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LEGISLATIVE
FINANCE
COMMITTEE

Program
Evaluation
Unit

Program Evaluation: Western School
Districts

January 16, 2023

Report #23-01



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January 16, 2023

Mr. Max Perez, Superintendent
413 Roosevelt, PO Box 8
Grants, New Mexico 87020

Mr. Steve Carlson, Superintendent
P.O. Box 1199, Highway 64, Old High School Road
Shiprock, New Mexico 87420

Dear Superintendents Max Perez and Steve Carlson:

The Legislative Finance Committee (LFC) is pleased to transmit the evaluation, *Western School Districts*. The program evaluation examined student performance, resource allocation and oversight practices within the districts. Exit conferences were held with you and your staff on January 6, 2023 to discuss the contents of the report.

The report will be presented to the LFC on January 16, 2023. LFC would like plans to address the recommendations within this report within 30 days of the hearing.

I believe this report addresses issues the LFC asked us to review and hope the districts will benefit from our efforts. We very much appreciate the cooperation and assistance we received from you and your staff.

Sincerely,

A handwritten signature in cursive script that reads "David Abbey".

David Abbey, Director

Cc: Representative Patricia A. Lundstrom, Chair, Legislative Finance Committee
Senator George K. Muñoz, Vice-Chair, Legislative Finance Committee
Senator William P. Soules, Chair, Legislative Education Study Committee
Representative G. Andres Romero, Vice Chair, Legislative Education Study Committee
Dr. Gwen Perea-Warniment, Director, Legislative Education Study Committee
Daniel Schlegel, Chief of Staff, Office of the Governor
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New Mexico School Boards Association
New Mexico School Superintendents' Association

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Student outcomes in Grants and Central remain low despite increased funding

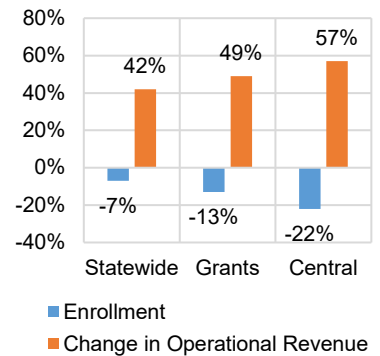
Public education is a key state responsibility accounting for \$3.8 billion, or 45 percent, of all recurring state general fund appropriations in FY23. Funding for education has grown in the face of declining enrollment and in response to the 2018 *Martinez-Yazzie* decision which found that the state was not providing sufficient funding. The Legislature has made a deliberate effort to grow funding faster for districts with higher at-risk populations. School districts, including superintendents, principals, educators, other staff and school board members, play a key role in using these resources to provide a sufficient education. This evaluation of the Grants-Cibola (Grants) and Central Consolidated (Central) school districts is one in a series of evaluations examining efforts and results of school districts.

In recent years, compared to the rest of the state Grants and Central saw greater decreases in enrollment coupled with larger funding increases but lower student performance. From FY12 to FY22, enrollment declined by 13 percent in Grants and by 22 percent in Central while operational revenue increased by 49 percent in Grants and by 57 percent in Central. While LFC found that some best practices are implemented which have led to pockets of improvement (including prekindergarten participation, effective instructional practices at select schools, and increased revenue), student outcomes in these districts trail state averages. In SY22, fewer than 30 percent of children were proficient in reading in either district. Native American and English learner students lag even further behind district and state averages. Increased chronic absenteeism, select issues with equity and outreach, along with frequent changes in principals, assistant principals, and teachers could be contributing to low student proficiency. A court and a federal report found districts were not always adequately meeting the needs of Native American students, who make up nearly half (in Grants) and the majority (in Central) of student populations.

Resources to districts have grown significantly, and districts with larger at-risk populations or receiving impact aid, such as Central and Grants, have benefited from recent legislative changes more than others. While operational revenue growth in these districts exceeded the statewide average, district spending on administration grew at a faster rate than spending on instruction. Grants and Central follow statewide trends with growing cash balances. As a percent of their budgets, Central currently has the 2nd highest cash balance in the state and Grants the 25th highest of 89 districts. Neither district has maximums or minimum targets for cash balances nor plans for spending down balances.

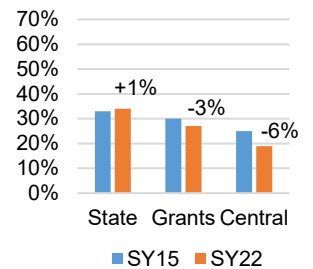
School boards and superintendents play an important role in improving district performance. Boards in Grants and Central could spend more time focusing on strategic rather than administrative decisions. There is also above-national-average turnover in superintendents in these districts. Increased and focused training could help board members exercise their appropriate authority and contribute to increased achievement. Lastly, before effective learning can occur, school boards and districts statewide must ensure student safety, including stronger policies and training to prevent adult sexual misconduct.

Chart 1. Percent Change in Enrollment and Operational Revenue, FY12 to FY22



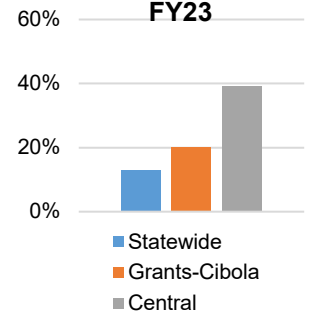
Source: LFC analysis of PED data

Chart 2. Percent Reading Proficient



Source: PED

Chart 3. Unrestricted Operational Cash as Percent of Operational Budget FY23



Source: LFC analysis of PED data

Evaluation Objectives

1. Examine governance and oversight structures;
2. Evaluate trends in student achievement and instruction; and
3. Study business management and resource allocation.

Key Findings

Districts need stronger instruction, deeper engagement and stable leadership to boost low achievement.

Revenue growth outpaces spending contributing to high cash balances, yet enrollment drops require workforce efficiencies.

Governance and leadership should focus on planning, stability, and training to improve student outcomes and safety.

Key Recommendations

The Legislature should consider:

- Targeted pay increases and additional support for principals to reduce mobility and turnover; and
- Amending state law (Section 22-5-13 NMSA 1978) to adjust local school board training requirements to include performance-based budgeting.

Grants and Central should:

- Increase low proficiencies by fully implementing PED's accelerated learning strategy (i.e. teach grade-level content while addressing unfinished learning);
- Offer more preK while effectively coordinating with Head Start programs so as not to supplant federal funds;
- Continue to promote and implement extended learning time programs such as K-12 Plus;
- Use student support services to further identify and resolve root causes of chronic absenteeism;
- Provide targeted supports to reduce principal and teacher instability;
- Set cash balance minimums, maximums, and targets for approval by school boards in line with cited best practices and create three-year plans for use of cash balances;
- Adopt the New Mexico School Board Association model policies on staff and student professional boundaries; and
- Require trainings for all district staff on adult sexual misconduct be in-person and include information on appropriate social medial and electronic communication behavior and boundaries.

The Public Education Department (PED) should:

- Expand the capacity of its teacher evaluation system to enable statewide and district-level analysis of its data by purchasing the module of CANVAS that allows for data reporting and analysis;
- Regularly report data to school boards relating to student performance, financials and educator workforce and ensure school boards receive increased training on how to use this data to inform their strategic decision-making; and
- Continue to work with New Mexico's congressional delegation to waive the two year home country residency rule for high-performing teachers on expiring J-1 visas.

BACKGROUND

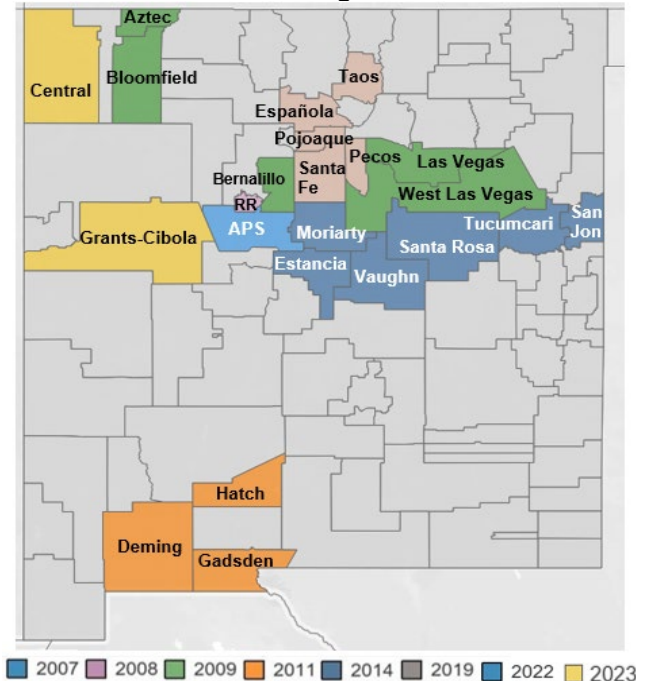


Continual examination of school district operations promotes an effective education system. From 2007 through 2022, the Legislative Finance Committee (LFC) reviewed the operations and finances of 21 school districts, beginning with Albuquerque Public Schools in 2007. This program evaluation examines governance, performance, and finances at two school districts in the western region of the state: Central Consolidated School District (Central) and Grants-Cibola County Schools (Grants).¹ Given that public education is a core state responsibility and accounts for the largest share of all state spending, it is important to continually examine school district operations to ensure an effective public education system for students and the public. Past LFC evaluations identified findings related to inefficiencies in financial management, declining student enrollment, and the need for long-term strategic planning.

Rural and expansive, Central and Grants both face challenges in serving a diverse and lower income student population. Located in the far northwest corner of the state, Central serves approximately 4,900 students, employs approximately 1,000 personnel, and covers nearly 3,000 square miles. Central’s students are primarily Native American (93 percent), one-third are English learners, and most are low-income (90 percent). This rural district serves three communities with diverse needs: Kirtland, Newcomb, and Shiprock, the latter two located on the Navajo Nation. The district also represents 15 Native American Chapter Houses. Some students in the district face distinct challenges, including three hour round-trip commutes to school. Systemic poverty is acute; up to 40 percent of families do not have electricity, potable water, or internet. The remoteness of the district presents challenges to infrastructure, staff recruitment and retention, and equitable allocation of resources.

Grants is located in Cibola County, west of the Albuquerque Public School district. It serves approximately 3,200 students and employs approximately 500 personnel. Grants is also a rural and diverse district, covering nearly 4,000 square miles, and includes Laguna Pueblo, Acoma Pueblo, and Baca-Prewitt Navajo Chapter. Grants’ students are primarily Native American (47

Figure 1. School Districts Evaluated by the Legislative Finance Committee 2007 through 2023



Source: LFC files

Table 1. Number of Schools and Students in Grants and Central SY22

	Grants	Central
Prekindergarten (# of students)	3 (88)	1 (65)
Elementary (# of students)	7 (1648)	8 (2149)
Middle (# of students)	2 (489)	3 (1014)
High (# of students)	3 (1041)	4 (1724)

Source: PED

¹ LFC has not evaluated any western school districts since 2009. For the current evaluation, staff identified a sample of 10 school districts in the western part of the state, each varying in size, funding, and performance, and used three criteria to select school districts for review. First, staff selected districts with more than 1,000 students. Second, staff identified districts with below state average proficiencies in reading and math. Lastly, districts with a higher number of FY21 audit findings were selected. As a result of these criteria, staff selected the Central and Grants school districts.

percent) and Hispanic (38 percent). Most are low-income (85 percent) and about one in ten students is an English learner. The vastness of the district presents similar challenges to those experienced in Central.

Districts continue to recover from the impacts of the pandemic. The pandemic placed substantial mental health burdens on school children and teachers. Previous LFC reports noted the exacerbating impact of the pandemic on increased chronic absence and slowed growth in proficiency, particularly for low-income students who had lower than average growth before the pandemic. Additional lost learning days are potentially widening the existing achievement gap and setting New Mexico’s children even further behind academic norms. Rural serving districts with large Native American populations, such as Central and Grants, faced particular challenges in providing remote instruction to students. While schools have returned to in-person learning, districts are still adjusting to the effects of the pandemic.

While the majority of district operational revenue comes from the state and goes to instruction, districts also receive millions in federal funds.

School districts receive nearly all of their operational funding from the state. The state allocates funding to school districts and charter schools based on a statutory funding formula called the state equalization guarantee (SEG) formula. School districts have local discretion over how to budget and spend these dollars. School boards oversee and approve district budgets (prepared by superintendents) before being sent to PED for review and approval. In FY22, Grants received \$58.1 million in total revenue, including funding for operations, grants, capital funds, debt services, and other purposes. State funding constituted 69 percent (\$39.9 million) of total revenue for Grants and

School districts receive nearly all of their operational funding from the state

Table 2. District Revenues, Expenditures, and Cash Balances for FY22

Sources and Uses		Grants		Central	
		Operational Fund	All Funds	Operational Fund	All Funds
Revenues	Local	\$161,506	\$5,351,587	\$603,830	\$9,224,703
	State	\$35,614,864	\$39,896,678	\$56,876,824	\$60,469,866
	Federal	\$2,345,708	\$12,836,057	\$21,644,682	\$45,934,620
	Other	\$46,764	\$46,764	\$140,425	\$140,425
	Total	\$38,168,842	\$58,131,086	\$79,265,761	\$115,769,613
Expenditures	Instruction and Related Support Services	\$24,148,189	\$32,996,479	\$44,923,079	\$61,505,343
	Buildings and Maintenance	\$6,079,840	\$19,346,827	\$14,989,668	\$30,239,378
	General/Central Administration	\$2,833,092	\$4,115,155	\$4,640,600	\$6,028,302
	School Administration	\$1,858,588	\$2,028,181	\$4,968,821	\$5,278,561
	Other	\$14,471	\$6,427,187	\$804,209	\$11,936,653
	Total	\$34,934,180	\$64,913,829	\$70,326,377	\$114,988,237
End-of-Year Cash Balances	Total	\$11,096,582	\$30,614,132	\$41,093,374	\$60,286,624

Note: FY22 expenditures in this table include actual expenditures and encumbrances.

Source: LFC analysis of PED Operating Budget Management System data

93 percent (\$35.6 million) of operational revenue. In the same year, Central received \$115.7 million in total revenue, including funding for operations, grants, capital funds, debt services, and other purposes. State funding constituted 52 percent (\$60.5 million) of total revenue for Central and 72 percent (\$56.9 million) of operational revenue. Both districts spent a majority of their expenditures on instruction and related support services for students and instructors.

Financial resources in Grants and Central increased over the past decade and a recent boost in federal funds provides significant new funding.

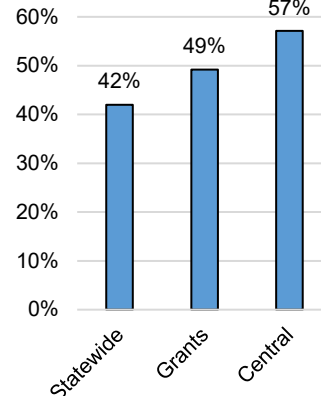
From FY12 to FY22, Grants and Central had operational revenue growth exceeding the state average due to state funding increases, additional funding for at-risk students, and the removal of a deduction for federal impact aid funding in the state funding formula. In addition to these operational funding increases, Central and Grants (along with districts statewide) received pandemic relief funds through three federal acts (Elementary and Secondary School Emergency Relief Fund, or ESSER I, II and III), with distributions based on enrollment.

Operational revenue growth in Central and Grants outpaced state growth in part due to impact aid funding. Federal impact aid compensates school districts for the loss of property tax revenue because of the presence of federal land. The largest category of impact aid funding (basic support payments) helps school districts educate federally connected students, including students residing on Native American lands. The public education funding formula used to deduct 75 percent of school districts' federal impact aid basic support payments and local property tax revenue from their state funding allocations. However, in 2021 the Legislature eliminated state funding deductions (Laws 2021, Chapter 52, House Bill 6), resulting in state funding increases to school districts receiving federal impact aid payments and local property tax revenue.

Grants and Central received an additional \$1.6 million and \$15.9 million, respectively, in FY22 from the removal of the impact aid deduction in the SEG formula. In FY20, prior to the removal of the deduction, Central received \$21.9 million in federal impact aid basic support payments and had 75 percent of that amount (or \$16.4 million) deducted from its final SEG funding allocation. In the same year, Grants received \$2.6 million in impact aid basic support payments and had \$1.9 million deducted from its SEG allocation. In FY22, after the removal of the deduction, Central received \$21.2 million and Grants received \$2.1 million in impact aid payments. From FY12 to FY22, operational revenue grew 42 percent in districts statewide while in Grants it grew 49 percent and in Central 57 percent.

Across the three federal pandemic acts, Grants will receive a total of approximately \$22 million and Central \$34 million; all districts statewide will receive approximately \$1.4 billion. Federal guidance allows for flexibility in allowable uses for these funds, ranging from activities related to school health and safety to providing accelerated learning, funding more counselors, or preventing teacher layoffs. According to a 2022 McKinsey & Company report, school districts nationwide face challenges deploying funds due to administrative hurdles, talent shortages and insufficient strategic

Chart 4. Growth in Operational Revenue from FY12 to FY22



Source: LFC analysis of PED data

planning and operational capacity. According to the Q1 PED Performance Report Card, PED has not been timely with issuing award letters and processing reimbursements. Districts have until September 2023 (ESSER II) and September 2024 (ESSER III) to spend the funds with a possibility for

potential extensions. Statewide, districts have largely spent down ESSER I. Central and Grants spent most of their ESSER I funds on educational technology. Central has spent approximately 75 percent of its ESSER II funds, the majority going towards educational technology and outdoor education support. In Grants, more than half (56 percent) of ESSER II funds has been spent, the majority on activities to

maintain continuity of services and facility improvements to reduce virus transmission (see Appendix B for more details).

Table 3. Federal Pandemic Funding
(in millions)

	ESSER I	ESSER II	ESSER III	Total
Grants	\$1.6	\$6.8	\$14	\$22
Central	\$2.5	\$10	\$21	\$34
Statewide	\$98	\$402	\$880	\$1,379

Source: PED

Grants plans to spend most ESSER III funds on career and technical education, technology, and outreach for at-risk students. Grants identified five priorities for its approximately \$14 million in ESSER III funds: addressing learning loss; building a comprehensive Career and Technical Education (CTE) program; appreciating culture and diversity; caring for vulnerable populations; and creating a nurturing culture for staff. According to financial data submitted to PED as of September 2022, Grants had spent \$630 thousand (5 percent) and encumbered an additional \$8 million (62 percent spent or encumbered). The majority was spent on equipment in connection with their CTE programs.

Central plans to spend most of ESSER III funds on student engagement programs to address learning loss and social-emotional well-being of students and staff with professional development. Central was awarded approximately \$21 million in ESSER III funds. The district identified the need to invest in technology, programs to improve engagement and behavior, parent and teacher education on impacts of the pandemic and cultural awareness, professional development, food and basic need supplies, and facility improvements related to the pandemic. Central has spent \$270 thousand (1 percent) and encumbered an additional \$1.6 million (9 percent spent or encumbered). The majority was spent on school-level administrative staff, salaries for instructional support coordinators, and building maintenance.

Student enrollment declines in Grants and Central outpaced statewide trends, driven by lower birth rates, outmigration, the pandemic, and closure of a key supporting industry.

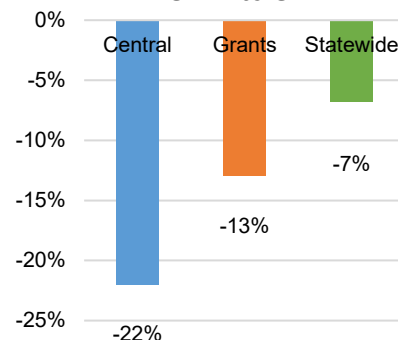
Declining enrollment in public schools presents challenges to districts as they make facility plans and project future revenue. In Central, the closure of a power plant has forced some families to relocate in pursuit of jobs elsewhere and also translates into a potential \$3.7 million reduction in property tax revenue no longer available for district capital improvement projects.

From SY12 to SY22, statewide enrollment declined 7 percent while Grants' enrollment declined 13 percent and Central's declined 22 percent. From SY12 to SY22, Grants lost 461 students and Central lost 1,395 students. With only one district-authorized charter school in Central and none in Grants, charter schools are not drawing students away from public schools in these two districts as they have in other districts. However, since 2010, birth rates have declined in the counties of both districts at a faster rate than statewide (31 percent in San Juan, 28 percent in Cibola, and 21 percent statewide). Outmigration has also likely played a role. In nearly every year since 2011, more individuals have moved out of both San Juan and Cibola counties than have moved into them. According to the University of New Mexico's Geospatial and Population Studies program, San Juan and Cibola counties are projected to lose population by 9 and 5 percent, respectively, from 2020 to 2040. A 2020 report from the Western Interstate Commission for Higher Education projected that from 2019 to 2037 the number of high school graduates in New Mexico will decline by 22 percent due in part to declining birth rates representing one of the steepest declines in the country. In the case of Central, decisions to close the nearby coal-fired power plant and mine are likely contributing to this trend, with the Associated Press reporting in October 2022 that 25 percent of students at Judy Nelson Elementary left in the last five years in response to the plant closure. The Covid-19 pandemic has also likely contributed to enrollment declines. However, preliminary 40th day school district enrollment counts indicate some students are returning to the districts. In FY23 in Grants, enrollment grew by approximately 300 students and in Central enrollment grew by approximately 130 students.

Closure of the San Juan Generating Station and San Juan Coal Mine could reduce Central's property tax revenue by as much as 49 percent. The San Juan Generating Station, a coal-fired power plant located within the Central school district, closed in 2022, along with the adjacent San Juan Coal Mine, which supplies the generating station with coal. The closure will impact the ability of the school district to raise revenue and repay school bonds issued for facility construction and improvement. In FY22, Central received \$7.7 million in property tax revenue with an estimated \$3.7 million attributable to the plant and mine.

Another important consequence of the plant closure relates to the ability of the district to receive state funding for capital projects through the Public School Capital Outlay Council (PSCOC). The PSCOC uses a formula that provides a higher state match to districts with lower property valuations, which are based on a five-year rolling average of a district's total property value. For districts that experience a catastrophic change in valuation, the rolling average will not immediately reflect the loss of local resources. Currently, Central receives an estimated 43 percent state match for capital outlay project funding, based on

Chart 5. Percent Change in Enrollment SY12 to SY22



Source: LFC analysis of PED files

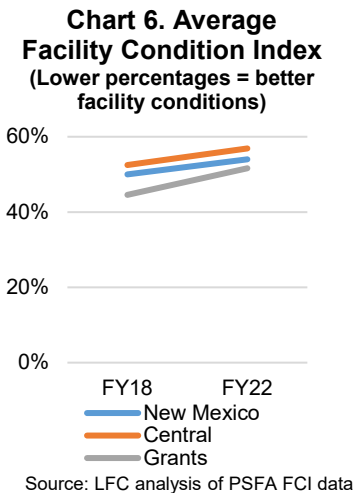
the five-year rolling average. If the state match was based on the most recent valuation rather than a rolling five-year average, Central would receive an estimated 58 percent state match in SY24. PSCOC, LFC, and LESC are also considering legislative changes to the formula that would reduce the local match by one-third from FY24 to FY26, which could further increase Central’s state match to 72 percent.

In 2020, Grants was similarly impacted by the closure of the Tri-State Generating Plant and the Ciniza Oil Refinery. In 2020, the Escalante Station, a coal power plant near Prewitt, New Mexico, closed with a loss of 107 employees. Grants district officials report 100 of these jobs were from Cibola county. The Ciniza Oil Refinery in Gallup closed the same year, resulting in a loss of 200 jobs but it is unknown how many of these jobs impacted Cibola county. Similar to in Central, these closures impacted the ability of Grants to generate local revenue.

Due to aging infrastructure, building needs in Grants and Central have increased, with local, state, and federal funding available for capital projects.

Despite declining enrollment, school buildings still need repair, with some schools in more critical need than others. On average, across the state, school buildings are around 36 years old, similar to in Central (34 years old) and Grants (37 years old). In response to a court ruling in the *Zuni v. State of New Mexico* lawsuit, the state created a process for school districts to apply for state match funding to improve school facilities falling below state adequacy standards. School districts are required to use their own local funds to pay for renovating or rebuilding schools above adequacy standards.

On average, the repair needs of school facilities in Grants and Central have increased in recent years and are comparable to statewide averages. The state Public School Facilities Authority (PSFA) tracks the quality of school facility conditions with a metric called the facility condition index (FCI), measuring a school’s costs of repairs relative to the costs of replacement. For example, an FCI score of 100 percent means replacement would be more cost-effective than repairs. In FY22, the statewide average FCI was 54 percent, similar to that of both Central (57 percent) and Grants (52 percent). However, there was wide variation of facility condition within these two districts. In Central, the FCI ranged from 21 percent at July Nelson Elementary School to 72 percent at Newcomb Elementary School, a school with some structures from the 1960s. In Grants, the range was even greater: the FCI was 16 percent at Los Alamitos Middle School compared to 85 percent at Bluewater Elementary School. PSCOC awarded Central \$15.9 million in state funds for replacement and repair costs at Newcomb and awarded Grants \$5.5 million for similar costs at Bluewater. About half of all schools in both districts have an FCI above 60 percent, suggesting demolition and replacement may be a more cost-effective option than renovation. The remoteness of many schools in both districts presents challenges to maintaining and updating infrastructure (see Appendix C for information on FCI by school in each district).



Districts need stronger instruction, deeper engagement and stable leadership to boost low achievement

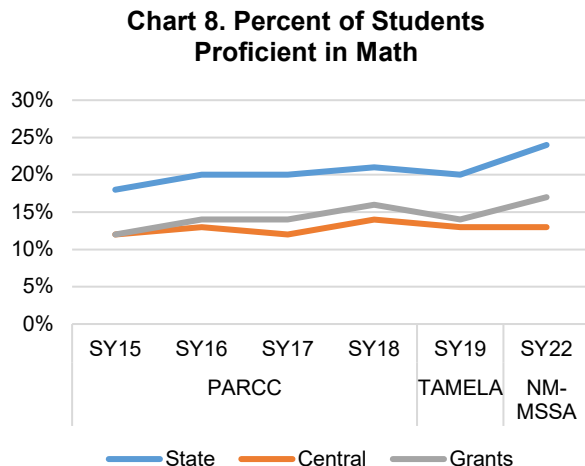
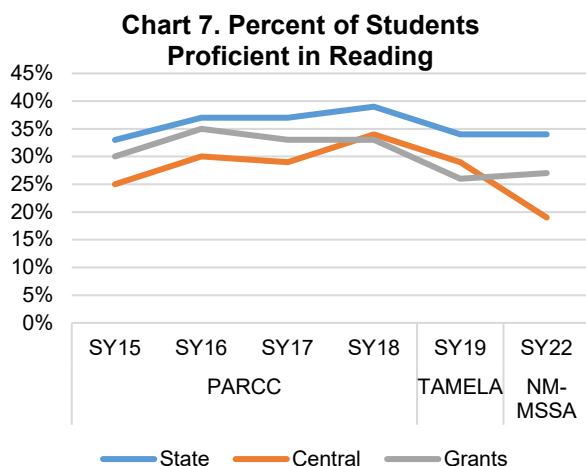
Student proficiency rates in Grants and Central have generally lagged behind already low statewide averages since SY15, with notable districtwide drops in proficiencies occurring in middle school. While on average students in both districts gain a year's worth of learning each year, Native American students and English learners fall behind peers in reading proficiency and high school graduation rates. Additionally, more students were chronically absent in both districts in SY22 than in recent years, mirroring statewide and national trends. In Grants, student behavior problems doubled from SY18 to SY22 while in Central they declined over this period. Addressing both absenteeism and behavior issues, particularly in middle schools, could increase meaningful student engagement and performance. Accelerated learning, extended learning time programs (ELTP) and prekindergarten (preK) are evidence-based to improve student outcomes. The Legislature has increased appropriations for ELTP and preK. Grants implements K-5 Plus and ELTP and Central implements only ELTP.

Additionally, instruction and school leadership are the two most important school-based factors influencing student achievement yet most schools in both districts have seen challenges maintaining stable leadership and teaching staff. Changes in principals and assistant principals exceeded 50 percent in SY22 in Central and was nearly 40 percent in Grants, exceeding the 2018 national average of 18 percent. Recruiting teachers (in Central) and retaining them (in Central and Grants) is also a challenge, as evidenced by high vacancy and frequent staff changes. Lastly, with Native American students making up nearly half (in Grants) and the majority (in Central) of students, there are opportunities to improve collaboration with Pueblos and Tribes and prioritize advanced course work for Native American students.

Districtwide proficiencies lag statewide averages

In recent years, reading proficiencies in Grants and Central have fallen below the state average, with a steep drop in Central in SY22.² In SY22, reading proficiencies were 19 percent in Central, 27 percent in Grants, and 34 percent statewide. Math proficiency grew slightly in SY22 in Grants (17 percent) and Statewide (24 percent), but remained relatively stagnant in Central (13 percent).

² Since SY15, New Mexico has undergone two state summative assessment transitions, in addition to two years of optional test taking due to the COVID-19 pandemic, making it difficult to track student proficiency longitudinally. However, comparing district student proficiencies to statewide trends remains a helpful measure.

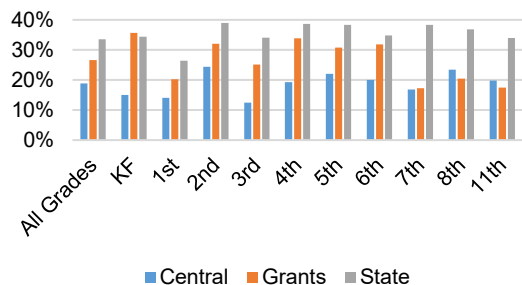


Source: PED

Low reading proficiencies in middle school contribute to lagging districtwide proficiency rates. Student proficiencies vary across grades. In SY22, while Grants elementary students’ reading proficiencies neared or surpassed the state average, middle school proficiencies were markedly below the state average (17 percent and 38 percent, respectively). This proficiency drop in middle school is a pattern that goes back several years in Grants. In Central, reading proficiencies in all grades remained below statewide averages. Math proficiencies statewide and in both districts tend to peak in

sixth grade and then fall again (see Appendix D). A previous LFC report on the costs and effectiveness of middle school found middle school is a time when achievement gaps are closed or widened. The same report found New Mexico middle schools did not consistently provide programming and resources to promote social-emotional behavior conducive to engagement and academic growth. In Grants, behavior problems were high among middle school students in SY22, as discussed further in the following section. Low proficiency scores, coupled with increased behavior problems, may indicate Grants middle school students require additional social-emotional and academic supports.

Chart 9. Percent of Students Proficient in Reading SY22



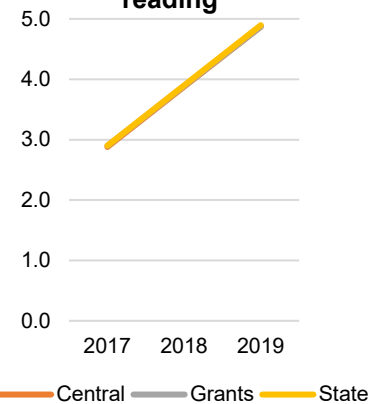
Source: PED

Research also indicates districts can bolster middle school achievement by beginning to incorporate college and career readiness in middle schools and not just in high schools. Providing career technical education (CTE) coursework can also be an effective way to motivate students to attend school. While Grants has begun to offer CTE pathways in middle schools, Central offers CTE classes only to high school students through the Bond Wilson Technical Center. Students who attend Newcomb High located in a remote part of the district lack these opportunities and the district is considering ways to extend similar offerings to these students. Central should finalize these plans and expand CTE coursework to middle school students throughout the district.

On average, students gain a year's worth of learning annually, but at-risk students are behind. The *Martinez-Yazzie* lawsuit found “dismal” outcomes indicated the state had not provided a sufficient education for at-risk students, including Native American students and English learners (EL). Additionally, New Mexico’s Indian Education Act lays out goals and requirements for providing Native American students an equitable, culturally relevant education through collaboration between tribes, schools, and the state. Districtwide in both Grants and Central, students on average typically gain a year’s worth of learning annually. At the same time, Native American and EL students lag their peers in proficiency and high school graduation rates. In SY21, the high school graduation rate in Grants was 72 percent, for Native American students it was 70 percent and for EL students it was 67 percent. In Central, there was a similar pattern. The districtwide graduation rate was 70 percent, for Native American students it was 68 percent and for EL students it was 64 percent. High school graduation rates for Hispanic students in Grants and Central (74 percent) exceeded districtwide averages. White students graduated at higher rates in both Grants (76 percent) and Central (92 percent) than districtwide averages.

In terms of reading proficiency, Native American and EL students lag even further behind their peers than they do with graduation rates. In Grants, 27 percent of students were proficient in reading in SY22, while 18 percent of Native American students were proficient and 10 percent of EL students. In Central, 19 percent of students were proficient in reading, 16 percent of Native Americans and 10 percent of EL. Rates of chronic absence in these districts do not follow the same trend. Hispanic students in Grants exceeded all groups with 52 percent chronically absent.

Chart 10. Students in Central and Grants gained a year's worth of learning annually from 3rd to 5th Grade in reading



Note: SY17-SY19 ELA PAARC data. The cohorts included 400 students in Central and 261 students in Grants. In both cohorts, all of the students qualified for the free-lunch program.
Source: LFC analysis of PED data

Chart 11. Four-Year High School Graduation Rates SY21

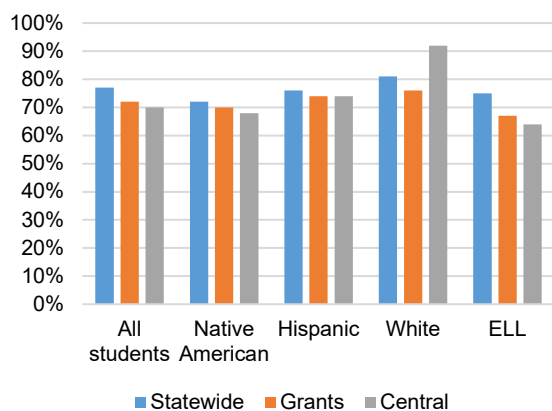
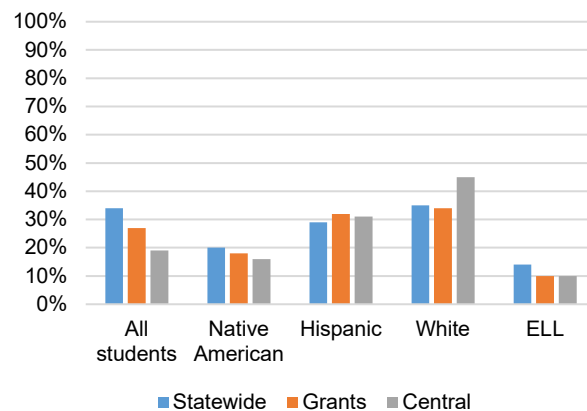


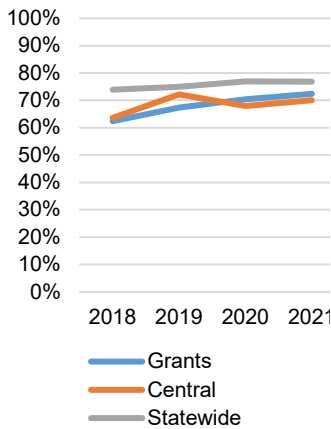
Chart 12. Percent of Students Proficient in Reading SY22



Source: LFC analysis of PED data

Graduation rates have increased while math and reading proficiencies remain low, suggesting students are graduating without achieving academic proficiency. From 2018 to 2021, the statewide high school

Chart 13. 4-Year Graduation Rates

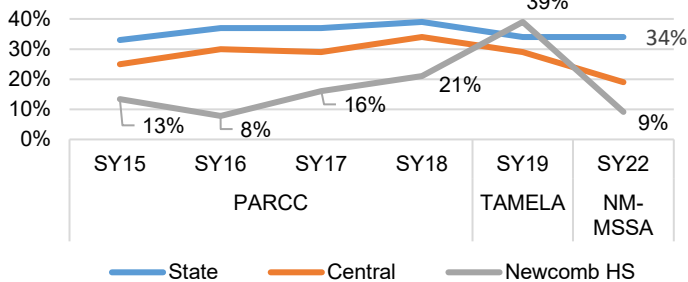


Source: PED

graduation rate increased from 74 percent to 77 percent. Over the same period, Grants experienced a 10 percentage point increase to a 72 percent graduation rate while Central increased 6 percentage points to a 70 percent graduation rate. At the same time, proficiency rates remain consistently below 35 percent in reading and below 25 percent in math. In SY22, in Grants 18 percent of students scored proficient on the SAT and 20 percent in Central. These data suggest students are graduating high school without academic proficiency for college and career readiness.

Students in Newcomb High (Central) and Cubero Elementary (Grants) excelled beyond statewide averages despite high poverty. The percent of students at Newcomb High proficient in reading increased by 18 percentage points from SY18 to SY19, surpassing the state average and building on a few years of steady gains. Students in this school are nearly 100 percent Native American and economically disadvantaged. During interviews with LFC staff, the Newcomb high school principal in place during this time of increased achievement, recounted how the school used the 90 day plans schools are required to submit to PED to create a detailed, school-wide effort to promote data-driven instruction and high expectations. On a triweekly basis, teachers examined data, developed interventions and monitored progress, supported with high-dosage tutoring. The plans for SY19 contained detailed weekly, bi-monthly and monthly action steps. In SY22, after that principal left, the action steps included in the 90 day plans were broader, covering an entire semester and did not include detailed steps for reaching goals.

Chart 14. Percent of Newcomb High School Students Proficient in Reading



Source: PED

In SY22, the growth in the percentage of Native American students at Cubero Elementary in Grants that were proficient in reading and math grew at a steeper rate than statewide. In recent years, the school’s 90 day plans submitted to PED closely aligned with the Grants districtwide protocol of examining student work through which teachers meet regularly on grade level teams with the principal and instructional coach to examine student data and plan instruction and interventions. The plan also emphasized the importance of teaching standards-based grade-level content, and set a goal for grade level teams to discuss professional development needs with the instructional coach and principal bi-weekly.

The strategies mobilized at Newcomb and Cubero are similar to those of PED’s accelerated learning strategy which aims to hold students to high expectations through teaching grade-level content while also addressing gaps in understanding. This strategy is supported by research from the non-profit educational research firm TNTF. Many of these strategies are also part of the eight characteristics of high-performing schools identified in prior LFC reports, including high expectations and standards, curriculum and instruction aligned with core standards, a data-driven focus, and frequent monitoring of student achievement. Additionally, the Results First Clearinghouse from Pew notes that professional development focusing on using assessment data to modify and improve instruction is not only evidence-based but also has a high benefit-to-cost ratio. Following the pandemic, school closures and a change in

school leadership, reading proficiency and graduation rates dropped at Newcomb. In the case of reading proficiency, the drop amounted to 30 percentage points with only 9 percent of students proficient.

Figure 2. Eight Characteristics of High-Performing Schools



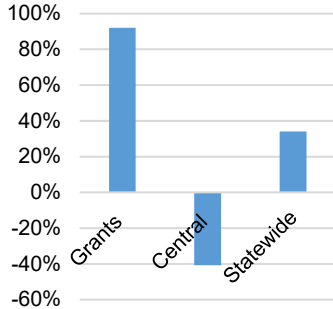
Source: LFC. (2014). "Program Evaluation: Performance and Improvement Trends." Report #14-11. P.12.

Behavior problems and high absenteeism suggest the need for improved engagement and more instructional time.

While students in Central and Grants elementary schools gained on average a year's worth of learning annually from SY17-SY19, across both districts, proficiencies remain low. Research has shown that additional learning time has the potential to raise academic proficiencies through multiple programs, including prekindergarten (preK), K-5 Plus, and extended learning time programs. A meta-analysis of research on the benefits of extended learning looked at 15 studies and found 14 provided some evidence of a positive relationship for at least one intended achievement outcome or subsample of students. There are also financial benefits with some extended learning opportunities offering returns as high as \$6-to-\$1 for preK and \$8-to-\$1 for summer learning programs.

This relationship between instructional time and student achievement is particularly important given the reported impact of missed learning time due to the pandemic and the exacerbating impact of growing chronic absence and student behavior issues. Additionally, LFC has published research identifying evidence-based programming to help address student behavior issues including the PAX Good Behavior game which has been implemented in several districts, including Central.

Chart 15. Percent Change in Student Discipline Incidents SY18 to SY22 (lower is better)



Note: SY19 – SY21 were excluded from the analysis.

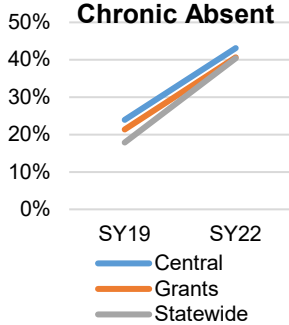
Source: Central, Grants, and PED

From SY18 to SY22, student discipline problems in Grants nearly doubled from 63 reported infractions to 121, whereas statewide incidents increased by 34 percent. Research has found behavior problems have a negative relationship with academic performance. In Grants, behavior incidents were due mostly to simple assault, followed by tobacco use. Of the 121 reported incidents in SY22, 87 occurred at Los Alamitos Middle School. District officials in Grants report changes to their discipline handbook and processes improved the accuracy of reporting, potentially contributing to some of the increase in incidents. Discipline issues typically rise in middle school and schools are often ill equipped to meet the social-emotional needs of young adolescents. Statewide, discipline problems also increased. A 2022 national survey conducted by the Institute of Education Sciences found an increase as well with more than 80 percent of public schools reporting stunted behavioral and socioemotional development in their students because of the COVID-19 pandemic. The experience in Central, however, was different where there was a decline in student discipline problems, dropping 42 percent from SY18 to SY22.

Last year, Grants used at-risk funds to place student success advisors for each grade level at every middle and high school, to allow traditional counselors to focus on student behavioral health. The district plans for the student success advisors to follow a cohort of students across their school careers. While this practice is promising, the effects cannot yet be measured.

Central is implementing the PAX Good Behavior game, an evidence-based classroom intervention for young children to decrease disruptive behavior and increase attentiveness, in all elementary schools. However, the district is also using the Capturing Kid’s Hearts Teen Leadership curriculum in middle school, which does not have the same research evidence base, according to the Pew Results First clearinghouse. Central should ensure it meets the behavioral needs of its students by implementing an evidence-based program, or evaluating the effectiveness of Capturing Kids’ Hearts’ curriculum on its students.

Chart 16. Percent of Students Chronic Absent



Note. SY20 and SY21 excluded due to pandemic related data collection inconsistencies.

Source: LFC analysis of PED data

Worsening chronic absenteeism in Grants and Central contributes to lagging performance, in ways similar to how poverty shapes achievement. A growing body of national research, as well recent LFC and LESC reports, reveal the role of quality classroom time on student achievement, with increased absences associated with decreased performance on assessments in reading and math. While chronic absenteeism is on the rise nationally, the problem is more serious in New Mexico with 40 percent of students chronically absent compared with 17 percent nationwide, and 43 percent in Central (or 2,148 students), and 41 percent in Grants (or 1,351 students). These students missed at least 18.5 days of school, more than the ten days that the state’s extended learning time programs add. An October 2022 LESC report found a relationship between the number of instructional hours and average student test scores, with the largest impact in middle school. Statewide, 10 additional instructional hours were associated with a one point increase in standardized test scores in middle school. Using this statewide analysis, and the instructional hours in Grants and Central, a chronically absent student would have lost approximately 11 points on standardized tests. LESC research also notes a similar gap in achievement, around 12 points, between low income middle school students and their more affluent peers. Time in

school, and the quality of instruction, impacts achievement and chronic absence sets students further behind.

While schools across the state and in Central and Grants have attendance coaches whose primary role is to help improve attendance, research from the Johns Hopkins Everyone Graduates Center suggests measuring and monitoring data is only part of the solution. Principals and schools must promote awareness about the impact of chronic absenteeism, celebrate successes, identify root causes, and connect students with supports related to transportation, food, health or housing. Federal pandemic funds can be used to track student attendance and improve engagement.

According to PED, no school in Central submitted an attendance improvement plan for SY22, although it is required by New Mexico's Attendance for Success Act. The New Mexico Attendance for Success Act requires districts and schools with rates of chronic absence over five percent to submit an attendance improvement plan. Although the Act passed in 2019, the pandemic disrupted full implementation and not all districts and schools consistently submitted plans. In SY22, all but one school in Grants had submitted an attendance improvement plan. Central district officials report all schools submitted an attendance improvement plan for SY23.

Grants and Central are implementing Extended Learning Time Programs (ELTPs) districtwide, but only Grants is participating in K-5 Plus, despite research pointing to the effectiveness of these programs. Research on the effects of extended learning time has found positive results for students, especially those at risk of school failure. One study on summer learning loss refers to the idea of a “resource faucet,” which is turned on during the school year, enabling all students to make gains. Out of school, however, the flow of resources slows for some students, while remaining steady for others. Extending the school year can provide a steadier flow of resources for low-income and at-risk students in New Mexico, who make up the majority of public school students. For students who may not have as many out-of-school opportunities and resources, time in school can be an important equalizer. Given the loss in student learning from the pandemic, extending learning time is an important tool for districts to use. Furthermore, the court ruling on the *Martinez-Yazzie* lawsuit recommended expanding access to extended learning approaches.

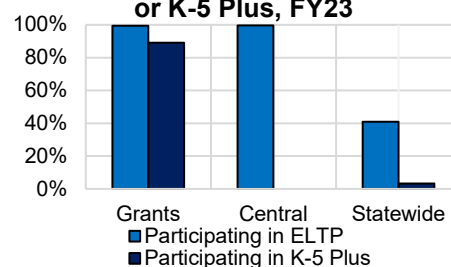
For FY23, the Legislature included \$95 million within the SEG public education formula to fund ELTPs and \$120 million to fund K-5 Plus programs across districts. According to preliminary data from PED, 41 percent of students statewide are participating in ELTPs while only 3 percent of students are participating in K-5 Plus programs statewide. Since FY21, districts have foregone nearly \$400 million in funding for these interventions. However, in Grants and Central roughly 100 percent of students are participating in ELTPs, resulting in an additional \$1.7 million for Grants and \$2.6 million for Central in FY23. In FY22 and FY23, 89 percent of eligible students in Grants (around 1.4 thousand students) participated in K-5 Plus, resulting in around an additional \$2.3 million for the district each year. Grants only recently started participated in greater numbers in K-5 Plus. In FY20 and FY21 few or no students participated in K-5 Plus (zero

Lower absenteeism and higher proficiencies at Bluewater

In SY22, Grants' Bluewater Elementary School's chronic absence rate (23 percent) was about half Grant's districtwide rate (41 percent). Students in this school outperformed the state average in reading and math with a student population over 95 percent low-income. Given the importance of instructional time, the school's low rate of chronic absence is likely contributing to its performance.

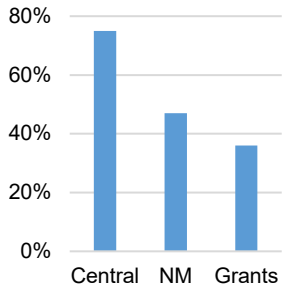
District officials report the school has also embraced the district's learning plan. Introduced in SY19, the learning plan aims to support its highly mobile student population by ensuring similar instructional scope and sequence across schools. Students are further supported through the examining student work protocol. Teachers meet weekly with principals and instructional coaches to examine student artifacts and assessments, identify student needs, evaluate class instruction, and plan interventions.

Chart 17. Percent of Eligible Students Participating in ELTP or K-5 Plus, FY23



Source: LFC analysis of preliminary FY23 SEG data

Chart 18. Capacity to Serve Total Four-Year Old Population with PreK FY23



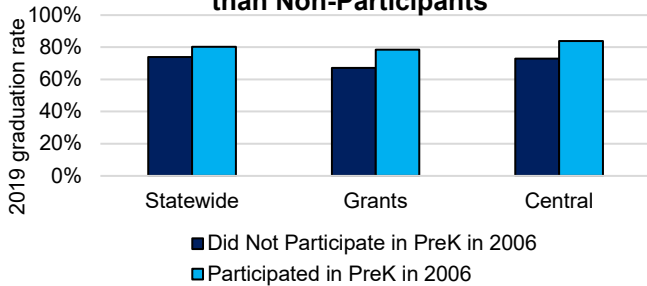
Source: LFC analysis of ECECD data

participants in FY20 and 314 in FY21). Central is not currently implementing any K-5 Plus programs, forgoing \$2.9 million in potential funding. Given the importance of instructional time for student achievement, Grants and Central should continue to implement and expand participation in extended learning time programs.

Students in Grants and Central who participated in prekindergarten (preK) had higher high school graduation rates than nonparticipants. The 2021 LFC program evaluation, *Prekindergarten Quality and Educational Outcomes*, found prekindergarten participation was associated with higher graduation rates later in life. Specifically, students who participated in the inaugural year of New Mexico prekindergarten (school year 2005-06) statewide had a four-year high school graduation rate of 80 percent in 2019 while nonparticipants had a graduation rate of 74 percent. LFC staff found similar patterns for students in Grants and Central. Students who participated in New Mexico prekindergarten in SY06 had higher 2019 graduation rates than nonparticipants in both Grants, 79 percent graduation versus 67 percent graduation, and Central, 84 percent graduation versus 73 percent graduation. These data provide further evidence prekindergarten programs improve student performance through high school graduation. In FY23, 75 percent of eligible children were served with preK in Central and 36 percent in Grants. Statewide, 47 percent of eligible children were served with preK. However,

previous LFC reports estimate 80 percent of four-year-olds have access to preK, Head Start, child care assistance or other programs. Coordinating between preK and Head Start is particularly important in order to not supplant federal funds while also ensuring high quality services. From FY13 to FY22, four-year-old enrollment in Head Start programs located in Central dropped 68 percent (from 54 to 17 slots) and in Grants remained stable (from 168 to 172 slots). Statewide, Head Start capacity dropped 13 percent (from 7,625 to 6,636). Both districts implement full-day prekindergarten and work with Head Start partners.

Chart 19. Prekindergarten Participants in 2006 had Higher Graduation Rates in 2019 than Non-Participants



Source: LFC analysis of PED data

Stable school leadership and evidence-based professional development could help address low student proficiency rates.

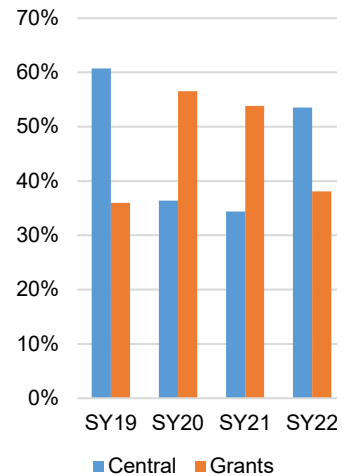
Instruction and school leadership are the two most important school-based factors influencing student achievement. Research points to the negative relationship between mobility and turnover of principals and teachers and student achievement, which disproportionately impacts high-poverty, low-achieving schools.³ Yet, mobility and turnover of principals, assistant principals, and teachers is high in Grants and Central compared with a national average. District officials report a number of factors contribute to staff changes such as superintendent transitions, management decisions, compensation,

³ Miller, A. (2013). Principal turnover and student achievement. *Economics of Education Review*, 36, 60–72; Levin, S., & Bradley, K. (2019). *Understanding and addressing principal turnover: A review of the research*. Palo Alto, CA: Learning Policy Institute.

principal promotions to central office, housing, long commutes, and retirement. With a limited teacher evaluation system, districts are unable to systematically evaluate instruction. Additionally, evidence-based professional development that helps teachers to use assessment data to modify instruction has a high benefit-to-cost ratio. More professional development funds could be dedicated to providing additional evidence-based supports for teachers to increase achievement.

Since SY20, mobility and turnover of principals and assistant principals in Grants and Central exceeded 35 percent, well above the 18 percent national average in 2018. Research notes principal leadership accounts for one quarter of all school effects on student achievement, second only to instruction in influence. Given the pivotal role school leaders can play in boosting achievement, ensuring their stability is critical. In SY22, 54 percent of principals and assistant principals were new to their role in Central and 38 percent in Grants. While this trend has improved in Grants since SY21, it has worsened in Central. Both districts, however, have surpassed an approximate 18 percent national average in principal turnover reported in a national 2020 study using data from the National Center of Education Statistics. The pandemic may have exacerbated this trend. A study published by the Learning Policy Institute and the National Association of Secondary School Principals found five major factors contribute to principal turnover: inadequate preparation and professional development, poor working conditions, insufficient salaries, and lack of decision-making authority.

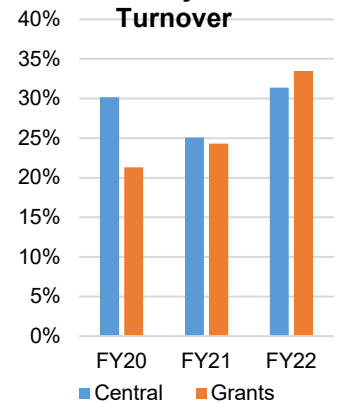
Chart 20. Principal and Assistant Principal Mobility and Turnover



Source: Grants and Central

Teacher mobility and turnover exceeded 30 percent in both districts in FY22. In 2021, the RAND Corporation, an independent research organization, conducted a national teacher survey indicating 25 percent of teachers were likely to leave their jobs by the end of the school year. The pandemic likely exacerbated challenges with retaining teachers nationwide. Prior to the pandemic, data from the U.S. National Center of Education Statistics found an annual teacher turnover rate of 16 percent. In FY22, teacher mobility and turnover in Grants was 31 percent and in Central was 33 percent. Research from the Learning Policy Institute finds teacher turnover negatively impacts student learning.

Chart 21. Teacher Mobility and Turnover

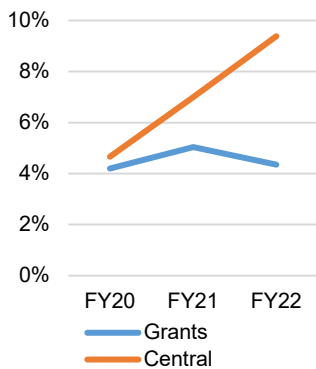


Note: Mobility and turnover includes those who left the district, changed schools or changed jobs within the district

Source: LFC analysis of Grants and Central data

Expiring J-1 visas for foreign teachers working in the state will increase teacher vacancies. Districts statewide rely on filling vacant positions with teachers from foreign countries by taking advantage of the federal J-1 visa program that allows teachers to stay for a maximum of five years. Following that stay, these teachers are required to return to their home countries for two years and start another process for a longer visa (H1B). This year there are 27 teachers with expiring J-1 visas in Central and 13 in Grants. PED should continue to work with New Mexico’s congressional delegation to waive the two year home country residency rule for high-performing teachers on expiring J-1 visas.

Chart 22. Teacher Vacancies Central and Grants



Source: Central and Grants

Central could improve teacher recruitment with sign-on bonuses. Much has been reported on the teacher shortage, both nationally and in New Mexico. Since FY20, teacher vacancies have grown in Central but remain stable in Grants. In FY22, teacher vacancies in Grants were 4 percent and in Central 9 percent. Districts use long-term substitute teachers when vacancies cannot be filled. In SY23, Grants employed 15 long-term substitutes (of 247 budgeted teacher FTE) and Central employed 21 (of 445 budgeted teacher FTE).

Research indicates compensation is an important factor in teacher recruitment. Grants-Cibola offers a \$6,000 sign-on bonus for certified teachers. Science, math, SPED, and certified counselors are eligible for an additional \$5,000 bonus. There are also rural stipends available for teachers at four schools in Grants. Central Consolidated offers no sign-on bonuses for teachers. However, beginning in SY23, Central will offer each employee \$1,500 to spend on health and wellness expenses. The Gallup-McKinley school district (just south of Central and north of Grants-Cibola) offered sign-on incentives for new classroom teachers in SY23 ranging from \$18,000 (for any new teacher or counselor) to \$22,000 (for new teachers or counselors who were graduates of the district) paid over two years. The district also offered relocation expenses between \$2.5 thousand to \$4.5 thousand.

PED’s new teacher evaluation system lacks the capability to analyze state and district trends, limiting its effectiveness. In response to a 2019 executive order, PED created a task force to develop a more effective method for assessing teacher performance, which gathered stakeholder input and collaborated with the Learning Policy Institute, New Mexico State University, and WestEd. The resulting new educator evaluation system, Elevate NM, aims to improve student and educator learning, growth, and well-being. Elevate NM is designed to be a tool for educator reflection, growth, feedback, and coaching. Site principals are intended to be the primary user of the resulting teacher information, rather than PED. Although the new system is well-intentioned, PED and districts are unable to extract school, district, or state-level data from the associated CANVAS platform. In SY22, participation in the evaluation system was optional, with an unknown number of schools participating. This limitation prohibits analyses of district and statewide instructional quality. With research indicating teacher quality is the most important school variable influencing student achievement, understanding areas for instructional growth among New Mexico’s teachers—as well as what is working well—is critical for improving outcomes, ensuring adequate teacher preparation programs, and targeting professional development. PED should expand the capacity of its teacher evaluation system to enable statewide and district-level analyses of its data by purchasing the module of CANVAS that allows for data exporting.

Districts budgeted more FY22 operational dollars for professional development than were spent. Grants indicates that federal funds are also used for this purpose with ESSER funds and Title II funds recently dedicated to professional development. This could also be a contributing factor to increasing fund balances which are discussed in a later chapter. Previous LFC evaluations have flagged overbudgeted categories in the past where budgeted operational funds for specific purposes are not spent down by districts. A 2019 LFC report on the costs and benefits of selected evidence-based interventions in public schools found that professional development focused on training

teachers how to use student academic assessment data to modify and improve instruction had a high benefit to cost ratio. According to Pew Results First cost-benefit model using New Mexico assumptions, for every dollar spent on effective professional development using data to inform instruction, \$132 were generated in returns. In FY22, both Grants and Central left the majority of their budgeted professional development funds unspent. Grants left 84 percent unspent and Central left 70 percent unspent. Grants budgeted \$319 thousand for this purpose and Central nearly \$472 thousand in FY22. For the past five years, Central has left budgeted operational professional development funds unspent and in Grants this pattern has persisted for the last three years. Grants and Central should spend more budgeted funds on professional development that is evidence-based and uses data to guide instruction for teachers and school leaders.

A recent court decision in Central and federal report in Grants identified a need for districts to better meet the needs of Native American students.

Native American students represent almost half of students in Grants (47 percent) and the majority of students in Central (93 percent). The recent *Martinez-Yazzie* lawsuit and the Indian Education Act both outline the need to better serve Native Americans in districts statewide through collaboration with Native communities and equitable educational opportunities. LFC staff identified instances of a lack of district consultation with Native American communities in Central and a lack of prioritization of advanced courses for Native American students in Grants.

The 11th Judicial District Court found Central had not been fulfilling its statutory obligation to consult and collaborate with the Navajo Nation regarding the return to in-person school. In April 2021, the court found the district, the board, and the superintendent failed to engage in meaningful consultation and collaboration with the Navajo Nation regarding the opening of in-person schools. The duty to consult and collaborate is a statutory obligation under the State-Tribal Collaboration Act (Section 11-18-3 NMSA 1978). In addition to being a statutory obligation, collaboration and communication with community is one of the eight effective practices of school boards. This case is currently on appeal.

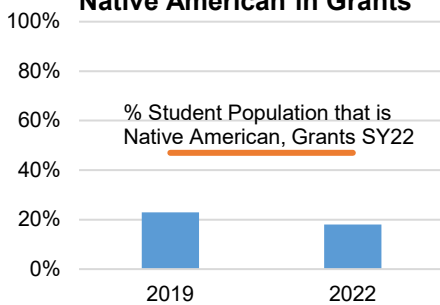
From SY16 to SY22, Central did not screen for gifted and talented students, resulting in potential missed opportunities for its student population which is 93 percent Native Americans. In SY23, the district has resumed testing. Honors and AP classes, as well as gifted and talented programs, offer opportunities to engage and challenge students. A 2022 New Mexico House memorial stated recent PED statistics found that access to gifted education and proportionality of service provision across New Mexico are grossly inequitable. Additionally, research suggests universal screening for gifted and talented students may allow for more equitable identification of students, rather than identification on a case-by-case basis. Central should ensure continued, universal screening for gifted and talented students.

Select Main Findings of Office of Civil Rights Complaint Against Grants

- Native American students are consistently underrepresented in gifted and talented education in Grants
- Native American students were under-represented among students enrolled in AP courses in Grants
- The district does not have written procedures for identifying students with disabilities as also being gifted.

The Office of Civil Rights (OCR) found that Native American students in Grants were under-represented in gifted and Advanced Placement (AP) classes, a potential ongoing existing challenge in Grants as well as in Central. The 2019 investigation of Grants by the U.S. Department of Education’s OCR outlined a pattern of limited AP classes and limited gifted and talented identification among Native American students in the district. In SY23, high schools in Grants with a higher percentage of Native American students have fewer AP classes than those with a lower percentage of Native American students. In SY23, Laguna-Acoma High (94 percent Native American) offered one AP class, while Grants High (45 percent Native American) offered seven. Shiprock High (in Central) offered no AP classes (95 percent Native American). Central High (83 percent Native American) offered 8 AP classes (see Appendix E). This information indicates a need to better target and prioritize resources for Native American students in Grants. Based on district gifted enrollment data, the percent of gifted students identified as Native Americans declined in Grants from 2019 to 2022. Grants should improve how it identifies and engages with Native American students through gifted programs and AP classes.

Chart 23. Percent of Gifted Students Identified as Native American in Grants



Source: LFC analysis of PED data

A resolution agreement with Grants and the OCR was reached in 2019 and the district reports it is revamping its gifted and talented program. However, the revamped Gifted Education Procedural Handbook provides limited examples of how the district will specifically engage Native American students to increase participation in advanced classes. The resolution agreement required a self-assessment of racial equity in gifted, honors and AP courses which the district stated they have completed but was unable to provide to the LFC at the time of publication. Grants did provide LFC staff with information regarding multiple meetings with stakeholders including the Pueblo of Acoma, Pueblo of Laguna, Navajo Nation Department of Education, and Baca Chapter which could help inform this process.

Recommendations

The Legislature should consider:

- Addressing loopholes that allow districts to receive funds for extended learning time programs without increasing the number of instructional days; and
- Amending statute (Section 22-10A-2 NMSA 1978) to increase compensation for principals by adjusting the principal responsibility factor.

Grants and Central school districts should:

- Increase low proficiencies by fully implementing PED’s accelerated learning strategy (i.e. teaching grade-level content while addressing unfinished learning);
- Use student support services to further identify and resolve root causes of chronic absenteeism;
- Ensure all schools required to submit an attendance improvement plan do so and dedicate more resources to identify and address the underlying causes of chronic absence;

- Continue to promote and implement extended learning time programs such as K-12 Plus;
- Provide targeted supports to reduce principal and teacher mobility and turnover; and
- Spend budgeted funds on professional development for teachers and school leaders that is evidence-based and uses data to guide instruction.

Grants should:

- Determine the impact of their student success advisors to improve student engagement and achievement;
- Fully comply with the Office of Civil Rights resolution agreement concerning Native American students and the district's advanced courses; and
- Offer more preK while effectively coordinating with Head Start programs so as not to supplant federal funds.

Central should:

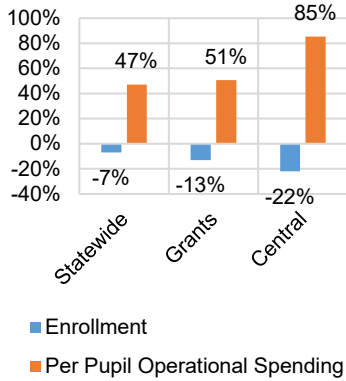
- Ensure continued, universal screening for gifted and talented students;
- Consider offering career and technical education courses to middle school students and identify ways to offer them to high school students in Newcomb;
- Ensure it meets the behavioral needs of its students by implementing an evidence-based program, or evaluating the effectiveness of Capturing Kids Hearts curriculum; and
- Offer sign-on bonuses with particular incentives for teachers in more rural or remote locations.

The Public Education Department should:

- Expand the capacity of its teacher evaluation system to enable statewide and district-level analysis of its data by purchasing the module of CANVAS that allows for data reporting and analysis; and
- Continue to work with New Mexico's congressional delegation to waive the two-year home country residency rule for high-performing teachers on expiring J-1 visas.

Revenue growth outpaces spending contributing to high cash balances yet enrollment drops require workforce efficiencies

Chart 24. Percent Change in Enrollment and Per Pupil Operational Spending FY12 to FY22

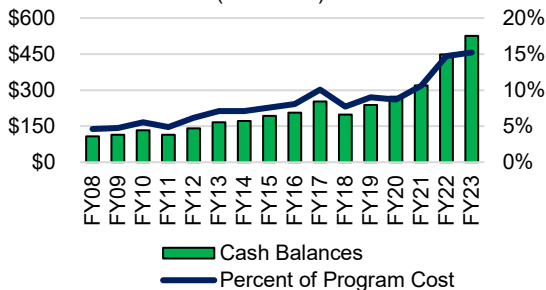


Source: LFC analysis of PED data

Both districts have experienced larger than statewide average declines in enrollment. At the same time, revenue has increased in both districts, meaning more resources are available for fewer students. Revenue growth was driven by increases to base SEG funding, significant increases in federal pandemic funding, and the removal of the impact aid deduction in the SEG formula. Districts will have until at least 2024 to spend pandemic relief. However, these resources need to be spent to address the dismal student outcomes cited by the court in the *Martinez-Yazzie* case. While both districts have increased per-pupil spending, proficiency remains low, districts do not spend all that they plan to, and leave unspent cash balances. With fewer students and more teachers in Grants and Central, the districts will need to consider workforce efficiencies given long-term declining enrollment and birth rate trends. Administrative spending also increased at a faster rate than instruction.

Central and Grants could benefit from better planning for the use of growing cash balances as both districts sit above statewide averages.

Chart 25. Statewide Public School Cash Balances Have Grown 391 Percent Since FY08
(in millions)



Note: Beginning of year operational cash balances.

Source: LFC analysis of PED OBMS data

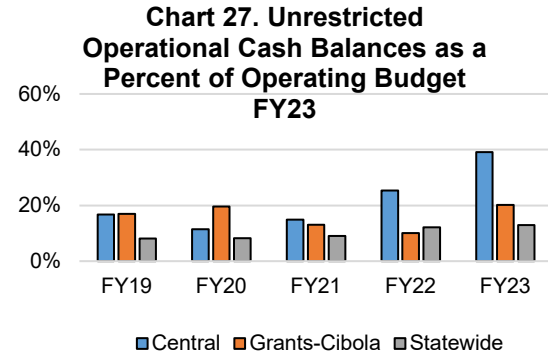
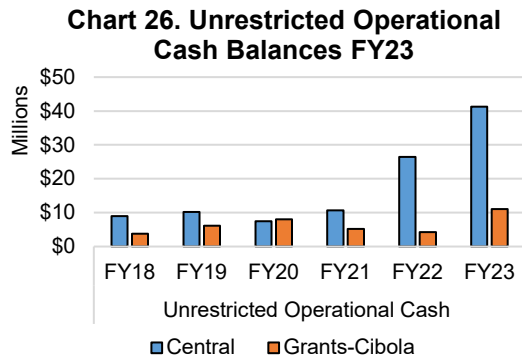
Districts and charter schools maintain cash balances for large purchases, emergencies, bond ratings, and delayed reimbursements from PED or federal sources. While maintaining a healthy cash balance is a financial best practice, significant recent growth in cash balances suggests school districts and charter schools are facing challenges translating increased financial resources into educational programming to improve student outcomes. Statewide cash balances in public education have more than doubled since FY18. At the beginning of FY23, 25 school districts and charter schools, including Central and Grants, had cash balances greater than 25 percent of their program cost.

At the beginning of FY23, Central and Grants carried forward cash equivalent to 39 percent and 26 percent of their operational budgets, respectively.

Central held over \$41 million in unrestricted operational cash. Central was second only to Jal school district in holding the highest percent of cash. Central's \$41 million in cash balance translates to an estimated \$8,500 per pupil in cash. In a September 2022 presentation to the Legislative Education Study Committee, Central's superintendent reported the need for teacher housing to attract and retain teachers and plans to fast-track construction for 15 teacherages with approximately 61 lots. The district reports it is working on a five-year master plan which will help identify housing needs.

In FY23, Grants held \$11 million in unrestricted operational cash, which represented the 25th highest district percentage statewide. The Grants FY21 audit also noted that the district had a material weakness regarding internal

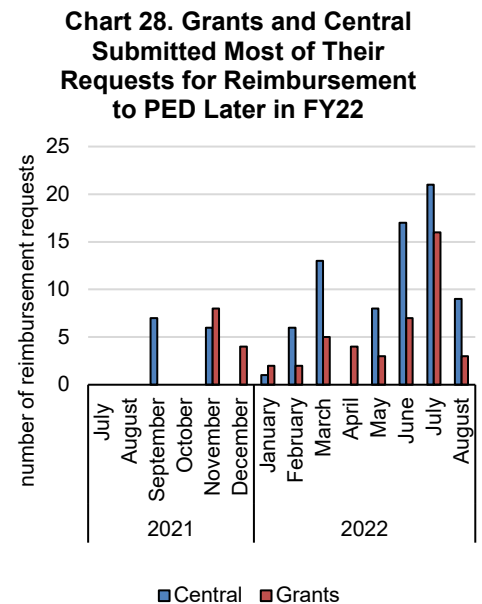
controls over district cash such that the district had not eliminated old funds where cash balances had not been transferred, likely understating the districts cash balances. Grant’s beginning of year FY23 unrestricted cash balances translates to \$3,600 per pupil in cash. During a November 2, 2021 board meeting, district officials discussed preparing a three-year cash plan which would detail the district’s future cash needs. Although the district had not yet completed this cash plan as of November 2022, it could represent an effective practice for financial planning. Both districts should set minimums, maximums, and targets for approval by school boards, a best practice recommended by the Government Financial Officers Association (GFOA). Grants and Central should also develop three-year cash plans detailing the district’s future cash needs.



Source: LFC analysis of PED data

Some PED processes may be contributing to spending delays and a need for some cash balances. Previous LFC reports have found PED is slow to reimburse districts for federal flow-through funds and other grants leading districts to keep more cash on hand to cover these costs. According to FY22 fourth quarter LFC report card data, PED took an average of 40 days to process reimbursements for school districts in FY22 whereas the agency had a target of 22 days. Additionally, PED has become slower at processing reimbursements since FY20, likely due to the influx of federal pandemic relief funds to schools. Additionally, districts that receive other federal funds, such as impact aid, could also experience delays in receiving funds. PED should streamline its reimbursement approval processes to reduce delays. District finance officials in Central report internal procurement processes are more involved than the state processes and could be slowing down spending at schools.

Grants and Central submit most requests for reimbursements later in the fiscal year, contributing to untimely reimbursements and cash flow issues. A 2009 LFC evaluation found both PED and school districts could reduce district cash-flow issues with more timely reimbursement processes. Although PED could process reimbursements to school districts faster, districts could also be timelier in submitting requests for reimbursements to PED throughout the fiscal year. Guidance from PED recommends that school districts should submit requests for reimbursements on a monthly or bimonthly basis to improve timeliness. LFC staff found that Grants and Central submitted a majority of their FY22 requests for reimbursements to PED during, or after, the last quarter of the fiscal year. Specifically,



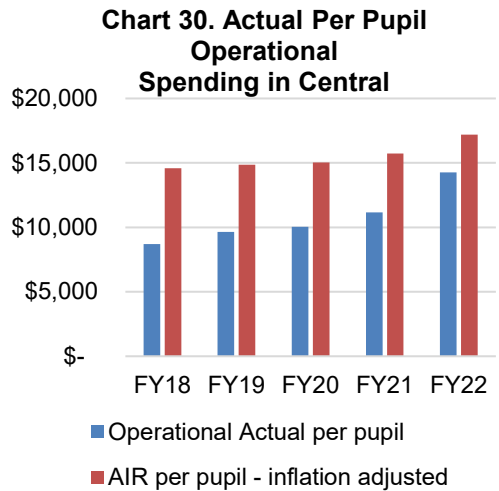
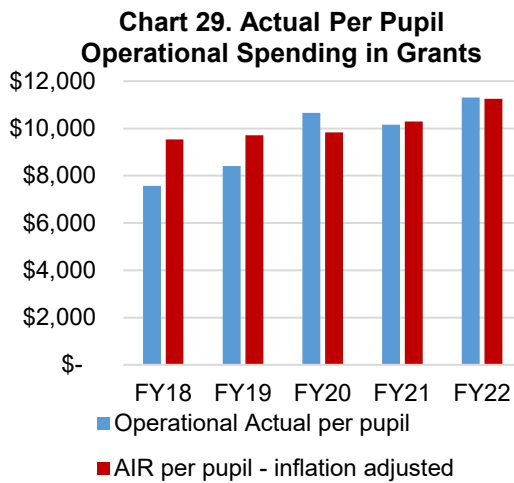
Source: LFC analysis of PED OBMS data

Grants and Central submitted 61 percent and 64 percent, respectively, of their requests for reimbursements for FY22 during (or after) the last quarter of FY22. Grants and Central should submit requests for reimbursements more frequently throughout the fiscal year.

High cash balances are potentially contributing to challenges in meeting sufficiency benchmarks.

Researchers found New Mexico devotes a higher proportion of its economic capacity to public education than the national average. The same researchers also found that district spending was below estimated adequate levels in 48 of New Mexico’s 89 school districts.⁴ Additionally, a recent LFC report on educational funding after the *Martinez-Yazzie* decision stated the Legislature may use the American Institute of Research (AIR) benchmark to fund the New Mexico public education system.⁵ The AIR study is one available benchmark against which to measure whether sufficient resources have been made available to districts and, in turn, whether districts actually spend a sufficient level of resources on students. LFC staff found available per-pupil funding exceeded the AIR benchmark but districts did not spend all available resources.

In FY22, Central did not meet the AIR sufficiency benchmark in per pupil spending but left \$8.5 thousand per pupil in unspent cash. Central spent \$14.3 thousand in per pupil operational spending in FY22, \$2.9 thousand less than the inflation- adjusted AIR benchmark. The district could have allocated some of its \$41 million in unspent funds at the end of FY22 to meet, or even surpass, the benchmark.



Source: LFC analysis of PED OBMS data

⁴ Baker, B.D., Carlo, M.D., Weber, M. (2022). *The Adequacy and Fairness of State School Systems*, Fifth Edition. Albert Shanker Institute, Washington DC.

⁵ Applying the AIR methodology and adjusting estimated per pupil costs at a rate of 38 percent cumulative inflation between 2008 and 2022 suggests the average per pupil AIR sufficiency cost in FY22 for a rural district like Central is \$17,205 per pupil, for a small town district like Grants is \$11,250 per pupil, and for a statewide average of \$11,238 per pupil.

In FY22, Grants spent \$11.3 thousand per pupil, meeting the AIR sufficiency benchmark. Grants ended FY22 with \$11 million in unspent operational funds, approximately \$3.6 thousand per pupil. If the district had mobilized some of these resources, they would have exceeded the sufficiency benchmark.

Despite revenue increases and low proficiencies, actual spending falls short of budgeted spending contributing to unspent cash balances.

Grants and Central experienced operational revenue growth higher than the statewide average. Even with these increases in revenue, Grants and Central do not spend all they plan to, leaving unspent cash balances. From FY18 to FY22, Central general fund budget more than doubled but per pupil spending increased only 63 percent. In Grants, budgeted and actual general fund spending both increased nearly 50 percent, but actual spending fell short of budgeted. Prior LFC reports have noted that school districts consistently overestimate budgeted spending compared to actual spending.

Grants and Central have not fully adjusted their teaching workforce to declining student enrollment

Managing staffing is one of the most important duties of a superintendent and staff. While enrollment has declined statewide, staffing levels in districts have increased, indicating potential room for efficiencies. A September 2022 Legislative Education Study Committee brief reported the need for class size waivers had been eliminated, indicating classrooms are no longer over-enrolled. Statewide and in Central, there are approximately 14 students per general education teacher and in Grants there are approximately 11 students per teacher.

Since SY19 in Central and Grants the number of students declined while teachers increased, following a statewide trend. In Grants, student enrollment dropped 10 percent and teachers increased 43 percent. Additionally, in Grants’ current five-year facilities master plan, the district notes, “the number of existing classrooms in the district overall exceeds the number of classrooms needed for current and projected enrollment.” In Central, enrollment dropped 13 percent and teachers increased 20 percent with a slight decrease in teachers from FY21 to FY22. Central’s five-year facilities master plan similarly notes, “declining enrollment over the last 12 years...has left the majority of its schools underutilized.” The report notes right-sizing efforts have begun. Statewide, enrollment dropped 6 percent and teachers increased 21 percent.

Chart 31. Central Student Enrollment vs Teachers

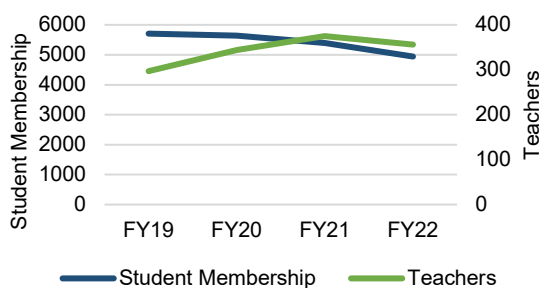
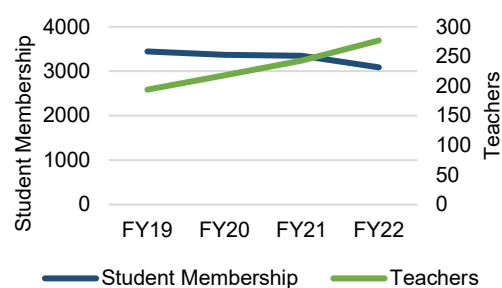


Chart 32. Grants Student Enrollment vs Teachers

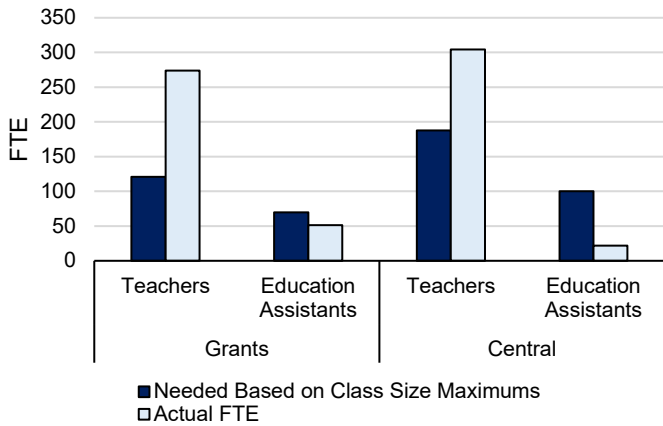


Source: LFC analysis of PED data

Classes in Grants and Central are below class size maximums with room for efficiencies but financial tradeoffs should be balanced with performance considerations. Grants and Central both have more teacher FTE than required by statutory class size maximums but fewer education

assistants. State law allows for larger class sizes when there is also an education assistant for the teacher. Had the districts hired more education assistants, they could reduce the number of teachers needed. In FY22, Grants needed a minimum of 121 teacher FTE and 70 education assistant FTE based on enrollment data and maximum class size thresholds in state law but employed 274 teacher FTE and 52 education assistant FTE. During the same year, Central needed a minimum of 188 teacher FTE and 100 education assistant FTE based on enrollment and class sizes but employed 305 teacher FTE and 22 education assistant FTE. District officials note it is important to consider a number of other factors when allocating FTE such as the acuity of special education needs, the physical size of classrooms, and expansion of new programs such as career and technical education.

Chart 33. General Education Teacher Staffing Levels are Above Statutory Requirements, FY22



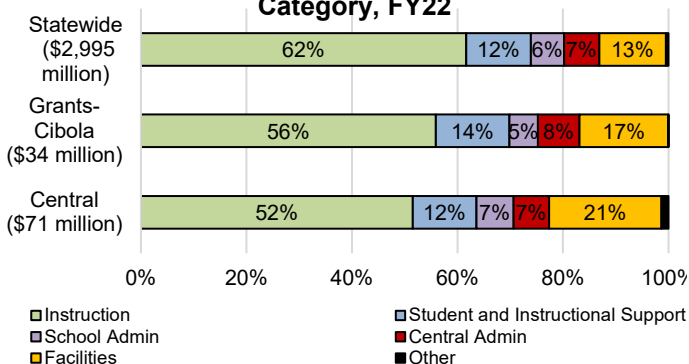
Source: LFC analysis of enrollment and PED OBMS data

Districts must balance tradeoffs when considering workforce efficiencies and student outcomes. While smaller class sizes can improve outcomes, other interventions offer a greater return on investment, such as coaching for teachers, professional development on data-guided instruction, extended learning time, and tutoring. Furthermore, when the supply of teachers is limited and reducing class sizes results in the hiring of less qualified and experienced educators, potential gains from class size reductions are likely to be counteracted by lower quality instruction. Grants and Central also face constraints in realizing these efficiencies as rural school districts with small schools spanning a large geographic areas often do.

While most district spending goes to instruction, administrative spending has grown at a faster rate, exceeding statewide trends.

Research has found student achievement increased with an increase in instructional expenditures. Across the state, school districts and charter schools spent the majority of their operational funding on instruction (62 percent) in FY22. However, Central spent 52 percent (\$36 million) and Grants spent 56 percent (\$19 million) on instruction. This difference is primarily due to larger percentages spent on facilities (21 percent in Central; 17 percent in Grants). State law prohibits districts from using operational funds on capital outlay projects unless PED determines the spending will not unduly hamper the district's operations (Section 22-8-41 NMSA 1978). Given the facility needs in the district, PED permitted Central to

Chart 34. Actual Operational Spending by Category, FY22

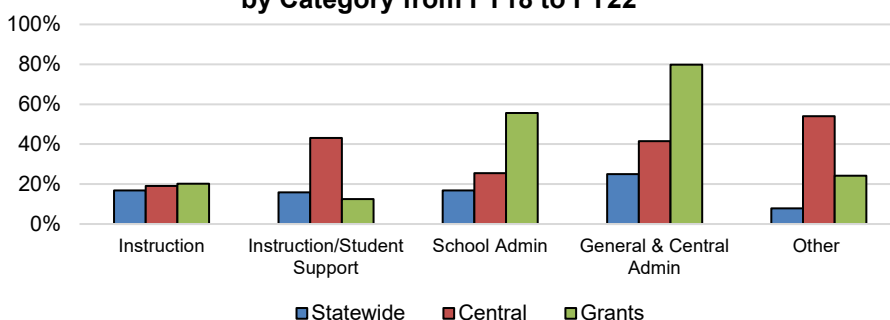


Source: LFC analysis of PED OBMS data

spend operational funds on capital outlay projects and the district spent \$4.5 million in FY22.

Administrative spending in Grants and Central grew faster than instruction and statewide trends. Research indicates that spending on instruction is positively correlated with student achievement but spending on administration does not yield the same relationship. From FY18 through FY22, operational spending on instruction grew by 17 percent statewide (\$267 million), 19 percent in Central (\$5.9 million), and 20 percent in Grants (\$3.2 million). At the same time, general and central administrative spending grew by 25 percent statewide (\$39.9 million), 42 percent in Central (\$1.4 million), and 80 percent in Grants (\$1.2 million). General/Central administration includes the superintendent’s office, financial departments, human resources and information technology activities, among other central administrative functions. Previous LFC school district evaluations have found similar patterns of high administrative spending growth rates in Albuquerque and multiple north central school districts.

Chart 35. Percentage Growth in Operational Spending by Category from FY18 to FY22



Note: Operational spending in capital outlay was excluded for this analysis due to an anomalous increase in spending in Central.

Source: LFC analysis of PED data

Recommendations

Grants and Central school districts should:

- Set cash balance minimums, maximums, and targets for approval by school boards in line with cited best practices and create three-year plans for use of cash balances;
- Submit requests for reimbursements more frequently throughout the fiscal year;
- Use increased available state and federal funding to implement evidence-based programming including professional development, incentives for hard to staff positions, supports for principals and programs to address learning loss;
- Realize potential staffing efficiencies by collapsing classes and hiring education assistants where feasible; and
- Reduce the growth of administrative spending to inflation.

The Public Education Department should:

- Streamline its reimbursement and award letter approval processes to reduce delays.

Practices of Effective School Boards

1. High expectations for student achievement with clear goals
2. Belief in system's ability to teach all children high levels
3. Accountability driven
4. Collaboration and communication with staff and community
5. Monitor data to drive continuous improvement
6. Align resources with district goals
7. Collaborative, complimentary, and trusting relationships with the superintendent
8. Participate in team development and training

Source: National School Board Association

Governance and leadership should focus on planning, stability, and training to improve outcomes and safety

The National School Board Association finds effective school boards focus on eight practices, related to setting and monitoring goals, data-driven decision-making, and fostering collaborative relations between the board and superintendent and the community. When boards frequently engage in these practices, there is evidence that districts show higher student performance. However, evidence suggests that both Central and Grants could more frequently engage in these practices. Since 2016, Central has been without a strategic plan and both districts have had superintendent turnover above the national average. An analysis of board meeting minutes indicates more time is spent on administrative rather than strategic decisions. A court found Central was not meaningfully consulting the Navajo Nation regarding the decision to return to in-person learning, pointing to a lack of collaboration with community. Effective training can help improve school board performance, as found by a growing body of research.

School boards also play an important role in setting policies for districts to help ensure the basic safety and wellbeing of students, without which learning cannot be achieved. Some of the most critical policies outline appropriate adult conduct with students. Adult sexual misconduct is a problem prevalent across the country and in school districts across the state. District policies could better reflect best practices to help increase prevention and awareness. Screening and training could also be improved.

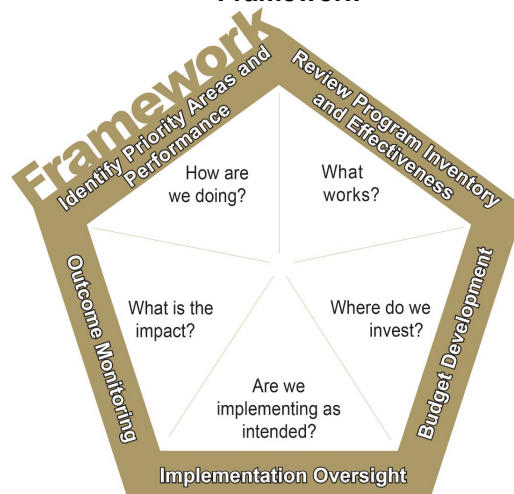
Boards should focus on strategic decisions and foster collaboration with the superintendent to improve student achievement.

When school boards more frequently use data to monitor achievement and make strategic decisions, research suggests districts show higher student performance. Increased and more focused training could help school boards in Grants and Central spend more time focused on these strategic decisions.

According to best practice, districts should have strategic plans but Central has lacked one since 2016. According to the Council of Great City Schools and the National School Board Association, school boards should use strategic plans to establish vision, high expectations, and goals for a district. The plan can then be used to monitor progress. Statute requires districts (Section 22-8-6 NMSA 1978) to submit educational plans along with their budget documents annually to PED. These plans are important operational documents for the district but do not provide opportunities to establish more long-term goals and vision, which a strategic plan provides. The school board of Central should reengage with the strategic planning process to establish ambitious goals for student performance and a road map for how to achieve the goals. The superintendent of Central reports they are restarting the strategic planning process.

Grants has a strategic plan for 2022 through 2025 with long-term goals, student achievement and financial data and timelines, a practice similar to performance-based budgeting. State law requires (Section 22-8-6 NMSA 1978) districts to submit budgets with performance targets. However, school boards could also adopt a version of the state’s “Legislating for Results” framework that relies on performance-based budgeting to monitor and improve performance. Much as a state Legislature passes law, school boards set policies for a school district. The framework, pioneered by former Baltimore mayor and Maryland governor Martin O’Malley, includes five key steps: identifying priority areas and performance, reviewing program inventory and effectiveness, budget development, implementation oversight and outcome monitoring. Performance data helps identify what the state, or a school district, is achieving for the activities it undertakes and the funds it spends. PED could train school boards in performance-based budgeting to monitor and improve student outcomes. The Grants school board uses a strategic plan and monitoring tool to establish goals and track progress. This is a promising step toward performance-based budgeting and the district could enhance its monitoring tool to inform budget priorities.

Figure 3. Legislating for Results Framework



Source: LFC

Research suggests superintendent longevity can improve student achievement, yet turnover in Grants and Central exceeds national rates, and in Central exceeds statewide rates. American Association of School Administrators Journal of Scholarship & Practice found statistically significant positive associations between superintendent longevity and experience with measures of student achievement in Kentucky,⁶ New Jersey,⁷ and North Carolina.⁸ According to district websites and financial audit documents, Grants had three superintendents or interim superintendents and Central had five superintendents during the six-year timeframe from 2017 through 2022. A current lawsuit filed by a former Central interim superintendent claims the board misused its authority, created a hostile work environment and forced the interim superintendent out of his position before the end of his contract. This litigation is ongoing.

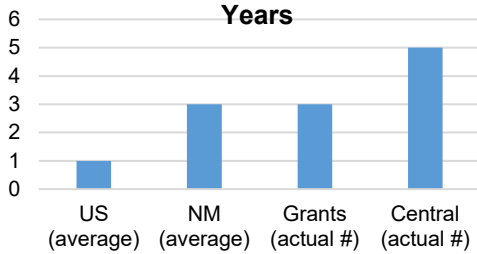
Grants had three superintendents or interim superintendents and Central had five superintendents during the six-year timeframe from 2017 through 2022.

⁶ Simpson, J. (2011). “Superintendent Tenure and Student Achievement.” AASA Journal of Scholarship & Practice, 9(4). 10-23.

⁷ Plotts, T. & Gilmore, D. (2014). “The Superintendents’ Influence on Student Achievement.” AASA Journal of Scholarship and Practice, 11(1), 26-37.

⁸ Hart, W.H., Schramm-Possinger, M., & Hoyle, S. (2019) “Superintendent Longevity and Student Achievement in North Carolina.” AASA Journal of Scholarship & Practice. 15(4). 4-12.

Chart 36. Number of Changes in School District Superintendents Over Six Years



Note: Includes interim superintendents
 Source: Grants, Central, Broad Center, NM Coalition of Educational Leaders

Research from the Broad Center, a research organization within Yale University’s School of Management, found the national average tenure for a school district superintendent is six years. The New Mexico Coalition of Educational Leaders, a professional association of state school administrators, reports the average superintendent tenure in New Mexico is roughly two years. As of SY23, 28 percent (or 25 of 89) superintendents in New Mexico had less than two years of experience. The issue of superintendent turnover is prevalent statewide. A 2019 LFC program evaluation, *North Central School Districts*, found only 15 percent of New Mexico superintendents (13 out of 89 superintendents) had stayed at the same school district for six years.

State law limits superintendent contracts to three years, which may impact superintendent recruitment and retention. Section 22-10A-21 NMSA 1978 limits the employment contracts of certified school administrators, engaged in administrative duties for more than one-half of their employment time, to three years. Shorter contract terms for school administrators can reduce a school district’s legal exposure and potential costs, but shorter contract terms may also be less attractive for superintendent candidates. According to a 2011 analysis from the Education Commission of the States (ECS), a non-profit education research group, the maximum length of superintendent contracts ranges from two years to five years across different states. Given the turnover of school district superintendents, the Legislature should consider amending state statute to increase the maximum contract length to four or five years.

The National School Boards Association states that a school board “abandons its leadership role when it involves itself in administration” and adds that “becoming involved in management activities distracts the board from its essential leadership functions or governance responsibilities – planning (vision), policymaking, and promotion (community leadership).”

To align with best practices, Grants and Central school boards should spend more time on strategic rather than administrative decisions. LFC staff reviewed school board meeting minutes, agendas, policies, strategic plans, websites and other documentation for evidence of the eight effective practices of school boards identified by the National School Boards Association. Staff reviewed 36 meeting minutes and agenda documents for Grants and 39 meeting minutes and agenda documents for Central from August 2021 through November 2022. Staff examined how often school boards reviewed reports on metrics of student performance (such as attendance or graduation) and the extent to which meeting minutes and agendas reflected a focus on strategic level decision-making and oversight (setting long-term goals and monitoring progress) rather than administrative level decision-making (approvals of field trips, small purchases or small donations). When boards frequently engage in the eight effective practices of school boards, there is evidence that districts show higher student performance.⁹

In Grants, in less than half (16 of 36) of reviewed board meetings was time spent reviewing attendance, enrollment, or interim student assessment data. Executive session was held during nearly one-third of the meetings (11 of 36 meetings), limiting transparency during the meetings. While the district

⁹ Michael R. Ford & Douglas M. Ihrke (2016) “Do School Board Governance Best Practices Improve District Performance? Testing the Key Work of School Boards in Wisconsin,” *International Journal of Public Administration*. 32(2), 87-9

consistently devotes time to recognize student and school success (nearly every reviewed meeting), introducing more time to evaluate performance against goals could help contribute to more strategic decision-making.

In Central, the school board reviewed school attendance or graduation rates reports in only 12 percent of the reviewed minutes and agendas (5 of 39). The Central school board spent more time on administrative approvals, decisions other school boards delegate to superintendents. For example, the Central school board approves field trips (14 of 39 reviewed meetings) while other districts, such as Grants and Albuquerque Public Schools, delegate field trip approvals to school district officials. Additionally, Central’s school board approves all charitable donations to schools but the board has discussed potentially delegating the approval of donations below \$5,000 to district officials. The school boards of Grants and Central should regularly monitor data on student performance, attendance, behavior and the educator workforce to inform decision-making and improve district outcomes.

Board training in New Mexico is limited and narrowly focused despite research suggesting its impacts on performance.

While New Mexico statute outlines minimal eligibility requirements for school board members (a resident of the district and qualified to vote) to encourage access to these positions, the complex skills needed to be an effective school board member means that targeted training is often necessary. A growing body of research indicates a correlation between school board member training and more effective governance, increased focus on student achievement, and improved student outcomes. In Arizona, a study found a significant positive relationship between participation in school board training opportunities and state rankings of school district performance.

New Mexico only requires five hours of training annually. State statute requires PED to develop mandatory training for school board members in policies and procedures, statutory powers and duties, legal concepts, and finance (Section NMSA 22-5-13 NMSA 1978). PED requires all school board members to attend five hours of training annually. School members in Grants and Central fulfilled this requirement. The training must be sponsored by the New Mexico School Board Association and approved by the department. Charter school governing board members are required to attend 10 hours of training in their first year and 8 hours in subsequent years (NMAC 6.80.5). A 2020 study from Northern Arizona University and the University of Central Florida analyzed training data from the Arizona School Boards Association and found a statistically significant correlation between higher training attendance among school board members and higher district rankings. Texas administrative code

Table 6. Texas school board members receive 29 hours of training in their first year

New Mexico	Texas
<p>Five hours of annual training are required.</p> <p>Training content must include:</p> <ul style="list-style-type: none"> • State board rules • department policies and procedures • Statutory powers and duties • Legal concepts pertaining to public schools; and • Finance and budget. 	<p>Within the first year, 29 hours of training are required; 11 hours annually, plus 6 hours biannually, are required thereafter.</p> <p>Training content must include:</p> <ul style="list-style-type: none"> • Local district orientation • Orientation to the Texas education code • Update to the Texas education code • Team-building • Framework for school board development • Evaluating and improving student outcomes • Sexual abuse, human trafficking, and maltreatment of children • Open Meetings Act • Public Information Act • Cybersecurity; and • School safety.

Source: NMSA 22-5-13 and Texas Education Agency

outlines 11 content areas of training for school board members with a minimum of 29 hours of training in the first year in office; thereafter, 11 hours are required annually and an additional 6 hours biannually (Texas Administrative Code §61.1). Given the association between school board training and student achievement, PED should develop a more extensive schedule of required training for school board members.

Since 2018, New Mexico has lacked guardrails to ensure school board members attend required trainings. The Center for School Turnaround and Improvement recommends coupling school board training requirements with clear accountability structures to ensure meaningful implementation, including tracking and publishing board training participation. New Mexico statute and administrative code require a school district’s accountability report to include the names of local school board members who fail to attend annual mandatory training (Section 22-2C-11(G) NMSA 1978 and NMAC 6.29.1.9(A)). Prior to 2018, school district report cards in New Mexico met this requirement by including school board member training attendance. In 2018, district report cards were discontinued and the state now meets federal accountability reporting requirements through the New Mexico Vistas website. However, while the New Mexico School Board Association continues to provide training attendance data to PED, this information is not published, making it difficult to determine compliance. PED should publish the training attendance of school board members on its new accountability website, New Mexico Vistas.

To reflect federal best practices, boards and districts statewide could strengthen policies, procedures, and trainings to reduce adult sexual misconduct in schools.

There are incidents of adult sexual misconduct in school districts across the state. The New Mexico Public School Insurance Authority (NMPSIA) made payments related to 141 sexual abuse and molestation claims from 2012 to 2021. These claims illustrate the scope of the problem, though they are likely an underestimation, given research indicates the majority of sexual assaults are not reported. Sexual abuse is also costly to the state with NMPSIA paying \$33.6 million over nine years for 141 claims. Adult sexual misconduct in schools is also prevalent nationwide with a 2014 report by the federal Government Accountability Office estimating nearly one in 10 students are subjected to sexual abuse by school personnel by the end of their academic careers. The U.S. Department of Education recommends three key areas to prevent, detect, and address adult sexual misconduct: staff screening, policies and procedures, and training. PED and school districts across the state can play a role in strengthening all three areas.

A PED investigation found a Grants coach had improper relations with students, and staff did not report the incident as required; a court settlement was reached. In December 2020, a student at Grants High School filed a complaint against the Grants-Cibola County School District for failing to protect her from sexual assault by an assistant coach. The student alleged they informed district employees of alleged sexual assault by the assistant coach, the staff failed to report the information to the police, and continued to allow the coach access to students. Once the district learned of the incident, they took swift action, immediately reporting it to PED and law enforcement, as required by law, and terminated staff. PED conducted its own investigation

From 2012 to 2021, New Mexico Public School Insurance Agency paid \$33.6 million in 141 claims related to sexual abuse and molestation.

and concluded the assistant coach had an improper relationship with at least two students and offered them alcohol. Additionally, PED concluded three school employees knew all of this information, failed to report the incident, and permitted the assistant coach continued access to students. According to the district, parties have agreed to an undisclosed settlement.

PED does not routinely check two federal databases when conducting background checks. Applicants who apply to PED for an initial educator license must undergo a criminal history background check issued by the Department of Public Safety and the FBI. When PED conducts background checks, they do not check the U.S. Department of Justice’s national sex offender public registry, nor the National Association of State Directors of Teacher Education and Certification clearinghouse. PED does not require subsequent background checks of educators unless their license expires prior to renewal. Educators, contractors (and their employees), and volunteers must also undergo an FBI background check prior to working with children in schools. Some states, such as Ohio, require background checks every five years, similar to federal requirements for childcare employees. Other states, such as Nebraska, require background checks at licensure renewal. The U.S. Department of Education also emphasizes the importance of checking relevant national databases in addition to federal and state criminal background checks.

Three years of financial audits found that Grants school district did not keep valid FBI background checks on file. According to the U.S. Department of Education, the first line of defense against preventing adult sexual misconduct is in the screening and hiring of staff members. New Mexico has laws requiring background checks of public school employees and volunteers. While district audit findings have decreased in recent years, the 2019, 2020, and 2021 financial audits for the Grants school district found the district had not been following state guidelines regarding documentation of background checks. For example, in 2021, seven of a sample of 25 files reviewed did not have a valid FBI background check on file. In the 2020 audit, 18 of 40 files reviewed lacked a valid FBI background check. In 2019, 22 of 40 files reviewed lacked a valid FBI background check on file. According to district officials and the financial audits, district human resources have corrected this issue by updating the background checks that were found to be deficient, and putting in place a new process with a mobile vendor to complete fingerprinting and no longer solely relying on the use of PED background checks.

The 2019, 2020 and 2021 financial audits for the Grants school district found the district had not been following state guidelines regarding documentation of background checks

A Junior Reserve Officer Training Corps (ROTC) instructor in Central was charged with sexual misconduct involving two special needs students at Shiprock High School in 2021 and 2022. A decade earlier, a different ROTC instructor resigned from his job at Shiprock High after being arrested for sexual misconduct in Las Cruces. An investigation conducted by the New York Times in July 2022 found at least 33 JROTC instructors nationwide have been criminally charged with sexual misconduct involving students, including a JROTC instructor at Santa Fe High School. In December 2022, a JROTC instructor in Albuquerque Public Schools was charged with child rape and is on administrative leave. Many states, including New Mexico, do not require JROTC instructors to have a teaching certificate and PED has limited authority to take action against a non-licensed school employee (Section 6-60-9 NMAC). One way to close this loophole would be for PED

to require JROTC instructors to hold a license such as a secondary vocational technical education license.

Districts have not adopted model policies outlined by the New Mexico School Board Association on appropriate relations between students and staff. The New Mexico School Board Association developed model policies on defining appropriate staff/student professional boundaries, electronic communications between students and staff, reporting boundary violations and examples of boundary violations, among other issues. While the districts receive technical assistance on policy from the School Board Association, school boards must choose to formally adopt particular policies. The current policy on staff conduct with students is limited and could be expanded.

Staff trainings to recognize sexual abuse should be in-person and address new technologies, per best practice. The U.S. Department of Education provides best practices for the content, frequency, and participants of these trainings. New Mexico administrative code requires all district personnel, school employees, school volunteers, contractors and contractors' employees to complete training on recognizing and reporting child abuse every two years (Section 6.60.11.8 NMAC). Grants and Central contracts with Vector Solutions for training courses on a wide range of topics, including five related to adult sexual misconduct. While the content of these training modules meet statutory requirements, they fall short of best practices. The U.S. Department of Education cautions against reading-based online courses with quizzes and recommends in-person trainings that allow for questions, discussion of questionable but not criminal behaviors, and tailored to the local context, highlighting local examples and school policies. Trainings should also be updated to reflect appropriate text and online communication with students.

Recommendations

The Legislature should consider:

- Amending state law (Section 22-5-13 NMSA 1978) to adjust local school board training requirements to include performance-based budgeting;
- Amending state law (Section 22-10A-21 NMSA 1978) to increase the maximum superintendent contract length to four or five years; and

School boards of Grants and Central should:

- Regularly monitor data on student performance, attendance, behavior and the educator workforce to inform decision-making and improve district outcomes;
- Strengthen district policies on adult sexual misconduct to include guidance on appropriate social media and electronic communication, impartial investigations, and false claims prohibitions; and
- Adopt the NMSBA model policies on staff/student professional boundaries.

Central should:

- Complete a strategic plan with long-term goals, timelines, and priorities for the district; and

- Comply with the State-Tribal Collaboration Act (Section 11-18-3 NMSA 1978).

Grants and Central school districts should:

- Require trainings for all district staff on adult sexual misconduct be in-person and include information on appropriate social medial and electronic communication behavior and boundaries.

Public Education Department should:

- Report data to school boards relating to interim student assessments, financials, and educator workforce;
- Develop a more extensive schedule of required training for school board members;
- Publish the training attendance of school board members on New Mexico Vistas;
- Update administrative code to require all educators, contractors and their employees, and volunteers to undergo background checks at more regular intervals;
- Check the U.S. Department of Justice's National Sex Offender Public Registry and the National Association of State Directors of Teacher Education and Certification clearinghouse during the background check process;
- Require JROTC instructors to hold a secondary vocational-technical license; and
- Use information from the Office of the State Auditor to monitor district background check compliance across the state.

The Office of the State Auditor should:

- Report district audit findings on background checks to PED.

AGENCY RESPONSE



MARION L. WELLS
Board President

SUZETTE JEAN HASKIE
Board Vice President

CHERYL L. GEORGE
Board Secretary

GARY J. MONTOYA
Board Member

CHRISTINA J. ASPAAS
Board Member



STEVE CARLSON
Superintendent

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January 13, 2023

Mr. David Abbey
Director, New Mexico Legislative Finance Committee
and members of the LFC

We would first like to thank you and all of the members of the Legislative Finance Committee's program evaluation team, Jon Courtney, Catherine Dry, Clayton Lobaugh and Annie Armatage for the professional, thorough and productive work they performed over the last several months in their evaluation of Central Consolidated School District (CCSD). We appreciate the opportunity to work with your team in performing the outside evaluation of our school district, as well as ongoing collaboration with the LFC, the Legislative Body, the Public Education Department and our stakeholders to improve educational opportunities and achievements of our students.

While I was just recently named the Superintendent of CCSD on July 1, 2022, I have worked at CCSD for 25 of my 35-year career. For the last 17 years, I have been the principal of Grace B. Wilson and Judy Nelson Elementary Schools, two schools that have been consistently successful during my tenure. As a result of this work with the District and our students, I have firsthand knowledge of not just the history and challenges of our district, but also the ways in which our District can better meet the needs of our students consistently throughout the entire District. This is a challenge I am honored to take on, along with our Board of Education, because our students and the diverse communities we serve deserve our best.

The January 2021 LFC Program Evaluation of the Western School Districts (Report) is consistent with many of our own internal findings that we are prioritizing in order to bridge gaps for our students. At the outset, please note that we agree with all of the recommendations provided by the Report and will not only implement the recommendations specific to CCSD, but will also support implementation of the recommended legislative and PED changes made by the Report. This letter provides a high-level outline of the steps that our District is taking to address both our internal findings and the findings described by the Report. We look forward to providing regular updates of our progress with your team and the LFC, as well as our other stakeholders.

Background:

The Report highlights some of the unique difficulties that Central Consolidated faces. For instance, the report mentions how difficult it is to provide services to the many diverse communities within our District over long distances and remote areas, which include 15 Chapters on the Navajo Nation and the town of Kirtland. There are many areas in our state where isolation and poverty exacerbate the delivery of educational services, but these issues are magnified in our district. During the pandemic, most of New Mexico's children suffered, but rarely to the extent of our students who live in remote areas of the Navajo Nation. In remote areas of our District it is estimated that upwards of 70% of our students do not have access to the internet, much less electricity, indoor plumbing or running water. Given these challenges as well as the lack of technology infrastructure within our District, CCSD was ill-prepared to tackle virtual instruction, and our students, as demonstrated by the low proficiencies documented in the Report, struggled due to this lack of technology and

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infrastructure. As a result, our students are now further behind academically than they were before the pandemic began. Please note that the Report identifies a spike in administrative funding last fiscal year. This increase was attributable to the District making needed investments in technology and technology infrastructure so that students were better able to participate in virtual learning.

The Report also mentions that CCSD is set to lose about 49% of its property tax revenues, which will impact our bond capacity greatly. We are currently evaluating the impact of loss of property tax revenues associated with the Four Corners Plant and Mine as well. The Four Corners Plant and Mine are located within the boundaries of the Navajo Nation. When the assets are owned by non-Navajo entities, those entities are required to pay state taxes. As a part-owner of the Four Corners Plant, PNM has transferred ownership of its assets to NTEC, which is a Navajo entity. As a result, property taxes attributed to PNM for the Four Corners Plant will also cease, further diminishing property tax revenues and bond capacity. Together with the San Juan Generating Plant it is estimated that these two industrial complexes comprise 80% of our District's property tax revenues.

Historically our students, and particularly our Native American and English Language Learner students have faced challenges and inequities in educational opportunities that have contributed to them experiencing significant educational and social emotional gaps. This sentiment was first expressed in the Kennedy Report over 50 years ago. It is unacceptable that these educational inequities still exist and we are committed to doing our part to change this circumstance. We applaud the State of New Mexico for allowing Impact Aid schools to retain 100% of Impact Aid funds because it will go a long way to helping us reverse past inequities. While we share the concerns expressed by the LFC Project Team Report that student outcomes remain poor despite increased funding, we respectfully submit that, especially in the wake of COVID learning deficits, it will take deliberate and strategic effort over several years to bridge these historic gaps for our students. Below please find the steps we are taking to address these challenges:

Strategic Planning; Student Proficiencies; Graduation Rates; Absenteeism; Extended Learning Time; Student Engagement and Student Safety:

On November 28, 2022, the CCSD School Board adopted a new policy titled "Commitment of Central Consolidated School District to Equity in Educational Opportunities" (Equity Policy). This new policy is attached for your review.

Beginning last Spring of 2022, our Intercultural Community Outreach Department (ICO) began drafting the Equity Policy. Nine separate community meetings were held in Shiprock, Newcomb and Kirtland in May, 2022, July, 2022, and August, 2022 to discuss and receive input about the policy from community members. Input from community members was incorporated into the Equity Policy. Additionally, the Equity Policy is aligned not only with the NMPED's 2022 Draft Strategic Plan, but also with the outcomes of the District's Graduate Profile work undertaken in SY 2021. The Graduate Profile assessment polled over 1200 students, staff, and community members across the District regarding the identification of the 21st Century life skills and educational competencies they believe are needed in order to be successful students, adults, and life-long learners. The identification and prioritization of the Graduate Profile honors cultural and linguistic values through ongoing collaboration with students, their families, District staff, and community stakeholders. Backwards planning is then utilized to create learning pathways that are implemented with Pre-K-12 curricula and other programs to support the outcomes identified by the Graduate Profile results. Please see attached Equity Policy.

The Equity Policy requires the development of a system-wide Strategic Equity Plan with appropriate procedural directives to implement the Equity Policy and bridge gaps identified by the subject Report, as well as our internal mapping efforts, with clear accountability and metrics that will result in measurable academic improvements for CCSD students. In high-level summary, the Equity Policy addresses the following topics:

- ❖ **Overarching Foundational Principles:**
 - Strategic Resource Allocation (Performance Based Budgeting);
 - Community Schools;
 - Family and Community Engagement;
 - Meeting the Needs of Yazzie/Martinez to Provide Equitable Learning Opportunities;
 - Equity Council;
 - Expansion of Data Functionality/Reporting and Closure of Digital Gaps;
 - Holistic Wellness and Health Services and High-Quality Nutrition;
 - Student Attendance;
 - Extended Learning and Out-Of-School-Time Opportunities;
 - Student, School and District Safety;
- ❖ **Foundational Pillar 1:** Address the Needs of the Whole Child Honoring Multicultural and Linguistic Diversity and Holistic Wellness Programs;
- ❖ **Foundational Pillar 2:** Address Educational and Social-Emotional Gaps;
- ❖ **Foundational Pillar 3:** Ongoing Development of Roadmap Needed to Attain Post-Graduation Skills and Knowledge for College, Career, Technology and Workforce Readiness; and
- ❖ **Foundational Pillar 4:** Educational Workforce Community Resources.

Many of the Report's recommendations are included in the Equity Policy and will be addressed during the Strategic Plan process. Additionally we address specific components of the Report as follows:

- ❖ The LFC Program Evaluation team mentioned in their report that our district has not had an active Strategic Plan in place since 2016. Beginning in 2018, the District began internal mapping work to serve as the foundation for strategic planning identified in the Equity Policy. The goal of the mapping work was to identify what is and isn't working in the District with a focus on bridging student gaps as quickly and effectively as possible. This work also included identifying funding mechanisms that can be utilized more efficiently or expanded given the potential closure of area power plants and mines. We will be kicking off the formal Strategic Plan Process at our upcoming Board Retreat on January 13, 2023. Current plans call for a new Strategic Plan to be in place before the end of the current school year.
- ❖ A recommendation of the Program Evaluation team was to "increase low proficiencies by fully implementing PED's accelerated learning strategy. This has been a central component of our own action plan to address academic performance for the entire 2022-2023 school year. Teachers and administrators know how important it is to make sure students have access to grade level standards mastery.
- ❖ The evaluation team referred to a past administration of Newcomb High School as an example of how academic growth was achieved by focusing on data-driven instruction and high expectations in their 90 Day Plans. Our Assistant Superintendent and Curriculum Department are working with each school to ensure that the requirements and benefits that derive from 90-Day Plans are realized at each school. Having high expectations will remain a focus throughout the district. We have implemented and will ensure continued, universal screening for gifted students, and we are exploring more academically challenging options for our students, such as increasing Advanced Placement offerings at the secondary level as part of our ongoing work.
- ❖ The LFC Program Evaluation team recommended that districts "strengthen district policies on adult sexual misconduct". This has been a district focus during the 2022-2023 school year, and will continue to be one moving forward. Our school board has been updating key policies, and our safety team has identified the necessary training for administrators and staff members.

In addition to updating these District policies, we have strengthened our internal reporting and investigatory processes as well.

- ❖ The LFC Program Evaluation team mentions that our district needs to "comply with the State-Tribal Collaboration Act." Our District complies with all State-Tribal Collaboration meetings with the Navajo Nation's Department of Dine Education (DODE). That being said, the Equity Policy and the creation of the ICO Department are indicators of our priority to strengthen our relationship with the Navajo Nation tribal leadership even further. We had a challenging situation arise during the pandemic regarding providing parents with choice for in-person instruction at schools during the pandemic. At that time, the Navajo Nation's health order prohibited students from attending school in-person. Unfortunately, given the inability many of our remote students had to access school virtually and federal requirements of in-person learning for children with disabilities, we believed the NM Constitution and Yazzie-Martinez decision required us to provide parents the option of in-person learning. The CCSD NEA and union administration disagreed on how to move forward, and the School Board made the decision to provide parents with the choice of in-person or virtual learning. Prior to implementing this decision, numerous meetings were held with the Navajo Nation President and his staff as well as the DODE Superintendent and her staff and council delegates to discuss the situation and need for parent choice.

Turnover of Educational Leaders: The Program Evaluation Team recommended that we "provide targeted supports to reduce principal and teacher turnover," and we have made that a priority during the current school year. We have introduced programs such as a medical reimbursement plan, and a reduction in insurance premiums for employees. We have also expanded our teacher and principal mentorship programs as well as our Staff Holistic Wellness Programs. We appreciate the team's recommendations that we consider offering hiring bonuses and/or stipends. These considerations will be part of our strategic planning effort and are specifically called out in Pillar 4 beginning on page 8 of the District's attached Equity Policy.

Cash Balances: Central Consolidated School District currently has a surplus in our cash balance, and we understand how this might look to anyone advocating fiscal responsibility. There are several reasons for this large amount. During the last couple of years, many of our avenues for spending various funding sources were paused, and we had an influx in federal money to address pandemic-related issues. We also began to receive Impact Aid payments that had previously gone to the state's equalization formula. The district plan is to utilize the majority of these funds to address student proficiencies and bridge student gaps as well as capital improvement projects, but we have had a number of setbacks as we attempt to move forward with these projects. We agree with implementing Performance Based Budgeting and have already begun working on that internally. We also agree with the team's recommendations to set cash balance minimums, maximums and targets that are in line with best practices. Creating a plan to spend down the cash balance will be a priority of the strategic planning process as we move forward.

We appreciate the thoughtfulness, objectivity and thoroughness of the LFC evaluation team. And we thank you for the opportunity to respond to the recommendations in the report. We understand that we have important work to do in the coming years in Central Consolidated, and we look forward to rectifying the issues identified in the report. Our School Board and Administration are working together in the spirit of open communication and trust, to broaden educational opportunities, while increasing expectations and student outcomes, for all of our students. Thank you again for all of your recommendations and suggestions, and thank you for this opportunity to respond.

Respectfully,



Steve Carlson
Superintendent
Central Consolidated School District

COMMITMENT OF CENTRAL CONSOLIDATED SCHOOL DISTRICT TO EQUITY IN EDUCATIONAL OPPORTUNITIES

The Central Consolidated School District (CCSD) recognizes the findings in *Yazzie/Martinez v. State of New Mexico* and the historic inequitable actions that have resulted in academic achievement and social-emotional gaps of students. CCSD further recognizes the value of diverse culture and language and the implementation of the Hispanic Education Act, Indian Education Act, Black Education Act, and Bilingual Multicultural Education Act. These multicultural education statutes provide goals and requirements for providing Native American, Hispanic, African-American, English-Language Learners, and At-Risk students with an equitable, culturally relevant education through collaboration between governmental stakeholders including schools, Native American tribes, and appropriate federal and state government entities. CCSD also recognizes the importance of identifying learning and other disabilities early in their education so that the District can provide support and resources as early as possible to help students grow and learn to the best of their ability.

With the implementation of this Policy, CCSD is beginning a process by which it is evaluating the best mechanisms to incorporate the requirements of the following sources of law:

Yazzie/Martinez v. State of New Mexico

In 2014, students, parents, and school districts filed two lawsuits, *Martinez v. State of New Mexico* and *Yazzie v. State of New Mexico*, alleging the state was not providing students with a sufficient education, especially Native American students, English language learners, students with disabilities, low-income students, and other students at risk of poor outcomes. In July 2018, the district court ruled that the state's public education funding, oversight, and outcomes did not meet the state's constitutional obligation to provide a sufficient education to these students. Overall, the court found student achievement and attainment "dismal" and attributed these poor educational outputs to insufficient educational funding and state oversight.

Native American students, who make up over 95 percent of enrollment at CCSD, have significant educational and social emotional gaps as compared to their peers on state and national measures of achievement. Additionally, we have Hispanic, Filipino, African-American, Anglo and students of multi-cultural descent. Our District has extremely high-poverty rates and many of our children face challenges with homelessness, hunger, trauma, abuse, neglect and other social injustices. Many of our students have learning and other disabilities. In recognition of the *Yazzie-Martinez* decision, CCSD is committed to addressing the needs of all of its students from a holistic, whole-child approach to ensure that we bridge educational and social emotional gaps as quickly as possible.

Bilingual Multicultural Education Act, NMSA 22-23-1.1 et seq.

- Requires that school districts provide English Language Learners with programs that use two languages, including English and the home or heritage language, as a medium of instruction in the teaching and learning process.

Indian Education Act, NMSA 22-23A-1 et seq.

- Requires that Native American students in New Mexico are provided with opportunities for equitable and culturally appropriate education in public schools;
- Requires school districts and charter schools to collaborate with tribal governments on matters related to culturally inclusive and relevant curricula, teaching, support services, and other programs to meet the needs of Native American students; and
- Requires improved educational opportunities for Native American students for the purpose of closing the achievement gap, increasing graduation rates and increasing postsecondary enrollment, retention and completion.

Hispanic Education Act, NMSA 22-23B-5 et seq.

- Requires improved educational opportunities for Hispanic students for the purpose of closing the achievement gap, increasing graduation rates and increasing postsecondary enrollment, retention and completion.

Black Education Act, 2021 HB 43

- Requires the inclusion of culturally inclusive curricula; anti-racism policies; racial sensitivity and anti-racism training;
- Requires the creation of an Advisory council; Black Education Liaison; curriculum coordinator; hotline manager; and professional development/training coordinator;
- Requires implementation of restorative justice disciplinary procedures; and
- Allows students to carry and administer his/her own medication, including asthma and anaphylaxis medication, as recommended by a healthcare provider.

Intercultural Community Outreach Department (ICO):

Historically, there have been deficiencies and difficulties with adequate funding, and other structural and programmatic challenges which have resulted in a system that has not met the needs of our students in a comprehensive and coordinated manner.

As a result, the District has created a new department with expanded staffing and resources,

the Intercultural Community Outreach Department (ICO), to ensure that CCSD is implementing and coordinating programs that strive to overcome disparities, reduce learning and social emotional gaps and track and assess the progress of these programs on student outcomes.

CCSD is committed to the cultural enrichment of all students through programs rooted in the preservation and extension of cultural and linguistic knowledge and values. CCSD is committed to intercultural education and views cultural diversity as a valuable resource that should be preserved and extended. CCSD's goal is to prepare students to live and learn in a world with more opportunities than the past with an understanding of the importance of their own culture and the culture of others. CCSD strives to provide a positive learning and work environment for all students and staff by developing, implementing, and monitoring policies, programs and procedures that enhance cultural awareness, understanding, knowledge and diversity; provide meaningful intercultural education, and promote diversity in staffing for CCSD.

CCSD is committed to the principles and practices of education that recognize and celebrate cultural diversity as an essential ingredient to student success and the fulfillment of CCSD's mission to provide a quality education for EVERY student. This commitment is directed toward the elimination of racism and prejudice and the removal of cultural barriers wherever they may exist throughout CCSD, including intentional or unintentional discriminatory practices in classrooms, schools, offices, and other work places and learning environments.

The goal of CCSD is to prepare students to live and work in a global, intercultural society by creating and supporting a teaching-learning environment where all students and staff understand and value commonalities and differences within and across various cultures in order to produce a harmonious community of lifelong learners. Contributions to this education process will require staff, students, parents and community involvement as well as interagency and government-to-government collaboration.

CCSD is committed to providing opportunities for all staff to learn about various cultures and to improve their skills in cross-cultural communication. The school system shall continue to promote a diverse work force by increasing personnel recruitment efforts and by fulfilling the commitment to maintain a school district that is free of prejudice and illegal discrimination in all aspects of employment.

Development and Implementation of Strategic Equity Plan

Together with input from community and tribal stakeholders, parents, students and staff, CCSD shall develop and implement a **Strategic Equity Plan** that provides cultural and linguistic responsive instruction for all students, appropriate instructional and assessment practices in general and special education, bilingual, and biliteracy, opportunities for all students to develop cultural understanding, respect and knowledge of their culture and other cultures, and holistic wellness programs that address the social-emotional needs of students and staff.

The Board directs the superintendent to develop and implement a system-wide Strategic Equity

Plan with appropriate procedural directives to implement this policy with clear accountability and metrics that will result in measurable academic improvements for CCSD students. The superintendent shall regularly report progress on the plan and outcomes.

CCSD created the Intercultural Community Outreach Department (ICO) and the Equity Council to collaborate with other Departments and Buildings to assist the District in the development and implementation of the equity plan and the elimination of academic achievement and social-emotional gaps through the following measures:

Overarching Foundational Principles/Mission/Goals:

Strategic Resource Allocation

- Provide technical assistance to support schools in the strategic allocation and fair distribution of resources to provide opportunities for all children to thrive in the District; and
- Improve efforts to allocate resources strategically to support students most in need.

Community Schools

- Foster community schools in communities and neighborhoods of concentrated poverty by providing technical assistance and financial resources to enable rigorous implementation of a community school framework;
- Increase the number of community schools serving communities throughout CCSD;
- Improve the quality of implementation of the community school framework in designated community schools; and
- Ensure that designated community schools are able to sustain the framework beyond the life of the state implementation grant.

Family and Community Engagement

- Provide professional development and technical assistance to support schools to implement robust and culturally relevant family and community engagement practices;
- Foster authentic school-home relationships, rooted in community healing, mutual trust, and reciprocal accountability;
- Cultivate goal-setting opportunities that:
 - balance the dynamics between families and educators to prioritize student growth;
 - empower families and teachers with resources to monitor social-emotional and intellectual growth and development in school, home and beyond;

- identify struggling students as early as possible to ensure they get the resources they need to succeed; and
 - identify and assist students in receiving wrap-around services.
- Provide culturally relevant and linguistically accessible information and resources that communicate academic expectations, support a shared culture of learning, and advocate for needs of the whole child; and
- Increase the number of home visits and follow-through on needs of CCSD students and families to help achieve the goals stated in this policy.

Meeting the needs of Yazzie/Martinez to provide equitable learning opportunities

- Increase funding and oversight to support at-risk students across programs;
- Increase access to broadband and devices necessary for students to fully participate in education;
- Increase access to physical and behavioral health services;
- Increase access to high quality nutrition and decrease food insecurity;
- Increase supports and resources to eliminate barriers to school attendance;
- Increase learning time for at risk students;
- Prioritize ELTP funding and K-5 Plus funding for schools serving high percentages of at risk students in a manner that honors the needs of local schools and communities;
- Improve advocacy and advice for students who are at-risk;
- Improve tribal consultation; and
- Implement recommendations from the CCSD Equity Council regarding equitable learning opportunities.

Equity Council: To address the inequities found in the Yazzie/Martinez lawsuit, CCSD has formed an Equity Council that reports to the Superintendent. The function of the Equity Council is to include community and student input into how we achieve equitable opportunities for our students. At least half of the Equity Council must represent students who are Native American, Hispanic, English language learners, economically disadvantaged, or have one or more disabilities. Additionally, membership on the Council shall include a liaison for each culture/ethnicity in our school district (e.g., Native American, African American, Hispanic, Filipino, Anglo, etc).

Expand Data Functionality and Close Digital Gaps

- Expand Data programs and resources to monitor and track student proficiency and assessment;
- Provide increased funding and technical assistance to expand student access to digital devices and high-speed internet services across CCSD;

-
- Provide every student with access to internet connectivity and devices necessary for remote learning;
 - Improve the ability of schools to integrate technology into daily routines that support students and families; and
 - Expand use of technology and data.

Holistic Wellness and Health Services and High-Quality Nutrition

- Enable schools to provide high quality holistic wellness and health services and nutrition to all students so they are ready to engage with learning;
- Ensure that every student has access to a school nurse, school-based health clinic, or other community health option;
- Ensure that every student has access to affordable, nutritious breakfasts and lunches; and
- Potentially expand meal accessibility beyond breakfast and lunch during the school day as well as during school breaks and holidays for those students in need.

Student Attendance

- Support schools to promptly identify absenteeism and train school staff in the use of non-punitive sports, other incentives and wrap-around services that address the root causes of absenteeism; and
- Support ability of schools to address and reduce the root causes of chronic absenteeism.

Extended Learning and Out-Of-School-Time Opportunities that honor the needs of local schools and communities

Equip districts and charters to increase student participation in extended learning and out of school time programs, including K-5 Plus, Extending Learning Time Program (ELTP), and other opportunities that take place before and after the typical school day and during summer that honors the needs of local schools and communities.

- Increase the number of schools that are implementing innovative schedules and programming to engage students outside of “traditional” school hours that honors the needs of local schools and communities;
- Increase the number and percentage of students who participate in an extended learning or out of school time program that honors the needs of local schools and communities; and
- Improve students' holistic health and well-being and deepen their engagement in school.

Student, School, District Safety

- Establish and Implement Safety Team Strategic Plan;

- Expansion of See Something/Say Something to function as a reporting hotline. The Safety Team will function as the hotline manager;
- Implement and Expand policies and training on Cultural and Racial Sensitivity, Anti-Racism, and Anti-Oppression;
- Allows students to carry and administer their own medication, including asthma and anaphylaxis medication, as recommended by their healthcare provider; and
- Provide sufficient training to students, school health staff, teachers and support staff on student self-administered medication.

Foundational Pillars:

Pillar 1. Address the Needs of the Whole Child: Implement programs that seek to help each student reach their full potential by focusing on the social-emotional well-being of students, which includes prioritizing the needs of the whole child, honoring multicultural and linguistic diversity, and holistic wellness programs. Pillar 1 seeks to implement programs that focus on the needs of the whole child and provides resources to children to help them address challenges and barriers to learning that each child may have coming to school as follows:

- instill resilience and self-sufficiency, coping skills, social-emotional wellness, and life skills;
- incorporate and promote holistic wellness skills, and knowledge needed to be one's best self and the ability to thrive regardless of the circumstances;
- teach students life skills necessary to thrive;
- teach better decision-making and sound judgment;
- provide resources necessary to support the student to navigate challenging circumstances they may be facing;
- identify and provide effective wrap-around services; and
- promote healthy self-identity.

Pillar 2. Address Educational and Social-Emotional Gaps: Implement strength-based programs that close educational and social-emotional gaps, while actively creating connections to learning opportunities and enhancing student and parent participation. Pillar 2 seeks to implement programs that address educational and social-emotional gaps as follows:

- Provide equitable access to education, culture and language;
- Provide resources to support students in challenges they may face due to external factors involving homelessness, food scarcity, familial unemployment, poverty, neglect, abuse or trauma, safety, health and/or disability;
- Implement restorative justice approaches to discipline so that students learn natural consequences to actions, accountability, making right the harm or wrong they caused others; learning from mistakes, creating connection and community between students and adults, and making better decisions;
- Implement programs that assist students in addressing challenges rather than engage in problem avoidance with substance abuse, or other damaging behaviors;
- Implement programs that instill respect of one's own culture and other cultures;

- Implement programs that promote diversity of cultures and languages as a strength and asset;
- Implement hiring practices, training and leadership advancement that promote diverse staff and diverse students;
- Implement curricula that instills critical thinking skills and cultural inclusion, racial sensitivity and anti-racism training;
- Create pathways to develop and promote opportunities for student leadership, advocacy and voice;
- Prioritize Culture and Language;
- Provide training and mentorship in De-Escalation/Crisis Prevention Intervention (CPI)/First Aid;
- Make Cultural Linguistic Relevant Instruction (CLRI) and Multi-Layered Student Systems (MLSS) a focus and component of all curriculum; and
- Expand Data programs and resources to monitor and track student Proficiency and Assessment

Pillar 3. Ongoing Development of Roadmap Needed to Attain Post-Graduation Skills and Knowledge for College, Career, Technology and Workforce Readiness: Implement a continuous process that identifies 21st Century life skills and educational competencies needed in order to be successful students, adults, and life-long learners. This continuous process is referred to as the Graduate Profile. The identification and prioritization of the Graduate Profile honors cultural and linguistic values through ongoing collaboration with students, their families, District staff, and community stakeholders. Backwards planning is then utilized to create learning pathways that are implemented with Pre-K-12 curricula and other programs to support the Graduate Profile.

Pillar 4. Educational Workforce Community Resources: Cultivate a positive, supportive and collaborative workforce of administrative and academic leaders; teachers and instructional staff, student health, disability and wellness professionals; and all support staff (Workforce). CCSD's Workforce will focus on the needs of our diverse cultural, linguistic, differently-abled, and varied socio-economic student populations.

CCSD's Workforce will share knowledge, expertise and experience by learning from and mentoring each other. Our Workforce will work together to help our students reach their full potential and become life-long learners that actively participate in being positive, responsible, global citizens. We will accomplish this by building thriving collaborative systems and partnerships across social and cultural communities. CCSD will strive to support our Workforce with expanded resources, educational opportunities and training in order to better provide students with an optimal learning environment and engage families and communities by providing the following:

- **Staff Holistic Wellness Programs:** Implement a Staff Holistic Wellness Team that includes representatives from all Departments and buildings that collaborate on identifying what resources are needed and develops recommendations on what holistic wellness programs would best provide resources for our Workforce including:

- Holistic Wellness Programming: CCSD will create an environment that supports holistic staff wellness. Staff wellness programs will include active participation to enhance their knowledge, skills and commitment to promote a healthier work-life balance and lifestyle. Holistic wellness will incorporate a best practice approach to physical, mental, spiritual, social-emotional, stress management, psychological and environmental wellness. This approach will provide staff with opportunities to engage in various programs, activities, events and learning modalities;
- Cultural Wellness Initiatives: Workshops will be provided that promote wellness topics for staff to learn, engage and utilize for their own cultural awareness and wellness enhancement;
- The wellness team will provide healthy concepts and tips through newsletters, emails, calendar, with posters, flyers and other methods of communication;
- Wellness equipment and suitable spaces will be available at various locations throughout the district for staff to utilize that are convenient and accessible throughout the workday; and
- Ongoing health and wellness reimbursement program that provides staff with the opportunity to enroll in various health and wellness related programs, equipment subscriptions, and workshops.
- Hiring, Recruitment, and Retention
 - Grow Our Own:
 - Implement programs that recruit, train, and promote staff from within our local communities to become certified teachers and student health professionals (e.g., nurses, social workers, school counselors, speech pathologists, etc). CCSD will prioritize inclusion of individuals into these programs that meet the needs of our diverse cultural, linguistic, differently-abled, and varied socio-economic student populations;
 - Cultivate Grow Our Own partnerships between local schools, school districts, colleges, community organizations, and teacher preparation programs;
 - Expand funding sources and seek additional grants that support Grow Our Own programs; and
 - Establish micro-campus and virtual opportunities to reach Grow Our Own candidates in rural and remote communities.
 - Recruitment and Retention Programs:
 - Implement incentive programs to attract and retain employees;
 - Implement a retention and recruitment strategic plan in collaboration with all of the departments and buildings;
 - Establish a retention and recruitment team with representatives from the departments and buildings that actively works throughout the year on retention and recruitment efforts;

-
- Apply for and expand funds from state and federal grants to help fund the retention and recruitment effort;
 - Partner with external agencies and community programs on retention and recruitment efforts;
 - Streamline dossier and certification process; and
 - Expand assistance of professionals needing certification with funding opportunities and create efficiencies to make it easier for them to get certified and eligible.
- Ongoing professional learning and professional development: Expand ongoing professional learning and professional development programs:
 - Create and implement a professional learning and professional development strategic plan that is aligned with this policy, the strategic equity plan, and the District 90-Day Plan that addresses the needs of CCSD's diverse cultural, linguistic, differently-abled, and varied socio-economic student populations;
 - Align continuous professional learning and professional development with this policy, the strategic equity plan, and the District 90-Day Plan;
 - Balance professional learning and professional development with experiential training and implementation time;
 - Approach professional learning and professional development from a strength-based perspective; and
 - Expand pathways for National Board certification and support/incentives for increased participation.
 - Educational Leaders mentorship programs - (TEAM - Teacher Education and Mentoring Program):
 - Expand teacher mentorship programs and stronger mentorship networks and resources;
 - Develop a TEAM Committee that includes key stakeholders (i.e. Upper Administrative/Executive Team, Principals, HR, ICO, C&I, SSO and Level 3 teachers) in planning the mentorship activities, programs and process;
 - Mentorship programs need to be coordinated by principals and their selected team to determine effective and best practices to meet the needs in their school building;
 - The school district needs to be aligned with SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound) Goals as a pathway for mentees to understand and achieve their professional goals consistent with this policy, the strategic equity plan, and the District 90-Day Plan that addresses the needs of CCSD's diverse cultural, linguistic, differently-abled, and varied socio-economic student populations; and
 - Establish continuous monitoring and feedback of mentorship programs to make sure that the programs are consistent, effective and there is accountability of

outcomes ensuring mentees are getting the support they need. The TEAM committee will review the process that evaluates progress and growth on a quarterly basis from an effective best practices and strength-based perspective with the focus on ensuring that the TEAM identifies resources that mentees and mentors need.

- Support Governing Board involvement, engagement, and training
 - Provide Information for the Fall and Spring board retreat:
 - Reporting on what each department does on an annual basis and with updates on strategic plan actions;
 - Have each department present to the board regarding their department (grants, funds, accountability, compliance, strategic plan recommendations and progress); and
 - Create Board resource binders for each department training.

Definitions:

Whole Child Approach: A whole child approach to education is one that honors the humanity of each teacher and student, and is important to equitably preparing each student to reach their full potential. This starts by creating environments of belonging and connection for students and adults to engage and thrive.

Asset-Based or Strength-Based Teaching: an asset-based approach focuses on strengths. It views diversity in thought, culture, and traits as positive assets. Teachers and students alike are valued for what they bring to the classroom rather than being characterized by what they may need to work on or lack. Asset-based teaching seeks to unlock students' potential by focusing on their talents. Also known as strengths-based teaching, this approach contrasts with the more common deficit-based style of teaching which highlights students' inadequacies.

Passed unanimously by the School Board November 28, 2022.

References:

Legal Ref:

- Hispanic Education Act Section 22-23B-2 NMSA 1978
- Indian Education Act Section 22-23A-10 NMSA 1978
- Black Education Act 2021 HB 43
- Bilingual Multicultural Education Programs Act 22-23-1.1 NMSA 1978 Education Programs Act (NMSA 22-2
- Section 22-2C-5 NMSA 1978
- Section 22-8-18 NMSA 1978
- Yazzie/Martinez v. State of New Mexico (2018)

11

Board Policy Cross Ref:

TO: Legislative Finance Committee
FROM: Max Perez, Superintendent
DATE: January 13, 2023

RE: Response to Final LFC Western School Districts Program Evaluation

Grants Cibola County Schools always appreciates receiving input and hearing outside perspectives about the district as we continue to grow. We have undergone a series of document requests, school site visits and interviews to satisfy the purpose of this LFC audit. As the assigned research group will affirm, we have complied with all requests and have many times offered even more than what was requested.

Overview

At the onset of the audit, we respectfully requested information about the selection of our district and about the selection criteria. Requesting such information is not uncommon. However, we are still not clear why the Grants Cibola County School District was chosen. Reviewing the given criteria at the bottom of page 5, we are a district of over 1000 students (Criterion 1) along with several others in the west side of the State. We are below state average proficiencies in reading and math (Criterion 2); however, there are also many other districts in the west with even lower proficiencies. The third criterion is a high number of audit findings (Criterion 3). Here, we have taken pride in, first intentionally finding the most stringent and thorough auditors and then bringing the number of our audit findings from 26 in SY18-19 down to the most recent 5 findings in SY21-22 in a relatively short period of time.

Grants Cibola County School District was informed that this audit would consist of data from the past three years. While we understand the importance of reviewing the trends for the past 10 years, significant events occurring within those 10 years included a global pandemic, changes in student assessments as well as participation in student assessments, and major changes in teacher evaluation. During these years, significant changes in funding also occurred when cash balances were reverted to the state, as well as increases in funding in response to the pandemic.

The district is concerned that the auditing and coupling of two districts in the same audit with the same audit report does not give a clear analysis of either district. Although the analysis and data were quite different, the headings and conclusions combine both districts.

Revenue Influx

The opening title of the report is “Student outcomes remain low despite increased funding.” We agree, yet there is more to setting this context and tone for this report. There has been an unusual

influx of revenue coupled with an unexpected and sudden change from face-to-face to remote learning.

These are both major and impactful events on a school system. Both lay citizens and professional researchers will agree that the effects of this paradigm shift will remain and impact education for years to come. As you see in the report we have carefully planned for these funds to address that impact and also bring forth engaging programs and activities for our students. For example, millions of dollars are going into creating a carefully planned series of career pathways designed to provide training and skill building for students. The result will be a generation that will have opportunities unsurpassed by other districts in the state. The long term effects will result in more family wage jobs, a more highly-skilled workforce and retention of population within the District.

In SY21-22 the District allocated \$750,000 in ESSER funds for Professional Development, as of this writing only \$97,604.16 remains. Eighty-seven percent of this allocation has been spent, leaving only 13% remaining. While operational funds may have been budgeted for professional development, the district chose to use ESSER funds first, before utilizing operational funds.

The report recommends that the district adopt a minimum and maximum cash balance policy. Too often districts across the state are criticized for excess cash reserves. GCCS's cash reserves are aligned with other districts across the state. Maintaining healthy cash balances are part of the district's plan to be a prudent steward of resources.

Strategic Planning

The GCCS School Board is very involved in the development and the monitoring of the Strategic Plan. A systematic monitoring process is in place. Out of the 26 regular board meetings, 25 have included student performance data reports, school site success reports, or school site presentations. Over half of the meetings have included a finance report.

While during the pandemic GCCS did experience a loss of student enrollment, (as all districts did), the decline was stemmed when the District employed outreach personnel whose primary focus was to increase student enrollment going into the 22-23 school year. This resulted in a re-enrollment of almost 300 students.

Grants Cibola County Schools has implemented a Standards Based Learning System and is the best strategy to implement in this District in order to improve student performance. This approach focuses on developing a positive outcome for both instructors and students, without simply relying on a single-source curriculum. The purpose of SBL is to identify what a student knows or is able to do in connection to a standard. At the quarterly reporting period, students will be identified as beginning, developing, secure, and exceeding in relation to academic performance, and this identification will be based on multiple pieces of evidence. This is in direct alignment with the Accelerated Learning Principles and Framework. Both systems focus on grade level standards, then intervention to address gaps, supporting all stakeholders and their needs.

Pre-Kindergarten is a full day program in GCCS. The district's Pre-K program works closely with Grants Head Start, partnering with Child Find and Special Education Services. Additionally, the two entities

work together to enroll students into Pre-K and Kindergarten. The report states that 36 percent of eligible students participate in Pre-K programs, this is a direct effect of the program's optionality.

The data depicting student behavior trends from SY18 to SY22 are misleading. SY20-21 and the beginning of SY21-22 had extended periods of virtual instruction, thus no discipline incidents occurred. In addition, GCCS changed our discipline handbook, our process for inputting discipline incidents, and changed our student information system which improved the accuracy of reporting. GCCS did not necessarily have an increase in student misbehavior.

Staffing and Funding Adjustments

In the context of mobility and turnover, transformation requires a certain amount of change in order to be effective. While site leadership may have been reassigned to new roles at different sites, they remain within the District.

While it is true that the administrative spending increased, the ESSER guidelines encouraged expenditures such as this to help address student needs brought about by the pandemic. Additionally, we sought to remain competitive with our neighboring districts.

There is a certain point to which we can adjust our class sizes. Classes have been collapsed to all extents possible. When classroom sizes and resources are determined for efficiency, student needs are the primary concern. We take into account the following considerations when determining staffing:

- The Special Education acuity needs of students. Depending on the severity of, or the complexity of the needs of students, staffing must be adjusted to accommodate these students
- Classroom sizes in the 11 various schools. The District has several old schools whose classroom configurations do not always accommodate the student membership by grade. Because of this, classroom sizes need to be adjusted to more completely support the grade configurations at each school
- The programmatic adjustments as identified in our Strategic Plan. In one example, the District is moving to fully implement the newly-expanded CTE program. New teachers were hired in preparation of the increased demand in CTE offerings
- The move to create smaller student-to-teacher ratios in an effort more fully address the exigencies of our high volume of at-risk students

Policies and Compliance

Safety is of utmost importance in the district and all statutory requirements for safety and professional development are complied with. Although we understand the gravity of the concerns around Adult Sexual Misconduct, the district believes that a single occurrence of misconduct does not constitute a systemic issue or trend. The exigency of this statewide and societal issue should not be a focus of the report unless all districts are included fairly, as this portrays an unbalanced perspective of the problem.

The issue of adult sexual misconduct is always concerning. However, there is no explanation that the incident was a one-time event and was properly adjudicated according to State law. This single event does not make a trend, and the focus on this promotes the idea that there is a systemic problem when none exists.

All districts relied on the NMPED licensure background clearances. Moving forward the district has implemented a new background clearance process. In November of 2021 employees who were previously cleared through the NMPED licensure department were fingerprinted, background checked, and filed at the district.

The recommendation to use the NMSBA policies is without merit as the School District currently and has always been part of the NMSBA Policy Service any criticism of the adequacy of policy development should be addressed to the NMSBA.

We want to thank the Legislative Finance Committee Evaluation Team for their efforts and bringing this to a forum of discussion and debate for the purpose of providing relevant information to the LFC. We continue to keep a mindset of viewing constructive feedback as leverage for our district's growth and development.

Very truly,

A handwritten signature in black ink, appearing to read 'Max Perez', written in a cursive style.

Max Perez, Superintendent, Grants Cibola County Schools



Appendix A: Evaluation Scope and Methodology

Evaluation Objectives.

- Examine governance and oversight structures;
- Evaluate trends in student achievement and instruction; and
- Study business management and resource allocation.

Scope and Methodology.

- Interviewed school district officials and teachers from each evaluated school district.
- Reviewed state and federal laws, regulations, and policies on public education.
- Reviewed school districts' strategic plans, financial reports, school board meeting minutes, and other administrative documentation.
- Analyzed state public education funding formula, revenue, and expenditure data from PED.
- Analyzed district-level and school-level demographic and performance data from PED.
- Reviewed empirical research and best practices from academic journals and nonpartisan research organizations.

Evaluation Team.

Catherine Dry, Project Lead, Program Evaluator
Clayton Lobaugh, Program Evaluator
Annie Armatage, Program Evaluator

Authority for Evaluation. LFC is authorized under the provisions of Section 2-5-3 NMSA 1978 to examine laws governing the finances and operations of departments, agencies, and institutions of New Mexico and all of its political subdivisions; the effects of laws on the proper functioning of these governmental units; and the policies and costs. LFC is also authorized to make recommendations for change to the Legislature. In furtherance of its statutory responsibility, LFC may conduct inquiries into specific transactions affecting the operating policies and cost of governmental units and their compliance with state laws.

Exit Conferences. The contents of this report were discussed with Superintendent Max Perez (Grants-Cibola County Schools), Superintendent Steve Carlson (Central Consolidated School District), and other school district leadership staff on January 6, 2023.

Report Distribution. This report is intended for the information of the Office of the Governor, Department of Finance and Administration, Office of the State Auditor, and the Legislative Finance Committee. This restriction is not intended to limit distribution of this report, which is a matter of public record.

Jon Courtney, Ph.D.
Deputy Director for Program Evaluation

Appendix B: ESSER I and II Spending in Grants, Central and Statewide

ESSER I Spending

	Grants	Central	Statewide (to LEAs)
Other Student and School Supports	\$186,510	\$230,000	\$25,530,000
Preparedness Activities	\$271,050	\$530,000	\$28,720,000
Educational Technology	\$286,450	\$1,720,000	\$29,540,000
Student Supports and Interventions	\$876,520		\$13,310,000
Total Allocation	\$1,640,000	\$2,470,000	\$97,720,000
Percent Spent	99.8%	99.2%	99.8%

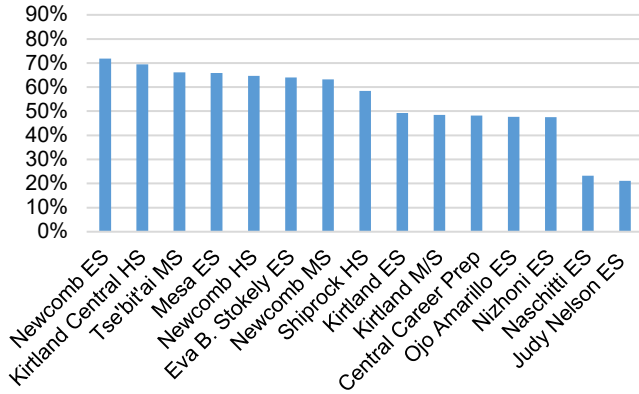
ESSER II Spending

	Grants	Central	Statewide (to LEAs)
Other Student and School Supports	\$2,100,000	\$800,000	\$99,640,000
Preparedness Activities	\$940,000	\$2,690,000	\$56,520,000
Educational Technology	\$500,000	\$3,380,000	\$67,700,000
Student Supports and Interventions	\$1,530,000	\$2,820,000	\$95,160,000
Facility Improvement	\$1,300,000	\$281,750.30	\$70,640,000
Total Allocation	\$6,750,000	\$10,080,000	\$401,560,000
Percent Spent	56%	76%	59%

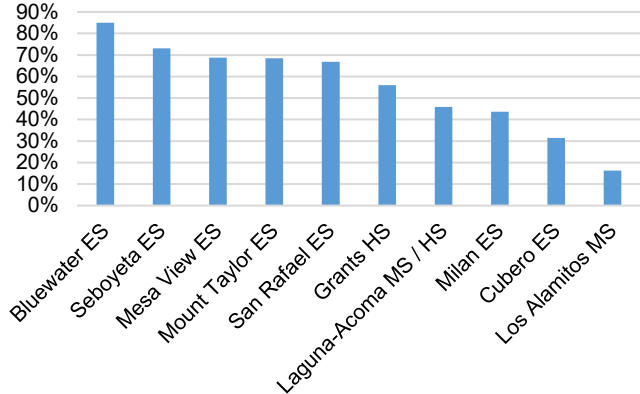
Source: PED

Appendix C: Facility Condition Index by School in Grants and Central FY22

FY22 FCI by School in Central
Districtwide FCI = 57 percent

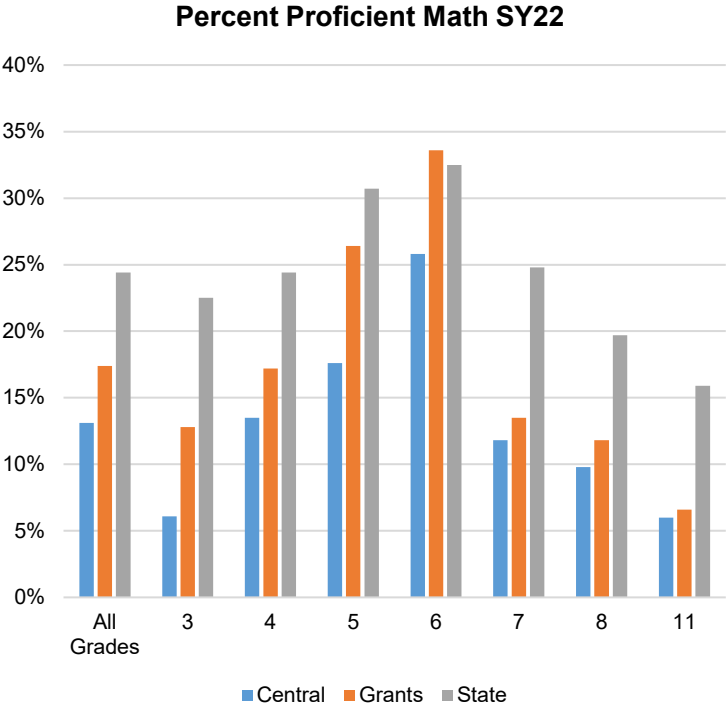


FY22 FCI by School in Grants
Districtwide FCI = 55 percent



Source: PSCOC

Appendix D: SY22 Grade Level Proficiency



Source: PED

Appendix E: College Board Authorized AP Classes in High Schools and Native American Student Populations

	# of AP Authorized Courses				% Native American SY22
	SY20	SY21	SY22	SY23	
Grants					
Laguna-Acoma High	2	2	3	1	94%
Grants High	10	10	9	7	45%
Central					
Shiprock High	7	7	6	0	95%
Central High	11	13	14	8	83%

Source: PED and College Board

Appendix F: Central Consolidated School District Key Facts



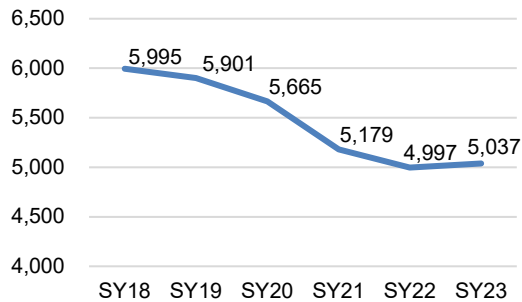
Central Consolidated School District

Steve Carlson

San Juan County

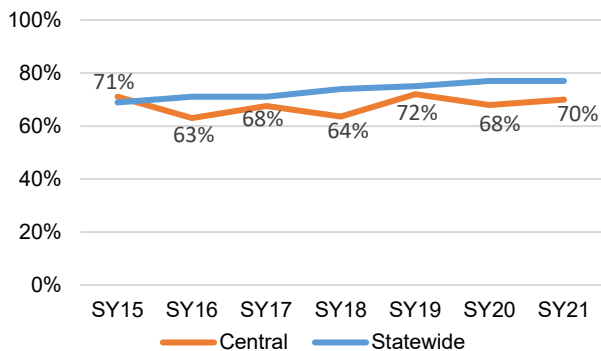
1 Prekindergarten • 8 Elementary Schools • 3 Middle Schools • 4 High Schools

Student membership



Source: PED 40-day count data

Four-year graduation rates



Source: PED data

Student demographics

	Number	Percent	State
All students	5,037		316,478
Asian	*	≤ 5%	≤ 5%
Black	*	≤ 5%	≤ 5%
Caucasian	197	≤ 5%	21%
Hispanic	219	≤ 5%	63%
Indian	4,486	93%	11%
Economically disadvantaged	2,657	53%	39%
English learners	1,748	35%	18%
Special education	805	16%	17%

Note. *Indicates values lower than 20. Economically disadvantaged students were eligible for free lunch in SY23.

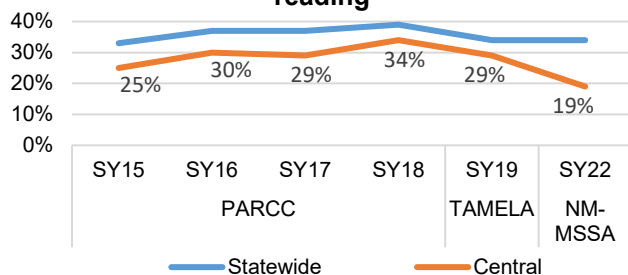
Source: PED 40 day enrollment data, SY23

Attendance

	Grants	Statewide
Chronic absence rate	41%	30%
Average excused absences	6	4
Average unexcused absences	10	11

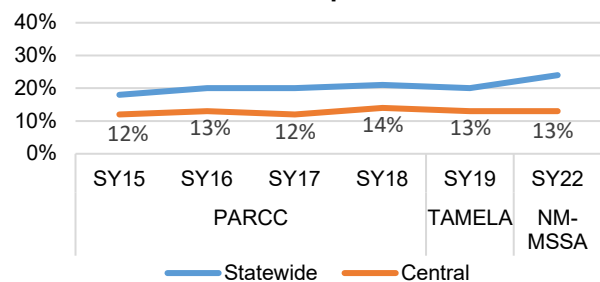
Source: PED data

Percent of students proficient in reading



Source: LFC analysis of PED data

Percent of students proficient in math



Source: LFC analysis of PED data

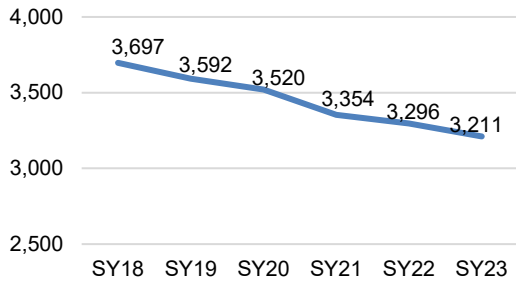
Appendix G: Grants-Cibola School District Key Facts

GRANTS CIBOLA COUNTY SCHOOLS

Grants Cibola County Schools
Max Perez, Superintendent
Cibola County

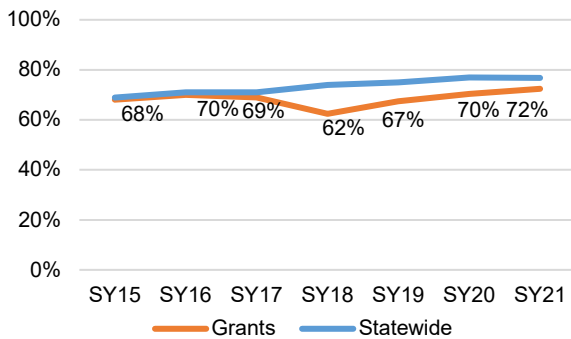
1 Prekindergarten • 7 Elementary Schools • 2 Middle Schools • 3 High Schools

Student membership



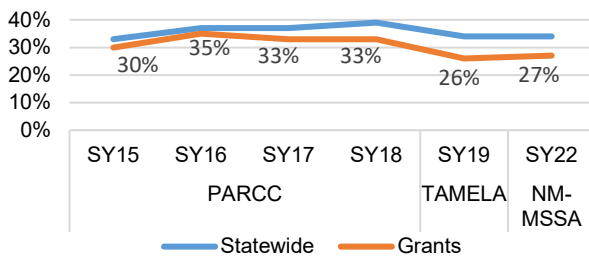
Source: PED 40-day count data

Four-year graduation rates



Source: PED data

Percent of students proficient in reading



Source: LFC analysis of PED data

Student demographics

	Number	Percent	State
All students	3,211		316,478
Asian	*	≤ 5%	≤ 5%
Black	*	≤ 5%	≤ 5%
Caucasian	357	11%	21%
Hispanic	1,239	39%	63%
Indian	1,510	47%	11%
Economically disadvantaged	1,557	48%	39%
English learners	354	11%	18%
Special education	454	14%	17%

Note. *Indicates values lower than 20. Economically disadvantaged students were eligible for free lunch in SY23.

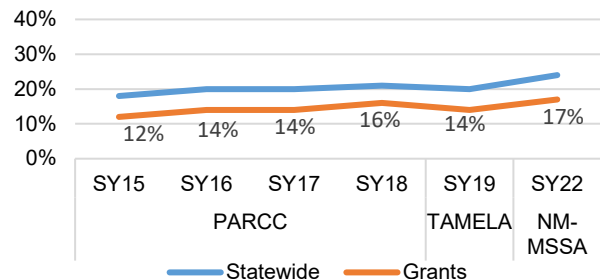
Source: PED 40 day enrollment data, SY23

Attendance

	Grants	Statewide
Chronic absence rate	43%	30%
Average excused absences	5	4
Average unexcused absences	12	11

Source: PED data

Percent of students proficient in math



Source: LFC analysis of PED data