

In 1992, the Committee of Sponsoring Organizations of the Treadway Commission (COSO) issued *Internal Control – Integrated Framework (Framework)* to help businesses and other entities assess and enhance their internal control systems. The *Framework* consists of the following five components:

- risk assessment—is the identification and analysis of relevant risks to achievement of the school's objectives. All organizations face a variety of risks from external and internal sources;
- control activities—are policies and procedures that help ensure management directives are carried out and include a range of activities such as approvals, authorizations, verifications, reconciliations, reviews of operating performance, security of assets, and segregation of duties;
- control environment—sets the tone of the organization and influences the control consciousness of its people and includes factors such as integrity, ethical values, management's philosophy and attention of the Board;
- information and communication—is a framework communicated in a form and timeframe that enables

people to carry out their responsibilities and includes internal and external stakeholders; and

- monitoring—assesses the quality of performance over time.
- Determining whether an organization's internal controls are effective involves judgment resulting from an assessment of whether the five components are present and functioning effectively without material weakness.

Southwest Schools should evaluate its internal controls over key business processes. Following onsite work in May 2012, central office staff reported that the business office has experienced changes in both the organizational structure and staff responsibilities. While some changes may have enhanced internal control issues, the charter school should examine business processes to determine areas for continued improvement. The Business Administrator could use the COSO best practice framework as a baseline for evaluating and improving the existing internal control structure. The Business Administrator should work with business office staff to correct weaknesses in internal controls, such as in the area of segregation of duties. Authorization of vendors should be controlled with changes documented and reviewed by an independent third party. The business office should adapt the *Framework* to its circumstances and continually monitor adherence to the five components as the school's internal control environment changes and evolves.

This recommendation can be implemented with existing resources.

CASH MANAGEMENT (REC. 14)

Southwest Schools lacks a process for internal funds cash collection at the campus level. Information provided to the review team indicates that the charter school has adopted a procedure for cash deposits at the business office level. **Exhibit 3–11** shows a flowchart of Southwest Schools' processes for cash deposits.

However, interviews with the review team indicate that campuses did not use a similar process for internal funds cash collections. Business office staff noted that no transfer receipt is used for cash collection between the schools and business office. Collections from student activities and fundraisers are counted at the schools and brought to the business office in an envelope. In some instances, school staff reported they just leave the envelope without documentation of the transfer of funds.

EXHIBIT 3–11 SOUTHWEST SCHOOLS CASH DEPOSITS FLOWCHART



SOURCE: Southwest Schools Business Office.

Cash collections, such as school internal funds, are more properly accounted for with a documented transfer of funds. Documentation ensures that cash has been properly accounted and recorded at the business office. Additionally, documentation provides a safeguard in the system.

Southwest Schools should develop a standardized process for cash collection at the campus level. The Business Administrator should consider a process similar to the cash deposits flowchart used by the charter school at the business office level. As a component of the process, the Business Administrator should develop a standardized form for cash collection and require use of the form prior to cash submission to the business office. Development of a system will ensure documentation of cash collections with detailed transfer receipts.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2013-14	2014-15	2015-16	2016-17	2017-18	TOTAL	ONE TIME
						5-YEAR (COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 3: FINANCIAL MANAGEMENT							
8. Regularly review all business office positions to ensure responsibilities are consistent with the roles of those positions and align with organizational best practices.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9. Update policies and develop written procedures for critical business and accounting processes and activities.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
10. Post the adopted budget and improve the type of financial information provided on the website so that the charter school's financial position and priorities are communicated more clearly and concisely.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11. Develop written guidelines for centralized contract management.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12. Analyze and update the vendor listing to ensure an accurate listing of valid vendors.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13. Evaluate internal controls over key business processes.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14. Develop a standardized process for cash collection at the campus level.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS-CHAPTER 3	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 4

FACILITIES USE AND MANAGEMENT

SOUTHWEST SCHOOLS

CHAPTER 4. FACILITIES USE AND MANAGEMENT

Facility planning, use, and management represent significant activities and challenges for a charter school. It is important to understand that a charter school faces unique circumstances, which are different than an independent school district (ISD).

Planning and maintenance functions must be coordinated to ensure the facilities meet the needs of students and staff. The manner in which a school manages its facilities can have a significant effect on the educational programs of the school. Charter school facilities staff must manage its campus to generate a safe, productive, and clean environment to support the educational programs of the charter school. Indoor air quality and thermal comfort have been shown to improve concentration and learning. Clean facilities with attention to hazardous materials management help maintain a level of appreciation and respect for the buildings of a charter campus. Facilities that provide a visible energy conservation program promote staff and student involvement while ensuring opportunities to reduce costs.

An ongoing formal facilities assessment to evaluate exterior, interior, mechanical systems, and safety and building code compliance is an important part of an effective facilities management process. Custodial operations should provide for the general cleanliness and daily upkeep of facilities. Grounds operations ensure that the schoolyards are properly groomed and maintained. An energy management/conservation program should be implemented that is focused on monitoring energy costs and usage and developing energy conservation practices.

An article on the Iowa Association of School Boards (IASB) website provides an excellent summary of the significant benefits and contributions of school buildings to teaching and learning. Entitled *The Link Between Buildings and Learning*, the article addresses such issues as how facilities can contribute to the teaching and learning environment.

An excerpt from the IASB website states:

A school building is an important tool to support learning. Experts agree that school facilities should be designed to facilitate what we know today about providing the best possible education for all students.

Buildings Reflect the Education Program

Schools are being designed and remodeled to accommodate how educators want to deliver instruction to improve student learning. But current knowledge and research about learning call for new models of education that are characterized by more active student involvement. Students are doing rather than just receiving; creating rather than absorbing; they are thinking, working, and solving problems. They are supported by teaching strategies such as cooperative, project-based, and interdisciplinary learning. All require students to move about, work in various sized groups and be active.

Source: Iowa Association of School Boards, *The Link Between Buildings and Learning*, <http://www.ia-sb.org/>, August 2012.

Southwest Schools received approval from the State Board of Education to operate as an open-enrollment charter school in 1998 and was founded in school year 1999–2000. The Southwest Schools Administrative Building resides at 3333 Bering Drive, Houston, Texas. Southwest Schools has a high school, middle school, and two elementary campuses. In addition, the charter school provides educational services to residential treatment centers (RTCs) around the greater Houston area and pre-Kindergarten satellite campuses.

Southwest Schools campuses include:

- Southwest Middle School and High School;
- Southwest Elementary School (Bissonnet);
- Southwest Mangum Elementary School;
- The Phoenix School (seven RTCs); and
- Young Learners (pre-K campuses).

The Southwest Schools lease agreements and landlords are shown in **Exhibit 4–1**. The charter school's operating lease expenses for the past five years are reflected in **Exhibit 4–2**. As shown, operating lease expenses have increased since 2006–07 due to the addition of two campuses.

Each facility also provides a playground area for students to use. Based on observations, the playground areas at the elementary and middle school/high schools were all well-maintained, clean, fenced, safe, and in good condition.

**EXHIBIT 4-1
SOUTHWEST SCHOOLS LEASE AGREEMENTS
FISCAL YEAR 2011-12**

Southwest Elementary Bissonnet School
8440 Bissonnet St. Houston, TX 77074
Sublessor: HEB Grocery Company, LP
Landlord: Berke Gessner, LTD
Property Manager: Huntington Properties, Inc.

Southwest Elementary Mangum School
4515 Mangum Rd. Houston, TX 77092
Landlord: Mangum Educational Center, LP

Southwest Middle/High School
6400 Southwest Freeway, Houston, TX 77074
Landlord: 6400 Southwest Freeway Ltd.

Southwest Middle/High School
6400 Westpark Dr. Houston, TX 77067
Landlord: SWCC Westpark, LP
Property Manager: SWCC Westpark Management, LLC.
SOURCE: Southwest Schools Lease Agreements, May 2012.

**EXHIBIT 4-2
SOUTHWEST SCHOOLS - FIVE-YEAR OPERATING LEASE
COSTS
FISCAL YEARS 2006-07 TO 2010-11**

FISCAL YEAR	OPERATING LEASE EXPENSE	CAMPUSES	PERCENTAGE INCREASE FROM PREVIOUS YEAR
2006-07	\$410,570	1	N/A
2007-08	\$446,075	1	8.6%
2008-09	\$609,161	2	36.6%
2009-10	\$605,510	2	-0.6%
2010-11	\$929,947	3	53.6%

SOURCE: Texas Association of School Business Officials, Research & Technology Department, May 2012.

Exhibit 4-3 shows the charter school’s buildings, square feet, and enrollment versus capacity for Southwest Schools.

Based on student capacity and current student enrollment figures provided by Southwest Schools, it would appear that Bissonnet Elementary is the campus closest to its capacity. The middle/high school is approaching its capacity prior to moving to its new facility in August 2012.

ACCOMPLISHMENTS

- ◆ Southwest Schools has taken an active role in providing a formal facilities master planning process for all of its campuses.
- ◆ Southwest Schools encourages its students to take an active role in taking care of school facilities.

FINDINGS

- ◆ Southwest Schools lacks a centralized facilities management structure.
- ◆ Southwest Schools’ campus sites do not have a hazardous materials management plan.
- ◆ Southwest Schools’ campus sites have no formal plan or written guidelines for maintaining acceptable levels of indoor air quality (IAQ).
- ◆ Southwest Schools lacks instructions with site-maps for emergency utility shut-offs should an emergency require immediate action.
- ◆ Southwest Schools does not have a comprehensive energy conservation program and lacks effective communication and staff support.

**EXHIBIT 4-3
SOUTHWEST SCHOOLS ELEMENTARY AND MIDDLE/HIGH SCHOOL CAMPUSES - FACILITIES AND UTILIZATION
SCHOOL YEAR 2011-12**

FACILITY	BUILDING	YEAR BUILT	SQUARE FEET	STUDENT CAPACITY	STUDENT ENROLLMENT
8440 Bissonnet	Bissonnet Elementary School	August 2008	23,597	396	373
4514 Mangum	Mangum Elementary School	August 2011	24,991	396	204
6400 Southwest Freeway	Middle/High School	August 1999	25,977	360	317
6400 West Park	Middle/High School (Under Construction)	August 2012	46,000	500	Not Applicable

SOURCE: Southwest Schools Administration, May 2012.

RECOMMENDATIONS

- ◆ **Recommendation 15: Identify key components of facilities management and centralize those responsibilities within the charter school.**
- ◆ **Recommendation 16: Develop and implement a Hazardous Material Management Plan to comply with Occupational and Safety Health Administration (OSHA) requirements for properly informing employees exposed to such materials in the workplace.**
- ◆ **Recommendation 17: Develop a written formal plan and/or guidelines for maintaining acceptable levels of indoor air quality (IAQ).**
- ◆ **Recommendation 18: Develop clear instructions and site-maps for all emergency utility shut-offs to avoid any potential future safety issues.**
- ◆ **Recommendation 19: Develop and implement a comprehensive energy conservation program and engage teachers and staff in an ongoing communication process.**

DETAILED ACCOMPLISHMENTS

FACILITIES MASTER PLANNING

Southwest Schools has taken an active role in providing a formal facilities master planning process for all of its campuses. Based on onsite interviews and the review of documentation, the central office typically engages in its facility planning approximately 12 to 18 months in advance of any anticipated major facility changes. Southwest Schools proactively reviews existing leases at least two years before they expire. These reviews allow for discussions about the current facility and, if it meets the continued needs of the charter school based on enrollment projections, community conditions, existing cost of the lease, and the condition of the existing facility.

An example of this process would be the current middle school/high school new facility that opened in August 2012. Southwest Schools considered the following factors when planning for the new middle school/high school facility:

- the existing site experienced heavy rains and flooding in January 2012;
- the location of the facility in a shopping center became compromised due to businesses bringing in unwanted customers into a common parking lot; and

- additional classroom space was needed in order to expand the science department.

Additionally, the Southwest Schools central office conducts meetings every other Thursday and an important component of these meetings is a discussion of facilities and related issues. The Thursday meeting is the primary process for school campuses to identify facility issues and discuss priorities.

Southwest Schools refers to its planning document(s) as a Launch Plan and the content of the document outlines a month-by-month major area activity plan of action. Part of the Launch Plan includes the site-map of the facility being planned for new construction/renovation. At the outset of the planning cycle, monthly meetings are conducted and the frequency increases as the project progresses on its timeline. Incorporated in the process is the needs assessment that looks at population changes, total households, race and ethnicity demographic data for a geographic area covering one mile, three miles, and a five-mile radius. It is important to consider HISD schools within a three-mile radius and identify each elementary, middle, and high school and their student enrollments as a basis for determining potential campus enrollment marketing.

The result of an effective facilities master planning process many times correlates with stakeholder perception regarding the process and process outcomes, such as sufficient space for academic processes. **Exhibits 4-4** and **4-5** show the results of the review team surveys related to facilities master planning.

As reflected in **Exhibit 4-4**, approximately 47.3 percent of teachers and staff felt that stakeholders have input into facility planning, while 25.3 percent have no opinion, and 22 percent disagreed or strongly disagreed. It appears that close to half of teachers and staff collectively feel that facility planning is a collaborative approach. Parents also feel supportive of the facility planning process with 72.6 percent either strongly agreeing or agreeing. Likewise, 56.3 percent of administrators agreed that stakeholders provide input.

Exhibit 4-5 shows that 60.2 percent of teachers and staff indicate the charter school has sufficient space and facilities for its instructional programs with 30.7 percent either disagreeing or strongly disagreeing, while 9.1 percent had no opinion. 80.3 percent of parents and 93.4 percent of administrators who responded agreed that the schools have adequate instructional space.

**EXHIBIT 4–4
SOUTHWEST SCHOOLS SURVEY
FACILITIES MASTER PLANNING**

SURVEY RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
Survey Question: “Stakeholders provide input into facility planning.”						
Teachers/Staff	15.4%	31.9%	25.3%	14.3%	7.7%	5.5%
Parents	31.5%	41.1%	25.8%	0.0%	0.0%	1.6%
Administrators	18.8%	37.5%	25.0%	6.3%	0.0%	12.5%

NOTE: Percentages may not sum to 100 due to rounding.
SOURCE: Review Team Survey, May 2012.

**EXHIBIT 4–5
SOUTHWEST SCHOOLS SURVEY
FACILITIES SPACE**

SURVEY RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
Survey Question: “Our Charter School has sufficient space/facilities for its instructional programs.”						
Teachers/Staff	21.6%	38.6%	9.1%	25.0%	5.7%	0.0%
Parents	32.3%	48.0%	10.2%	5.5%	1.6%	2.4%
Administrators	26.7%	66.7%	0.0%	6.7%	0.0%	0.0%

NOTE: Percentages may not sum to 100 due to rounding.
SOURCE: Review Team Survey, May 2012.

Southwest Schools is commended for its effective facilities master planning process that provides effective direction and support for its school campus sites.

STUDENT INVOLVEMENT IN CARE OF FACILITIES

Southwest Schools encourages its students to take an active role in taking care of school facilities. Although there is no central office-generated initiative, each campus does assume responsibility for engaging students in awareness and interest in accepting responsibility for maintaining a clean learning environment.

The middle school/high school, as well as the elementary school campuses, publishes expectations for student behavior in the Parent/Student Handbook. The middle school/high school campus focuses its attention on student involvement through regularly scheduled assembly programs, some of which address the discussion of student respect for the school and its facilities. Before 2009, the middle/high school campus property was tagged with graffiti and vandalized. The school enrollment of students affiliated with gangs and competing gangs in the neighborhoods surrounding the campus created issues for the campus. In 2009, the Safe and Civil Schools program was implemented at Southwest Schools middle/high school. A Safe and Civil School Committee was formed and known as the ‘Eagles Committee’

which included both students and teachers. The function of the committee is to identify issues of safety and civility in the school culture and to recommend new policy or processes to eliminate concerns. When new policy or procedures are identified by the committee, lunch assemblies are held to bring the information to the students. Since the implementation of the program, there have been limited incidents of graffiti, theft, and drug possession on campus. To enhance this effort student leaders have been identified and are responsible to give tours of the campus to visitors and to new enrollees. The program has made students take ownership into the safety and civility of the campus.

The Safe and Civil School Program is a collection of practical materials designed to help school staff improve safety and civility across all school settings. By so doing, school personnel lay a foundation to engage students and enhance learning. The goal of the materials in the series is to empower school staff with techniques to help all students behave responsibly and respectfully. The procedures impact three levels of the campus to include school wide, classroom and individuals.

In addition to Safe and Civil Schools, TRENDS discipline tracker software is used at Southwest middle/high school to track all discipline referrals which allows more effective

analysis for improved decision-making. The campus can generate reports providing a full picture of important trends and patterns by analyzing incidents by location, time, and grade level; incidents by race/ethnicity and referring staff member; and commendations by month and grade level.

During school year 2010–11, full implementation of E-Colors for students and staff occurred at all levels of the charter school. E-Colors helps to identify different personality styles enabling the campus to better understand each other. Some of the benefits gained from implementation of E-Colors is having a better awareness of communication styles and behavioral tendencies of individuals which has improved communications, performance and teamwork, and better risk management and mitigation. Southwest Schools indicates that E-Colors has had a huge impact on the culture and climate of Southwest Schools middle/high school.

Both elementary campuses have numerous ways of getting students involved in awareness of the facility and respecting the school. Bissonnet Elementary, for example, engages students in creating and active involvement in maintaining a campus garden for the benefit of all students. Students are also encouraged to pick up any trash they see on school property. In addition, students have been engaged in a school project to recycle items to help make the environment greener. Mangum Elementary School has a very active shared recycling project with its joint neighbor AVANCE® next door. The students assist in making recycling boxes and participating in recycling items for the boxes to be picked up every Friday. Students are asked to take responsibility for helping to keep the bathrooms clean. There are signs posted on each bathroom door to encourage children to “GO/FLUSH/WASH/LEAVE.”

Southwest Schools is commended for its student engagement in the respect and care of the learning environment.

DETAILED FINDINGS

FACILITIES MANAGEMENT ORGANIZATION (REC. 15)

Southwest Schools lacks a centralized facilities management structure. At the time of the review, in May 2012, it was noted that several positions oversee components of the facilities organization, including:

- Facilities contract management;
- Management/Review of the leases; and
- Operational support for the campuses.

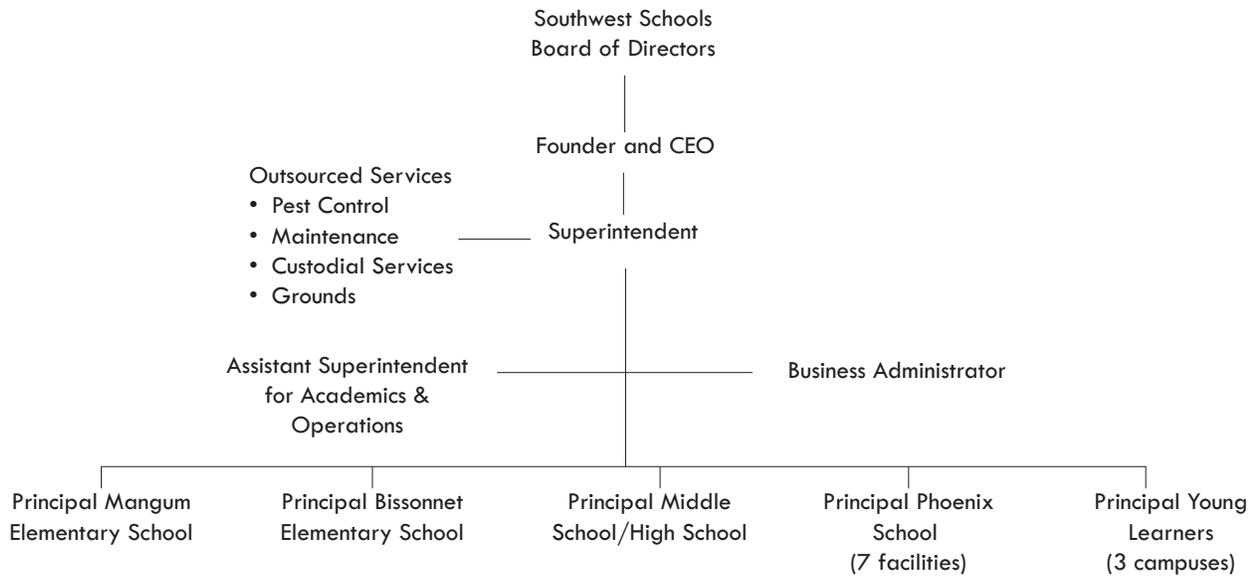
The Southwest Schools organizational structure of the facilities operation consists of the superintendent, an assistant superintendent for Academics and Operations, Business Administrator, principals, and the support of outsourced contracts to address maintenance, grounds, custodial services, and pest control.

Based on onsite interviews and observations, the superintendent reports to the Founder and Chief Executive Officer (CEO) who in turn reports to the Board of Directors (board). Both the assistant superintendent for Academics and Operations and Business Administrator provide operational support to principals under a highly structured decentralized organization. **Exhibit 4–6** presents Southwest Schools operations organization at the time of the review team’s onsite visit in May 2012.

FACILITIES/CONTRACT MANAGEMENT

As indicated in **Exhibit 4–6**, the charter school has outsourced its custodial, grounds, maintenance, and pest control services for all campuses. According to the organizational chart and interviews with staff, these outsourced services report directly to the superintendent who manages all contracts independent of where services are delivered on the campuses.

**EXHIBIT 4-6
SOUTHWEST SCHOOLS OPERATIONS ORGANIZATION
SCHOOL YEAR 2011-12**



SOURCE: Southwest Schools Administration, May 2012.

MANAGEMENT/REVIEW OF THE LEASES

A review of the leases represented in **Exhibit 4-1** demonstrated that the board is responsible for approving and overseeing all lease agreements with the lessor of each campus site. This includes terms and conditions that are common and unique to each of the campus sites. The major difference between the campuses is the base rent and additional rent (includes common area shared costs; real estate costs; and required insurance sharing). The common lease arrangement includes the following conditions detailed within each lease (not an all-inclusive list):

1. Basic terminology identified in each lease document.
2. Base rent typically provided with a range of months such as for the new Middle/High School as an example:
 - a. Months 1 to 3 amount to \$20,716 (low);
 - b. Months 91 to 120 amount to \$44,656 (high); and
 - c. Each lease has a range of various months with different costs attached.
3. Acceptance of leased premises in “as is condition.”
4. Additional Rent (adjusted from time to time)

- a. Common area is typically defined along with maintenance costs.
5. Interior space of building is lessee expense.
6. New school required a \$900,000 contribution for interior finishes and general build-out.
7. Tenant responsible for licenses and permits and take care of premises.
8. Landlord keeps structure sound and responsible for exterior walls, utility lines and roof.
9. Tenant responsible for repairs/replacements windows, doors, Heating Ventilation and Air Conditioning (HVAC) systems, plumbing, fixtures and interior.
10. Landlord can require tenant to perform necessary repairs, maintenance, and replacements.
11. Tenant required to enter into a regularly scheduled preventative maintenance/service contract for hot water, heating, air conditioning systems and equipment.
12. Alterations, additions, improvements must have prior written approval of landlord.

13. Landlord has right to access premises during normal business hours with a 24-hour notice to tenant.
14. Tenant responsible for all utilities and necessary insurance.

OPERATIONAL SUPPORT FOR THE CAMPUSES

Southwest Schools' grounds are maintained by the landlord at all locations. Modern Pest Control provides quarterly pest control service at each campus. The contracts are managed at the charter school office and level of service is confirmed between the campus and the charter school to ensure customer satisfaction and compliance with the contract.

H&J Building Services provides custodial services at each campus. The contract details the scope of service to include five days per week—Monday through Friday—with one daytime janitor and one nighttime janitor. Daily cleaning is broken down among offices, classrooms and common areas plus restroom sanitation.

The details of each of these daily cleaning activities cover the following expectations:

Offices, classrooms and common areas to include:

- A. Carpeting will be vacuumed.
 1. The floors will be swept, washed with auto scrubber, and sprayed and buffed.
 2. Trash receptacles will be emptied and trash removed to designated area. Liners will be replaced when soiled or torn, containers will be cleaned as necessary.
 3. Desks, file cabinets and furniture will be dusted with a treated cloth.
 4. Dust telephones, calculators, and other desk items.
 5. Drinking fountains will be cleaned and disinfected.
 6. Entrance doors and windows, metal kick plates, and push plates will be cleaned and dry polished.
 7. Lunchroom areas, wipe countertops, tables and chairs. Microwave and refrigerator will be cleaned. Restock towel dispensers and clean sink areas.

B. Restroom sanitation schedule to include:

1. Floors will be wet-mopped, cleaned and sprayed and buffed with a disinfectant solution, paying particular attention to areas around urinals and toilet bowls.
2. Commodes, urinals and wash basins will be scoured and disinfected, removing scale and stains.
3. Disinfect both sides of toilet seats, dust and clean restroom signage and doors.
4. Trash and sanitary napkin receptacles will be emptied, cleaned and sanitized, and liners replaced.
5. Clean and polish mirrors, clean and disinfect sinks and countertops.
6. Fill dispensers with soap, paper towels, toilet paper, and sanitary napkins.

Best practices indicate that facilities management may be more efficient if managed by one position given that many of Southwest Schools' facilities operations are outsourced. Centralizing facilities responsibilities would allow for responsibilities and oversight to remain with one position. This would help ensure the charter school receives the appropriate services and would allow for one contact should there be facilities issues.

Southwest Schools should identify key components of facilities management and centralize those responsibilities within the charter school. Southwest Schools staff involved in the facilities operation, including the superintendent, assistant superintendent for Academics and Operations, Business Administrator, and campus principals, should be involved in these discussions. As part of this recommendation, this group should examine the decentralized processes within the charter school and determine where those duties should reside within the organizational structure.

This recommendation can be implemented with existing resources.

HAZARDOUS MATERIALS MANAGEMENT (REC. 16)

Southwest Schools' campus sites do not have a hazardous materials management plan.

During onsite observations and interviews, the review team found that campus sites do not have a plan in place and lack the appropriate federal-required information sheets, signage,

and necessary material for staff and others who work with hazardous materials while on campus. No material safety data sheets (MSDS) or signs are available near or in the custodial storage area nor at the chemistry lab in the middle school/high school. At one of the elementary campuses, an empty classroom was being used to store custodial supplies and equipment was not secured. This same site indicated that pesticide spraying was applied after hours, but no signage was placed on campus to indicate that the pesticide had been sprayed.

Improper handling and storage of hazardous materials can result in a number of scenarios that can cause adverse effects to human and animal health as well as the environment. The U.S. Department of Labor Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) includes all workers exposed to hazardous chemicals in all industrial sectors, including custodians. The standard is based on a simple concept that employees have both a need and a right to know the hazards and the identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring. The HCS preempts all state or local laws which relate to an issue covered by HCS without regard to whether the state law would conflict with, complement, or supplement the federal standard, and without regard to whether the state law appears to be "at least as effective as" the federal standard. There are an estimated 650,000 existing hazardous chemical products and new ones are being introduced every day.

Chemical manufacturers and others must convey the hazard information they learn from evaluations to employers by means of labels on containers and MSDSs. All employers are expected to have a hazard communication program to get the information to their employees through labels on containers, MSDSs, and training. Chemicals used by the custodial staff or maintenance, as well as pesticide contractors, may need to be noted on a MSDS to verify that proper procedures for their use, storage, and disposal have been properly followed. No potentially hazardous material should be brought into a school without being properly labeled and having a MSDS on file. A school is responsible for ensuring that its contractors respond appropriately to ensure compliance with all safety regulations. An example noted in the HCS guide states: "many people know that when the roof leaks, wood can get wet and mold can grow. Fewer people know that the bleach used to clean mold stains may itself have serious health

ramification if the space is not properly ventilated during use."

The Texas Department of State Health Services' *Texas Guide to School Health Programs* (May 2009) recommends that schools keep copies of current MSDSs easily accessible to "minimize exposure to people." The Mesquite Independent School District (MISD) opted to deploy 3E Company's online-MSDS, which ensures that all material safety data sheets (MSDS) are up to date and available 24/7. The charter school opted to eliminate the binder requirement and subscribe to an online, 24/7 service specializing in MSDS information as well as a 24/7 hotline for assistance and questions. These online service providers offer the advantage of adding information to MSDS' as new information becomes available on chemicals stored in the system. A sample MSDS from MISD can be found at <http://www.mesquiteisd.org/departments/risk/msdsnotebook.pdf>.

The Harris County Department of Education and the Texas School Safety Center are two good resources for obtaining insight and assistance as to how to best approach establishing an effective process. The Texas Charter School Association; the National Resource Center on Charter Schools; the Texas Education Agency Charter School Division; as well as the National Center for Education Statistics *Planning Guide for Maintaining School Facilities* (<http://nces.ed.gov/pubs2003/2003347.pdf>) are also all excellent resources to assist in identifying and implementing an effective Hazardous Material Management Plan.

Southwest Schools should develop and implement a Hazardous Material Management Plan to comply with the Occupational Safety and Health Administration (OSHA) requirements for properly informing employees exposed to such materials in the workplace. The assistant superintendent for Academics and Operations for the charter school should schedule a series of visits to several local employers as one community focused opportunity to learn how private employers address this concern and obtain firsthand knowledge. ISDs are required to maintain a binder of MSDSs related to hazardous materials exposed on the campus property by either custodial supplies, art supplies, lab supplies and materials, or other relevant hazardous materials. The up-to-date binder must be available for employee's access for their right to know what they may be exposed to and what remedies are available by the campus. Custodial closets should have appropriate signage and MSDS availability for employees.

This recommendation can be implemented with existing resources.

INDOOR AIR QUALITY (REC. 17)

Southwest Schools' campus sites have no formal plan or written guidelines for maintaining acceptable levels of indoor air quality (IAQ). Observations of the campus sites and several onsite interviews highlighted that the campuses do not have any active guidelines that are readily known and shared to identify what are acceptable levels of indoor air quality. Although this is not a mandatory statutory requirement for charter schools, it is important because it is related to the health of children and the working environment in schools.

In discussions concerning indoor air quality, it was apparent that it was not clear to the school campus staff as to who holds ultimate responsibility. School campus staff feel it is a central office issue, but the central office indicated it is the individual responsibility of each school to develop an appropriate procedure or practice to address any IAQ concerns. This uncertainty between the central office and each respective school creates a vacuum for lack of accountability.

Schools face indoor air quality in many areas. For example, research related to IAQ indicates that one in four children in cities have asthma. Cockroaches, dust mites, and pesticides are prime causes and triggers. According to the 2006–07 Texas Asthma Call Back Survey, more than 30 percent of children with current asthma who had attended school within the past 12 months missed greater than or equal to five days of school due to asthma-related issues.

The most common issues that schools need to address when effectively managing IAQ risks and their six technical solutions are identified in **Exhibit 4–7**. The exhibit also shows whether Southwest Schools is engaged in the steps outlined.

As shown in **Exhibit 4–7**, interviews with the review team indicate that Southwest Schools has either not engaged in, or it is unknown whether the charter school has engaged in, several steps associated with control of moisture/mold, integrated pest management, smart materials selection, and aggressive source control. As noted within the IAQ Framework, these areas are important to managing and supporting IAQ.

ISDs and charter schools typically find themselves with IAQ issues because they fail to respond to warning signs. The

Planning Guide for Maintaining School Facilities, developed by the National Center for Education Statistics (NCES) in conjunction with the Association of School Business Officials International, is an excellent resource for all elements of school facilities. The guide is available on the NCES website (<http://nces.ed.gov/pubs2003/2003347.pdf>). The guide provides reasonable actions to undertake to be proactive in relation to IAQ. The guide addresses the common indoor air pollutants and potential sources of IAQ contaminants. The potential sources include fresh air, odors from dumpsters, lab and workshop emissions, cleaning process emissions, insects and other pests, insecticides and pesticides, furnaces and fuel lines, underground sources such as sewer lines, as well as HVAC equipment. In addition, the Houston ISD website for facility services identifies several areas of interest in relation to indoor air quality including integrated pest management (IPM), Asbestos Hazard Emergency Response Act (AHERA) management planning, asbestos rules, Environmental Protection Agency (EPA) guidelines, and environmental programs.

Significant incidents are not the preferred method of learning about environmental regulations that apply to a school campus. ISDs and charter schools must also take a proactive approach to learn about their responsibilities from regulatory agencies, state departments of education, and other professional associations.

Texas Occupation Code Section 1951.212 discusses pest management programs for ISDs. As shown in the IAQ Framework in **Exhibit 4–7**, a strong integrated pest management program contributes to IAQ. Although this does not apply directly to charter schools, the fact that these issues affect the potential safety of children and employees warrants charter schools having a preventative approach to providing a healthy environment in these areas:

- adopt an integrated pest management (IPM) program;
- designate an IPM coordinator;
- only use licensed pesticide applicators;
- post indoor applications 48 hours in advance; and
- post outdoor application signage at time of treatment and keep posted as required.

**EXHIBIT 4–7
INDOOR AIR QUALITY (IAQ) FRAMEWORK: SIX TECHNICAL SOLUTIONS**

THE FRAMEWORK FOR EFFECTIVE SCHOOL IAQ MANAGEMENT: SIX TECHNICAL SOLUTIONS

SOLUTION	STEPS	SOUTHWEST SCHOOLS COMPLETING (Y/N/X*)
Quality HVAC	Inspect HVAC systems regularly;	Y
	Establish a maintenance plan;	N
	Change filters regularly and ensure condensate pans are draining;	Y
	Provide outdoor air ventilation according to American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard or local code;	X
	Clean air supply diffusers, return registers, and outside air intakes; and	Y
	Keep unit ventilators clear of books, papers, and other items.	Y
Control of Moisture/Mold	Conduct routine moisture inspections;	Y
	Establish mold prevention and remediation plan;	X
	Maintain indoor humidity levels between 30 percent and 60 percent;	X
	Address moisture problems promptly; and	Y
	Dry wet areas within 24 to 48 hours.	Y
Strong Integrated Pest Management (IPM)	Inspect and monitor for pests;	Y
	Establish an IPM plan;	N
	Use spot treatments and baits;	Y
	Communicate with occupants prior to pesticide use; and	N
	Mark indoor and outdoor areas treated with pesticides.	X
Effective Cleaning & Maintenance	Conduct routine inspections of school environment;	Y
	Develop a preventative maintenance plan;	Y
	Train cleaning/maintenance staff on protocols;	X
	Ensure material safety data sheets (MSDS) are available to staff;	N
	Clean and remove dust with damp cloth;	Y
	Vacuum using high-efficiency filters; and	N
	Walk the grounds.	Y
Smart Materials Selection	Maintain products inventory;	N
	Develop low-emitting products purchasing and use policies;	N
	Use only formaldehyde-free materials;	X
	Use only low-toxicity and low-emitting paint;	X
	Select products based on product rating systems; and	N
	Use least toxic cleaners possible (only those approved by the charter school) .	Y
Aggressive Source Control	Conduct regular building walkthrough inspections;	Y
	Test for radon; mitigate if necessary;	N
	Implement a hazardous materials plan (use, label storage and disposal);	N
	Establish a school chemical management and inventory plan;	N
	Implement Smoke-Free policies;	Y
	Establish an anti-idling school bus policy;	N
	Use walk-off mats at building entrances; and	N
Conduct pollutant-releasing activities when school is unoccupied.	X	

*Y = Yes; N = No; and X = Unknown.

SOURCE: U.S. Environmental Protection Agency, May 2012; Review Team assessment.

Texas Administrative Code Rule 7.150 indicates that a school IPM program must contain these elements:

- a school board adopted policy;
- a monitoring program to determine when pests are present and to justify corrective action;
- preferential use of lower risk pesticides and the use of non-chemical control measures;
- a system of keeping records;
- a plan to educate and inform school employees about their role in the program; and
- written guidelines that identify thresholds.

Exhibit 4–8 identifies the six key drivers to deliver effective school IAQ management programs.

The Carrollton–Farmers Branch Independent School District developed the TEAMS (Tools for Schools, Energy, Asbestos, Moisture Management, Safety, and Security) approach to managing the school environment for IAQ. The Cypress–Fairbanks Independent School District, located in a climate that can promote mold growth and other IAQ hazards, met its IAQ challenges in 2004 by developing in–house expertise through implementing a district IAQ Plan and the Environmental Protection Agency’s (EPA) “Tools for Schools” program. This resulted in the district receiving an Excellence Award from the Environmental Protection Agency for IAQ practices. The El Paso Independent School District (EPISD) is another district that responded to mounting indoor air quality concerns by implementing IAQ Tools for Schools guidance from the Environmental Protection Agency (EPA). According to the EPA website, EPISD “used information from the IAQ Tools for Schools Kit to develop a district-wide (72 of 84 school campuses) air quality survey, response, and problem prevention program. The district reports that IAQ Tools for Schools enabled a highly organized, logical response to indoor air quality issues that fostered teamwork and a sense of mission districtwide, resulting in a higher quality learning environment.” Reference: <http://www.epa.gov/iaq/schools/region6.html>. The reference is provided to allow for additional information as needed. Although these are large ISDs, their approaches could be modified and used in charter schools.

Southwest Schools should develop a written formal plan and/or guidelines for maintaining acceptable levels of indoor air quality (IAQ). The IAQ Tools for Schools Framework provides a common language to describe drivers of IAQ

EXHIBIT 4–8

INDOOR AIR QUALITY FRAMEWORK SIX KEY DRIVERS

THE FRAMEWORK FOR EFFECTIVE SCHOOL INDOOR AIR QUALITY (IAQ) MANAGEMENT: SIX KEY DRIVERS

Organize	Develop Systematic Approach; Identify Existing Assets; Design Standard Operating Procedures; Empower an IAQ Leader; Build an Effective Team; Create Champions; and Secure Senior Buy-In.
Communicate	Share Your Goals; Make IAQ Meaningful; Be Transparent & Inclusive; and Communicate Results.
Evaluate	Solicit Feedback; and Capture Return on Investment.
Assess	Walk the Grounds; Listen to Occupants; Use Technology; Determine a Baseline; Keep Customers Satisfied; and Identify and Prevent Risks.
Act	Educate Staff About IAQ to Change Behavior; Train Occupants to Address IAQ Risks; and Address the Source of Problems.
Plan	Prioritize Actions; Put Goals in Writing; Start Small; Work in Stages; and Plan for the Future.

SOURCE: U.S. Environmental Protection Agency, May 2012.

program success. Southwest Schools should implement the IAQ Framework displayed in **Exhibit 4–8** and develop a master key drivers and technical solutions checklist to be completed on a quarterly basis by each campus. The assistant superintendent for Academics and Operations should establish a working group to conduct the necessary research and identify contacts. Each campus should designate facilities representatives to be responsible for completing and maintaining the records. The campus representatives should be part of the working group. At least every six months the charter school designee, when visiting each campus site,

should review and discuss the document with appropriate staff. Action items identified on these inspection checklists can be discussed at one of the charter school staff meetings. The charter school should consolidate all site issues to develop an action plan that fits the situation. The Department of State Health Services has an IAQ complaint form that should be incorporated into the plan and used throughout the charter school. The Department of State Health Services is an additional resource to contact for support and advice.

This recommendation can be implemented with existing resources.

EMERGENCY UTILITY SHUT-OFFS (REC. 18)

Southwest Schools lacks instructions with site-maps for emergency utility shut-offs should an emergency require immediate action. Based on interviews with staff while onsite as well as observations, the campuses do not provide instructions nor in many cases, site-maps, to identify emergency utility shut-offs. Although Southwest Schools facilities are leased facilities and there is no legal requirement to provide this, safety preventative action could be implemented to avoid a more serious situation that could occur. The documentation and necessary instructions on how to shut-off the necessary utilities should be readily available with the lessor of each facility. None of the three main facilities indicated awareness and the need for this information.

Developing and maintaining emergency utility shut-off instructions and site-maps are critical for facility management. If the campus does not develop and maintain this information, the lost time to call the lessor in a critical emergency may have considerable negative ramifications to the campus and to the potential safety of staff, teachers, and students.

The Texas Unified School Safety Standards: Best Practices Standard 2.4, developed by the Texas School Safety Center (TxSSC), indicates that an ISD/school should incorporate maps and floor plans into its multi-hazard emergency operations plan (EOP) to include evacuation options, utility shut-offs, and other critical information.

The Southwest Schools central office was under the impression that the contractor or lessor at the individual campus sites should provide the principal with this critical information. Without knowing that this information was needed, the campus leadership would not know what to request. Given the critical nature of this information, and the

need to confirm each campus has everything it needs to know, the central office should coordinate this key activity. In addition, the central office should work with the site managers to discuss their role in implementing the EOP along with the information and how it fits into the charter school EOP for all campus sites.

The TxSSC provides reference material, training assistance, and other efforts that can be a valuable resource for Southwest Schools. In addition, the Harris County Department of Education (HCDE) is also available as a resource via its Center for Safe and Secure Schools. The HCDE provides a wide array of services for a nominal fee.

Each Southwest Schools campus should develop clear instructions and site-maps for all emergency utility shut-offs to avoid any potential future safety issues. The Southwest Schools central office should contact each lessor, discuss the issue and concern, and arrange for a site visit from someone knowledgeable of the utility shut-off locations and understanding of how to properly disengage the utility to shut it down-whether it be electric, telephone, gas, water, cable or some other necessary emergency shut-off process. This knowledgeable individual to be identified by each landlord should come to the campus and walk the facility to properly locate each utility shut-off site to validate the site-maps and to assist in the development of the detailed, step-by-step instructions.

The central office should ensure that all necessary emergency utility shut-off locations are properly identified and capture the necessary detailed instructions to provide easy-to-understand instructions and a legible map for each utility shut-off.

Once these site-maps and instructions are developed, they should be shared with key staff and a copy of each location and instruction should be securely located near the emergency shut-off location for additional use and reference. The central office should also maintain a master copy of the information for each campus for support and control of this critical information.

This recommendation can be implemented with existing resources.

ENERGY MANAGEMENT (REC. 19)

Southwest Schools does not have a comprehensive energy conservation program and lacks effective communication and staff support. Based on numerous interviews while onsite and direct facility observation, the review team found that

each of the campuses did not have a comprehensive energy conservation program and there is no ongoing communication with staff and teachers to develop and maintain their awareness.

The charter school does make use of sensor lighting at each of the campuses. During onsite observations and interviews at the two elementary and the middle/high school sites, the review team observed that all campus sites have sensor lighting in the classrooms and throughout the facilities. With lighting typically accounting for 30 percent to 50 percent of energy use in most facilities, finding ways to increase lighting efficiency can result in significant savings.

Energy conservation can be a significant cost savings endeavor for both ISDs and charter schools that maximize their efforts to implement various measures to conserve energy. Installing sensor lighting throughout the facilities is one example of an energy conservation measure implemented across all Southwest Schools campus sites. Occupancy sensor lighting works by turning on the lights when the motion or sound of an individual(s) entering or leaving the room is detected. These sensors reduce energy waste by taking over light switch chores. Installation of this lighting helps to reduce both expenses and to conserve environmental resources.

Texas Education Code Section 44.902 entitled: *Long-Range Energy Plan of Reduce Consumption of Electric Energy* states "...The Board of Trustees of a school district shall develop a long-range energy plan to reduce the district's annual electric consumption by five percent beginning with the 2008 state fiscal year and consume electricity in subsequent fiscal years in accordance with the district's energy plan." Although this code does not directly apply to charter schools the need to have an energy conservation program is an effective business practice and can help Southwest Schools save money with quality practices.

Most facilities, including charter schools, incur utility expenditures which represent a significant cost to the

operation. **Exhibit 4-9** shows the Southwest Schools utility expenditures for the past five years. The utility costs show a significant increase from 2007-08 to the following year due to the addition of a new campus, and the expenditures have remained high.

EXHIBIT 4-9
SOUTHWEST SCHOOLS UTILITY EXPENDITURES
SCHOOL YEARS 2006-07 TO 2010-11

SCHOOL YEAR	TOTAL UTILITY EXPENDITURES	NUMBER OF CAMPUSES	PERCENTAGE INCREASE FROM PREVIOUS YEAR
2006-07	\$73,984	1	N/A
2007-08	\$95,058	1	28.5%
2008-09	\$134,072	2	41.0%
2009-10	\$153,207	2	14.3%
2010-11	\$167,163	3	9.1%

SOURCE: Southwest Schools Administration, May 2012.

Discussions while onsite with individual campus sites highlighted that there is no ongoing analysis of utility costs to support efforts to monitor aspects of a comprehensive energy conservation program at the campus sites. Heating, cooling, electric lights, and sufficient power for equipment (copiers, technology hardware, cleaning equipment, etc.) are essential in today's educational environment. Consequently, schools are well-advised to take all reasonable measures to reduce energy use without compromising human comfort, and the ability to perform teaching and learning activities.

The review team survey results in **Exhibit 4-10** are negative with regard to Southwest Schools having an effective energy management system. Results reflect that only 38.2 percent of teachers and staff indicated that the school has an effective energy management program in place while 41.6 percent had no opinion and another 14.6 percent disagreed. Similarly, 37.6 percent of administrators agreed or strongly agreed while 37.5 percent expressed no opinion and 12.5 percent disagreed. Based on all responses it would appear there are

EXHIBIT 4-10
SOUTHWEST SCHOOLS SURVEY
ENERGY MANAGEMENT

SURVEY RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
Survey Question: "Our charter school has an effective energy management program."						
Teachers/Staff	13.5%	24.7%	41.6%	10.1%	4.5%	5.6%
Administrator	6.3%	31.3%	37.5%	12.5%	0.0%	12.5%

NOTE: Percentages may not add up to 100 due to rounding; Parents were not surveyed.
SOURCE: Review Team Survey, May 2012.

opportunities for the school to enhance awareness of its energy management initiatives.

With the advent of increased costs for energy to provide fuels for HVAC systems and other related activities, schools have established numerous and varied methods for increasing efficiencies in energy consumption and reducing operating costs. Energy management methods range from sophisticated, centralized computer controls over HVAC systems and other energy consumption devices to simple manual procedures for turning thermostats down and lights off during periods of minimal building or room utilization.

Ysleta Independent School District (YISD) represents an example of an ISD that implemented a comprehensive district energy program. The YISD energy management program includes a clear policy to conserve energy while exercising sound financial management. The policy includes general guiding statements and specific energy conservation and building guidelines. The conservation efforts focus on reduction of usage with and without additional capital investment. YISD's conservation efforts included peak load-shedding to lower electrical costs, lighting retrofits focused on the largest consumer areas first, and implementation of a consolidated 4–10 work schedule for the summer.

The Texas State Energy Conservation Office (SECO) provides several programs and resources that charter schools can use to develop an energy management program and formal policy to promote energy usage awareness. SECO provides Texas ISDs, including charter schools, with the Energy Education Curriculum Program at no cost to schools. The Energy Education Curriculum program promotes energy conservation and efficiency. The goal of the SECO Energy Education Curriculum Program is to increase Texas' teachers awareness of alternative energy communities and to improve understanding of the nature and extent of energy and its resources, energy conservation and efficiency, the economic and environmental effects of energy use, and alternative energy technologies. SECO also recommends best practice elements for an energy management program that include a mission statement, ongoing monitoring and distribution of facility-specific energy bills, documents reasonable achievable savings targets for annual energy consumption/costs, and documents energy related tasks for custodial, maintenance, and administrative costs.

Southwest Schools should establish and implement a comprehensive energy conservation program and engage teachers and staff in an ongoing communication process. The

superintendent should solicit a representative at each campus for the program who will develop the necessary framework for a comprehensive approach with coordination and leadership from the charter school office. An ongoing formal analysis of all energy-related costs should be incorporated into the process. Southwest Schools should also take advantage of SECO as a resource.

This recommendation can be implemented with existing resources. Having access to the free resources available from SECO is a vehicle for pursuing this worthwhile endeavor.

FISCAL IMPACT

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

RECOMMENDATION	2013–14	2014–15	2015–16	2016–17	2017–18	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
CHAPTER 4: FACILITIES USE AND MANAGEMENT							
15. Identify key components of facilities management and centralize those responsibilities within the charter school.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16. Develop and implement a Hazardous Material Management Plan to comply with Occupational and Safety Health Administration (OSHA) requirements for properly informing employees exposed to such materials in the workplace.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17. Develop a written formal plan and/or guidelines for maintaining acceptable levels of indoor air quality (IAQ).	\$0	\$0	\$0	\$0	\$0	\$0	\$0
18. Develop clear instructions and site–maps for all emergency utility shut–offs to avoid any potential future safety issues.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
19. Develop and implement a comprehensive energy conservation program and engage teachers and staff in an ongoing communication process.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS–CHAPTER 4	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 5

SAFETY AND SECURITY

SOUTHWEST SCHOOLS

CHAPTER 5. SAFETY AND SECURITY

Most school safety actions involve the safety of students and staff as well as campus property. In the past, safe and secure schools entailed surrounding schools with fences to create safe zones and creating alternative education programs for disruptive students. Today's environment requires a more balanced and comprehensive approach of prevention, intervention, enforcement, and recovery to develop an effective safety and security program. Safe and secure schools require identifying threats and vulnerabilities, developing plans to minimize risk, and then implementing the plans.

Schools provide safe environments through building access management, identification processes, fire protection, communication systems, crisis management/disaster planning, playground safety, and overall building and

grounds safety. Securing school facilities and making them safe and secure for students and staff relies mostly on common sense of employees. Locks and cameras can be installed, but entrances will remain security breaches if people insist on propping doors open. Securing a facility must consider ensuring both the physical security of both the facility and its occupants. To properly secure a facility there are some factors that must be considered as noted in the excerpt from the National Center for Education Statistics' *Planning Guide for Maintaining School Facilities* displayed in **Exhibit 5-1**.

Establishing a safe and secure learning environment, which is stated as a priority in each of the Southwest Schools Parent/Student Handbooks, requires that a campus have effective

EXHIBIT 5-1 SECURING SCHOOL FACILITIES

Locking System	<p>Install locks on doors and windows as appropriate.</p> <p>Maintain locking devices responsibly so that keys and combinations are protected.</p> <p>Change locks that get compromised.</p> <p>Prohibit manipulation of locks and entries (e.g., propping doors open).</p>
Equipment Protection	<p>Secure particularly valuable equipment (e.g., computers) with heavy-duty cable and locks.</p> <p>Keep an up-to-date log of all valuable equipment, including equipment location, brand, model, and serial number.</p> <p>Label equipment in a visible way to deter theft (e.g., with fluorescent paint, permanent markers, or engraving equipment).</p> <p>Simultaneously label equipment in an unobtrusive way (e.g., labels hidden inside the computer case so they are less likely to be noticed and removed by thieves) so that items can be identified if they are stolen and later recovered.</p> <p>Never leave expensive portable equipment unattended (e.g., don't leave a laptop computer on the desk in an unlocked office).</p> <p>Install security lighting and motion detector lighting.</p>
Police/Security Facilities	<p>Install surveillance cameras in otherwise unobservable parts of the buildings, as necessary.</p>
Fire Protection	<p>Install fire-response equipment as appropriate (e.g., automatic sprinklers and well-marked manual fire extinguishers).</p>
Communications System	<p>Provide administrators (or all staff) with wireless handsets equipped with 911 panic buttons.</p> <p>Develop and practice an emergency communications action plan for contacting local fire, police, and medical authorities in the event of an actual emergency.</p>
Crisis Management/ Disaster Planning	<p>Perform a risk assessment to identify potential threats and risk facing the organization.</p> <p>Convene top-level managers to determine appropriate crisis and disaster response for the organization.</p> <p>Include staff from throughout the organization in disaster-response efforts.</p> <p>Include representatives from outside the organization as necessary for coordinating response with police, fire safety, and emergency medical services.</p> <p>Write a disaster-response plan that can be understood by staff members who will be expected to implement it.</p> <p>Practices crisis-management and disaster-response activity.</p>

SOURCE: U.S. Department of Education, National Center for Education Statistics, *Planning Guide for Maintaining School Facilities*, NCES 2003-347.

processes in place to address the categories noted in **Exhibit 5–1**. The language in the exhibit is intended to describe activities needed to address safety and security issues related to securing a facility.

The State of Florida School Safety and Security Self-Assessment Form for Best Practices identifies some common elements schools should consider when developing comprehensive school safety policies and procedures, which includes:

- eliminating the philosophy that “it can’t happen here;”
- developing clear rules and high expectations for behavior and school performance;
- adopting clear statements of student and staff responsibilities;
- providing professional development for teachers, staff and volunteers in all aspects of safety, supervision, classroom management, and crisis intervention; and
- adopting procedures for identifying and responding to the needs of at-risk/disruptive students.

At Southwest Schools, principals oversee the safety and security requirements and use the central office as a resource. The principal has overall responsibility for the educational program and operational processes conducted within the campus, including the safety and security of all stakeholders.

ACCOMPLISHMENTS

- ◆ Evacuation plans for emergencies and appropriate checklists are implemented at the Southwest Schools middle/high school campus.
- ◆ Southwest Schools has established methods of using the support of available community services at the middle/high school campus.

FINDINGS

- ◆ Southwest Schools has no formal process and plan in place for an annual evaluation of safety and security programs and processes.
- ◆ Southwest Schools has not developed and implemented a recovery plan in its Emergency Operations Plan for use after an emergency event.

- ◆ Southwest Schools is not enforcing the policy of requiring staff to wear their identification badges while on duty.

RECOMMENDATIONS

- ◆ **Recommendation 20: Develop a formal process and plan to perform an annual evaluation of safety and security programs at all campus facilities.**
- ◆ **Recommendation 21: Develop and implement a recovery plan in its Emergency Operations Plan for resuming operations at all campus facilities after an emergency event.**
- ◆ **Recommendation 22: Enforce the policy requirement for staff to wear identification badges to enhance the security and identification process.**

DETAILED ACCOMPLISHMENTS

EVACUATION PLANS AND EMERGENCY CHECKLISTS

Evacuation plans for emergencies and appropriate checklists are implemented at the Southwest Schools middle/high school campus.

The middle/high school campus makes use of its onsite safety committee (called the Eagles Committee) to assist in outlining safety and security activities on campus. The committee assisted in developing and distributing copies of the contents of the emergency folders for the campus. The folders include exit strategies with alternative routes, student rosters, and a single sheet of emergency reference data. In addition to the emergency folder, each teacher is provided with a flashlight and an emergency kit, which includes basic first aid materials.

During evacuation drills, the middle/high school has continued to challenge staff to improve its exit time and has achieved a benchmark of two minutes or less to completely evacuate the facility during an evacuation drill. The campus has identified and is prepared to evacuate to a secondary site, Liberty High School, which is in the same parking lot. The campus has also arranged for the Young Men’s Christian Association (YMCA) to be an additional backup site, if needed.

The middle/high school campus is commended for its efforts to continually improve its evacuation exit strategy and exit time. Having pursued and identified not only a secondary evacuation site but an alternative site provides the campus with adequate options in the event of an actual emergency.

COMMUNITY SUPPORT SPECIALISTS

Southwest Schools has established methods of using the support of available community services at the middle/high school campus. Onsite interviews confirmed that community safety and security specialists in the areas of law enforcement, fire departments, poison centers, and hotline centers are contacted throughout the year for various events being conducted on campus to increase the awareness of staff, teachers, and students.

Given the campus is for middle/high school students, the need to interact with community services is elevated due to the nature of opportunities for older students to engage in activities that would necessitate the interaction with local law enforcement and other agencies, such as the drug enforcement task force. The campus indicated that the relationship with the Houston Police Department (HPD) is excellent. HPD provided the campus with a special contact telephone number for the closest substation to provide a better response time to the campus.

The campus also encountered an issue with its fire alarm system, which was triggering false alarms. The Houston Fire Department (HFD) notified the campus of the issue and worked with them to get the issue fixed. By extending considerable time with the campus, HFD exhibited support of Southwest Schools' efforts.

Both the Dean of Instruction and Dean of Students and Parental Involvement are actively involved in the safety and security of the middle/high school campus. Both deans maintain an up-to-date list of emergency contact numbers for their local community support specialists. Additionally, the Dean of Students has a working relationship with the head of Houston's Anti-Gang Office and has worked with them to provide training on how to recognize signs and what to do in cases of gangs in the community and on campus.

The Southwest Middle/High School is commended for its extra efforts to engage community safety and security partners to provide a safe and secure learning environment for its secondary school students.

DETAILED FINDINGS

ANNUAL EVALUATION OF SAFETY AND SECURITY PROGRAMS (REC. 20)

Southwest Schools has no formal process and plan in place for an annual evaluation of safety and security programs and processes. Based on interviews conducted onsite and a review

of provided documentation, the review team found no formal process to evaluate the effectiveness of its existing safety and security programs and activities. Existing current Emergency Operations Plan provided by the school campuses highlighted the need for the schools to readdress their procedures to be more all-inclusive with easier to follow data lists, and less narrative description.

Charter schools are exempt from Texas Education Code (TEC) Section 37.108 which states:

Each school district shall conduct a security audit of the district's facilities at least once every three years. And to the extent possible, a district shall follow security audit procedures developed by the Texas School Safety Center or a comparable public or private entity. A school district shall report the results of the safety and security audit conducted under Subsection (b) to the district's board of trustees and, in the manner required by the Texas School Safety Center, to the Texas School Safety Center.

Although charter schools are not statutorily required to conduct any safety and security evaluations, such a process is a necessary activity to evaluate the effectiveness of safety and security programs and to provide staff and students with a safe and secure environment. This is an effective continuous improvement activity to support the safety and security of the school(s).

Each Southwest Schools campus has developed both formal and informal safety and security policies and plans that incorporate elements of prevention, intervention, and enforcement. Mangum Elementary and Bissonnet Elementary each have differing versions of an Emergency Operations Plan. Bissonnet Elementary calls its procedures the Emergency Handbook and Mangum Elementary calls its plan the Safe School Plan. The same situation exists at the middle/high school campus, which provided three documents to represent its Emergency Operations Plan. One document addressed building evacuation procedures; emergency alert level and codes; and student and staff rally points. The second document outlined fire drill emergency procedures, and the third document was safety hints from Houston's METRO transportation service used by many students. Although responsibilities were noted in the items presented, there were no specific responsibilities detailed as typically found in independent school district (ISD) Emergency Operations Plan or guidelines.

Southwest Schools provide students and parents with a Parent and Student Handbook which incorporates the Student Code of Conduct/Discipline Management Plan. The elementary and middle/high schools campuses provide the handbooks in both English and Spanish. Both elementary handbooks are very similar in format and content covering dress codes, responsibilities of parents and students, electronic devices, attendance policy and procedures, statement about bad weather/school closing, zero tolerance policy for violence, abusive language, weapons, drugs, and alcohol, and a section on bullying. The handbooks address the campuses being a closed campus. There is a section on school safety indicating that “providing a safe learning environment is the district’s top priority.” The handbooks include forms for both student and parent signatures indicating they have read the expectations and received a copy of the handbook.

The format of the Southwest Middle/High School Handbook provided while onsite presents the material in alphabetical order throughout the document. Many of the categories have more of a focus on items for older children such as gambling, sexual harassment, tobacco use, Internet usage, cheating/plagiarism, athletics, parking, clubs and organizations, and public displays of affection. The middle/high school campus has gang awareness and Internet safety guidelines as part of its process and handbook. The middle/high school campus does conduct beginning and end-of-year student and staff surveys through each campus’s Eagles Committee. Results are reviewed and discussed with the Eagles Committee and, if changes are warranted, the committee will make a recommendation to the principal for consideration.

The Southwest Middle/High School campus has revised its Emergency Handbook for school year 2012–13, which is more comprehensive and includes the follow categories:

1. Emergency phone numbers;
2. Definition of a crisis;
3. Crisis response guidelines;
4. Media communications guidelines;
5. Accidental death/suicides;
6. Accident/serious illness (off campus);
7. Accident/serious illness (on campus);
8. Bomb threat procedures;
9. Chemical spill;

10. Contagious disease;
11. Dangerous or irate person on campus;
12. Food Poisoning;
13. Gang violence and/or riots;
14. Hostage situation;
15. Inclement weather procedures;
16. Natural disasters pending;
17. Natural disasters occurring;
18. Nuclear threat;
19. Protest/demonstrations;
20. Sexual assault/abduction on campus; and
21. Shelter in place.

All Southwest Schools sites visited had the proper certificate of occupancy and current fire marshal life safety inspections for fire extinguishers and exit sign illumination. One school, Mangum Elementary, has an active freight railroad track in the rear of the facility with a fence in between the facility and the tracks. However, the presence of a nearby railroad track is not listed in the Mangum Elementary School’s Emergency Operations Plan (“Safe School Plan”). These weaknesses must be factored into the process and plan to avoid any unplanned negative consequences that might impact the life or safety of staff or students. Failure to be prepared is a crisis situation waiting to happen. A comprehensive evaluation process of the safety and security programs and practices would highlight this as an area of concern.

Central office staff use a site visit expectations checklist when visiting the school campuses. The checklist addresses health and safety, bathrooms, physical environment, program, outdoor areas for children, marketing appeal, business management, and communications and interactions. The checklist encompasses a broader scope than just items related to safety and security.

The Texas School Safety Center (TxSSC) was established in 1999 and statutorily authorized by the Seventy-seventh Texas Legislature, 2001, to serve as a central location for school safety information, and to provide schools with research, training, and technical assistance to reduce youth violence and promote safety in the state. The TxSSC developed the *Unified School Safety and Security Standards* to present a list of standard practices to which schools, as well as first responders,

can align themselves to provide for the best possible safety for students, staff, and visitors. These standards address prevention, preparedness, response, and recovery.

ISDs must conduct an annual review of the audit recommendations set forth in the written audit report. The TxSSC developed the *School District Facility Safety and Security Audit Toolkit* (www.txssc.txstate.edu). The *Toolkit* states, “school safety is the responsibility of everyone—staff, students, parents, and the community.” An audit, when used effectively, provides a snapshot of facility safety identifying areas which need improvement. This proactive process ensures students achieve learning potential within a safe and secure environment while fulfilling the requirements of TEC Section 37.108(b). It should be noted that charter schools are not required to comply with TEC Section 37.108(b).

The *Safety and Security Audit Toolkit* requires specific onsite activities such as a walk-through and visual assessment of the buildings and grounds; observation of transition between class periods, and movement throughout the facility; and observation of dismissal of students from school. In addition, the audit requires reviewing of documents such as:

- campus/facility Emergency Operations Plan;
- site plan of the facility(extensive details required);
- emergency contact numbers including home numbers;
- student code of conduct;
- floor plan of facility(extensive details required);
- student/staff identification (IDs) and policy;
- visitor procedures;
- campus improvement plan;
- climate survey results; and
- campus discipline referral data.

The *Toolkit* provides detailed checklists for safety and security concerns. At an ISD, the results of the audit are typically presented in a written report to the superintendent and the Board of Trustees. Reference to this *School District Facility Safety and Security Audit Toolkit* makes the process more comprehensive and supportive of efforts to evaluate/audit the safety and security programs and process in the school campuses.

In addition, the TxSSC provides training on topics such as gang awareness, suicide prevention, digital wellness, and school violence, to name a few. The TxSSC has approximately 25 trainings scheduled through the end of 2012. A complete list of upcoming trainings can be reviewed on the web at <http://www.txssc.txstate.edu/> under the K–12 Services tab (schedule). The TxSSC allows charter school representatives to attend trainings being delivered at nearby ISDs and Regional Education Service Centers at no charge. In addition, the TxSSC is also encouraging charter schools to participate in training sessions being provided at Regional School Safety Summits across the state.

The Crime Prevention Through Environmental Design (CPTED) would also be a good resource for this initiative. The content, including strategies, found within the CPTED Assessment would help as a starting point for Southwest Schools if the *Safety and Security Audit Toolkit* is too comprehensive for the needs of the charter. The process of performing a CPTED assessment is not a replacement for the need for a school to have a formal plan and process to annually evaluate its safety and security programs. However, the strategies contain a list of best practices which both ISDs and charter schools are encouraged to consider and adopt for their respective campuses.

Exhibit 5–2 provides another example of areas covered by a school safety and security best practice self-assessment for program evaluation made available by the Florida Department of Education. The self-assessment represents another quality assessment tool for an annual evaluation of the school’s safety and security programs. Many of these categories are also incorporated within the Texas School Safety Center *School District Facility Safety and Security Audit Toolkit*.

Southwest Schools should develop a formal process and plan to perform an annual evaluation of safety and security programs at all campus facilities. Although charter schools are exempt from this requirement of the TEC, the magnitude of not assessing the effectiveness of a campus safety and security program and process is to place the safety and security of children and staff at potential risk. It is up to Southwest Schools to conduct its own evaluation of the security programs and develop a more thorough understanding of the total effectiveness of the process and the programs.

Since the review, Southwest Schools has established a District Safety Committee comprised of five staff members who have been meeting on a monthly basis since August 2012 to

EXHIBIT 5–2
SCHOOL SAFETY AND SECURITY BEST PRACTICE SELF-
ASSESSMENT AREAS OF REVIEW

- Performance Effectiveness and Efficiency;
- Organizational Staffing;
- Emergency and Safety Procedures;
- School Safety Plan with Stakeholder Input;
- Health and Safety Issues for the Facility;
- Developed Emergency Response Procedures;
- Emergency Checklist;
- Regular Practice of Emergency Responses;
- Floor Plans and Blueprints;
- Master Plan for In-service;
- Code of Student Conduct;
- Disciplinary Procedures;
- Early Warning Signs of Violent Behavior;
- Community Outreach;
- Use of Curriculum;
- Safe and Drug Free School Plan;
- Violence and Drug Prevention;
- Threat of Suicidal Behavior;
- Safe School Design to Reduce Vandalism;
- Limited Access to Facility;
- Playground Safety;
- Security of Records and Property;
- Prevent Injury to Students and Others;
- Environmental and Food Safety Health Practices and Regulations;
- Pre-Incident Security Enhancement Plan;
- Student Arrival and Departure from Campus; and
- Transportation Safety of Children.

SOURCE: Florida Department of Education, Office of Emergency Management, 2012 Safety and Security Best Practices (Year 11), 2012.

address the issues cited in this report. Compiling information for an Emergency Procedures Manual, requesting safety plans from the Residential Treatment Center sites, and identifying and addressing current safety concerns have been some of the issues addressed at these meetings thus far. In addition, four staff members attended a regional Texas School Safety Center Safety Summit in October 2012 allowing Southwest Schools to access additional school safety resources. As a result, Southwest Schools should consider using the TxSSC's *School District Facility Safety and Security Audit Toolkit* and/or the self-assessment guide referenced in **Exhibit 5–2** as sources to capture important key elements of areas that Southwest Schools should be reviewing and evaluating annually.

This recommendation can be implemented with existing resources.

RECOVERY PLAN (REC. 21)

Southwest Schools has not developed and implemented a recovery plan in its Emergency Operations Plan for use after an emergency event.

The Emergency Operations Plan does mention the activities related to a post-crisis intervention. There are no statutory requirements to implement a recovery plan, yet normal preventative business planning dictates the need to establish a plan of action should a circumstance arise.

Research conducted over the past decade indicates that schools are increasingly more susceptible to crisis situations that adversely affect large numbers of students and faculty. Schools today are facing new types of trauma and emergencies that were almost nonexistent 20 years ago including hostage-taking, sniper attacks, murders, terrorist activities, and bomb threats. These types of situations cause an aftermath of issues difficult to predict. The more direct the exposure to the event, the higher the risk for emotional harm which requires post-intervention planning to assist students and staff recover from the physical, psychological and emotional trauma associated with tragic events. Staff at the various campus sites indicated that current procedures require they contact the Southwest Schools Community in Schools office for appropriate assistance as it relates to the post-trauma created by crisis situations.

Weather-related emergencies require a different set of recovery considerations. Unpredictable weather situations can cause wind or water damage and do extensive damage to the buildings themselves. Recovery plans for all sites must consider an alternative location to establish the continuance of the education process and the necessary support functions to conduct business. Southwest Schools indicated in interviews that, in its Emergency Operations Plan, the school had alternative sites selected if necessary. The sites were noted for evacuation/relocation centers, but not recovery sites to allow Southwest Schools to continue to operate for an undefined period. The middle/high school had considered alternative evacuation sites and was prepared to continue operations in those facilities. However, the details of what the campus recovery plan would entail was not provided.

Disaster or crisis situations must be considered in the recovery plan so that the campus is prepared to deal with situations that might arise. Disaster planning is more than dealing with response activities; it is also being prepared for recovery situations regardless of the crisis or disaster. Being in a crisis recovery situation, without a comprehensive plan and

engaged in problem solving, is not the appropriate situation to be in having to make decisions that could have unintended negative consequences. For example, the middle/high school campus was faced with a flooding crisis situation in January 2012 which had not been considered part of any crisis planning process in terms of a recovery plan. The central office and the middle/high school campus were in the midst of a crisis and brainstorming for solutions. They could have avoided brainstorming and responded to the crisis immediately if a comprehensive recovery plan was in place.

Notification of stakeholders in a crisis situation is critical and the timing is important. At the time onsite interviews were conducted, Southwest Schools officials reported that they did not have a mass notification software process in place to automatically call parents and interested parties with important messages at the elementary and middle/high school locations. This explains why calls, which took a considerable amount of time, were manually placed by central office staff to parents and other individuals during the flooding crisis situation in January 2012. However, since the review, Southwest Schools reports that a mass notification system was actually in place during the January 2012 flooding; however, the phone and computer system were unavailable and administrators allowed students to use their personal cell phones to contact parents. The system has features that call, email, and/or text parents, students, and staff; the system is capable of sending out all calls, emails, and texts at one designated time. The notification system can be programmed with a computer voice, or district/campus personnel may personalize the message being sent. Southwest Schools officials report that the notification system is set-up through the phone and computer systems, which had to be disconnected for safety purposes due to the rising floodwaters rendering the system useless.

The *Texas Unified School Safety Standards: Best Practices*, developed by the TxSSC, highlight areas to be considered in the recovery state of crisis management. Within the standards, continuity of operations is addressed to resume school functions after an incident are covered as well as procedures for resource management and procedures for emotional and physical health recovery needs for students and staff after an incident. Resumption of instructional delivery, payroll, information technology, transportation, administration, and change in chain of command, physical plants, and a formal memo of understanding with service providers are additional areas highlighted in the standards.

Southwest Schools should develop and implement a recovery plan in its Emergency Operations Plan for resuming operations at all campus facilities after an emergency event. Consideration must be given to the recovery steps necessary to deal with a major fire or weather occurrences that could destroy a building or a major portion of the facility. The recovery plan should include contingency plans on how to continue to conduct business if the facility is no longer available for educational purposes either in short-term or long-term. The recovery plan must address an alternative location to conduct ongoing business operations/educational activities; a process for establishing communications; the ability to provide the proper information systems or technology support to the operations; a method for document retrieval from the dislocated facility; and the ability to continue with all campus-related financial services and human resource support in order to conduct business.

Southwest Schools leaders should determine a time to discuss the factors to be considered in developing a recovery plan. Lessons learned from the most recent flooding situation at the middle/high school should provide some immediate insight into the factors that must be considered in the planning process. Access to the TxSSC is an option that Southwest Schools should consider to do preliminary research to determine if the TxSSC has readily available material and/or suggestions and support to create a comprehensive recovery plan. Once the charter school has prepared and completed its background research, the superintendent should designate the assistant superintendent of Academics and Operations to collaborate and develop the plan with campus representatives and have it approved by school leaders. Once Southwest Schools has an acceptable plan it should be approved by the Board of Directors, implemented, monitored, and updated on an annual basis.

This recommendation can be implemented with existing resources.

IDENTIFICATION BADGES (REC. 22)

Southwest Schools is not enforcing the policy of requiring staff to wear their identification badges while on duty. The campus sites have an access process for students, parents and visitors. The schools also issue and require all staff on campus to wear identification badges while on duty; a policy that appears in each one of the campus handbooks. However, during onsite interviews and observations, staff stated that campuses are not consistently wearing identification badges. Southwest Schools has an effective entrance and access

process at all campuses, but failed to include the enforcement element by allowing staff to not wear identification badges during the school day while on campus.

Not involving staff in the security access and control process, including the wearing of identification badges, sends the wrong message to the rest of the stakeholders who expect everyone to be participants in the safety and security of children. Key control is only one of many methods for controlling building access. Individuals who are authorized to be on a campus facility should be clearly identifiable, even from a distance, and that is one of the primary purposes of requiring everyone to wear an identification badge.

A step taken by Southwest Schools to identify visitors at their various campuses includes the use of a Visitor Management System called Raptor. Raptor requires everyone to provide a form of identification (ID), preferably with a picture, which is scanned into the system. Once a user scans an ID, Raptor prints an ID badge. The Visitor Management System identification software and hardware is used by all campuses for all visitors.

Southwest Schools should enforce the policy requirement for staff to wear identification badges to enhance the security and identification process. Central office and campus staff should conduct a meeting to discuss various issues and this unenforced practice at campus sites should be added as a topic. The meeting should result in recommendations on how to refresh the expectation of staff to consistently wear identification badges and possibly provide some action for employees not wearing identification badges. Campus staff represent role models to students, parents and other visitors, and not enforcing the use of proper identification badges for faculty and staff presents two sets of rules within Southwest Schools.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2013-14	2014-15	2015-16	2016-17	2017-18	TOTAL	ONE TIME
						5-YEAR (COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 5: SAFETY AND SECURITY							
20. Develop a formal process and plan to perform an annual evaluation of safety and security programs at all campus facilities.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21. Develop and implement a recovery plan in its Emergency Operations Plan for resuming operations at all campus facilities after an emergency event.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22. Enforce the policy requirement for staff to wear identification badges to enhance the security and identification process.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTALS-CHAPTER 5	\$0	\$0	\$0	\$0	\$0	\$0	\$0

APPENDICES

SOUTHWEST SCHOOLS

ADMINISTRATOR SURVEY

Completion Rate = 100 Percent

N = 16

Note: Totals may not add to 100 percent due to rounding.

A. DEMOGRAPHICS

	LESS THAN 2 YEARS	2 TO 5 YEARS	6 TO 10 YEARS	11 TO 15 YEARS	16 YEARS OR MORE
1a. How long have you been employed by your charter school?	18.8%	56.3%	18.8%	6.3%	0.0%
	1 TO 5 YEARS	6 TO 10 YEARS	11 TO 15 YEARS	16 YEARS OR MORE	
1b. How long have you been employed as an administrator in this capacity at your school?	81.3%	12.5%	6.3%	0.0%	

B. CHARTER ORGANIZATION AND MANAGEMENT

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
2. School board members understand their role as policymakers and stay out of the day-to-day management.	31.3%	43.8%	25.0%	0.0%	0.0%	0.0%
3. The superintendent (headmaster) is an effective leader.	25.0%	62.5%	6.3%	0.0%	6.3%	0.0%
4. The school administration is efficient in providing services to our school.	18.8%	75.0%	6.3%	0.0%	0.0%	0.0%
5. The morale of administrative staff is good.	37.5%	37.5%	12.5%	12.5%	0.0%	0.0%
6. Our charter school administration is efficient.	18.8%	50.0%	18.8%	12.5%	0.0%	0.0%
7. Our charter's strategic plan guides daily decision making.	12.5%	56.3%	25.0%	6.3%	0.0%	0.0%
8. Most administrative practices in our charter school are highly efficient and effective.	6.3%	62.5%	12.5%	18.8%	0.0%	0.0%
9. Faculty and staff who do not meet expected work standards are held accountable for improving their performance.	12.5%	75.0%	0.0%	12.5%	0.0%	0.0%
10. Our charter school communicates with parents in a timely manner.	25.0%	68.8%	6.3%	0.0%	0.0%	0.0%
11. The extent to which our charter school shares information with the community and media is sufficient.	12.5%	81.3%	6.3%	0.0%	0.0%	0.0%
12. Charter school salaries are competitive with similar positions in the job market.	6.3%	25.0%	6.3%	37.5%	25.0%	0.0%
13. Our school has an effective employee recruitment program.	0.0%	68.8%	6.3%	25.0%	0.0%	0.0%

B. CHARTER ORGANIZATION AND MANAGEMENT (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
14. The staff development program relevant to my position is effective.	12.5%	62.5%	18.8%	6.3%	0.0%	0.0%
15. I receive an annual personnel evaluation.	0.0%	25.0%	12.5%	37.5%	12.5%	12.5%
16. Our school states qualifications such as seniority and skill levels needed for promotion.	0.0%	37.5%	25.0%	25.0%	12.5%	0.0%
17. Employees are rewarded for superior performance or are counseled about less than satisfactory performance.	6.3%	31.3%	37.5%	25.0%	0.0%	0.0%
18. Our charter school has a fair and timely grievance process.	18.8%	56.3%	18.8%	6.3%	0.0%	0.0%
19. Our charter school's health insurance package meets my needs.	0.0%	25.0%	12.5%	31.3%	18.8%	12.5%

C. EDUCATIONAL SERVICE DELIVERY

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
20. Education is the main priority in our charter school.	43.8%	43.8%	6.3%	6.3%	0.0%	0.0%
21. Teachers are given an opportunity to suggest programs and materials that they believe are most effective.	26.7%	53.3%	0.0%	20.0%	0.0%	0.0%
22. Our school provides curriculum guides for all grades and subjects.	56.3%	43.8%	0.0%	0.0%	0.0%	0.0%
23. The needs of the college-bound student are being met.	25.0%	37.5%	18.8%	0.0%	0.0%	18.8%
24. Our charter school has effective educational programs for the following:						
a) Reading	25.0%	62.5%	6.3%	6.3%	0.0%	0.0%
b) Writing	25.0%	56.3%	12.5%	6.3%	0.0%	0.0%
c) Mathematics	25.0%	56.3%	18.8%	0.0%	0.0%	0.0%
d) Science	25.0%	56.3%	12.5%	6.3%	0.0%	0.0%
e) English or Language Arts	25.0%	68.8%	6.3%	0.0%	0.0%	0.0%
f) Computer Instruction	12.5%	43.8%	25.0%	12.5%	0.0%	6.3%
g) Social Studies (history or geography)	18.8%	62.5%	18.8%	0.0%	0.0%	0.0%
h) Fine Arts	12.5%	37.5%	31.3%	12.5%	0.0%	6.3%
i) Physical Education	12.5%	56.3%	12.5%	6.3%	0.0%	12.5%
j) Business Education	12.5%	18.8%	43.8%	6.3%	0.0%	18.8%
k) Career and Technology Education	12.5%	25.0%	31.3%	6.3%	0.0%	25.0%
l) Foreign Language	13.3%	46.7%	20.0%	13.3%	0.0%	6.7%

C. EDUCATIONAL SERVICE DELIVERY (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
25. Our charter school has effective programs for the following:						
a) Library Service	0.0%	20.0%	20.0%	33.3%	0.0%	26.7%
b) Honors/Gifted and Talented, and Advanced Placement Education	13.3%	20.0%	6.7%	20.0%	6.7%	33.3%
c) Special Education	37.5%	56.3%	0.0%	6.3%	0.0%	0.0%
d) Head Start and Even Start	18.8%	31.3%	18.8%	6.3%	0.0%	25.0%
e) Dyslexia	6.3%	43.8%	25.0%	6.3%	0.0%	18.8%
f) Student mentoring	12.5%	37.5%	6.3%	18.8%	0.0%	25.0%
g) Literacy	12.5%	75.0%	6.3%	0.0%	0.0%	6.3%
h) Drop-out Prevention	6.3%	37.5%	25.0%	6.3%	0.0%	25.0%
i) Summer school	18.8%	75.0%	0.0%	6.3%	0.0%	0.0%
j) Alternative Education	6.3%	25.0%	6.3%	12.5%	0.0%	50.0%
k) "English as a second language"	12.5%	81.3%	6.3%	0.0%	0.0%	0.0%
l) Career counseling	18.8%	25.0%	31.3%	6.3%	0.0%	18.8%
m) College counseling	18.8%	43.8%	12.5%	6.3%	0.0%	18.8%
26. Teacher turnover is low.	18.8%	31.3%	12.5%	31.3%	6.3%	0.0%
27. Highly qualified teachers fill job openings.	25.0%	62.5%	0.0%	12.5%	0.0%	0.0%
28. The student-to-teacher ratio is reasonable.	50.0%	43.8%	6.3%	0.0%	0.0%	0.0%
29. Students have access, when needed, to a school nurse.	12.5%	0.0%	12.5%	25.0%	37.5%	12.5%
30. Teachers/teacher groups use data to tailor learning experiences for individual students/student groups.	25.0%	62.5%	0.0%	12.5%	0.0%	0.0%
31. Our charter school can be described as a "good places to learn."	50.0%	43.8%	6.3%	0.0%	0.0%	0.0%

D. FACILITIES USE AND MANAGEMENT

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
32. Parents, citizens, students, faculty, staff and the board provide input into facility planning.	18.8%	37.5%	25.0%	6.3%	0.0%	12.5%
33. Our charter school is clean.	81.3%	18.8%	0.0%	0.0%	0.0%	0.0%
34. Our charter school is well-maintained.	75.0%	25.0%	0.0%	0.0%	0.0%	0.0%
35. Emergency maintenance is handled promptly.	37.5%	56.3%	0.0%	6.3%	0.0%	0.0%
36. Our charter school has sufficient space and facilities to support instructional programs.	26.7%	66.7%	0.0%	6.7%	0.0%	0.0%
37. Charter school facilities are available for community use.	0.0%	31.3%	37.5%	18.8%	0.0%	12.5%

D. FACILITIES USE AND MANAGEMENT (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
38. Our charter school has an effective energy management program.	6.3%	31.3%	37.5%	12.5%	0.0%	12.5%

E. FINANCIAL MANAGEMENT AND PURCHASING

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
39. Site-based budgeting is used effectively.	18.8%	75.0%	6.3%	0.0%	0.0%	0.0%
40. Funds are allocated fairly.	25.0%	62.5%	12.5%	0.0%	0.0%	0.0%
41. Campus administrators are well trained in fiscal management techniques.	18.8%	50.0%	18.8%	12.5%	0.0%	0.0%
42. Our school's financial reports are easy to read and understand.	12.5%	43.8%	31.3%	12.5%	0.0%	0.0%
43. Our charter school's financial reports are readily available to parents and community members.	12.5%	25.0%	50.0%	12.5%	0.0%	0.0%
44. Because of effective internal controls, our charter school is safe from abuse or misuse of funds.	25.0%	50.0%	25.0%	0.0%	0.0%	0.0%
45. Our charter school's contract management is efficient and effective.	31.3%	37.5%	25.0%	0.0%	0.0%	6.3%
46. Purchasing processes are not cumbersome for the requestor so I get what I need when I need it.	25.0%	50.0%	12.5%	12.5%	0.0%	0.0%
47. Our charter school acquires high quality materials and equipment at the lowest cost.	37.5%	56.3%	6.3%	0.0%	0.0%	0.0%
48. Students are issued textbooks in good shape and in a timely manner.	18.8%	56.3%	12.5%	0.0%	0.0%	12.5%

F. SAFETY AND SECURITY

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
49. Gangs are not a problem in our charter school.	25.0%	50.0%	6.3%	18.8%	0.0%	0.0%
50. Drugs are not a problem in our charter school.	37.5%	37.5%	12.5%	12.5%	0.0%	0.0%
51. Vandalism is not a problem in our charter school.	31.3%	50.0%	6.3%	12.5%	0.0%	0.0%
52. Security personnel have a good working relationship with principals and teachers.	12.5%	0.0%	43.8%	0.0%	0.0%	43.8%
53. A good working arrangement exists between local law enforcement and our charter school.	12.5%	50.0%	18.8%	6.3%	0.0%	12.5%

G. OVERALL OPERATIONS

CHARTER SCHOOL OPERATION	SHOULD BE ELIMINATED	NEEDS MAJOR IMPROVEMENT	NEEDS SOME IMPROVEMENT	ADEQUATE	OUTSTANDING	DON'T KNOW
a) Strategic Planning	0.0%	6.3%	37.5%	31.3%	18.8%	6.3%
b) Curriculum Planning	0.0%	12.5%	37.5%	31.3%	18.8%	0.0%
c) Facilities Planning	0.0%	0.0%	0.0%	68.8%	25.0%	6.3%
d) Budgeting	0.0%	0.0%	12.5%	50.0%	37.5%	0.0%
e) Financial Management	0.0%	0.0%	6.3%	43.8%	37.5%	12.5%
f) Asset Management	0.0%	0.0%	6.3%	37.5%	25.0%	31.3%
g) Risk Management	0.0%	0.0%	6.3%	56.3%	12.5%	25.0%
h) Program Evaluation	0.0%	12.5%	31.3%	25.0%	12.5%	18.8%
i) Instructional Coordination	0.0%	18.8%	12.5%	50.0%	18.8%	0.0%
j) Student Support Services	0.0%	0.0%	6.3%	56.3%	25.0%	12.5%
k) Federal Programs Coordination	0.0%	0.0%	12.5%	68.8%	12.5%	6.3%
l) Instructional Technology	0.0%	0.0%	31.3%	31.3%	31.3%	6.3%
m) Professional Development	0.0%	0.0%	26.7%	46.7%	26.7%	0.0%
n) Facilities Maintenance	0.0%	0.0%	12.5%	50.0%	25.0%	12.5%
o) Custodial Services	0.0%	0.0%	0.0%	50.0%	43.8%	6.3%
p) Safety and Security	0.0%	0.0%	0.0%	75.0%	25.0%	0.0%

H. GENERAL QUESTIONS

SURVEY STATEMENT	EXCELLENT	GOOD	FAIR	POOR	DON'T KNOW
54. I think the overall quality of education in our charter school is:	37.5%	50.0%	12.5%	0.0%	0.0%

SURVEY STATEMENT	IMPROVING	STAYING THE SAME	GETTING WORSE	DON'T KNOW
55. I think the overall quality of education in our charter school is:	93.8%	6.3%	0.0%	0.0%

SURVEY STATEMENT	HIGHLY EFFICIENT	ABOVE AVERAGE IN EFFICIENCY	AVERAGE IN EFFICIENCY	LESS EFFICIENT THAN MOST OTHER CHARTER SCHOOLS	DON'T KNOW
56. The overall operation of our charter school is:	13.3%	40.0%	40.0%	6.7%	0.0%

TEACHER/STAFF SURVEY

Completion Rate = 59.9 Percent

N = 88

Note: Totals may not add to 100 percent due to rounding.

A. DEMOGRAPHICS

	LESS THAN 2 YEARS	2 TO 5 YEARS	6 TO 10 YEARS	11 TO 15 YEARS	16 YEARS OR MORE
1a. How long have you been employed by your charter school?	50.0%	33.3%	14.8%	1.9%	0.0%

	TEACHER	SUPPORT STAFF
1b. Position at school:	81.3%	12.5%

	ELEMENTARY SCHOOL	MIDDLE/JUNIOR HIGH SCHOOL	HIGH SCHOOL	MULTIPLE GRADE RANGES	OTHER
1c. What school level is the campus on which you are located?	16.7%	14.8%	18.5%	41.7%	8.3%

B. SCHOOL ORGANIZATION AND MANAGEMENT

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
2. School board members understand their role as policymakers and stay out of the day-to-day management.	29.3%	27.2%	28.3%	8.7%	2.2%	4.3%
3. The superintendent (headmaster) is an effective leader.	25.6%	37.8%	24.4%	5.6%	4.4%	2.2%
4. The school administration is efficient in providing services to our school.	18.5%	51.1%	12.0%	14.1%	4.3%	0.0%
5. Our charter school administration is efficient.	19.4%	45.2%	15.1%	12.9%	7.5%	0.0%
6. Our charter school's strategic plan guides daily decision making.	16.3%	50.0%	20.7%	8.7%	3.3%	1.1%
7. Most administrative practices in our charter school are highly efficient and effective.	17.4%	44.6%	12.0%	19.6%	6.5%	0.0%
8. Faculty and staff who do not meet expected work standards are held accountable for improving their performance.	15.1%	51.6%	10.8%	18.3%	4.3%	0.0%
9. The schools communicate with parents in a timely manner.	22.6%	50.5%	16.1%	4.3%	2.2%	4.3%
10. Our charter has a sufficient number of volunteers to help student and school programs.	8.6%	24.7%	24.7%	22.6%	15.1%	4.3%

B. SCHOOL ORGANIZATION AND MANAGEMENT (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
11. School salaries are competitive with similar positions in the job market.	5.4%	33.7%	13.0%	22.8%	25.0%	0.0%
12. The school has an effective employee recruitment program.	6.5%	41.3%	28.3%	15.2%	6.5%	2.2%
13. The staff development program relevant to my position is effective.	18.5%	39.1%	18.5%	17.4%	5.4%	1.1%
14. I receive an annual personnel evaluation.	34.4%	37.6%	15.1%	7.5%	1.1%	4.3%
15. The school states qualifications such as seniority and skill levels needed for promotion.	8.6%	36.6%	30.1%	18.3%	3.2%	3.2%
16. Employees are rewarded for superior performance or are counseled about less than satisfactory performance.	7.6%	41.3%	22.8%	15.2%	12.0%	1.1%
17. The school has a fair and timely grievance process.	8.8%	29.7%	42.9%	4.4%	7.7%	6.6%
18. The school health insurance package meets my needs.	9.8%	37.0%	22.8%	14.1%	14.1%	2.2%

C. EDUCATIONAL SERVICE DELIVERY

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
19. Education is the main priority in our school.	44.6%	45.7%	6.5%	3.3%	0.0%	0.0%
20. Teachers are given an opportunity to suggest programs and materials that they believe are most effective.	30.4%	51.1%	7.6%	9.8%	1.1%	0.0%
21. The needs of the college-bound student are being met.	24.4%	47.8%	13.3%	11.1%	2.2%	1.1%
22. Our school provides curriculum guides for all grades and subjects.	39.1%	52.2%	4.3%	2.2%	1.1%	1.1%
23. The curriculum guides are effective tools.	29.3%	42.4%	14.1%	12.0%	1.1%	1.1%
24. The school has effective educational programs for the following:						
a) Reading	31.1%	52.2%	6.7%	4.4%	3.3%	2.2%
b) Writing	30.0%	54.4%	5.6%	7.8%	1.1%	1.1%
c) Mathematics	21.3%	56.2%	9.0%	7.9%	3.4%	2.2%
d) Science	23.3%	60.0%	3.3%	8.9%	2.2%	2.2%
e) English or Language Arts	32.2%	55.6%	4.4%	5.6%	1.1%	1.1%
f) Computer Instruction	18.0%	60.7%	7.9%	5.6%	5.6%	2.2%
g) Social Studies (history or geography)	25.6%	58.9%	5.6%	4.4%	2.2%	3.3%
h) Fine Arts	15.6%	41.1%	14.4%	14.4%	10.0%	4.4%
i) Physical Education	22.2%	51.1%	5.6%	12.2%	4.4%	4.4%
j) Business Education	7.8%	31.1%	25.6%	13.3%	6.7%	15.6%

C. EDUCATIONAL SERVICE DELIVERY (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
k) Career and Technology Education	10.0%	36.7%	17.8%	17.8%	7.8%	10.0%
l) Foreign Language	11.1%	38.9%	18.9%	14.4%	6.7%	10.0%
25. The school has effective programs for the following:						
a) Library Service	2.2%	11.0%	17.6%	30.8%	18.7%	19.8%
b) Honors/Gifted and Talented, and Advanced Placement Education	2.2%	21.3%	16.9%	28.1%	18.0%	13.5%
c) Special Education	17.6%	59.3%	6.6%	8.8%	5.5%	2.2%
d) Head Start and Even Start	5.6%	13.3%	36.7%	6.7%	5.6%	32.2%
e) Dyslexia	5.6%	38.2%	29.2%	9.0%	6.7%	11.2%
f) Student mentoring	11.0%	39.6%	16.5%	18.7%	7.7%	6.6%
g) Literacy	12.2%	55.6%	11.1%	7.8%	7.8%	5.6%
h) Drop-out Prevention	11.1%	45.6%	18.9%	8.9%	4.4%	11.1%
i) Summer school	23.1%	58.2%	11.0%	2.2%	1.1%	4.4%
j) Alternative Education	13.3%	24.4%	22.2%	11.1%	5.6%	23.3%
k) "English as a second language"	17.6%	46.2%	17.6%	4.4%	5.5%	8.8%
l) Career counseling	8.8%	35.2%	22.0%	13.2%	5.5%	15.4%
m) College counseling	14.3%	39.6%	15.4%	11.0%	6.6%	13.2%
26. Parents are immediately notified if a child is absent from school.	25.3%	29.7%	22.0%	8.8%	0.0%	14.3%
27. Teacher turnover is low.	14.6%	31.5%	21.3%	19.1%	10.1%	3.4%
28. Highly qualified teachers fill job openings.	27.5%	51.6%	9.9%	8.8%	2.2%	0.0%
29. The student-to-teacher ratio is reasonable.	40.4%	58.4%	1.1%	0.0%	0.0%	0.0%
30. Students have access, when needed, to a school nurse.	5.6%	14.4%	16.7%	25.6%	22.2%	15.6%
31. Teachers/teacher groups use data to tailor learning experiences for individual students/student groups.	25.3%	59.3%	9.9%	3.3%	0.0%	2.2%
32. Our charter school can be described as a "good place to learn."	33.0%	53.8%	6.6%	5.5%	1.1%	0.0%

D. FACILITIES USE AND MANAGEMENT

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
33. Parents, citizens, students, faculty, staff and the board provide input into facility planning.	15.4%	31.9%	25.3%	14.3%	7.7%	5.5%
34. Our charter school is clean.	41.1%	47.8%	6.7%	2.2%	1.1%	1.1%
35. Our charter school is well-maintained.	37.4%	50.5%	8.8%	1.1%	2.2%	0.0%
36. Emergency maintenance is handled promptly.	31.9%	52.7%	7.7%	4.4%	2.2%	1.1%

D. FACILITIES USE AND MANAGEMENT (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
37. Our charter school has sufficient space and facilities to support its instructional programs.	21.6%	38.6%	9.1%	25.0%	5.7%	0.0%
38. Our facilities are open for community use.	11.1%	15.6%	31.1%	17.8%	5.6%	18.9%
39. Our charter school has an effective energy management program.	13.5%	24.7%	41.6%	10.1%	4.5%	5.6%

E. FINANCIAL MANAGEMENT AND PURCHASING

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
40. Site-based budgeting is used effectively.	7.7%	41.8%	37.4%	5.5%	4.4%	3.3%
41. Funds are allocated fairly.	7.7%	36.3%	41.8%	5.5%	6.6%	2.2%
42. Campus administrators are well trained in fiscal management techniques.	11.1%	30.0%	50.0%	3.3%	2.2%	3.3%
43. The school's financial reports are easy to read and understand.	9.9%	17.6%	57.1%	1.1%	3.3%	11.0%
44. The school's financial reports are readily available to parents and community members.	5.5%	22.0%	53.8%	6.6%	3.3%	8.8%
45. Because of effective internal controls, our school is safe from abuse or misuse of funds.	13.2%	31.9%	48.4%	1.1%	2.2%	3.3%
46. The school contract management is efficient and effective.	7.8%	26.7%	54.4%	3.3%	3.3%	4.4%
47. The school provides teachers and administrators appropriate materials in a timely manner.	11.1%	43.3%	17.8%	20.0%	7.8%	0.0%
48. Purchasing processes are not cumbersome for the requestor so I get what I need when I need it.	8.9%	43.3%	20.0%	25.6%	2.2%	0.0%
49. The school acquires high quality materials and equipment at the lowest cost.	8.9%	40.0%	38.9%	7.8%	2.2%	2.2%
50. Students are issued textbooks in good shape and in a timely manner.	16.5%	33.0%	22.0%	12.1%	8.8%	7.7%

F. SAFETY AND SECURITY

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
51. School disturbances are infrequent.	20.2%	38.2%	9.0%	23.6%	3.4%	5.6%
52. Gangs are not a problem in this school.	24.4%	45.6%	7.8%	13.3%	2.2%	6.7%
53. Drugs are not a problem in this school.	23.6%	40.4%	15.7%	11.2%	2.2%	6.7%
54. Vandalism is not a problem in this school.	22.5%	44.9%	11.2%	12.4%	2.2%	6.7%

F. SAFETY AND SECURITY (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
55. Security personnel have a good working relationship with principals and teachers.	18.9%	18.9%	22.2%	3.3%	1.1%	35.6%
56. Security personnel are respected and liked by the students they serve.	16.7%	20.0%	23.3%	3.3%	1.1%	35.6%
57. A good working arrangement exists between local law enforcement and the school.	15.6%	36.7%	30.0%	2.2%	1.1%	14.4%
58. Students receive fair and equitable discipline for misconduct.	22.2%	37.8%	7.8%	16.7%	11.1%	4.4%
59. Safety hazards do not exist on school grounds.	17.8%	48.9%	16.7%	13.3%	2.2%	1.1%

G. OVERALL OPERATIONS

CHARTER SCHOOL OPERATION	SHOULD BE ELIMINATED	NEEDS MAJOR IMPROVEMENT	NEEDS SOME IMPROVEMENT	ADEQUATE	OUTSTANDING	DON'T KNOW
a) Strategic Planning	0.0%	6.7%	25.8%	33.7%	12.4%	21.3%
b) Curriculum Planning	1.1%	7.9%	24.7%	34.8%	20.2%	11.2%
c) Facilities Planning	1.1%	8.0%	12.5%	38.6%	12.5%	27.3%
d) Budgeting	1.1%	5.7%	13.6%	29.5%	6.8%	43.2%
e) Financial Management	0.0%	6.7%	9.0%	27.0%	5.6%	51.7%
f) Asset Management	0.0%	4.5%	9.1%	26.1%	3.4%	56.8%
g) Risk Management	1.1%	5.7%	8.0%	33.0%	4.5%	47.7%
h) Program Evaluation	1.1%	6.7%	10.1%	42.7%	6.7%	32.6%
i) Instructional Coordination	0.0%	10.2%	21.6%	37.5%	15.9%	14.8%
j) Student Support Services	1.1%	10.2%	21.6%	28.4%	23.9%	14.8%
k) Federal Programs Coordination	1.1%	5.7%	9.1%	25.0%	10.2%	48.9%
l) Instructional Technology	1.1%	6.7%	23.6%	40.4%	18.0%	10.1%
m) Professional Development	1.1%	12.5%	25.0%	34.1%	19.3%	8.0%
n) Facilities Maintenance	2.2%	3.4%	7.9%	48.3%	21.3%	16.9%
o) Custodial Services	2.3%	5.7%	12.5%	36.4%	26.1%	17.0%
p) Safety and Security	1.1%	4.5%	12.5%	45.5%	18.2%	18.2%

H. GENERAL QUESTIONS

SURVEY STATEMENT	EXCELLENT	GOOD	FAIR	POOR	DON'T KNOW
54. I think the overall quality of education in our charter school is:	26.1%	55.7%	14.8%	2.3%	1.1%

SURVEY STATEMENT	IMPROVING	STAYING THE SAME	GETTING WORSE	DON'T KNOW
55. I think the overall quality of education in our charter school is:	76.1%	14.8%	5.7%	3.4%

H. GENERAL QUESTIONS

SURVEY STATEMENT	HIGHLY EFFICIENT	ABOVE AVERAGE IN EFFICIENCY	AVERAGE IN EFFICIENCY	LESS EFFICIENT THAN MOST OTHER CHARTER SCHOOLS	DON'T KNOW
56. The overall operation of our charter school is:	15.1%	40.7%	34.9%	7.0%	2.3%

PARENT SURVEY

Completion Rate = 13.5 Percent

N = 129

Note: Totals may not add to 100 percent due to rounding.

A. DEMOGRAPHICS

	0 TO 5 YEARS	6 TO 10 YEARS	11 YEARS OR MORE
1. How long has your child attended the charter school?	90.1%	8.6%	1.2%

B. SCHOOL ORGANIZATION AND MANAGEMENT

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
2. School board members understand their role as policymakers and stay out of the day-to-day management.	30.4%	30.4%	35.7%	0.9%	0.0%	2.6%
3. The superintendent (headmaster) is an effective leader.	49.6%	31.8%	16.3%	0.0%	0.8%	1.6%
4. The school administration is efficient in providing services to our school.	46.4%	43.2%	8.8%	0.0%	0.0%	1.6%
5. The charter school's financial reports are easy to read and understand.	28.7%	35.2%	29.5%	0.8%	0.8%	4.9%
6. The charter school's financial reports are readily available to parents and community members.	27.9%	35.2%	30.3%	1.6%	0.0%	4.9%
7. The charter school communicates with parents in a timely manner.	54.8%	38.1%	5.6%	0.8%	0.8%	0.0%
8. Charter school facilities are available for community use.	31.5%	33.1%	26.8%	0.0%	0.0%	8.7%
9. The charter school has a sufficient number of volunteers to help with student and school programs.	35.2%	39.2%	19.2%	2.4%	0.8%	3.2%
10. The charter school's administration is efficient.	42.4%	44.8%	11.2%	1.6%	0.0%	0.0%
11. The charter school's strategic plan guides daily decision making.	40.0%	40.0%	15.2%	0.0%	0.0%	4.8%
12. Most administrative practices in the charter school are highly efficient and effective.	37.1%	43.1%	16.4%	0.9%	0.9%	1.7%
13. Faculty and staff who do not meet expected work standards are held accountable for improving their performance.	31.0%	44.0%	17.2%	2.6%	0.0%	5.2%

C. EDUCATIONAL SERVICE DELIVERY

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
14. The charter school provides a high quality education.	46.0%	44.4%	6.3%	2.4%	0.8%	0.0%
15. The needs of the college-bound student are being met.	30.2%	38.8%	24.1%	4.3%	0.0%	2.6%
16. The charter school has effective educational programs for the following:						
a) Reading	53.2%	37.3%	8.7%	0.8%	0.0%	0.0%
b) Writing	52.8%	36.0%	9.6%	0.8%	0.8%	0.0%
c) Mathematics	54.0%	38.9%	5.6%	0.8%	0.0%	0.8%
d) Science	53.2%	39.7%	5.6%	1.6%	0.0%	0.0%
e) English or Language Arts	52.9%	33.9%	10.7%	1.7%	0.0%	0.8%
f) Computer Instruction	48.8%	34.7%	13.2%	1.7%	0.8%	0.8%
g) Social Studies (history or geography)	56.1%	35.8%	7.3%	0.8%	0.0%	0.0%
h) Fine Arts	44.8%	29.6%	17.6%	4.8%	1.6%	1.6%
i) Physical Education	45.2%	27.4%	18.5%	5.6%	1.6%	1.6%
j) Business Education	32.5%	28.1%	29.8%	5.3%	0.0%	4.4%
k) Career and Technology Education	30.9%	34.5%	27.3%	5.5%	0.0%	1.8%
l) Foreign Language	36.4%	28.2%	28.2%	4.5%	0.9%	1.8%
17. The charter school has effective programs for the following:						
a) Library Service	36.8%	31.6%	18.8%	6.0%	0.0%	6.8%
b) Honors/Gifted and Talented, and Advanced Placement Education	35.2%	30.3%	25.4%	3.3%	2.5%	3.3%
c) Special Education	33.6%	31.9%	27.6%	0.0%	1.7%	5.2%
d) Head Start and Even Start	22.8%	27.2%	39.5%	0.9%	0.0%	9.6%
e) Dyslexia	20.9%	23.6%	45.5%	0.9%	0.9%	8.2%
f) Student mentoring	38.3%	35.8%	20.8%	2.5%	0.0%	2.5%
g) Literacy	25.2%	41.2%	26.9%	2.5%	0.0%	4.2%
h) Drop-out Prevention	41.2%	26.9%	26.1%	0.8%	0.0%	5.0%
i) Summer school	38.5%	36.8%	18.8%	1.7%	0.0%	4.3%
j) Alternative Education	38.2%	34.5%	23.6%	0.9%	0.0%	2.7%
k) "English as a second language" program	38.1%	32.2%	22.0%	1.7%	0.0%	5.9%
l) Career counseling	38.3%	31.3%	25.2%	2.6%	0.0%	2.6%
m) College counseling	36.0%	31.6%	26.3%	3.5%	0.0%	2.6%
18. Parents are immediately notified if a child is absent from school.	62.2%	24.4%	10.2%	2.4%	0.0%	0.8%
19. Teacher turnover is low.	29.5%	36.9%	27.9%	0.8%	0.8%	4.1%
20. A substitute teacher rarely teaches my child.	33.9%	29.8%	28.2%	1.6%	4.0%	2.4%
21. Classrooms are seldom left unattended.	35.5%	24.2%	31.5%	1.6%	2.4%	4.8%

C. EDUCATIONAL SERVICE DELIVERY (CONTINUED)

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
22. Teachers are knowledgeable in the subject areas they teach.	54.5%	34.1%	11.4%	0.0%	0.0%	0.0%
23. Students have access, when needed, to a school nurse.	37.5%	25.0%	22.7%	2.3%	3.9%	8.6%
24. Students are issued textbooks in good shape and in a timely manner.	34.6%	50.4%	12.6%	0.8%	0.0%	1.6%
25. Teachers/teacher groups use data to tailor learning experiences for individual students/student groups.	38.9%	42.9%	15.9%	1.6%	0.0%	0.8%
26. The charter school can be described as a "good place to learn."	57.0%	35.9%	4.7%	2.3%	0.0%	0.0%

D. FACILITIES USE AND MANAGEMENT

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
27. Parents, citizens, students, faculty, staff, and the board provide input into facility planning.	31.5%	41.1%	25.8%	0.0%	0.0%	1.6%
28. Our charter school is clean.	62.2%	36.1%	1.7%	0.0%	0.0%	0.0%
29. The charter school is well-maintained.	63.0%	33.9%	3.1%	0.0%	0.0%	0.0%
30. Emergency maintenance is handled promptly.	41.1%	33.9%	21.8%	0.0%	0.0%	3.2%
31. The charter school has sufficient space and facilities to support the instructional programs.	32.3%	48.0%	10.2%	5.5%	1.6%	2.4%

E. SAFETY AND SECURITY

SURVEY QUESTIONS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	N/A
32. Students feel safe and secure at school.	55.1%	42.5%	2.4%	0.0%	0.0%	0.0%
33. School disturbances are infrequent.	39.7%	40.5%	15.1%	1.6%	0.8%	2.4%
34. Gangs are not a problem in this charter school.	50.8%	29.8%	13.7%	0.8%	1.6%	3.2%
35. Drugs are not a problem in this charter school.	54.5%	26.8%	12.2%	1.6%	1.6%	3.3%
36. Vandalism is not a problem in this charter school.	55.6%	28.6%	11.9%	0.8%	1.6%	1.6%
37. Students receive fair and equitable discipline for misconduct.	55.9%	35.4%	4.7%	2.4%	1.6%	0.0%
38. Safety hazards do not exist on school grounds.	44.4%	37.9%	16.1%	0.0%	0.0%	1.6%

F. OVERALL OPERATIONS

CHARTER SCHOOL OPERATION	SHOULD BE ELIMINATED	NEEDS MAJOR IMPROVEMENT	NEEDS SOME IMPROVEMENT	ADEQUATE	OUTSTANDING	DON'T KNOW
a) Strategic Planning	3.9%	15.6%	7.0%	28.9%	10.2%	34.4%
b) Curriculum Planning	4.4%	8.0%	7.1%	31.0%	15.0%	34.5%
c) Facilities Planning	5.2%	7.8%	5.2%	39.7%	7.8%	34.5%
d) Budgeting	7.0%	4.4%	5.3%	22.8%	7.0%	53.5%
e) Financial Management	5.3%	5.3%	7.0%	21.9%	7.9%	52.6%
f) Asset Management	5.4%	4.5%	5.4%	21.6%	6.3%	56.8%
g) Risk Management	5.4%	4.5%	6.3%	25.2%	9.0%	49.5%
h) Program Evaluation	5.4%	5.4%	7.1%	35.7%	12.5%	33.9%
i) Instructional Coordination	5.3%	5.3%	4.4%	39.8%	15.9%	29.2%
j) Student Support Services	8.4%	5.9%	8.4%	32.8%	28.6%	16.0%
k) Federal Programs Coordination	4.4%	7.0%	4.4%	24.6%	10.5%	49.1%
l) Instructional Technology	5.3%	7.9%	4.4%	37.7%	17.5%	27.2%
m) Professional Development	5.2%	7.8%	4.3%	37.1%	19.8%	25.9%
n) Facilities Maintenance	4.3%	6.8%	2.6%	46.2%	17.1%	23.1%
o) Custodial Services	5.4%	4.5%	3.6%	33.9%	13.4%	39.3%
p) Safety and Security	5.9%	7.6%	1.7%	46.6%	28.8%	9.3%

H. GENERAL QUESTIONS

SURVEY STATEMENT	EXCELLENT	GOOD	FAIR	POOR	DON'T KNOW
39. I think the overall quality of education in our charter school is:	48.0%	43.1%	4.9%	2.4%	1.6%

SURVEY STATEMENT	IMPROVING	STAYING THE SAME	GETTING WORSE	DON'T KNOW
40. I think the overall quality of education in our charter school is:	77.0%	15.6%	0.8%	6.6%

SURVEY STATEMENT	HIGHLY EFFICIENT	ABOVE AVERAGE IN EFFICIENCY	AVERAGE IN EFFICIENCY	LESS EFFICIENT THAN MOST OTHER CHARTER SCHOOLS	DON'T KNOW
41. The overall operation of our charter school is:	51.2%	23.6%	11.4%	2.4%	11.4%