Governance Internal Audit Report

Prepared for:
Killeen Independent School District

April 2024

Submitted By:
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Chapter 1: Introduction

This report presents the results of the Governance Internal Audit, as part of Killeen Independent School District's (KISD) internal audit program to support continuous improvement. This audit began in December 2023 and was completed in April 2024.

The audit team at Gibson Consulting Group (Gibson) wishes to thank the KISD Board of Trustees (herein referred to as the "Board"), the superintendent, and staff for their assistance in conducting this audit. We especially appreciate the efforts of Brenda King, who served as the project liaison on this important project, facilitating the collection of data and scheduling of interviews.

Objective and Scope

A governance audit is unique in that it does not audit any particular school district program, department, or function, but rather the mechanisms through which decision-making, performance measurement, and accountability are implemented in a school system at the highest level. A governance audit focuses on the board of trustees and senior district leadership (including the superintendent and key staff positions that support the board). In this context, the following elements are addressed in a governance audit:

Board Governance

- The quality, frequency, timeliness, and format of information coming to the board to support board decisions (e.g., budget adoption, policy adoption, superintendent evaluation, and decisions requiring approval by the board).
- The efficiency, effectiveness, and compliance of board meetings.
- The board's use of board committees or other mechanisms to assist the board in the governance process.
- Communications between the superintendent and the board.
- Assessment of whether the board as a whole operates in a manner consistent with its prescribed role based on statutory requirements.
- Assessment of how legal and local policies are updated and communicated.
- Assessment of how the superintendent is held accountable by the board for performance.

Senior Administration

- Assessment of administrative regulations in terms of their adequacy and usefulness in providing guidance to implement board policies.
- Assessment of how the school district monitors compliance with board policies.
- Assessment of the formal or informal decision-making frameworks guiding how decisions are made in the central office and schools.

- Organizational analysis of the senior administration, evaluating logical alignment of functions and reasonable spans of control (number of direct reports).
- Assessment of how programs and departments are held accountable for performance.
- Assessment of district short- and long-range planning processes.

Approach and Methodology

To develop the findings and recommendations included in this report, the audit team conducted the following activities:

- Collected and analyzed data provided by KISD, as well as publicly available data from the KISD website. This included Board meeting documentation and materials, Board policies, Board Operating Procedures (BOPs), the district senior-level organizational chart, District Improvement Plan (DIP), and staff presentations at Board meetings.
- Reviewed Board meeting videos for a sample of Board meetings.
- Conducted audit testing including validation of public meeting notice requirements, Board meeting parliamentary procedure, and meeting statutory deadlines for major events (e.g., adoption of budget and tax rates).
- Conducted interviews with each Trustee, the Superintendent, General Counsel, the Deputy Superintendent for Learning Services, the Deputy Superintendent for Operations, the Assistant Superintendent for Elementary Learning Services, the Assistant Superintendent for Human Resources, and the Board Clerk.
- Conducted analyses and developed findings and recommendations, culminating in draft and final report deliverables.

The KISD Board of Trustees

The KISD Board of Trustees has seven elected positions, one of which is vacant. All Board members serve at large and are elected to three-year terms. Below are the KISD Trustees.

Brett Williams
President
Place 5 – Expires 2026

Susan Jones
Vice President
Place 2 – Expires 2025

Marvin Rainwater
Secretary
Place 4 – Expires 2026

Cullen Mills
Place 6 – Expires 2024

Brenda Adams
Place 1 – Expires 2025

Oliver Mintz
Place 3 – Expires 2025

Executive Summary

This audit evaluated the governance function at both the Board and district administration levels, both of which were in a time of transition during the audit. The superintendent had not yet completed her first year in the position, and half of the current Board had been in their seats for less than three years. As a result, many district protocols were in the process of being reevaluated and updated; the findings included in this report should be viewed in that context. Gibson's major findings are as follows:

KISD Board

Overall, the KISD Board of Trustees operates well together and collaborates effectively with the superintendent. This is largely due to an emphasis on team-building training and a recognition of the importance of an effective Board-superintendent working relationship. To further strengthen its own

governance capabilities, the Board should conduct an annual self-evaluation. This will provide an opportunity for reflection and improvement and will also assist in identifying Board training needs.

KISD's local Board policies and BOPs represent the two most important collections of documents related to how the Board governs the district. Neither, however, are prioritized in a way that ensures they are reliable sources of information. To ensure local policies are up-to-date and consistent with local priorities, the Board should conduct a cyclical review of local Board policies every five to seven years. Additionally, the Board should update its BOPs to include all major governance components. This will assist in reasserting the BOP as the Board's central procedural document.

KISD Board meetings are in compliance with Robert's Rules of Order. The audit team identified several opportunities to increase efficiency, such as expanding the use of the consent agenda to expedite the approval of routine items.

Currently, Board members may reach out directly to a district staff member with information requests. This process conflicts with the protocol described in KISD's BOP and creates the risk that not all information requests are being tracked, which is a state requirement. To strengthen controls over Board member information requests, all requests should be filtered through the Board clerk and be explicitly categorized as "data" or "report."

KISD Board member training is compliant with state regulations, individually and collectively. However, the district's current process for onboarding new trustees leaves them inadequately prepared for the role. The Board and administration should re-envision the onboarding experience, making it an ongoing process (rather than a single orientation) and involving experienced trustees in each training component.

In recent years, the Board's evaluation of KISD's superintendent has not been adequately data-driven and has ineffectively promoted accountability. The audit team recommends overhauling the Board's process and instrument for evaluating the superintendent, ensuring that the new instrument is reliant on metrics that are aligned with district performance objectives.

Despite the adoption of the budget being one of the Board's central responsibilities, KISD trustees do not establish budget priorities, nor do they receive sufficient budget analysis to support their decision to adopt it. The district has a budget dashboard to support analysis, but it is not being actively used by the administration or the Board. The Board should create formal budget priorities at the beginning of the budget process and increase the use of the budget dashboard and related metrics to support budget development and budget decisions.

KISD Administration

In recent years, the district lacked a strategic plan to drive its programming and operations toward measurable goals. The absence of a central guiding document negatively impacted KISD in several ways. For example, the Board was not able to effectively evaluate the superintendent, and district leaders lacked a common objective to work towards. Throughout 2023-24, district administration has worked to create a strategic plan, known as a system scorecard. The development and implementation of the system scorecard is critically important to the long-term success of KISD, and the Board and administration should continue prioritizing these efforts.

The district's Administrative Regulation Manual contains nearly 200 regulations. The manual is not regularly reviewed and includes out-of-date information. Administrative regulations, adopted by the superintendent, represent the district's official position and response on matters dealing with everything from cybersecurity to students in crisis. Accordingly, it is important that regulations provide accurate guidance and are consistent with actual practice.

The KISD district administration has not adequately defined decision-making authority for campus leaders. This hinders alignment across campuses and creates the potential for implementation fidelity issues. Administration should develop a framework for decision making, clarifying when a campus has the authority to make a decision without district approval, with district approval, or when the decision is the district's to make.

Table 1 lists the 12 audit recommendations in the order they appear in the report, along with a priority level recommended by the audit team.

Table 1. Summary of Audit Recommendations

No.	Priority	Recommendation
Chapter 2: Board Governance		
1	High	Adopt a local Board policy to conduct an annual Board self-evaluation.
2	Low	Conduct a cyclical review of KISD's local Board policies every five to seven years.
3	Medium	Update KISD's Board Operating Procedures to include all major governance components.
4	Medium	Clarify the roles and responsibilities of the attorneys working with the Board.
5	Low	Expand the use of the consent agenda.
6	High	Strengthen the controls over Board member information requests.
7	Medium	Create an onboarding program for new KISD trustees.
8	Low	Align Board training with the needs of the Board as a whole.
9	High	Overhaul the superintendent evaluation process and instrument.
10	High	Develop formal Board budget priorities.
Chapter 3: District Administration		
11	Medium	Review district administrative regulations for relevance and accuracy on a regular basis.
12	Medium	Implement a decision-making framework.

The remainder of this report is organized into the following chapters:

- Chapter 2: Board Governance
- Chapter 3: District Administration

Chapter 2: Board Governance

This chapter includes the following domains related to Board governance:

- Roles and Responsibilities
- Operations
- Policies and Procedures
- Board Meetings
- Board Communication
- Board Training
- Evaluation of Superintendent
- Budget Adoption

Roles and Responsibilities

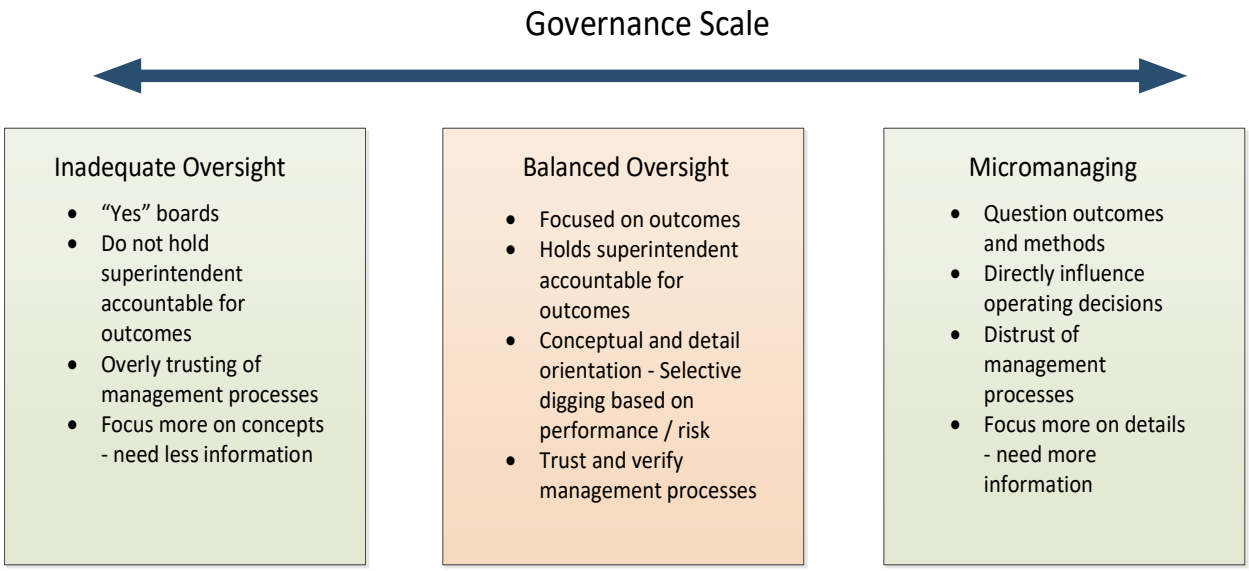
Texas statutory requirements related to board governance responsibilities are found in KISD Board Policy BAA (Legal). This policy states that "the trustees as a body corporate have the exclusive power and duty to govern and oversee the management of the public schools of the district." This policy also outlines 24 legal responsibilities of Texas school boards, including the following major responsibilities related to board governance and oversight:

- Adopt a vision statement and comprehensive goals for the district and the superintendent, and monitor progress toward those goals;
- Establish performance goals for the district concerning the academic and fiscal performance indicators under Education Code Chapter 39, Subchapters C, D, and J, and any performance indicators adopted by the district;
- Provide oversight regarding student academic achievement and strategic leadership for maximizing student performance;
- Ensure that the superintendent is accountable for achieving performance results, recognizes performance accomplishments, and takes action as necessary to meet performance goals;
- Collaborate with the superintendent as set forth in Education Code 11.1512(b);
- Publish an annual educational performance report as required under Education Code 39.306 [See AIB, BQ series];
- Adopt an annual budget for the district as required under Education Code 44.004 [See CE]; and
- Monitor district finances to ensure that the superintendent is properly maintaining the district's financial procedures and records [See CF series].

Other legal responsibilities in Policy BA (Legal) include specific activities, such as adopting a tax rate, conducting elections, developing a cybersecurity policy, and ensuring that district fiscal accounts are audited annually.

In order to evaluate KISD's governance and the Board's ability to stay within its intended role, a framework for analysis is necessary. Figure 1 introduces a range of governance approaches common in public education. This governance "scale" ranges from the extremes of inadequate oversight to excessive oversight, or micromanaging, which are discussed further below.

Figure 1. Governance Scale – Balanced Oversight



Source. Gibson Consulting Group

Inadequate oversight refers to boards that do not question the decisions or performance of the school system and do not hold the superintendent accountable for performance. These boards are highly trusting of management processes, focus more on big picture matters, and need less information to fulfill their role. Some boards may lean toward this role until a performance result or other event alters their trust in management processes. Under this governance approach, the primary responsibility for governance essentially rests with the administration.

Micromanaging refers to the opposite extreme, where there is little trust in management processes and everything needs to be questioned and verified, including methods and outcomes. Micromanaging boards also attempt to step into the administrative decision-making process. Micromanaging boards focus more on details and accordingly need more information to fulfill their role. This places an extra burden on administrators, who are constantly addressing board questions and providing additional information.

No school system operates at these extremes, but may lean or move towards one approach more than the other, depending on the superintendent's leadership style, changes in the board composition through elections, changes in board leadership, superintendent turnover, or the occurrence of an event that drives the board's perceptions of governance to a different point on the scale.

There are examples of KISD Board policies that appear to support both extreme roles, particularly with respect to information access:

- Board Policy BBE (Legal) relates to information access by individual trustees. This policy states that "when acting in the member's official capacity, a board member has an inherent right of access to information, documents, and records maintained by the district…without regard to whether the requested items are the subject of or relate to an item listed on an agenda for an upcoming meeting."
- Board Policy BBE (Local) states that "no individual Board member shall direct or require District employees to prepare reports derived from an analysis of information in existing District records or to create a new record compiled from information in existing District records. Directives to the Superintendent or other custodian of records regarding the preparation of reports shall be by Board action."

Other Board policies also help KISD avoid inappropriate governance extremes. Board Policy BBE (Local) states that Board members as individuals shall not exercise authority over the district, its property, or its employees. As stated above, Board Policy BAA (Legal) requires the Board to "ensure that the superintendent is accountable for achieving performance results, recognizes performance accomplishments, and takes action as necessary to meet performance goals."

A balanced governance approach focuses more on outcomes and accountability for those outcomes. The superintendent, through the annual performance evaluation, is held accountable for results, and the Board's focus tends to be deeper in areas of under-performance or higher risk. This prompts selective (but not comprehensive) digging into specific issues, allowing the Board to fully understand the underlying root causes and proposed solutions. A more balanced governance approach helps the Board focus on the areas of highest need and importance.

While a school board as a whole is located in between these extremes, individual board members will have their own position on this scale. The wider the variance in individual positions, the greater the challenge in governing. The fundamental challenge for school boards is to find the right balance for the board as a whole and take advantage of the diversity of individual board members to achieve that balance.

Finding 1: The KISD Board does not conduct an annual self-evaluation.

There is no legal requirement for a Board self-evaluation, but state law does authorize the Commissioner of Education to develop a board evaluation and improvement survey tool that may be used by school boards (Policy BG [Legal]). No local KISD Board policy addresses self-evaluations and, historically, the KISD Board has not conducted a regular self-evaluation. However, as part of its teambuilding work with Moak Casey, the Board completed a self-evaluation in August 2023. The evaluation tool asked Board members to respond "Yes," "No," or "I don't know" to statements related to the following six indicators:

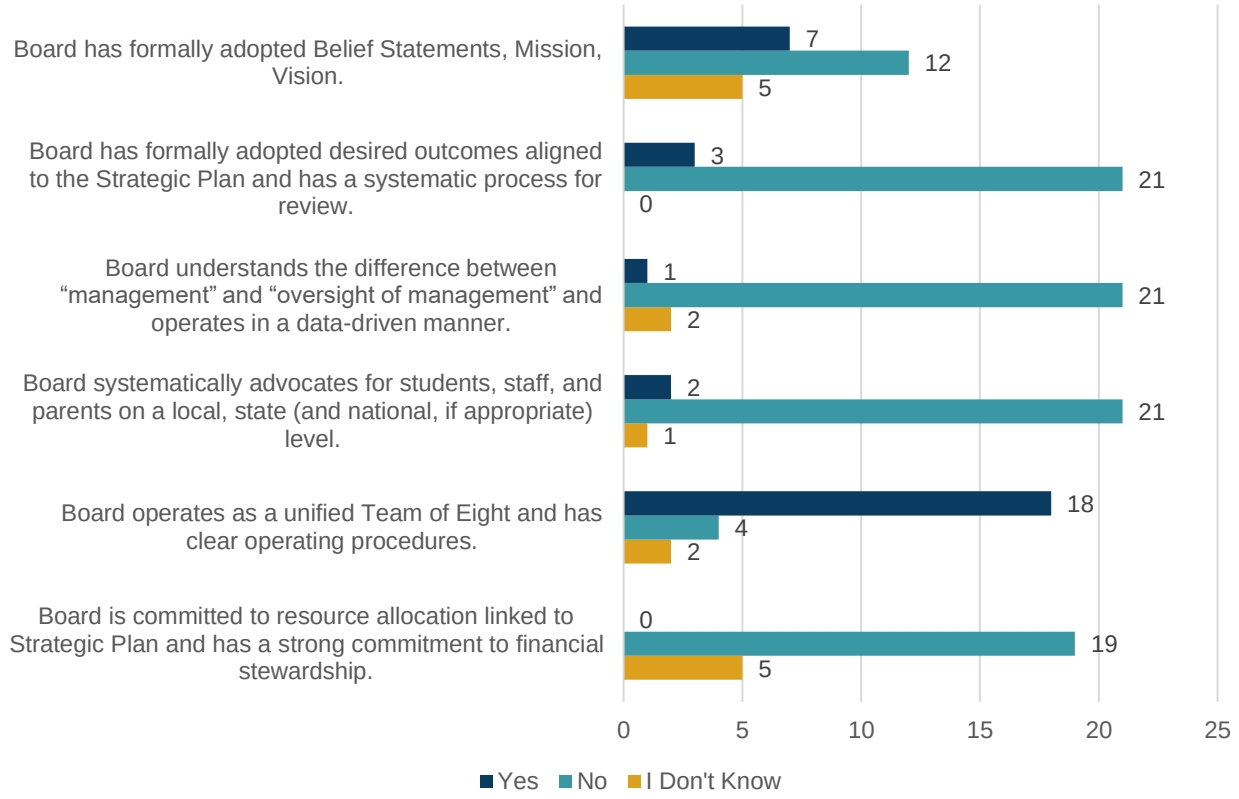
1. Board has formally adopted Beliefs, Mission, and Vision Statements.
   - We have collectively developed and formally adopted Beliefs, Mission, and Vision (BMV) Statements.
   - Our BMV statements are regularly reviewed as part of our Board meeting process.

- Our actions are consistent with our BMV.

2. Board has formally adopted desired outcomes aligned to the Strategic Plan and has a systematic process for review.
   - We have formally adopted a three-to-five-year Strategic Plan with clear outcomes.
   - We regularly review and discuss our Strategic Plan outcomes.
   - Board members can state, in general terms, our most important expected outcomes.
3. Board understands the difference between "management" and "oversight of management" and operates in a data-driven manner.
   - We have a clear model, formally adopted and part of Board operating guidelines, that describes our governance structure based on the Three Essential Roles in an Aligned School System.
   - We regularly assess our progress in good governance expectations.
   - We are data driven and use data to hold ourselves and senior leaders accountable to our stated expected outcomes.
4. Board systematically advocates for students, staff, and parents on a local, state, and national (if appropriate) level.
   - We have an active plan for advocacy in the district, community, and state.
   - The advocacy plan lists both individual and "Board as a whole" activities and is regularly reviewed.
   - The advocacy plan expectations are imbedded in the Board annual activity plan and BOPs.
5. Board operates as a unified Team of Eight and has clear operating procedures.
   - The Board and superintendent participate in at least one team-building activity each year.
   - A written annual calendar of Board events and Board operating guidelines are in place and regularly reviewed.
   - We regularly discuss the Board Code of Ethics and ensure that new trustees are made aware of the Code of Ethics, annual calendar, and operating procedures within 60 days of successful election.
6. Board is committed to resource allocation linked to Strategic Plan and has a strong commitment to financial stewardship.
   - We review how our strategic outcomes are addressed in the annual budget review process.
   - We have incorporated an efficiency review as part of our annual budget review process.
   - We have clear, district-wide expected outcomes related to financial stewardship.

Seven trustees and the superintendent recorded their responses to each statement, totaling eight responses per statement and 24 per indicator. Figure 2 presents the aggregate results, grouped by indicator. Excluding "Board operates as a unified Team of Eight and has clear operating procedures," the vast majority of trustees answered "No" or "I don't know" to the self-evaluation statements, indicating a general discontent with the current state of Board operations.

Figure 2. KISD Board Self-Evaluation Results, August 2023



Source. KISD Team of 8 Survey administered by Moak Casey, August 2023

The results of the Moak Casey evaluation showed that the Board consistently rated itself as low performing across each domain, underscoring the need to track these and other perceptions on an ongoing basis. Other benefits of a routine self-evaluation include:

- Allows the Board to identify specific areas of strength and opportunities for growth, as well as track progress;
- Provides a platform to have an honest discussion about differing perspectives;
- Serves as an important mechanism for the Board to hold itself accountable; and
- Models accountability, growth, and development for the rest of the district.

Recommendation 1: Adopt a local Board policy to conduct an annual Board self-evaluation.

The Board should administer an annual self-evaluation. Further, the audit team recommends adding the completion of a self-evaluation to KISD local Board policy. This will add a layer of accountability for current and future Boards. The process needs to include time to complete the evaluation as well as time to debrief the results as a Team of 8. Best practice is to conduct a self-evaluation annually. Due to the three-year term of Board members, a three-year self-evaluation will not provide the same benefits if there is Board turnover.

Research on effective boards can provide the KISD Board with a template for developing its own evaluation instrument. The "Trustee Demonstration Project"[1] identified six areas of competence exhibited in high-functioning boards, listed below. Below each area is an example of a statement that could assist the Board in evaluating its own proficiency.[2]

- **Contextual**
  - The Board establishes and maintains a systemic plan for feedback on policies to determine their effectiveness, worth, and whether they need to be amended, modified, or canceled.
- **Educational**
  - At least once every two years, the Board has a retreat or special session to examine its performance.
- **Interpersonal**
  - Board members are able to speak their minds without fear of being ostracized.
- **Analytical**
  - Before reaching a decision on important issues, the Board requests input from students or staff likely to be affected by the decision.
- **Political**
  - The Board actively cooperates with the news media to spread information about school programs.
- **Strategic**
  - The Board discusses where the district will be five years from now.

Policies and Procedures

KISD subscribes to the Texas Association of School Boards (TASB) Policy Update service. Through this service, TASB provides an online platform for board policies, provides legal (statutorily required) policies, and also suggests local policies for consideration.

As stated in Board Policy BF (Local), recommended local policy changes may be initiated by the superintendent, Board members, school personnel, or community citizens, but generally shall be recommended for the Board's consideration by the superintendent.

Finding 2: KISD's local Board policies are not routinely reviewed.

Policymaking is one of any school board's most important responsibilities. Local policies act as the mechanism by which a school board injects the district community's specific needs into the legal framework

[1] Chait, Richard. "Improving the Performance of Governing Boards." The Oryx Press, 1996.

[2] School Board Self-Evaluation, North Dakota School Board Association.

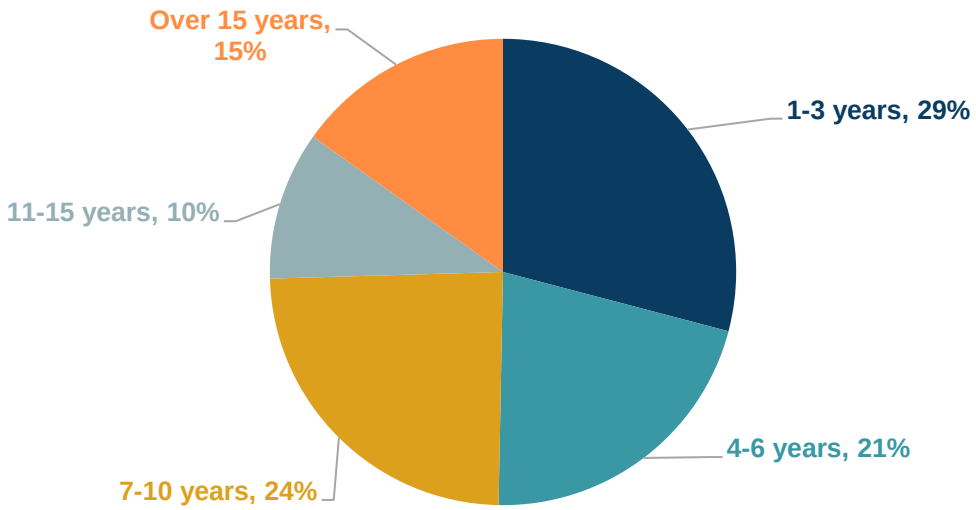
defined at the state and federal levels. KISD BOPs do not provide procedural guidance for the development and update of local policies.

KISD's policies disclose the date of the last change or update, but not the date of the last "review." Similar to legal policies, the bottom of each page of local policy ends with references to the following information:

- Date issued;
- Update number; and
- Applicable local policy reference number.

Figure 3 presents a distribution of KISD local Board policies based on the most recent date of update. This shows the number of local policies updated within the past one to three years, four to six years, seven to 10 years, 11-15 years, and more than 15 years ago. This analysis shows that 25% of KISD's local Board policies have not been updated in more than 10 years.

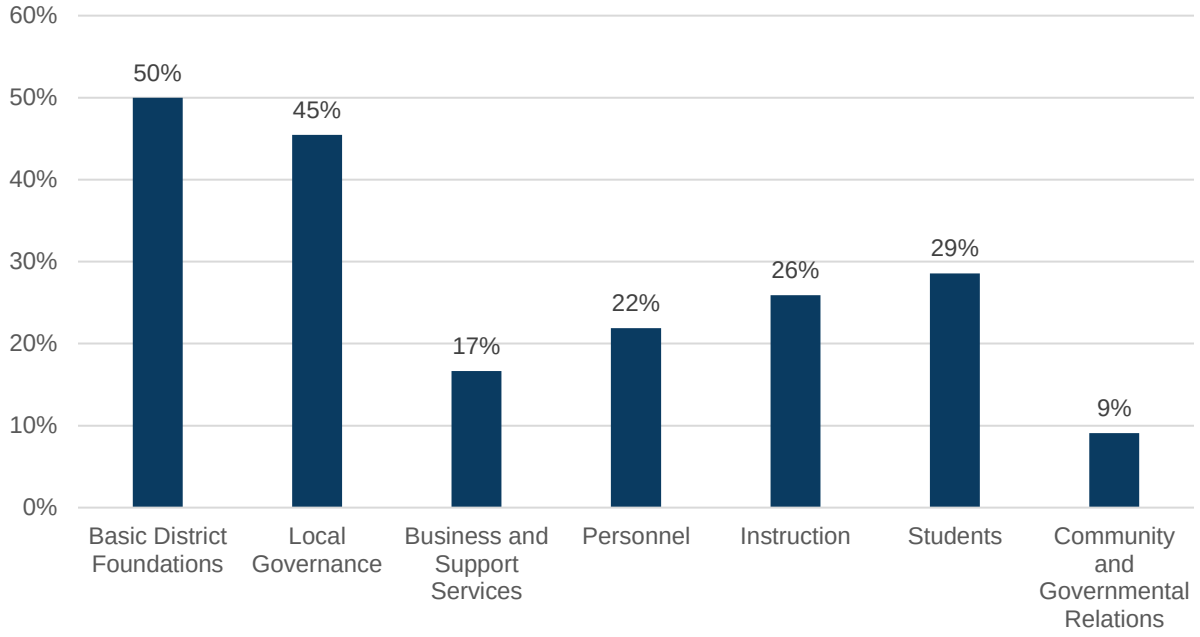
Figure 3. Date of Last Update, KISD Local Board Policies



Source. KISD Board Policy Manual

There are seven sections of KISD's Board Policy Manual: Section A (Basic District Foundations), Section B (Local Governance), Section C (Business and Support Services), Section D (Personnel), Section E (Instruction), Section F (Students), and Section G (Community and Governmental Relations). Figure 4 presents the percentage of local policies that are more than 10 years old, separated by section. The greatest percentage of older policies are in Section A (Basic District Foundations). As context, the policies found in Section A define foundational elements of the district (e.g., Local Policy AB – District Name).

Figure 4. Percentage of Local Policies Over 10 Years Old, by KISD Policy Manual Section



Source. KISD Board Policy Manual

It is important to note that no information is provided regarding the date of the most recent review as disclosed in the local Board policy. Accordingly, it is possible that a local policy could have been reviewed but not changed.

Recommendation 2: Conduct a cyclical review of KISD's local Board policies every five to seven years.

The TASB Policy Update service recommends a thorough policy review and audit every five to seven years to ensure that policies are up to date and consistent with changing local priorities.[3] The Board should ensure that each local policy is at least subject to a review every five years, even if it is not changed. Local policies represent an important extension of the KISD Board's guidance to the administration and should be subject to review regardless of whether a proposed change is initiated. The local policy review could occur on a cyclical basis by reviewing different sections of the Board Policy Manual each year, or by reviewing all local policies at one time every five years.

The information at the bottom of each local policy should be supplemented to include the "date of last review," in addition to the date of last update. This will help establish accountability over the update of local policies. Additionally, a protocol for the revision of local Board policies should be added to KISD's BOPs.

As it reviews its local policies, the KISD Board should research other school district local board policies to evaluate against their own. Below are examples of local policies from Fort Bend ISD and Dallas ISD related to basic district foundations, local governance, and curriculum and instruction. KISD does not have local

[3] TASB website: https://www.tasb.org/services/policy-service/frequently-asked-questions-faqs.aspx.

policies for AE – Educational Philosophy, BAA – Board Legal Status: Powers and Duties, EA – Instructional Goals Objectives, or EK – Testing Programs.

- Dallas ISD's Policy AE (Local) Educational Philosophy – communicates the district's Mission, Vision, and Value Statements. Additionally, this policy includes the district's Theory of Action, academic achievement goals, and strategic covenants.
- Dallas ISD's Policy BAA (Local) Board Legal Status: Powers and Duties – defines the role of the Board and differentiates between appropriate and inappropriate constituent services. This policy also outlines the system by which Board members will provide quality customer service to their constituents.
- Fort Bend ISD's Policy EA (Local) Instructional Goals and Objectives – articulates the district's Theory of Action of "managed curriculum and includes a comprehensive system to develop leadership throughout the organization. Managed curriculum aligns what is written, taught, and tested, and requires adequate resources, systematic monitoring, and highly qualified teachers." This policy also articulates the Board's expectations regarding a managed curriculum and leadership development.
- Fort Bend ISD's Policy EK (Local) Testing Programs – articulates the Board's assessment philosophy and requires the district to implement a student-centered assessment system which promotes student ownership of learning. The assessment system shall provide appropriate and timely feedback to students about progress toward proficiency in the district curriculum and encourage students to engage in the teacher-facilitated formative assessment cycle.

Finding 3: KISD's BOPs do not provide effective guidance to trustees.

KISD has a BOP document that provides guidance to the operation of the Board as a whole, as well as the actions of individual trustees. The Board meets annually to review and approve the document.

KISD's BOP document is 11 pages long and is organized using questions such as "What is the Board's annual workplan?" and "Does the Board participate in public policy?" During interviews, most trustees did not recognize the BOP document and did not recall its annual review and approval.

The Board's lack of familiarity and engagement with the BOP renders it ineffective as a guiding document. The likely reason for this is that KISD's BOP contains insufficient guidance for Board members. As a preliminary benchmark, the audit team compared the page length of KISD's BOP to those of four other Texas districts: Houston ISD, Dallas ISD, Lewisville ISD, and Garland ISD. Table 2 presents the total page length of the BOPs at each of these districts.

Table 2. Board Operating Procedure Page Length, 2023-24

District	BOP Total Page #
Killeen ISD	11
Houston ISD	122
Dallas ISD	39

District	BOP Total Page #
Lewisville ISD	36
Garland ISD	55

Source. District websites

The length of a document does not necessarily translate to quality; however, in the audit team's review of BOPs, the shortened length of KISD's BOP reflects a comparatively superficial approach. Two examples are listed below:

- KISD's BOP does not include guidance for the Board on how to manage the superintendent relationship. Garland ISD's BOP includes a description of overall expectations, formal and informal evaluations, objectives for the written evaluation, and a declaration of how the Board will avoid micromanagement.
- KISD's guidance related to the election of Board officers and their duties (first sub-bullet below) does not provide as thorough a description as Lewisville ISD's (second sub-bullet below).
  - **From KISD's BOP***: The KISD Board will select officers each year at the first meeting after school board elections and after newly elected board members have been installed. Officers selected will be:*

    1) President – presides over meetings, spokesperson for the Board;

    2) Vice-president – presides over meetings when president is absent; and

    3) Secretary – works with Board clerk to maintain records and minutes.

    When newly elected Board members are sworn in and the Board reorganized, an item will be placed on the agenda allowing the Board to convene in closed session. Board members will have an opportunity to state their desire and/or position relative to the office of Board president, Board vice-president, and Board secretary. The provisions of Board Policy BDAA (Local) will be followed.
  - **From LISD's BOP:** *Board Officers Authority and Role include but are not limited to the following.*

    1) *President – serves as the "face of the board"' presides at all Board meetings; appoints Board members to both committee participation and chairmanships; calls special meetings; speaks on behalf of the Board at most district-wide events; is a signatory on district checks, legal documents approved by Board action, resolutions, and student diplomas; responds on behalf of the Board to media requests; has the right to discuss, make motions and resolutions, and vote on all matters coming before the Board.*

    2) *Vice President – presides at any Board meetings when the Board president is unable to attend; speaks on behalf of the Board at events the Board president is unable to attend; works with the Board president to appoint Board members to both committee participation and chairmanships; performs other duties as directed by the Board.*

    3) *Secretary – presides at any Board meetings that the Board president/vice president are unable to attend; speaks on behalf of the Board at events the Board president/vice*

president are unable to attend; times speakers at grievance hearings; is a signatory on district checks, legal documents approved by Board action, resolutions and diplomas; keeps an accurate record of the proceedings of each Board meeting; performs other duties as directed by the Board.

Election of Board officers is governed by Board Policies BDAA (LEGAL), BDAA (LOCAL).

- *No Member shall be eligible for an officer position until completion of one-year minimum current Board experience.*
- *Board officers shall serve for a term of one year. Officers may succeed themselves in office.*
- *Any Board member who seeks to be elected will make their intentions known to the Board in executive/closed session at any Board meeting held in the months of April or May.*
- *At the first eligible public meeting of the Board after the scheduled joint general election date, the members of the Board shall organize by electing Board officers [BDAA (LEGAL)]. The call of the meeting will include a provision for an executive/closed session for the purpose of reconstituting the officers of the Board.*
    a. *During the executive/closed session, the Board will deliberate the duties and qualifications of a public officer. The current Board president will ask for any nominations.*
    b. *When reconvened in open session, the current Board president will preside over the election of the Board officers. The current Board president will entertain nominations. Board members will not self-nominate or second their own nomination to serve as an officer from the dais. A nomination requires a second. If additional nominations are made, then each office will be voted on separately by the Board according to Robert's Rules of Order. The Board will vote for each office in turn, beginning with the Board president. If there is more than one nominee for a position, candidates will be voted on in the order of their nomination.*
    c. *Newly elected officers will assume responsibility for their office immediately upon election to the Board office.*
- *In the event of a vacancy in an officer's position, the Board may, by majority action of the Board at any duly called meeting, fill the vacancy.*
- *The immediate past president and the newly elected president shall meet with the superintendent within one week of the election of officers to review all matters pending, to ensure the newly elected president has all the information required of the office, and to be sure all operating procedures are completed in a timely manner.*

Because of the brevity of information included in KISD's BOP, trustees have been unable to rely on it as a central guiding document, which creates two main issues: it undermines the original purpose of the BOP, and it creates compliance risks when not all trustees are familiar with the expected operating procedures of the Board.

Recommendation 3: Update KISD's Board Operating Procedures to include all major governance components.

To ensure the BOP's relevance and reassert it as the Board's central procedural document, the district should update the procedure manual to include thorough guidance for all major governance components. The keys steps in this process should be as follows:

1. Review other districts' BOPs (this should include, but not be limited to, the districts discussed in this finding) and update KISD's to address all major areas in a more comprehensive manner. At minimum, this should include Board Governance, Board Mission and Goals, Board Meetings, Board Committees, Board Relationships, Standards of Conduct, Officer Elections, Community Engagement, Communications, Media Relations, Trustee Travel, Development and Advocacy, and Training.[4]
2. Organize the BOP in a way that allows trustees to easily search the document (e.g., by sub-header topics).
3. Reserve time in an upcoming Board meeting/workshop to review and approve the new BOPs, ensuring they satisfactorily address the procedural guidelines of the Board.

Finding 4: The reporting relationships between the Board and district/Board legal counsel are not consistently understood.

Board Policy BDD (Local) states that an attorney gives general guidance related to the ways in which the Board may receive legal counsel, both in-house – "the Board shall employ an attorney or attorneys, as necessary, to serve as the District's in-house counsel and representative in matters requiring legal services" – and externally – "the Board shall have final authority to retain outside counsel." Further, the policy states that "when seeking advice or information from the District's outside counsel, individual Board members shall channel legal inquiries through the District's in-house counsel, Superintendent, Board President, or Board's designee, as appropriate."

The district currently employs in-house counsel and retains multiple external law firms/attorneys. This practice is compliant with Board policy. However, during the audit team's interviews, trustees expressed confusion and misalignment as to the process for seeking legal counsel. Several trustees expressed the belief that the district's in-house counsel serves the Board; others disagreed with this, stating that the in-house counsel served only district administration. Further, the role of KISD's in-house counsel has evolved in recent years from primarily representing district administration to now working more directly with the Board and sitting on the dais in Board meetings. Overall, this lack of clarity has the potential to result in accountability constraints in overseeing legal services and potential conflicts of interest by attorneys representing both Board and district interests.

Recommendation 4: Clarify the roles and responsibilities of the attorneys working with the Board.

As stated above, the district's practice of retaining in-house counsel and multiple external law firms/attorneys to guide the Board is compliant with Board policy and also best practice, given the

[4] Garland ISD's Board Operating Procedures.

specialized expertise that they bring. However, to ensure that trustees receive accurate, consistent legal guidance, the district should clarify the roles and responsibilities of all of the attorneys/firms working with the Board. This will have several benefits:

- Streamline the Board's process for seeking legal counsel;
- Reduce the chances of trustees receiving inconsistent or conflicting legal guidance from different sources; and
- Mitigate the risks of any potential conflicts of interest between Board's and administration's legal counsel.

Board Meetings

Board Policy BE (Legal) states that "the notice of a meeting of a board must be posted in a place readily accessible to the general public at all times for at least 72 hours before the scheduled time of the meeting." Notice of KISD Board meetings are virtually posted on the district's website as well as physically posted at the central administration building. Gibson reviewed all virtual postings for Board meetings held in 2023-24 to validate compliance with Board Policy BE (Legal) and found that all notices were posted a minimum of three days in advance.

Meeting Structure

The KISD Board uses five types of meetings to conduct its governance responsibilities. Unless otherwise specified, all meetings are open to the public.

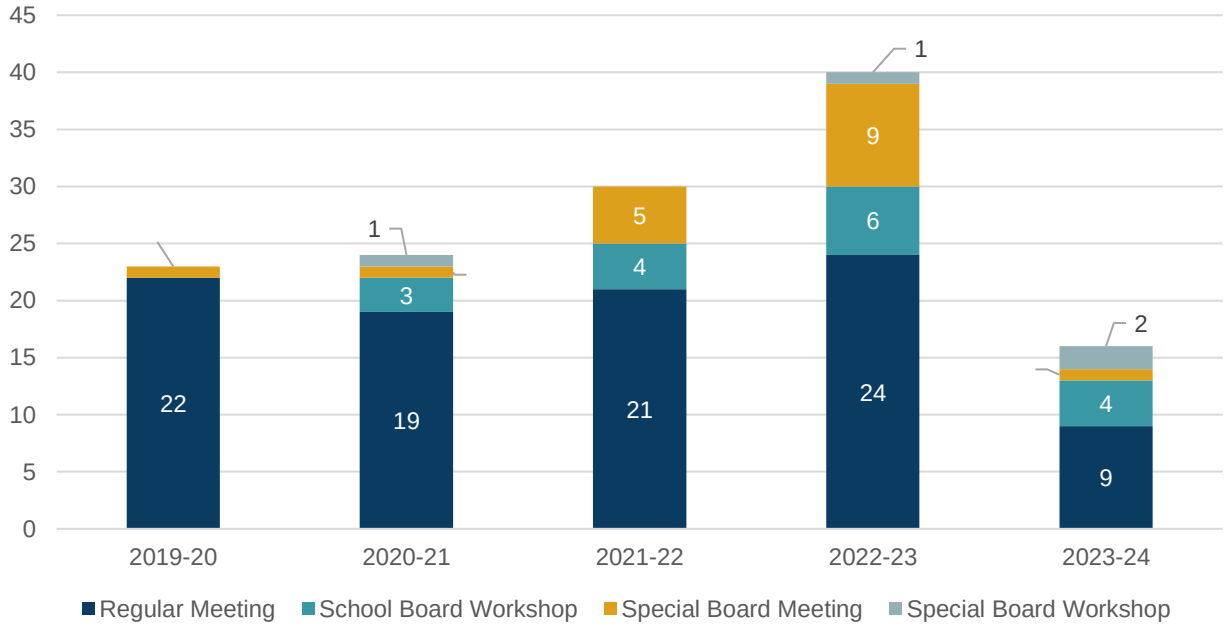
- (Regular) Board Meetings – Normally conducted on the second Tuesday of every month, these meetings are held to conduct the formal business of the district in public.
- Board Workshops – Workshops are normally conducted on the third Tuesday of every month. These meetings are held for Board members and staff to engage in intensive discussion on a limited number of subjects or projects, some of which may be brought at a later date to a regular Board meeting.
- Special Board Meetings – These meetings are held at a time outside of the regular meeting schedule and intended to address a specific topic.
- Emergency Meetings – A meeting that may be called with at least a one-hour notice to the public. An emergency meeting can be called for only two reasons: an imminent threat to public health and safety or a reasonably unforeseeable situation.[5]
- Executive/Closed Sessions – These meetings are closed to the public and can only cover certain topics which are defined in the Texas Open Meetings Act. No formal action or vote can be taken in an executive/closed session. These meetings may be conducted any time, but generally occur before or during another type of Board meeting. Examples of items discussed in executive/closed sessions include:

[5] 2024 Open Meetings Handbook. *Office of the Attorney General*. 2024

- Consulting with an attorney regarding pending or contemplated litigation, a settlement offer, or if the duty owed to the State Bar of Texas conflicts with open meeting requirements;
- Deliberating the purchase, exchange, lease, or value of real property;
- Deliberating the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of an employee or to hear a complaint or charge against an employee;
- Deliberating the deployment of security personnel or devices, or a security audit; and
- Deliberating the discipline of a child.[6]

The audit team reviewed meeting videos and agendas to analyze the Board meeting length and how much time was spent on various agenda items and topics. The following graphics display the results of this analysis. Figure 5 presents total meeting counts, grouped by meeting type, between 2019-20 and 2023-24 (as of February 13, 2024). Overall meeting counts increased between 2019-20 and 2022-23.

Figure 5. KISD Board Meeting Counts, 2019-20 to February 2024

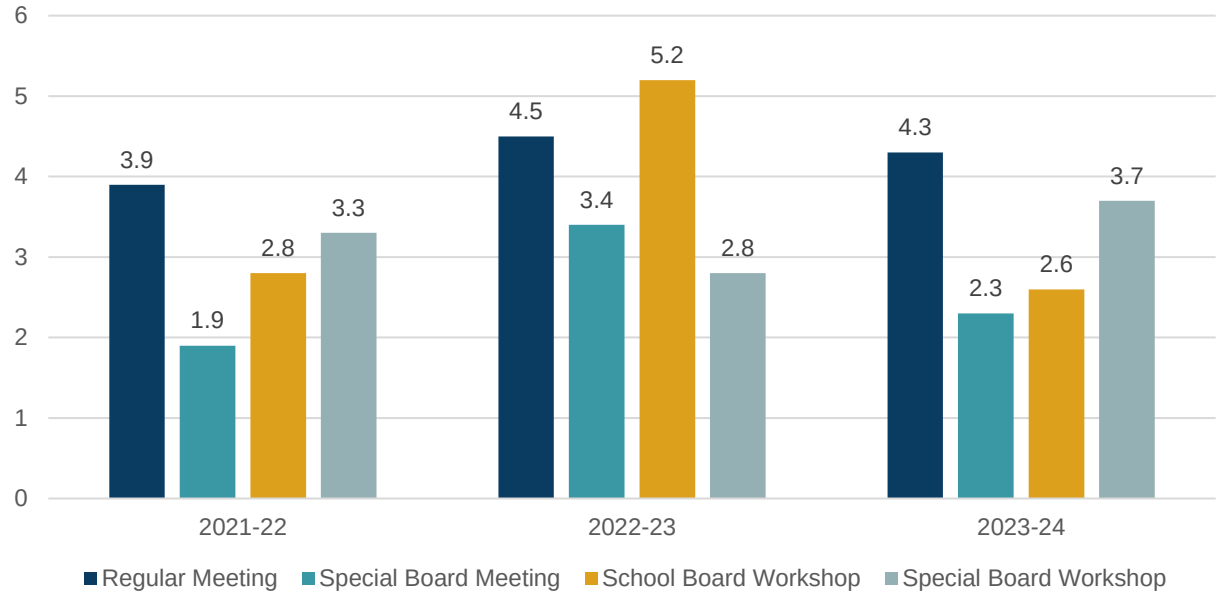


Source. KISD archived School Board meetings

Figure 6 presents the average length of each meeting type between 2021-22 and 2023-24. Meeting times increased overall in 2022-23, due in large part to the superintendent search. Over this period, the average regular Board meeting lasted 4.2 hours, special Board meetings lasted 3.0 hours, Board workshops lasted 4.3 hours, and special Board workshops lasted 3.3 hours.

[6] Texas Government Code 551.071 – 551.090.

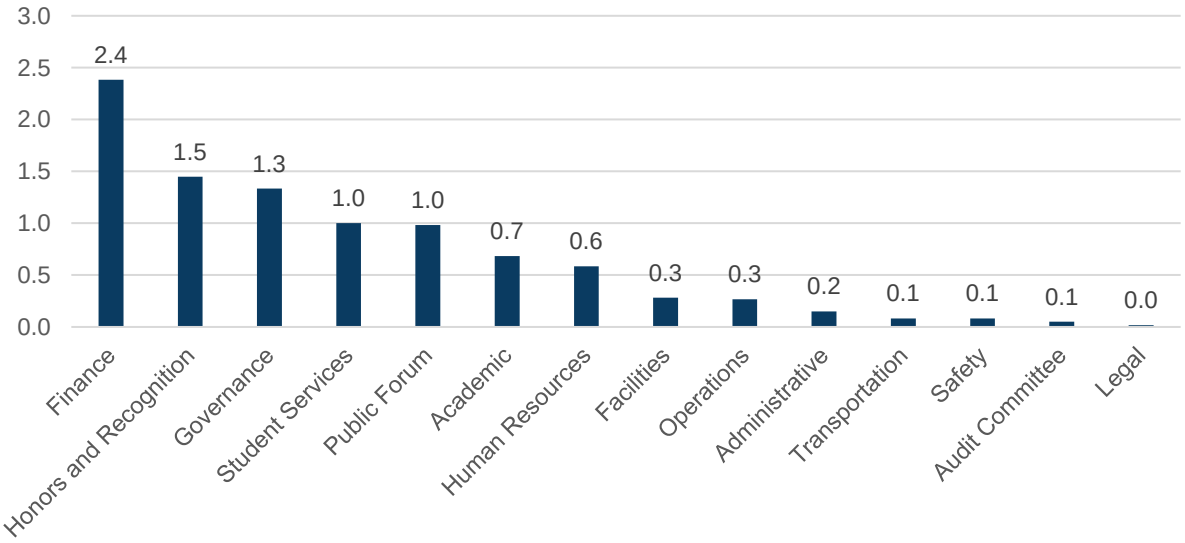
Figure 6. Average Board Meeting Length by Meeting Type, 2021-22 to February 2024



Source. KISD archived School Board meetings

The following graphics depict how the Board spent its Board meeting time during regular meetings and workshops between August 2023 and December 2023. Figure 7 presents the distribution of hours at regular Board meetings, by topical area, and excluding any executive sessions. The largest portion of time was devoted to financial management (2.4 hours) and honors and recognitions (1.5 hours), with other areas (e.g., governance and student services) also receiving attention. Academic topics ranked sixth out of 14 topical areas.

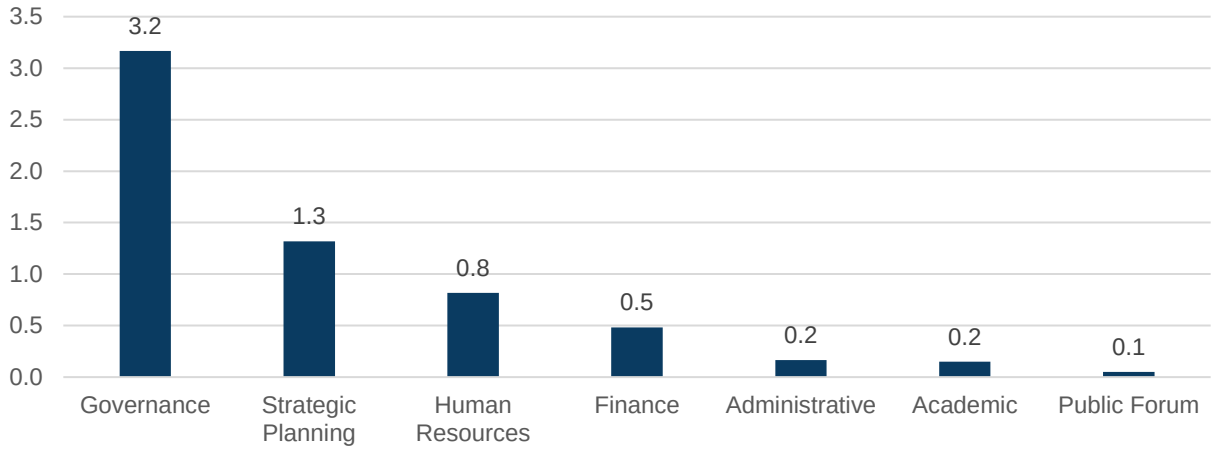
Figure 7. Hours Spent on Topical Areas, KISD Regular Board Meetings, August 2023 to December 2023



Source. KISD archived School Board meetings

Figure 8 presents time spent at Board workshops between August 2023 and December 2023, by topical area, excluding any executive session. The majority of time was dedicated to governance (3.2 hours) and strategic planning (1.3 hours), which is largely a result of a superintendent hire occurring during this period.

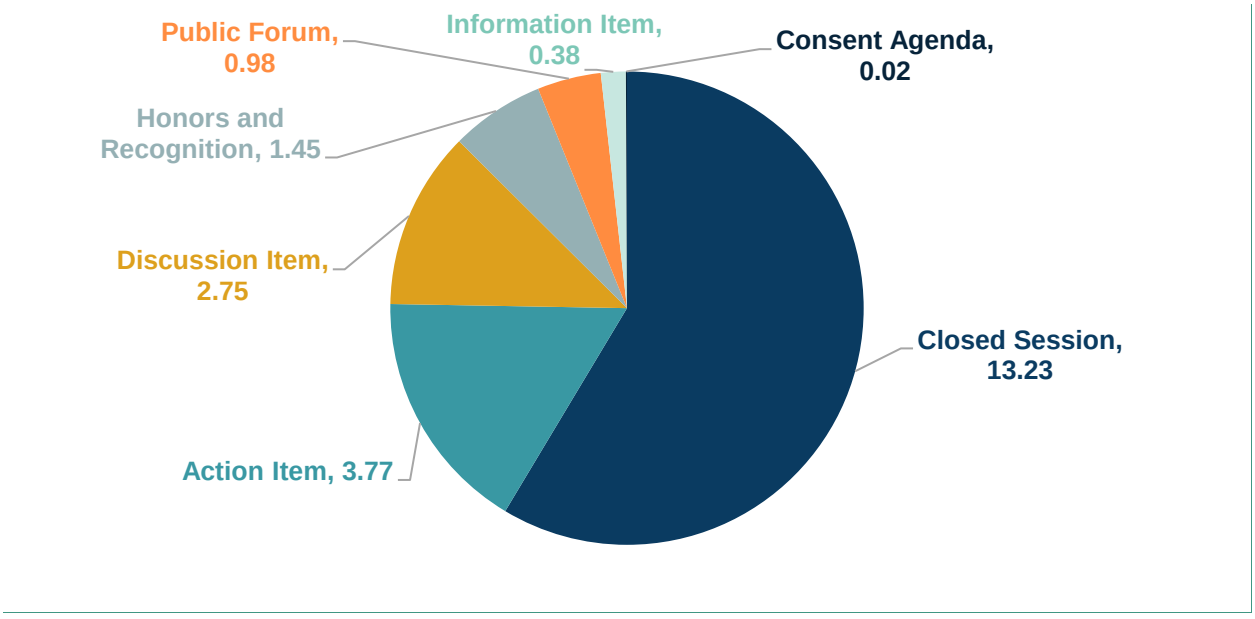
Figure 8. Hours Spent on Topical Areas, KISD Board Workshops, August 2023 to December 2023



Source. KISD archived School Board meetings

Figure 9 presents time spent at regular Board meetings by type of agenda item. The vast majority of time was dedicated to agenda items that were discussed in closed session (13.2 hours), followed by action items (3.8 hours) and discussion items (2.8 hours).

Figure 9. Hours Spent by Type of Agenda Item, KISD Regular Board Meetings, August 2023 to December 2023



Source. KISD archived School Board meetings

Finding 5: The Board's use of the consent agenda is inconsistent.

A consent agenda – provided for in Robert's Rules of Order and Board Policy BE (Local) – is a valuable tool that allows a board to group routine, noncontentious topics into a single agenda item. Policy BE (Local) states that "when the agenda is prepared, the Board President shall determine items, if any, that qualify to be placed on the consent agenda. A consent agenda shall include items of a routine and/or recurring nature grouped together under one action item. For each item listed as part of a consent agenda, the Board shall be furnished with background material. All such items shall be acted upon by one vote without separate discussion, unless a Board member requests that an item be withdrawn for individual consideration. The remaining items shall be adopted under a single motion and vote."

The KISD Board inconsistently uses a consent agenda. Table 3 presents the dates of regular Board meetings in the 2023-24 school year and whether a consent agenda was used during that meeting.

Table 3. Consent Agenda Usage at Regular Board Meetings, 2023-24

Meeting Date	Consent Agenda Used?
February 13, 2024	No
January 23, 2024	Yes
December 12, 2023	No
November 14, 2023	No
October 17, 2023	Yes
September 12, 2023	Yes
August 22, 2023	No

Source. KISD archived School Board meetings

The audit team observed several instances where use of a consent agenda would have resulted in considerable time savings.

- During the May 16, 2023 regular Board meeting, no consent agenda was used. As a result, the Board voted separately on the approval of minutes, routine change orders, and the authorization of HVAC repairs.
- During the September 12, 2023 regular Board meeting, a consent agenda was in place. Its use, however, was limited to the approval of minutes. There were multiple agenda items from this meeting that would have been appropriate for inclusion on the consent agenda. Three honorary resolutions – two of which did not have impacted individuals in attendance – were voted on separately. Additionally, noncontentious items, such as the approval of alternate hearing officers and the School Health Advisory Council (SHAC) roster, were presented and voted on separately. Had these items been added to the consent agenda, the Board could have saved roughly 20 minutes during the September 12 meeting.

Recommendation 5: Expand the use of the consent agenda.

The Board should expand its use of the consent agenda to promote the efficiency of its meetings. Board Policy BE (Local), as written above, describes the process through which items can be added and removed from the consent agenda. All routine, noncontentious agenda items that require approval are candidates for inclusion on the consent agenda. This includes:

- Minute approval;
- Honorary resolutions;
- Routine renewals (e.g., facilities contracts); and
- Items already agreed upon in Board workshops.

Parliamentary Procedure

KISD Board Policy BE (Local) requires the Board to observe the parliamentary procedures as found in Robert's Rules of Order, Newly Revised, except as otherwise provided in Board procedures or law. As part of the audit, Gibson contracted with a law firm to observe two regular Board meetings and assess their compliance with this policy. The KISD Board is fundamentally compliant with Robert's Rules of Order. The two sections below describe suggestions made by the contracted law firm related to the observed regular Board meetings.[7]

Discussion Prior to a Motion

According to Robert's Rules of Order, "strictly speaking, discussion of any subject is permitted only with reference to a pending motion. When necessary, a motion can be prefaced by a few words of explanation and introduction." § 4:7, RONR, 12th Ed. "For a member to begin to discuss a matter while no question is pending, without promptly leading to a motion, implies an unusual circumstance and requires permission of the assembly." § 4:8, RONR, 12th Ed. In smaller meetings, such as boards with twelve or fewer members, the rule requiring a motion before any discussion may sometimes be relaxed. § 49:21, RONR, 12th Ed.

Throughout both meetings reviewed, the presiding officer invites discussion prior to a motion being made. The presiding officer routinely engages in the following sequence:

- *Reads the agenda action items;*
- *Asks for any questions from the Board;*
- *Invites staff to present on the item in certain instances;*
- *Declares that the item is an action item;*
- *Seeks a motion and a second;*
- *Asks for further discussion; and*

[7] Italics written by Debra Esterak; Rogers, Morris & Grover, LLP.

- *Takes a vote.*

This system seems to work well for the Board and is permitted by the "Procedure in Small Boards" rule, which allows "informal discussion of a subject...while no motion is pending." See § 49:21 RONR, 12th Ed. Interestingly, Robert's Rules cautions that even if a small board is relaxing the requirement of no discussion without a motion, "unless the assembly has specifically authorized that a particular subject be discussed while no motion is pending..., such a discussion can be entered into only at the sufferance of the chair or until a point of order is made; and in the latter case, the chair must immediately require that a motion be offered or the discussion cease." § 4:8, RONR, 12th Ed. There is no reference in Board policy or procedure that specifically opts for the practice of dispensing with motions prior to informal discussion. To the contrary, the Board Operating Procedures state that the Board "shall observe the parliamentary procedures as found in Robert's Rules of Order, Newly Revised; except as otherwise provided by Board procedural rules or by law. Procedural rules may be suspended at any Board meeting by majority vote of the members present." Given this, the informal discussion approach appears to be at the will of the presiding officer.

The Board president may wish to reconsider this practice of discussing an item without a motion pending, as it could present challenges in the future. For example, although discussions in the meetings reviewed relate to the agenda item, it would be difficult to reign in a conversation that veers off topic or limit a discussion by calling for a vote when there is no motion pending. Should the Board wish to continue this practice, it may want to consider amending Board Operating Procedures to establish protections guaranteed by Robert's Rules that this practice renders obsolete. As currently written, the Board Operating Procedures indicate that a trustee can employ several motions to end non-productive debate (i.e., move to postpone indefinitely, move to postpone definitely, or move the previous question). Yet each of these motions is a subsidiary motion that requires a main motion to be pending. None of these motions are available for use if the discussion is being held without a motion. Moreover, informal discussion raises additional concerns – Can Board members talk for however long they see fit? Is there a time limit for the discussion? Can any member bring discussion to an end by making an actual motion? Although not evident in the meetings reviewed, there are definite risks that this informal approach could create procedural issues. Note that Robert's Rules advises "[t]he general rule against discussion without a motion is one of parliamentary procedure's powerful tools for keeping business 'on track', and an observance of its spirit can be an important factor in making even a very small meeting rapidly moving and interesting." RONR, 12th ed., pgs.30-35.

Reading Resolutions

The September 2023 meeting contained six resolutions – three establishing dates of recognition, one declaring a good cause exemption under the House Bill (HB) 3 armed security guard requirement, one authorizing use of school buses for a community-related activity, and one authorizing intervention in the accountability lawsuit against the state. All six were read aloud in their entirety. Whether or not a resolution needs to be read into the record is a matter of preference. Depending upon the importance of the resolution, it is common for public bodies to not read the entire document aloud since the resolution is a matter of public record, is before each trustee, and is often available to the public for viewing with the agenda. Instead, when introducing the agenda item, the title and a brief summary can be read out loud and that will suffice.

Certain resolutions, such as those required by law or those of significant public importance (like the HB 3 resolution or the intervention in the accountability lawsuit), should be read in their entirety. Should the Board

wish to save time during its meetings, it could consider dispensing with complete readings of certain resolutions that have been distributed to the trustees. Robert's Rules suggests the following language in such a case: "Trustee B has moved the adoption of the resolution relating to…, as printed. Is there a second to the resolution?" § 4:10, RONR 12th Ed. Note that should a trustee wish for the resolution to be read in its entirety, it is the right of every member to request that a paper laid before the Board for action be read once.

Board Communication

For purposes of this section, Board communication relates to how the superintendent keeps the Board informed other than through formal Board meetings, and how the Board communicates with each other and with KISD stakeholders, namely the district staff and the community.

KISD Board Policy BQA (Legal) requires the Board to ensure that systematic communications measures are in place to periodically obtain broad-based community, parent, and staff input and to provide information to those persons regarding the recommendations of the district-level planning committee. A similar policy exists for campus-level planning committees. Other Board policies regarding communication relate to specific limitations or abilities of Board members to communicate with each other or relate to attorney consultation in an executive/closed session.

As a local governmental entity, KISD is subject to the requirements of the Texas Public Information Act, which gives the public the right to request access to information. KISD's primary responsibilities in this capacity are to:

- Complete open records training as required by law;
- Provide requested information promptly;
- Inform the requestor if the information will not be provided within ten business days and give an estimated date on which it will be provided; and
- Inform the requestor when the Office of the Attorney General has been asked to rule on whether information may or must be withheld.

Finding 6: Control weaknesses in Board member information requests create potential compliance issues.

Two Board policies dictate which types of information a trustee may request from the district. Board Policy BBE (Legal) states that "a board member has an inherent right of access to information, documents, and records maintained by the district." However, Board Policy BBE (Local) restricts Board members' access to district reports – "no individual Board member shall direct or require District employees to prepare reports derived from an analysis of information in existing District records or to create a new record compiled from information in existing District records. Directives to the Superintendent or other custodian of records regarding the preparation of reports shall be by Board action."

KISD's BOPs provide guidance for how a trustee may request information outside of a Board meeting. Page 5 of the BOP states that "Board information requests outside of a Board meeting will be made to the

Superintendent in compliance with Texas Education Code 11.1512, and Board Policies BBE (Legal) and (Local).” Additionally, the BOP states that KISD “is required to report annually to the Texas Education Agency the number of requests submitted by each Board member and the total cost to the district for that school year of responding to the requests.”

The audit team observed three compliance risks related to these documented protocols:

- Currently, Board members may reach out directly to a district staff member with information requests. While this practice is compliant with Board Policy BBE (Legal), it conflicts with the protocol described in KISD’s BOPs, stated above.
- Because requests do not filter through a single position, staff members are to notify KISD’s Board clerk when they receive a request. The Board clerk is responsible for compiling all requests made outside of Board meetings and reporting them to the Texas Education agency (TEA). According to interviews, the Board clerk is not always notified, creating the potential for requests to be fulfilled without proper documentation.
- In compliance with Board Policy BBE (Local), the district maintains a document of Board information requests made outside of meetings. For each request, the document tracks the Board member who made the request, the date the request was made, the date it was fulfilled, a description of the request, the number of pages, who provided the information to the Board member, the time commitment, and cost. However, the document does not explicitly distinguish between “data” and “report” requests, which is important because, as stated above, trustees may not individually request reports from the district. Several descriptions included in the tracker describe requests that are more involved than raw data sharing, such as “Coordinated organizational roles and success of programs,” or are vague, such as “Transportation questions.”

Recommendation 6: Strengthen the controls over Board member information requests.

To ensure compliance with Board policy and operating procedures, the district should take the following steps to strengthen controls over Board member information requests:

- Filter all Board member information requests through KISD’s Board clerk. This is consistent with Board policy and BOPs and ensures accountability for all requests.
- Update the request tracker to distinguish clearly between “data/document” requests and “report” requests, and standardize the way descriptions are captured. The description should clearly describe the exact information requested.

Board Training

Training requirements for Board members are established in Texas Administrative Code §61.1 and Texas Government Code §§ 551.005, 552.012, and 2054.5191. School boards adopt legal policies to ensure that training requirements are met by trustees, as well as local policies to introduce training requirements not specifically discussed in the legal codes referenced above. Table 4 provides the annual training requirements for school board trustees.

Table 4. Annual Training Requirements for Texas School Board Trustees

Required Continuing Education	First Year in Office	Subsequent Years in Office
Local District Orientation	Three hours within the first 120 days in office	N/A
Orientation to the Texas Education Code	Three hours within the first 120 days in office	N/A
Update to the Texas Education Code	Following each legislative session and of sufficient length to address major changes	
Team Building (Team of 8)	Three hours	Three hours every year
Additional Education based on Framework for School Board Development	Ten hours	Five hours every year
Evaluating and Improving Student Outcomes	Three hours within the first 120 days in office	Three hours every two years
Sexual Abuse, Human Trafficking, and Other Maltreatment of Children	One hour within the first 120 days in office	One hour every two years
Open Meetings Act (OMA)	One hour within the first 90 days in office	N/A
Public Information Act (PIA)	One hour within the first 90 days in office	N/A
Cybersecurity	Varies by provider	Every year
School Safety	Two hours within the first 120 days in office	Every two years

Source. https://tea.texas.gov/texas-schools/school-boards/school-board-member-training

Several KISD Board policies address Board training:

- *Board Members Training and Orientation: BBD (Legal)* – includes all Board member training required by Texas state law. This policy includes the training requirements shown in Table 4 above.
- *Board Members Training and Orientation: BBD (Local)* – identifies the superintendent as the public information coordinator for KISD, thus removing the Public Information Act training requirements for individual trustees. The policy also states that continuing education status for each trustee must be announced annually at the last regular Board meeting before the district's uniform election date.
- *Technology Resources Cybersecurity: CQB (Legal)* – states that, at least annually, a district must identify district employees and Board members who have access to district computer systems or databases and require those individuals to complete a certified cybersecurity training program.

KISD Board member training is compliant with state regulations, individually and collectively. The audit team compared training records for each trustee to the requirements included in Table 4 above. Table 5

below provides the results of this test. “P” indicates that the Board member passed the requirement; “NR” indicates that the training was not required.

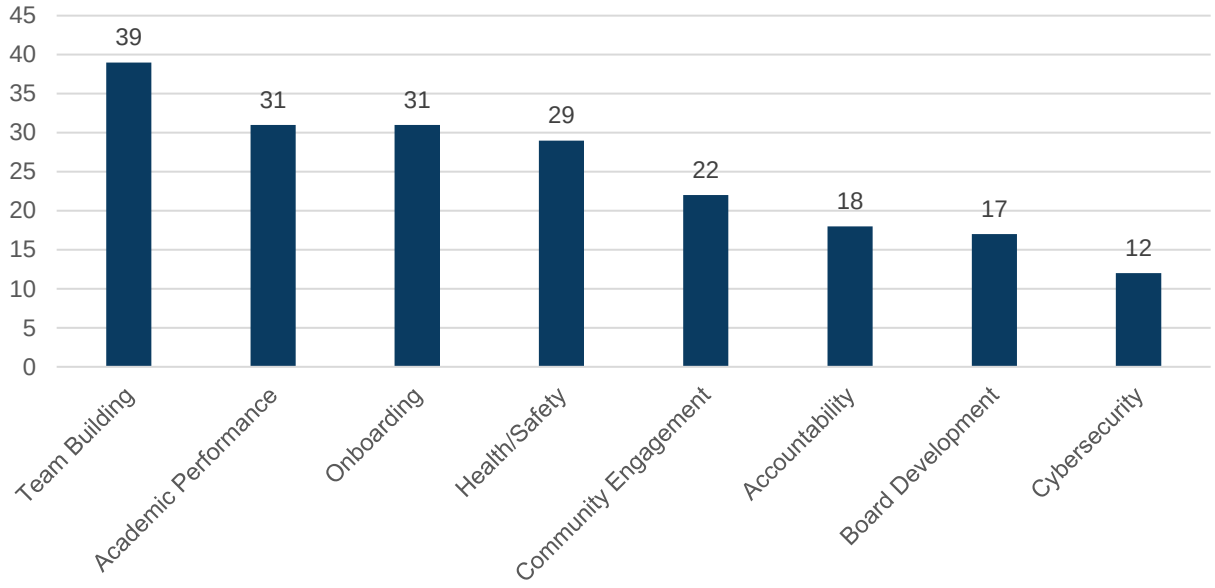
Table 5. Audit Test: Board Member Training Requirements Results, 2022-23

	Board Member						
	A	B	C	D	E	F	G
Local District Orientation	NR	NR	NR	NR	P	P	NR
Orientation to the Texas Education Code	NR	NR	NR	NR	P	P	NR
Open Meetings Act (OMA)	NR	NR	NR	NR	P	P	NR
Public Information Act (PIA)	NR	NR	NR	NR	P	P	NR
Update to the Texas Education Code	P	P	P	P	P	P	P
Team Building (Team-of-8)	P	P	P	P	P	P	P
Additional Education based on Framework for School Board Development	P	P	P	P	P	P	P
Evaluating and Improving Student Outcomes	P	P	P	P	P	P	P
Sexual Abuse, Human Trafficking, and Other Maltreatment of Children	P	P	P	P	P	P	P
Cybersecurity	P	P	P	P	P	P	P
School Safety	P	P	P	P	P	P	P

Source. KISD Board member training hours, 2022-23

The audit team obtained Board training records between 2021-22 and June 2023. Using the title of the specific training, Gibson grouped each training into one of 28 different categories. Figure 10 presents the total number of Board training hours spent in the top eight categories. The KISD Board has spent most of its training time on team building (39 hours), with academic performance and onboarding (three trustees joined the Board during this timeframe) tied for second (31 hours).

Figure 10. Board Training, Total Hours by Category, 2021-22 to June 2023



Source. KISD Board member training hours, 2021-22 to June 2023

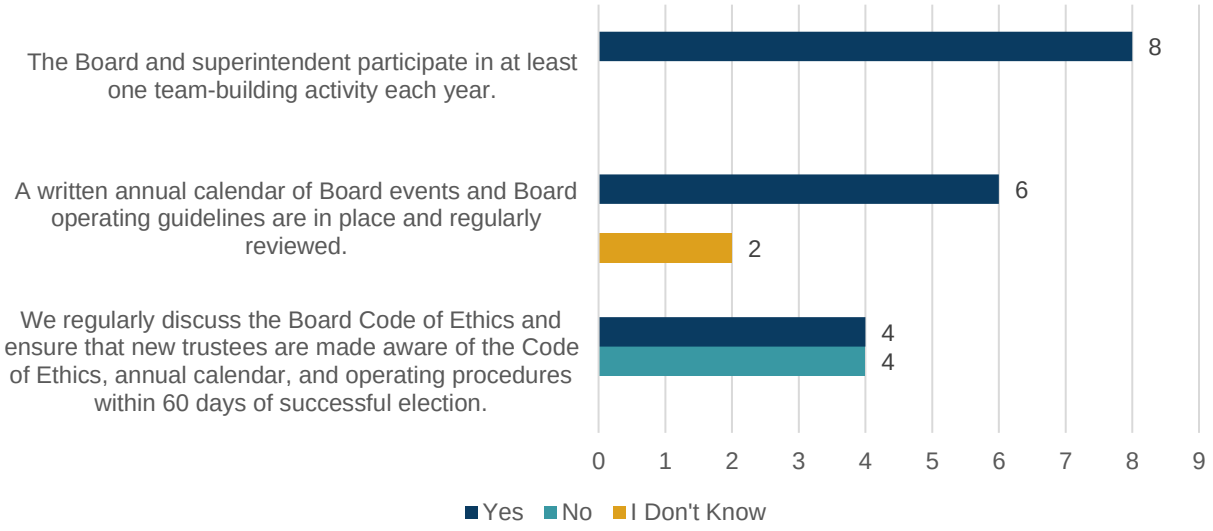
Commendation 1: The KISD Board and superintendent prioritize team-building training.

In *Boards That Make a Difference,* John Carver states that "no single relationship in the organization is as important as that between the board and its CEO. That relationship, well-conceived, can set the stage for effective governance and management. However, probably no single relationship is as easily misconstrued or has such dire potential consequences."[8] In a school system, a high-functioning team of 8 is paramount to organizational effectiveness and student achievement. The KISD Board and superintendent recognize this and have accordingly prioritized team-building training.

Starting in 2023-24, the district contracted with Moak Casey to provide team-building training to the Board and superintendent. These sessions have included a self-evaluation, the development of the district's system scorecard, and general team building. Further, the timing of these trainings is particularly appropriate, given that there are several Board members with less than three years of experience and the superintendent has been in the role for less than one year. In fact, the Board self-evaluation section titled "Board operates as a unified Team of Eight and has clear operating procedures" had the three highest scores across all domains. Figure 11 presents that section's questions and results.

[8] John Carver, *Boards That Make a Difference* (San Francisco, Jossey-Bass, 2006), p. 153.

Figure 11. Board Self-Evaluation – Team of 8 Responses



Source. Moak Casey, 2023

Finding 7: New trustee orientation ineffectively prepares Board members for their role.

As shown in Table 4 on page 27, Local District Orientation is a mandated training requirement for all new trustees in Texas. This is the only mandated training that deals specifically with the intricacies of the trustee's district. Districts are given broad autonomy to conduct this training in whatever manner they choose. Historically at KISD, new trustees have attended a three-hour meeting with the superintendent for their orientation. During this meeting, trustees receive a large binder that includes everything from guidance on parliamentary procedure at Board meetings to their football sideline pass. In interviews, Board members expressed that this orientation was ineffective for several reasons:

- The binder was not shared with trustees in advance of the meeting, leaving them with limited time to internalize its contents or ask informed questions during the orientation.
- Current Board members – excluding the trustee receiving the orientation – do not attend any part of the orientation. This means that new trustees do not receive "first-hand" guidance from their colleagues unless they reach out of their own volition.
- Several trustees felt as though reading a binder and attending a meeting were inadequate methods for orienting a new Board member to KISD. They proposed different mediums (e.g., PowerPoints) and settings (e.g., tours of district facilities).
- One meeting is insufficient time to familiarize oneself with the intricacies of a district as large as KISD. Effective onboarding is an iterative process. Trustees expressed a desire to see their formal onboarding process require multiple sessions over several weeks.

As a result of an unsatisfactory onboarding experience, most trustees recalled feeling ill-equipped to meaningfully participate in their first several Board meetings. In effect, they used those Board meetings as onboarding sessions, learning about the district through Board books, agendas, and speakers.

Recommendation 7: Create an onboarding program for new KISD trustees.

To more effectively prepare its trustees, KISD should create an onboarding program that all new Board members experience. The first step in doing so will be to differentiate between "orientation," which is a one-time meeting, and "onboarding," which is an ongoing education initiative. The district should position the orientation it currently offers new Board members within a broader onboarding experience. Other components of a trustee onboarding process could include:

- **Mentor program** – assign a veteran Board member to each new Board member. The mentor should serve as the mentee's first point-of-contact for all questions, help the new Board member navigate the onboarding process, and provide first-hand guidance.
- **Ambassador program** – Hurst-Euless-Bedford ISD, which won Texas Association of School Administrator's (TASA's) Outstanding School Board award in 2020, operates an ambassador program that educates residents on the district as well as Board member duties. Participants learn about school finance, graduation standards, state testing requirements, and tour facilities. Upon graduating from the program, each member is highly knowledgeable about the district, which significantly decreases the learning curve during their first several months on the Board.
- **Listening tour** – strategically select district administrators, principals, teachers, and auxiliary staff who can share their experiences at the district with the new Board member. The purpose of these interviews should be for the new trustee to gain direct insight and a more complete picture of the district's strengths and areas for improvement.

Finding 8: The Board lacks an overarching strategy for its own training and development.

With the exception of the required trainings listed in Table 4 on page 27, selection of training topics is left to the discretion of individual Board members. There are no formal or informal mechanisms to determine collective training needs at the Board level. While this allows Board members to pursue the types of issues that are of interest to them, it also creates the potential for an imbalance of areas of expertise across the Board. Collectively, the Board should be well versed in all of the issues that come before it, which requires a diverse body of knowledge.

Recommendation 8: Align Board training with the needs of the Board as a whole.

To enhance its collective effectiveness, the Board should align the trainings that trustees attend to identified needs and the district's strategic outcomes. Similar to how teachers and staff identify training needs via observations and evaluations, the Board should use its self-evaluation to identify training needs. Board Policy BBD (Legal) and BBD (Exhibit) provide a framework for this process. In addition to the consideration of individual preferences, this data should be used to develop the Board's training calendar, which includes sessions and assignments. The Board clerk should provide the Board president with a list of training opportunities, and the Board president should be responsible for assigning individual Board members to each training. There should also be opportunities – likely in workshops – for Board members to share their learnings with the rest of the Board.

Evaluation of Superintendent

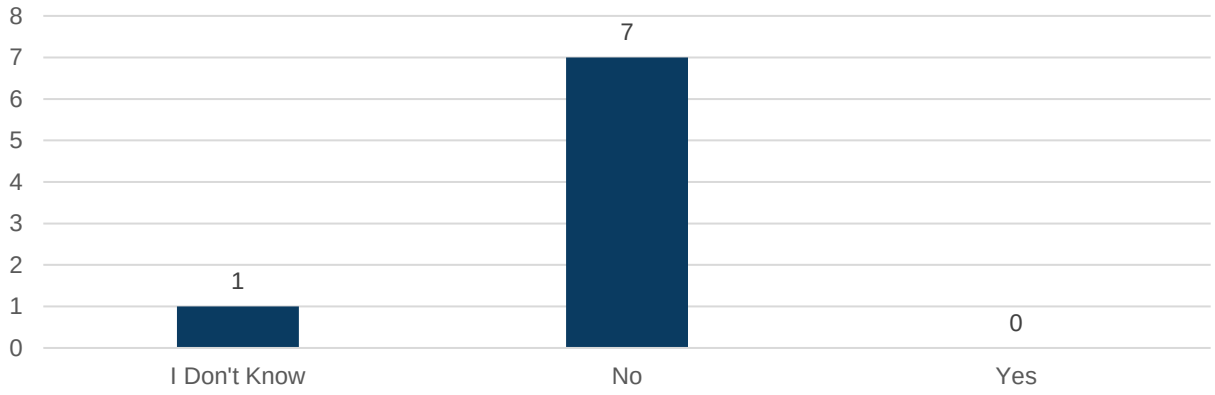
Board Policy BJCD (Legal) requires that the Board appraise the superintendent annually using either the Commissioner of Education's recommended appraisal process and criteria or one that is developed by the district in consultation with the district- and campus-level committees and adopted by the Board. The KISD Board applies the latter approach.

Finding 9: The Board's evaluation instrument for KISD's superintendent does not promote accountability.

The success of a superintendent is inextricably tied to the success of the district. Carver states that "organization performance and CEO performance are the same. Evaluation of one is evaluation of the other. Accountability can be gravely damaged when the two are viewed differently…in fact, it is best for the board not to think of itself as evaluating the CEO at all. It should evaluate the organization based on relevant board policies and pin that evaluation on the CEO."[9] Therefore, an effective superintendent evaluation is fundamentally reliant on clear, established metrics that are tied to organizational performance.

In recent years, the KISD Board has used an evaluative process and instrument that does not effectively hold the superintendent accountable. The district was not able to provide Gibson with historical superintendent evaluations, but Board members described the evaluation process during interviews with the audit team. The process consisted of Board members writing anecdotal comments related to eight domains and submitting them to the Board president. The Board president would then create a final evaluation, comprised of the trends noted in trustee comments, and share it with the superintendent. There was no data associated with the evaluation, nor any district goals to tie to the superintendent's performance. As shown in Figure 12 below, Board members were aware that this method did not adequately hold the superintendent to account. Nearly all trustees disagreed with the notion that the Board uses data to hold senior leaders accountable.

Figure 12. Board Self-Evaluation Responses – "We are data-driven and use data to hold ourselves and senior leaders accountable to our stated expected outcomes."



Source. Moak Casey, August 2023

[9] Carver, *Boards That Make a Difference*, p. 171.

Recommendation 9: Overhaul the superintendent evaluation process and instrument.

The Board should overhaul its process for evaluating KISD's superintendent. There are two principles that the Board should ensure are in place with the new evaluation process:

- As discussed above, the district's performance *is* the superintendent's evaluation. This requires organizational performance metrics, and a formal process by which they are created, periodically measured and annually assessed.
- Instead of a once-a-year task, make the evaluation a continual process. The process should certainly include an annual formal evaluation, but the feedback provided on a more frequent, informal basis is what will drive superintendent, and therefore organizational, performance.

District administration has already started this process by drafting a new evaluation instrument, which is expected to be used in the summer of 2024. Gibson requested the draft instrument as part of the data request for this audit, and identified several strengths and areas for improvement, listed below.

- **Strength**: A clear rubric is present, with standards drawn directly from the state's requirements for the Standard Superintendent Certificate.
- **Strength:** There is a documented process for collecting all Board members' completed evaluations and synthesizing that information. Additionally, according to Gibson's interview, the superintendent plans to publicize her identified strengths and areas for development.
- **Area for Improvement**: Indicators are not linked to metrics, which impedes Board members' ability to impartially evaluate the superintendent.
- **Area for Improvement**: It is not explicitly clear how the organizational priorities and objectives included in the system scorecard are tied to the superintendent evaluation. The district's achievement of its goals should directly influence the Board's perception of the superintendent's performance.
- **Area for Improvement**: The draft instrument includes eight standards and 72 indicators. Its length reflects a lack of prioritization. The superintendent and Board should collectively decide the indicators that are "must wins."

Budget Adoption

The annual adoption of a budget and tax rate is a primary responsibility of a school board. This responsibility is codified in several KISD Board policies.

- BAA (Legal) – Board Legal Status: Powers and Duties – establishes the Board's authority to adopt an annual budget and fiscal year tax rate for the district.
- CCG (Legal) – Local Revenue Sources: Ad Valorem Taxes – authorizes the Board to adopt a tax rate for the current tax year.
- CE (Legal) – Annual Operating Budget – describes the Board's responsibility related to budget preparation and adoption, and mandates the facilitation of a public meeting on the budget and proposed tax rate.

- CE (Local) – Annual Operating Budget – defines KISD's fiscal year, describes the budget planning process, and provides rules for how the budget adoption meeting is to be conducted.

The KISD budget is developed according to a calendar. This process takes approximately nine months, from the initiation of budget development activities in December to the approval of the budget by the KISD Board in August. Table 6 shows the sequence of major events in the budget development and approval process.

Table 6. KISD Budget Planning Timeline

Month	Activity
December	Planning timeline presented for Board review
January	▪ Administration discusses budget initiatives and assumptions ▪ Initial revenue forecast projections
February	▪ Review staffing allocations with senior staff and principals ▪ Staffing allocations presented to Board
March	▪ Distribute full-time equivalent (FTE), pay grade change requests
April	▪ Certified values received from Bell County Appraisal District ▪ Budget worksheets completed by campuses/departments
May	▪ Board approval of final staffing allocations ▪ Board meeting budget update with non-payroll budget items ▪ Compensation plan discussed with Board ▪ Board approval of anticipated federal grant applications
June	▪ Board meeting budget update, including budget and tax rate calendar ▪ Board approval of compensation package, including stipends
July	▪ Final budget planning salary snapshot ▪ Finalize revenue projections
August	Board public hearing and adoption of official budget and tax rates

Source. KISD budget planning timeline, 2024-25

Since its fiscal year begins on September 1, KISD must adopt a budget and tax rate by August 31 annually. The audit team reviewed historical Board meetings and agendas and found the Board to be compliant with this requirement. In 2020-21, KISD's budget and tax rate were approved in the August 25, 2020 Board meeting; in 2021-22, the August 24, 2021 meeting; in 2022-23, the August 23, 2022 meeting; and in 2023-24, the August 22, 2023 meeting.

Finding 10: The district's budget adoption process does not allow for sufficient Board input.

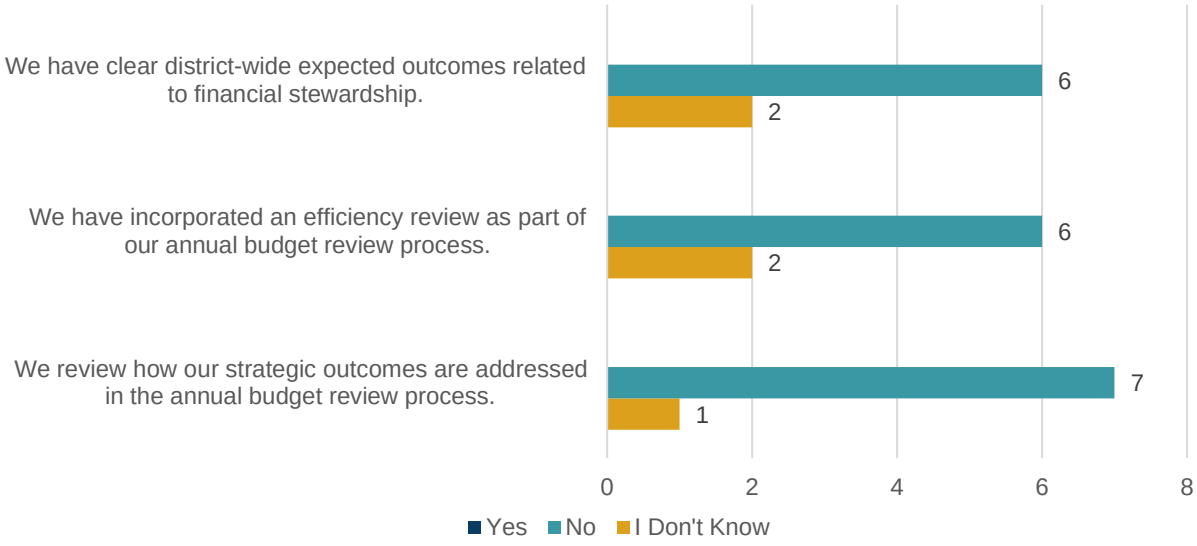
With the end of Elementary and Secondary School Emergency Relief (ESSER) funding and a stagnant basic allotment, many school systems are facing a challenging budget year. As the budget approver and representative of the community, school boards are responsible for critically engaging with district management to ensure that the budget that is put forward is one that best supports the needs of students.

To do this, a school board must regularly collaborate with community members and district administrators to guide budget discussions.

Currently, the KISD Board does not have sufficient input on the district's budget. This is, in large part, because the budget adoption process does not include a formal mechanism for collecting, implementing, and reporting the Board's priorities related to the budget. Additionally, the Board does not receive sufficient budget analysis to support their decision making. The district has access to a budget dashboard, in which it annually invests, but it is not being actively used.

Further, the Board's self-evaluation reflects a general dissatisfaction with the budget process. Figure 13 below presents the Board's responses to three questions related to financial stewardship.

Figure 13. Board Self-Evaluation – Financial Stewardship Responses



Source. Moak Casey, 2023

In the spring of 2023, the Board completed a survey which captured their individual priorities related to the district's 2024-25 budget. The results of this survey were shared in the regular Board meeting on April 11, 2023. Fifty-one priorities were shared without ranking, organized by management into categories. According to management's comments during the meeting, the list was to be used to guide internal budget discussions, but there were no specifics provided and no follow-up mentioned.

In interviews, nearly all KISD trustees shared dissatisfaction with how their values/priorities were incorporated into the district's budget. They reported playing the role of "rubber stamp" – being asked to approve a budget without the opportunity to meaningfully engage in its creation.

Recommendation 10: Develop formal Board budget priorities.

To more effectively engage in the development of the district's budget, the Board should create its own budget priorities. The survey referenced above is a step in this direction, but there are several other steps the Board should take to make their priorities actionable:

- **Engage with the data**. As mentioned above, the Board and administration currently have access to a budget dashboard. Whether through this dashboard or another tool, the Board should be familiar with the district's budget data and underlying metrics. This context is necessary to develop informed priorities.
- **Connect with the community.** In collaboration with administration, the Board should ensure that community discussions are a part of the budget development process. These discussions should directly influence trustee priorities.
- **Come to a consensus.** It is acceptable to start the process with individual priorities, but the Board should work to identify the four to five priorities that they collectively want to see addressed in the budget. This will likely require at least one workshop.
- **Ensure follow-up.** The budget development schedule should require management to report to the Board about the ways in which their priorities were included in the budget. This may include the need to develop new account codes to track expenditures for these areas. It is entirely possible that one or two Board priorities will not be incorporated, but management should be able to explicitly explain why and if there are any potential compromises.

Chapter 3: District Administration

This Chapter addresses the administrative governance responsibilities at the executive level and is organized into the following sections:

- Senior-Level Organizational Structure
- Management and Decision Making
- Planning and Strategy

Senior-Level Organizational Structure

Killeen ISD Board Policy BJA (Legal) defines the responsibility of the superintendent to develop the organizational structure for the district. Two duties listed under this policy describe the superintendent's obligations:

- Duty #1: Assuming administrative responsibility and leadership for the planning, **organization**, operation, supervision, and evaluation of the education programs, services, and facilities of a district and for the annual performance appraisal of the district's staff.
- Duty #10: Organizing a district's central administration.

Board Policy BJA (Local) provides supplemental guidance to the superintendent in defining the organizational structure, requiring the position to "**organize District staff in a manner consistent with District priorities and resources** and monitor the administrative organization at all levels for effectiveness and efficiency."

In defining their organizational structure, superintendents can and should consider elements of personal preference as well as organizational theory. Some superintendents are more hands-on; others prefer to delegate more responsibility. Superintendents may also consider organizational options in the context of internal (e.g., programs, operations) and external (e.g., board, community) job demands, as well as what would benefit schools the most. School boards may also have perceptions of the superintendent's focus on internal versus external demands when they are hiring a superintendent. At times, the preferences of superintendents and the priorities of school boards may create competing organizational demands.

Political pressure and other outside influences can affect the superintendent's development of an organizational structure. Public perceptions of a "bloated" or "inefficient" central administration are common accusations, but often reflect a lack of understanding of the need to effectively manage large, complex organizations. This notwithstanding, these perceptions can affect the number of leadership positions in a school system.

In addition to policy guidance and superintendent preferences, several principles of organizational theory were applied by Gibson in the analysis of KISD's leadership structure. These are discussed briefly below.

Logical Alignment of Functions

Logical alignment of functions speaks to whether the aggregation of responsibilities makes sense and can be suited to the particular skill sets of leadership positions. For example, facilities maintenance, custodial services, grounds care, and energy management are often aligned under facilities management services. This represents a logical alignment of functions, since each are related to the operation and maintenance of school facilities and are often required to coordinate with each other in their daily operations.

The risk of misaligning a function is that the job description for the leadership position over that function may not have the skill requirements that support effective supervision and oversight of that function. This, in turn, could limit the unit's effectiveness and ability to achieve stated goals and objectives. Another risk of misalignment is that it can create organizational barriers that constrain necessary communications with other related departments.

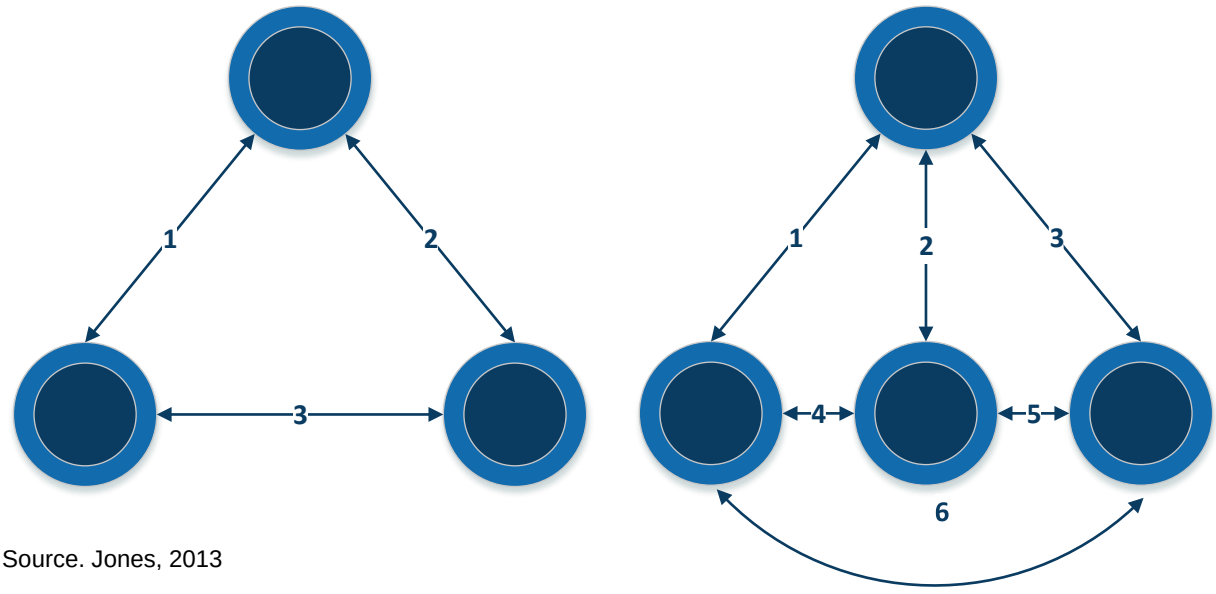
There are no absolutes in logically aligning functions, but the factors above should be considered so that the organizational structure effectively supports, rather than inhibits, accountability.

Span of Control

Span of control refers to the number of direct reports to a supervisory position. Several factors can affect organizational span of control, including the degree of complexity or homogeneity of the reporting functions, the size (in terms of personnel and/or spending) of the reporting functions, and physical location of staff.

Each staff member who is added to a manager's span of control results in an exponential increase in the number of relationships that must be managed. For example, if a manager has direct oversight over two positions, that manager is managing three day-to-day relationships. However, when one additional staff member is added as a direct report, the manager is now managing six day-to-day relationships. Figure 14 demonstrates this concept.

Figure 14. The Increasing Complexity of a Manager's Job as Span of Control Increases



Source. Jones, 2013

The Stieglitz Method[10] offers six factors that affect span of control. These factors are described briefly below. The first four relate more to the subordinate positions and functions; the last two relate to the supervisory position and related time demands. Variables are scored or weighted using different scales based on their relative importance to the overall scoring.

- **Similarity of Functions** – this refers to the degree that subordinate positions are similar or different. As the differences increase, the span of control decreases. This factor suggests that a supervisor over bus drivers can and should have a higher span of control than a chief officer over several different operational areas.
- **Spatial Spread of Subordinates** – this factor refers to the geographic dispersion of the subordinates and their related units that report to a supervisor. While technology has helped reduce the impact of spatial dispersion, the geographic separation of functions makes it more difficult to supervise. Accordingly, the higher the geographic dispersion, the lower the span of control.
- **Complexity of Functions** – this variable relates to the nature of duties being performed by subordinate positions, and the degree of difficulty in performing them in a manner that meets or exceeds expectations. Generally, the greater the complexity, the lower the span of control.
- **Staff Qualifications** – this factor refers to the quality of skills in the subordinate position and the requisite need to closely or loosely supervise. The higher the quality of skills in the subordinate position, the higher the span of control, since less time is needed to oversee these positions.
- **Coordination** – this variable relates to the supervisory position itself, and the extent to which the supervisor must work to foster coordination among the units in achieving common goals. The more time the supervisor needs to foster coordination, the lower the span of control.
- **Planning** – this factor refers to the time requirements of the supervisor in working with subordinate units to establish plans and budgets for the subordinate units. Consideration is given to the seasonal nature of planning, as well as the ability to lean on subordinate positions to conduct most of the planning and budgeting efforts on their own. Accordingly, as the time requirements for the supervisor increase, the span of control decreases.

Under this method, each of the above factors are assigned load points based on a subjective ranking using the above definitions. Values are used to quantify the supervisory capacity for each factor and, when combined, are used to provide a desired range of the number of direct reports a management position should have. Table 7 presents the scoring framework under the Stieglitz Method.

Table 7. Degree of Load on a Manager Matrix

Factor	Degree of Load				
Similarity of Functions	Identical	Strikingly Similar	Similar	Fundamentally Different	Completely Different
	1	2	2	4	5
Spatial Spread of Subordinates	All Together	All in One Building	On the Premises	Spread in the City	Spread in the Country

[10] Organization – A Guide to Problems and Practice, John Child, 1984.

Factor	Degree of Load				
	1	1	2	4	5
Complexity of Functions	Simple, Recurring	Routine	Complicated	Very Complicated	Very Complicated and Diverse
	2	4	6	8	10
Staff Qualifications	Minimum of Hints and Control	Limited Supervision	Periodic Supervision and Control	Frequent Systematic Control	Frequent Systematic and Strict Control
	2	6	9	12	15
Coordination	Minimum Contacts	Limited Contacts	More Contacts	Permanent Contacts in Case of Serious Problems	Broad Unrepeatable Contacts
	2	4	6	8	10
Planning	Minimum	Limited Range	Bigger Range	Considerable Range	Wide Range
	2	4	6	8	10

Source. Organization – A Guide to Problems and Practice, John Child, 1984

Table 8 shows the scale aligning the number of load points to the range of the number of direct reports a manager should have.

Table 8. Alignment of Load to Number of Direct Reports

Load in Points	40-42	37-39	34-36	31-33	28-30	25-27	22-24
Number of Direct Reports	4-5	4-6	4-7	5-8	6-9	7-10	8-11

Source. Organization – A Guide to Problems and Practice, John Child, 1984

It is important to note that the above ranges – and span of control in general – excludes clerical or administrative support staff reporting directly to the leadership position.

Delineation of Line versus Staff Functions

Organizational charts for large organizations should distinguish “line” versus “staff” functions. A line function is a major function responsible for the day-to-day operations of the organization. For a school system, line functions include academic programming, instruction, administration (e.g., human resources, financial management, purchasing) and operational activities (e.g., facilities, nutrition services, transportation). While coordination among these functions is important, each unit is independently managed.

Staff functions are those that support the entire organization, such as communications, planning, and legal services. Staff functions are typically shown at the top of the organizational chart, even though these areas

are generally smaller and leadership positions have less responsibility (and lower pay grades) than line function leaders over larger and more complex units.

If staff functions are aligned under line functions, this may create real or perceived conflicts of interest regarding their support for the entire organization. Accordingly, it is important in an organization to identify staff functions and ensure that they are separately aligned in the organizational structure.

Organizational Leveling

Organizational leveling helps demonstrate equity in an organizational structure. This is achieved in two ways. First, position titles (e.g., chief officer, associate superintendent) and responsibilities should be commensurate across the organization. For example, in a leadership hierarchy of assistant superintendent, director, coordinator, and supervisor, supervisors would ideally report to coordinators, coordinators to directors, and directors to assistant superintendents. If supervisors report directly to assistant superintendents, this could be perceived as a position of equal importance as a director position on the organizational chart, since it reports to the same position.

Second, the same leadership position titles should visually be at the same horizontal level on an organizational chart. Otherwise, it could be perceived that one position is more important or more senior than the other, also contributing to perceived inequities.

The above goals are often challenging in drawing organizational charts, but attempts should be made to ensure that the organizational chart reflects appropriate and equitable levels of authority for managerial positions.

Commendation 2: The superintendent's proposed organizational structure reflects best practice in organizational theory and aligns with district priorities.

During interviews with the audit team, the superintendent shared a proposed reorganization of the district's senior administration. Figure 15 on the next page presents the proposed reorganization. This organizational structure reflects best practice and aligns with the district priorities established in the system scorecard.

- **Logical Alignment of Functions** – the functions depicted in the proposed organizational structure are logically aligned. Theoretically, the departments aligned under each of these functions are as well (e.g., Curriculum and Instruction under Academics; Transportation under Operations; Procurement under Finance).
- **Span of Control** – Gibson scored the proposed organizational structure using the Steiglitz Method described above (results in Table 9). With a score of 34, this method recommends between four and seven direct reports. The proposed organizational structure shows the superintendent with seven direct reports.

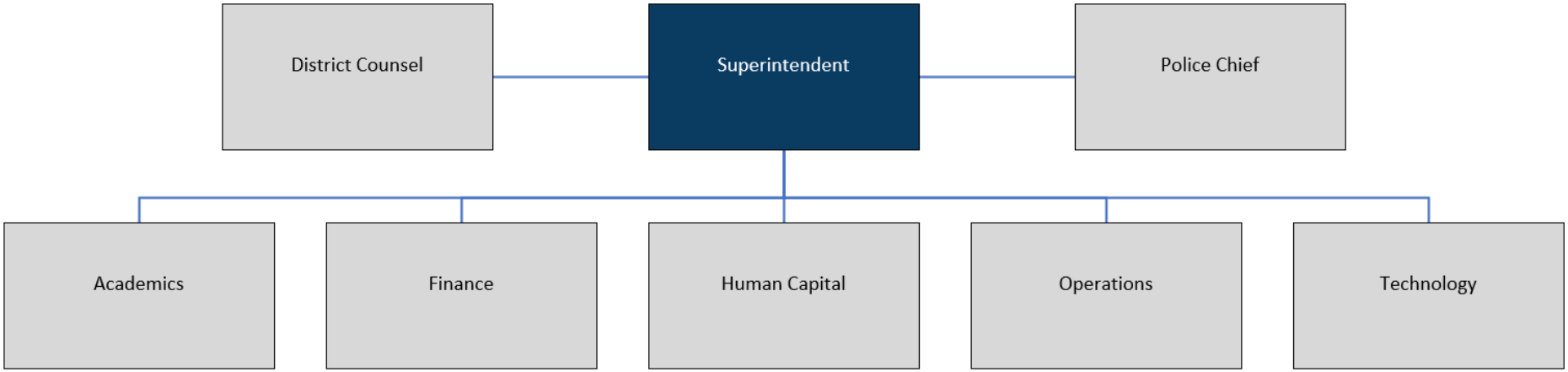
Table 9. Alignment of Load to Number of Direct Reports, Results of KISD Proposed Reorganization

Load in Points	40-42	37-39	34-36	31-33	28-30	25-27	22-24
Number of Direct Reports	4-5	4-6	4-7	5-8	6-9	7-10	8-11

Source. Organization – A Guide to Problems and Practice, John Child, 1984

- **Line vs. Staff Functions** – line functions are very clearly delineated in this organizational structure. Academics, Finance, Human Capital, and Operations are managed independently by a chief who reports to the superintendent. Staff functions – District Counsel and the Police Department – support the entire district and are accordingly set apart on the organizational chart.
- **Leveling** – under the proposed organizational chart, the superintendent's cabinet would be comprised entirely of chief-level positions. This is a departure from the former structure, in which three different positions (deputy superintendent, assistant superintendent, and director) reported directly to the superintendent.
- **Organizational Priorities** – the three district priorities established in KISD's System Scorecard – Student Success, Human Capital, and Financial Stewardship – are explicitly represented in the superintendent's cabinet, representing an organizational commitment to achieving those goals.

Figure 15. Proposed KISD Senior Administration Organizational Structure



Source. Gibson Consulting Group

Management and Decision-Making

Finding 11: KISD's administrative regulations are not regularly reviewed and contain out-of-date information.

Administrative regulations are an extension of board policy, providing additional administrative guidance to the operation of a school system. The major difference between a board policy and an administrative regulation is that administrative regulations do not require board approval – only superintendent approval.

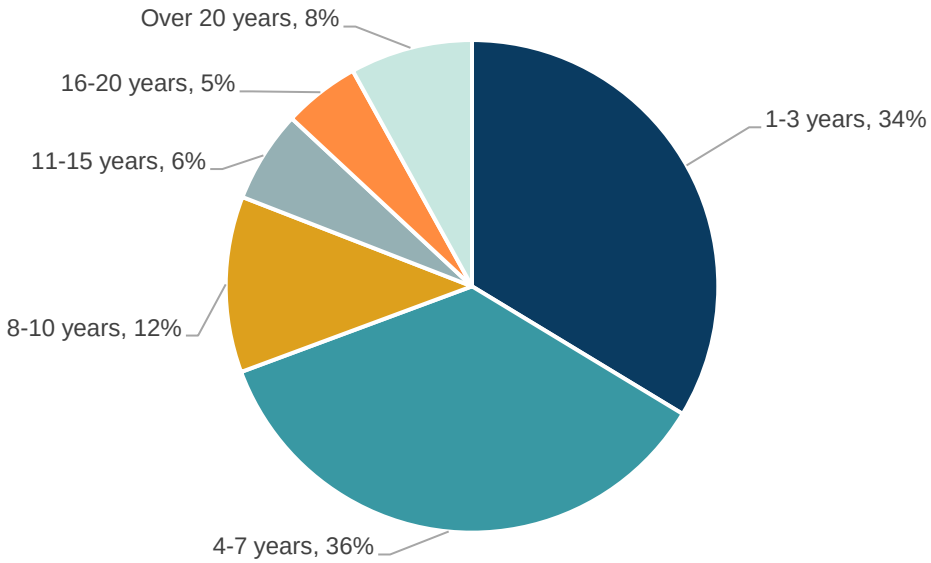
According to TASB, a regulation can designate a management process; specify a step-by-step process to enforce policy; describe what, when, how, and by whom the policy is enforced; give instructions; provide examples of exhibits, forms, or management reference tools; give specific applications of the policy; or expand/complement the policy.

KISD maintains an Administrative Regulation Manual that includes 11 chapters:

- Chapter 1 – General Information
- Chapter 2 – Situational Guidelines and Reporting Procedures
- Chapter 3 – Routine Management
- Chapter 4 – Curriculum Considerations
- Chapter 5 – Travel, Special Activities, and Related Guidelines
- Chapter 6 – Personnel Concerns
- Chapter 7 – Rights, Responsibilities, and Privileges of Students
- Chapter 8 – Discipline and Attendance Matters
- Chapter 9 – Parental Circumstances and Requests
- Chapter 10 – Campus Access Procedures
- Chapter 11 – Technology

In total, the manual includes 199 regulations. The majority of regulations also have an exhibit attached, which in most cases is a template. Additionally, all KISD administrative regulations include a log of the "date of last update," and several include a "date of last review." However, based on this information, the district does not regularly review and revise its administrative regulations. Only once an issue has occurred and the relevant administrative regulation has been consulted and deemed obsolete does an update happen. The risk is that many of these administrative regulations may be outdated or no longer applicable. Figure 16 presents a distribution of KISD administrative regulations based on the most recent date of update. Nearly one-third of KISD's administrative regulations have not been updated in more than eight years, and 13% have not been updated in more than 16 years.

Figure 16. Date of Last Update, KISD Administrative Regulations



Source. KISD Administrative Regulation Manual

The primary risk associated with out-of-date administrative regulations is that they include inaccurate or misleading information. Many administrative regulations provide guidance on crisis situations (e.g., protocols for a bomb threat at a school), which means it is critical that they can be relied on to provide accurate direction. During its review of KISD's administrative regulations, the audit team found a number of instances of inaccurate or irrelevant information:

- All KISD regulations include a contact position. The person in this position is meant to provide further instruction on that specific regulation. Multiple regulations included contact positions that no longer exist at KISD or do not reflect current practice (i.e., the district's internal auditor is listed as a contact in Chapter 3, Article DD).
- Chapter 6, Article GGG provides an overview of hiring stipulations in the No Child Left Behind Act (NCLB). NCLB was signed into law in 2002 and replaced by the Every Student Succeeds Act (ESSA) in 2015.
- Two regulations in Chapter 11 (Technology) related to cybersecurity procedures and social media have not been updated since 2021 and 2019, respectively. These topics are both highly relevant and constantly evolving. District protocols established five years ago are likely obsolete.

Recommendation 11: Review district administrative regulations for relevance and accuracy on a regular basis.

The district should review all of its administrative regulations for relevance and accuracy on a regular basis. There will be several key steps in implementing this protocol:

- Develop an inventory of existing administrative regulations. There are likely many regulations that need extensive edits and some that can be removed from the manual altogether.

- Determine the process by which administrative regulations will be reviewed. This should include the frequency of review (which may vary depending on the regulation) and position responsible for reviewing.
- Delegate an "owner" of the Administrative Regulation Manual who will be responsible for ensuring this protocol is followed.
- Take advantage of the TASB Policy Update feature that allows administrative regulations to be attached to applicable policy references.

Finding 12: Decision-making authority is inadequately defined, hindering the alignment of KISD central office and school leaders.

How decisions are made in a school district has a direct impact on the effectiveness and efficiency of its organization. In the absence of a decision-making framework, decision authority may depend on the individual in a certain position, causing inconsistent applications of decision-making across the district.

Certain academic decisions (e.g., teaching strategies for individual students) should be made at the school level in order to provide the needed flexibility to meet unique needs. Other decisions (e.g., curriculum) need to be made at the district level to ensure that all students are learning the same curriculum at the same time in order to meet state performance standards on standardized tests or other district requirements.

Other types of decisions, such as teacher professional development and instructional technology, may not be as clear cut and, in some cases, may require a hybrid solution for decision-making. Where a district falls in terms of the level of centralized or decentralized decision making is not as important as the need to formally define the decision-making framework so that it is consistent across the school district.

KISD Board Policies BQ (Legal), BQA (Legal), and BQB (Legal) define the requirements for district- and campus-level planning and decision-making committees and processes. The purpose of these committees is to involve parents and community members in establishing and reviewing the district's and campuses' educational plans, goals, performance objectives, and major classroom instructional programs. However, neither this policy, nor any other legal or local policy, speaks to how decisions are made within KISD.

Recommendation 12: Implement a decision-making framework.

Documentation of a single decision-making framework will help ensure that all principals and district administrators understand the criteria for making certain decisions. Adopting a decision-making framework will ensure its consistent use by all positions involved in decision making. At a minimum, decisions should be identified in the following four categories:

- **Site-based decisions not requiring district administration approval.** These are decisions that can be made or approved independently by principals or their designees without intervention or approval by district administration. These decisions might include teaching strategies used and assignments of special projects to staff.
- **Site-based selection from a list of district-provided options.** Examples of selection lists might include computer and instructional software available for purchase. Schools can be provided choices of computer brands and software as long as they meet minimum specifications established

by the district administration's technology function. Purchasing items that are not on the approved list could result in the inability of the technology function to effectively support the hardware or software. Selecting from a list provides decision-making flexibility within a framework that helps ensure district-wide efficiency and effectiveness.

- **Site-based decisions requiring district office approval.** Certain decisions, such as hiring or terminating school staff, should require the approval of district administration to ensure compliance with state and federal laws and district policy.
- **District decisions.** There are certain decisions that should be made by district administration and enforced at all schools. A single standardized curriculum and assessments are examples of decisions that should be established, or standardized, by district administration. In making these decisions, however, the district administration should elicit input from schools to ensure that decisions make sense for the schools, as well as the district.

School systems should inventory the decisions that need to be included in the scope of a decision-making framework. The process for determining decision rules should consider the following elements:

- Does state or federal law prescribe the decision?
- Does Board policy prescribe a decision?
- Do administrative regulations prescribe a decision?
- Does the decision affect the flexibility schools need to meet individual student needs?
- Who is technically capable of making the decision?
- Does the decision affect the district's immediate or long-term cost?
- Does the decision commit the district to future expenditures?
- What are the risks of making the wrong decision?
  - Student or employee safety
  - Lawsuit or grievance
  - Sacrifice of necessary internal controls
  - Possible lack of alignment with district goals
  - Inconsistent services for students who move to another school in the district
- Does the decision affect the ability of central office to provide ongoing support?
- Could the decision have a ripple effect on other areas in the school system?

Table 10 presents a sample grid for a decision-making framework. KISD should use this as a starting point for its own framework, and the superintendent should approve the final version as an administrative regulation to ensure consistent application across the district.

Table 10. Sample Decision-Making Framework

Sample Decisions	(1) Principal Decision	(2) Principal Choice	(3) District Approval	(4) District Decision
Curriculum/curriculum guides				
Academic program decisions				
Ability to reallocate instructional and/or non-instructional staff to meet needs identified by school				
Assessments				
Course offerings (secondary)				
Identification of professional development needs				
School calendar				
School bell schedule				
Class size				
Bus routes				
Cafeteria schedule				
Work schedules for any categories of staff				
Number of workdays per year for any categories of staff				
Block scheduling (secondary)				
Terminating school staff				
Establishing staffing needs				
School facility renovations				
Student discipline – code of conduct				
Student activity funds – software/processes				
Class rank determination/computation				
Computers/servers				
Instructional software purchases				
Hiring school staff				

Source. Gibson Consulting Group

In interviews with district leadership, Gibson learned that there are plans underway to implement TEA's Effective Schools Framework (ESF) to assist in defining autonomy for KISD campuses. According to KISD administration, this will serve as the decision-making framework for campus leaders.

Planning and Strategy

Planning is the primary activity that links organizational goals to the execution of activities and the achievement of intended results. Goals are generally broad statements that can include statements of desired activities (e.g., build new schools) and desired outcomes (e.g., reduce the dropout rate). Performance objectives fall underneath goals, and their most distinguishing characteristic is that they are measurable. Long-term plans support the execution of long-term goals and performance objectives, while more detailed short-term plans support activities for the coming year. As time passes, actual results are compared to the established performance objectives, and plans and related strategies may be modified to help achieve the desired results.

KISD Board Policy BAA (Legal) defines several Board responsibilities related to goal setting and planning.

- Adopt a vision statement and comprehensive goals for the district and superintendent, and monitor progress toward those goals;
- Establish performance goals for the district concerning the academic and fiscal performance indicators under Education Code Chapter 39, Subchapters C, D, and J, and any performance indicators adopted by the district;
- Adopt a policy for the district- and campus-level planning and decision-making process;
- Adopt early childhood literacy and math proficiency plans; and
- Adopt college, career, and military readiness plans.

The KISD administration is primarily responsible for the development of planning documents. An annual District Improvement Plan (DIP), as well as annual Campus Improvement Plans (CIP), are required by state law.[11]

KISD's annual planning process begins in March of each year. The final DIP/CIPs are approved by the Board in October (in 2021-22 and 2022-23) or November (2023-24).

Finding 13: KISD does not have an active strategic plan to guide the work of the district.

In *Improving School Board Effectiveness,* Thomas Alsbury and Betsy Miller-Jones include a set of standards, based on studies of effective school boards across the country, known as the "Elements of School Board Success." These standards codify the core attributes of effective school board governance; the first element is "Vision-Directed Planning." Vision-directed planning describes a process through which "boards engage communities and staff in the development of a shared vision focused on student learning. The vision is the foundation of the mission and sets goals that direct board policy making, planning, resource allocation, and activities."[12] Vision-directed planning is therefore synonymous with strategic planning, and its place at the top of Alsbury's list underscores its role in good governance.

[11] Texas Education Code 11.251.

[12] Thomas Alsbury, *Improving School Board Effectiveness* (Cambridge, MA: Harvard Education Press, 2018), p. 79.

In recent years, KISD has operated without a strategic plan. Several documents shared with the audit team (e.g., the DIP) have acted in this capacity, but they lack several core attributes of a formal strategic plan. Namely, the DIP is inherently reactive and short-term, meant to address identified areas of need in a single school year. A strategic plan is forward-looking and should set the district's course for the next three to five years. The lack of a strategic plan has a direct impact on the Board's ability to govern – without it, the Board is essentially rudderless. This is reflected in the Board's self-evaluation responses, show in Figure 17 below. The majority of trustees do not feel that Board members can state the district's most important outcomes.

Figure 17. KISD Board Self-Evaluation Results, August 2023

Source. Moak Casey, 2023

The district is currently in the development-phase of a new strategic plan, called a "system scorecard." The administration organized multiple stakeholder councils – community members, teachers, auxiliary staff, and students – and workshopped the mission, vision, priorities, goals, and objectives of the district. Additionally, the Board has been involved at regular intervals during the scorecard's development. As of the spring of 2024, the Board had approved the system scorecard's priorities and goals (displayed below in Table 11), putting the scorecard on track to be fully implemented in the 2024-25 school year.

Table 11. KISD System Scorecard Priorities and Goals

Priorities		
1: Student Success	2: Human Capital	3: Financial Stewardship
Goals		
1.1 Pathways for all students to build connections.	2.1 To recruit and retain staff, the district will promote a positive work environment, and provide a competitive compensation and benefits plan.	3.1 The district will use data-driven planning to prioritize resource allocations.

Priorities		
1.2 All students meet or exceed the Texas grade level standards in reading and writing.	2.2 The district will implement effective standards and practices that will consistently and strategically staff campuses and departments.	3.2 The district will prepare budgets using transparent and open communication among stakeholders.
1.3 All students meet or exceed the Texas grade level standards in math.	2.3 The district will identify and provide ongoing training and coaching needed for staff to build their professional capacity.	3.3 The district will continuously evaluate and update policies and procedures to foster a positive culture and climate.
1.4 All students will graduate from high school ready to enroll in post-secondary education, enlist in the military and/or enter the workforce.	2.4 All staff will have formal and informal opportunities to give and receive feedback regarding job satisfaction and performance.	3.4 District Operational Departments training will focus on effective and sustainable use of district resources and procedures.

Source. KISD website

Commendation 3: Continue the development and implementation of KISD's new system scorecard.

The draft system scorecard that was shared with the audit team is exemplary. Its continued development and implementation are central to the district's long-term success. Gibson identified three key strengths in the draft scorecard:

- **Stakeholder involvement** – the administration engaged all levels of the organization, as well as non-parent community members, to ensure the alignment and investment of all of the district's stakeholders.
- **Organizational alignment** – an effective strategic plan encourages an organization to work towards a common mission. KISD's system scorecard achieves this through the explicit alignment of its top-level components (i.e., vision, mission) down to the tactical components (i.e., owners, benchmarks, objectives).
- **Data-driven accountability** – as part of the system scorecard's implementation, regular progress will be reported up the organization, culminating in quarterly updates to the Board. These updates will show the organization's progress against pre-established data metrics, making performance exceedingly clear.

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