



Internal Audit

Section 504 Audit

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Date: May 19, 2025

To: Board of Trustees
Stephanie S. Elizalde, Ed.D., Superintendent

From: Robert Rubel, MBA, CPA, CIA, CISA
Chief Internal Audit Officer

Subject: Section 504 Audit

Executive Summary

The Dallas Independent School District (District) Office of Internal Audit (OIA) has completed the Section 504 of the Rehabilitation Act of 1973 (Section 504) Audit.

The objective of the audit was to evaluate the processes and procedures surrounding the District's Section 504 program for efficiency and effectiveness as well as compliance with federal and state regulations.

Overall, the District has implemented processes and procedures for administering Section 504 in accordance with federal and state regulations. Opportunities for improvement were identified in the following areas:

Observation	Priority	Recommendation
1	Medium	Leverage available technology to improve 504 processes by consolidating student information.
2	Medium	Manage accommodation complaints in a more strategic fashion by enhancing stakeholder communication, analyzing trends, and standardizing responses.

Implementation of the recommendations in this report would assist the District in reducing administrative burden on campus staff, enhance compliance with Section 504 requirements, and improve student support services.

Background

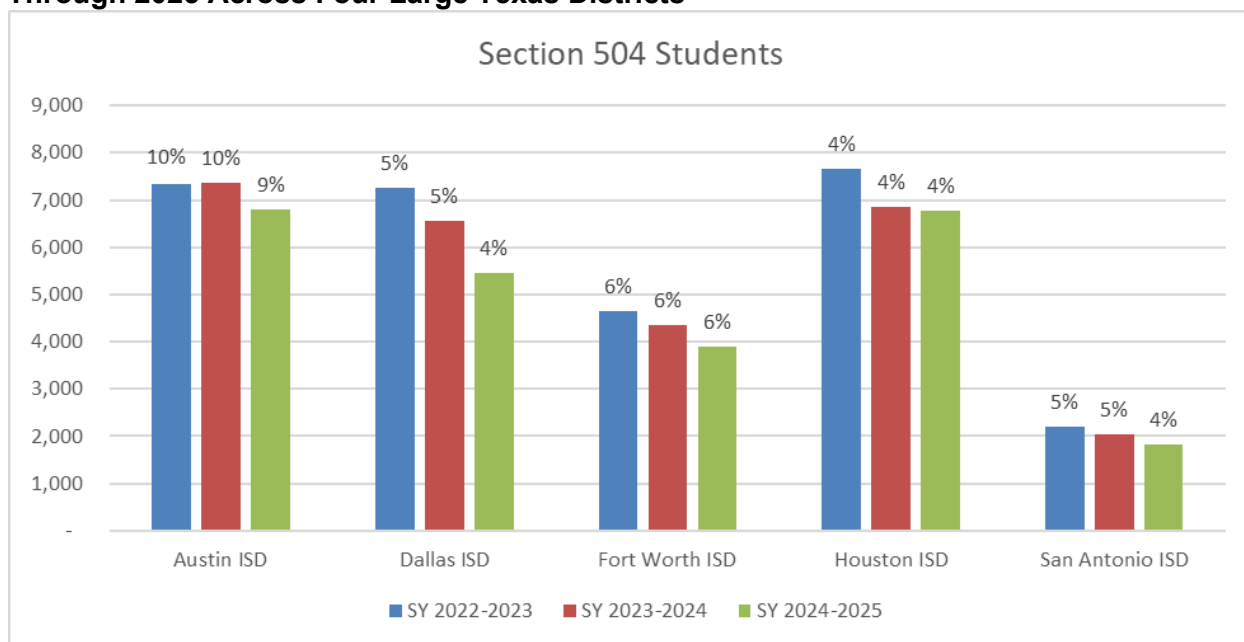
Section 504 of the Rehabilitation Act of 1973 is a federal civil rights law that focuses on the non-discrimination of students with disabilities. The law states that a public school receiving federal funds cannot discriminate against a student because of a disability and such students must be given the same opportunities to participate in academic and extracurricular activities. Under Section 504, if a student has physical or mental impairment that substantially limits their ability to access education the District must provide accommodations to ensure their individual educational needs are met as adequately as those of non-impaired students.

As of November 2024, there were 5,499 students receiving 504 accommodations. The Section 504 Department manages the District's 504 program. Section 504 is composed of one director, one manager, and two coordinators who are responsible for providing training to District staff and reviewing campus compliance with 504 requirements. Each campus must appoint at least one 504 chairperson who is responsible for the program at their location. The assistant principal

typically serves as the 504 chairperson but the position can vary by campus. Additionally, a 504 committee is formed for each student in the program, which is made up of the 504 chairperson, teachers, and other applicable staff such as nurses and counselors.

The following chart (Figure 1) presents a 3-year trend analysis for students in Section 504 for the Austin, Dallas, Fort Worth, Houston, and San Antonio school districts¹. The ratios presented in the chart reflect the ratio of Section 504 students to the district's total population.

Figure 1 – Percent Section 504 Students of Total Student Population for School Years 2023 Through 2025 Across Four Large Texas Districts



Section 504 Process Overview

Referrals for 504 accommodations are typically received from parents, teachers, or any individual who suspects a student may have a disability that impairs their access to education. After a referral is received, the District recommends 5 business days to notify the parent or guardian to schedule an initial meeting to determine eligibility. According to 504 data, an average of approximately 1,000 referrals were processed over the last two years.

Once initial eligibility is determined, an evaluation will be conducted if parental consent is given. During the evaluation, the campus 504 committee reviews academic records, health information, and external evaluation observations and considers input from parents and teachers. If deemed eligible, the 504 committee develops an Individual Accommodation Plan (IAP) tailored to the student's specific disability needs. Parental consent is also required for the implementation of the IAP. Additionally, the IAP must be signed by campus staff responsible for executing the accommodations outlined in the plan.

Every three years, or when there is a change in the student's condition, the District is required to re-evaluate the student's IAP. In addition to the three-year re-evaluation, the District has processes in place to review each student's plan annually. During the annual review and re-evaluation meetings, applicable staff such as teachers, counselors, relevant specialists, and the

¹ Data obtained from TEA website which was last published on March 24, 2025.

504 chairperson will review the student's plan and accommodations with the parents to determine if they are still effective and address any concerns.

The campus 504 chairperson is also responsible for maintaining the Section 504 student documentation. The student's 504 file follows the student throughout their academic progression until the student graduates or withdraws from the District.

Specific documentation to be maintained in the student's file by Section 504 include:

1. Section 504 referral form
2. Signed parental Notice and Consent for Initial Evaluation form
3. Signed parental Consent for Services form
4. Signed parental Notice of Section 504 Meeting Receipt form
5. Section 504 meeting documents (i.e., evaluation data, attendance, academic progress, etc.)
6. Individual Accommodation Plan (IAP)
7. Signed campus personnel IAP Receipt form
8. Any external supporting documentation

Section 504 documentation is primarily maintained in EdPlan, the software used to manage cases for special services, including Section 504. EdPlan is also used to manage cases for students receiving special education services. Section 504 is a separate module within EdPlan, for which access is typically granted based on job title and function. Training must be completed prior to gaining access to the Section 504 module. Processing through EdPlan allows the Section 504 Department to more easily monitor campus compliance with 504 requirements.

Ineligibility

In certain circumstances a student may be referred for 504 accommodations but is deemed ineligible. This is due to various reasons such as lack of parental consent or the student's impairment no longer substantially limits their ability to access education.

Manifestation Determination Reviews (MDRs)

MDRs are meetings that are held for students who have Section 504 eligibility and have behavior that is against the student code of conduct. On or before the 10th day of a disciplinary removal, a committee meets to determine if there is a link between the student's behavior and their disability. The meetings also determine if the behavior was a direct result of the campus not implementing the student's IAP.

Parent Concerns

Concerns regarding student 504 accommodations are primarily addressed during the annual review meetings. If a concern needs to be addressed sooner, parents are encouraged to reach out to their 504 chairperson. Additionally, parents can submit questions, concerns, suggestions, etc. through Let's Talk, where they will be routed to the applicable department based on the selected category. Concerns submitted through Let's Talk are addressed within 72 hours. Let's Talk has a survey function where feedback can be given regarding if concerns were addressed. The platform also collects data for departments to use to analyze trends based on concerns submitted as well as feedback on how concerns were addressed.

House Bill (HB) 3928

HB 3928 focuses on the evaluation, identification, and instruction of students with dyslexia. It was effective June 10, 2023, with implementation beginning in the 2023-2024 school year to be completed by the end of the 2024-2025 school year.

Under HB 3928, evidence-based dyslexia programs are now classified as specially designed instruction only available through an Individual Education Plan (IEP) under the Individuals with Disabilities Education Act (IDEA) managed by SPED.

The bill requires dyslexic students currently receiving dyslexia services through Section 504 to be reviewed to determine if dyslexia services are still needed. If continued support is deemed necessary, the student is referred for a Full Initial Individual Evaluation (FIIE) under Special Services. The parents/guardian must be notified, and consent must be obtained prior to evaluation. Meanwhile, students will keep receiving dyslexia instruction under Section 504 until parental consent is obtained and eligibility is determined. The District began the HB 3928 transition in FY 2023-2024. At the beginning of the transition there were 2,700 students receiving dyslexia services under Section 504 who needed to be reviewed under the regulation. As of April 2025, 93% of the students receiving dyslexia services under 504 have been reviewed, and the 504 department expects to have all remaining reviews conducted by the end of the school year in accordance with the timeline given by the Texas Education Agency. As of November 2024, SPED receives all new HB 3928 referrals for dyslexia services, and they are no longer processed by Section 504.

Scope

The audit focused on current operations and procedures and included activity from fiscal year (FY) 2023-2024 and FY 2024-2025. Certain other matters, procedures, and transactions outside that period may have been reviewed to understand and verify information during the audit period.

Objective

The objective of the audit was to evaluate the processes and procedures surrounding the District's Section 504 program for efficiency and effectiveness as well as compliance with federal and state regulations.

Methodology

Auditors interviewed key personnel, conducted walkthroughs, and reviewed supporting documents to understand processes and controls surrounding Section 504. Detailed audit procedures are noted below:

1. 504 Process – To determine if students eligible for Section 504 accommodations were properly identified, evaluated, and provided with an IAP, auditors performed the following:
 - a. Obtained a listing of active students in the Section 504 program as of September 28, 2024, from EdPlan noting a total of 3,276 students receiving accommodations for services other than dyslexia. Auditors made a sample selection of 20 students and performed the following:
 - Verified referrals were properly documented in EDPlan detailing the reasons for the referral, the referral date, who referred the student for evaluation under Section 504, and student's need(s) or area of concern(s).
 - Verified referrals were processed within the recommended 15 business days.
 - Verified notice and consent for initial evaluation were received prior to the initial evaluation of the student.

- Verified qualified members served on the evaluation committee.
- Verified the required documents such as parent/teacher input forms, health information, and attendance/school records were obtained and considered during the initial student evaluation.
- Verified parental consent for services was received prior to the 504 plan implementation date.
- Verified an IAP was provided for the student and was signed by the campus staff supporting the student's IAP.
- Verified annual review meetings were conducted and documented.
- Verified re-evaluations were conducted and documented.

No observations were noted; however, results were sent to management for review.

- b. Obtained and reviewed a referral report from the Section 504 Department as of November 1, 2024, to identify any referrals with extensive processing times.
No observations were noted.

- c. Obtained and reviewed a non-compliance report from the Section 504 Department as of November 1, 2024 and as of April 15, 2025, to identify one-year review meetings and/or three-year re-evaluation meetings that are significantly past due.
See Recommendation 1 in this report.

- d. Obtained a listing of re-evaluations conducted from January 1, 2024 through September 26, 2024, noting 435 re-evaluations. From the population, auditors made a sample selection of 10 meetings and reviewed summary meeting documentation to verify meetings assessed the student's accommodations and progress to address the student's needs.
No observations were noted.

2. Parent Concerns – To determine if processes are in place to address parent concerns regarding 504 accommodations, auditors reviewed the processes in place to address concerns and reviewed data from Let's Talk to verify concerns are addressed timely and appropriately.
See Recommendation 2 in this report.

3. 504 Ineligible Students - To determine if ineligibility decisions were properly documented, auditors obtained a listing of student referrals for currently active students that were deemed ineligible for 504 accommodations as of September 30, 2024, noting a total of 873 students. Auditors made a sample selection of 10 students and reviewed the reasons for ineligibility and supporting documentation retained in EDPlan.
No observations were noted.

4. 504 MDRs - To determine if MDR decisions were supported, auditors obtained a listing of active students with MDRs conducted during FY25 as of November 22, 2024, noting a total of 63 students. Auditors made a sample selection of 10 students and reviewed summary meeting documentation to verify it supported the MDR determination decisions.
No observations were noted.

5. HB 3928 - To determine if processes and controls are in place to smoothly transition dyslexia services in accordance with HB 3928, auditors conducted the following:

- a. Reviewed processes and data regarding re-evaluations conducted for students receiving dyslexia accommodations or services under Section 504 to verify re-evaluations were being processed timely and key metrics such as students continuing to receive services under SPED were tracked.
No observations were noted.
 - b. Obtained a listing of current dyslexia evaluators as of December 2, 2024, noting a total of 20 evaluators. Auditors made a sample selection of 10 lead dyslexia evaluators and verified they met one of the following HB 3928 requirements:
 - o Evaluator is a licensed dyslexia therapist (LDT);
 - o Evaluator holds the most advanced dyslexia-related certification issued by an association recognized by the State Board of Education (SBOE), and identified in, or substantially similar to an association identified in, either the rules or Dyslexia Handbook adopted by the SBOE; or
 - o If neither of the first two is available, the evaluator is an individual who meets applicable training requirements adopted by the SBOE.
 No observations were noted.
6. EDPlan User Access: To determine if controls are in place to restrict access to the 504 module within EdPlan, auditors reviewed the process for granting access to the 504 module within EdPlan and conducted the following:
- a. Reviewed a listing of administrator access as of September 2024 and verified administrative access was properly restricted and appropriate based on job function.
No observations were noted.
 - b. Obtained a listing of active employees as of November 2024 from Oracle and compared to active users in the 504 module within EdPlan to verify active users were currently employed by the District and set up with a RapidIdentity account.
No observations were noted.
 - c. Obtained a listing of users along with their type of access in the 504 module noting a total of 2,300 users as of September 2024. Auditors first reviewed access by job function for reasonableness and then made a sample selection of 15 users and verified access went through the established approval channels. Additionally, auditors reviewed the selected users' access logs from July 1, 2024 through November 30, 2024 to verify users only accessed approved modules.
No observations were noted.

Primary criteria used for this audit were:

- 1) Texas Education Agency (TEA) Section 504, dated January 2024
- 2) Texas Dyslexia Handbook, August 2024
- 3) HB 3928 Dyslexia Evaluation, September 26, 2024
- 4) Dallas ISD Operational Guidelines for Section 504, Nov 2017
- 5) Dallas ISD Special Education Operating Procedures Manual, dated 2020
- 6) FB(LEGAL) - Equal Educational Opportunity, January 2023
- 7) FB(LOCAL) - Equal Educational Opportunity, September 2020
- 8) TEA's Effective Districts Framework (EDF) Version 1.0, 2024

Audit Observations and Recommendations

Observation 1 – Section 504 administrative processes could be further streamlined.

Condition

Auditors reviewed the processes and procedures surrounding Section 504 and noted the 504 Department has strong controls in place for monitoring Section 504 compliance. Reporting tools are regularly utilized to monitor compliance with 504 meeting and documentation requirements. Auditors reviewed the November 2024 and April 2025 compliance reports, noting that the majority of re-evaluation and review meetings are being conducted. However, auditors also noted instances in which campuses were out of compliance with these meetings.

To encourage compliance with 504 requirements and ensure students are receiving accommodations, auditors reviewed the campus procedures to determine where streamlining efforts could be made. The following were noted.

- Student data is not easily accessible – auditors noted the data required to be gathered for evaluation, review, and re-evaluation meetings is not housed in the EdPlan case management system where documentation of 504 processes must be submitted, but rather must be collected from multiple platforms such as the student information system, health management systems, behavioral logs, etc.
- Documentation methods could be more automated – auditors noted meetings are often held and originally documented on paper and then manually input into the case management system. Physical signatures are often obtained for many of the documents, such as parental consent, rather than use of digital signatures processed within the case management system.
- Challenges in communicating 504 accommodations – auditors noted 504 accommodations are documented in the case management system where access is limited. The 504 chairperson is responsible for manually sharing the details of student accommodations with the staff tasked with implementing them. This can be a large undertaking as some students may have multiple teachers, counselors, etc. that are also susceptible to frequent change. Additionally, other support services such as MTSS, Special Services, Student Discipline, and Health Services must also be aware of students receiving accommodations in order to conduct their various processes. As noted above, this can be cumbersome as accessing student information often requires navigating through multiple platforms.
- Compliance monitoring data is not centralized or easily accessible – Along with many other mission critical duties, principals are ultimately responsible for ensuring compliance with Section 504 requirements. Although many departments, including 504, regularly disseminate reporting tools to principals, they are housed in multiple platforms or even come through email. Principals have no dashboards or one centralized platform to monitor compliance with the multitude of regulations for which they are responsible.

Cause

The siloed structure of the District contributes significantly to the fragmentation of student data as well as compliance monitoring data across various platforms. Additionally, available technology has not been fully leveraged to eliminate or reduce manual and cumbersome processes.

Effect

The challenges above have led to inefficiencies in gathering and preparing student data, increasing the likelihood of delays or noncompliance with 504 requirements. Utilization of multiple platforms to maintain student information increases data security risks and the likelihood of unreliable/inconsistent data. The manual communication of student accommodations could result in delays or lack of accommodations for students.

Recommendation 1

The 504 Department should explore options for processing and managing 504 functions within a centralized platform, such as the student information system or one of its embedded applications such as PowerSchool Analytics and Insights, while still maintaining privacy compliance requirements. 504 should collaborate with any applicable departments in efforts to streamline data collection and analysis efforts and other student support processes. Use of a centralized platform across student support areas would enable the following:

- Student data to be easily accessed and reviewed by applicable parties
- Significant reduction in administrative duties for campus personnel
- Easier notification of student accommodations to all applicable parties ensuring accommodations are provided timely
- Enhanced reliability, reporting, and analysis of complete student information to facilitate data-driven decision making
- Reduced costs by utilizing software already in place and eliminating the need for separate systems
- Less data security and privacy risks as student data would be maintained on a single platform

If conducting 504 processes within the student information system is not viable, the following options are also potential solutions to aid in addressing the above challenges:

- Integrate applicable real-time student information into the case management system.
- Collaborate with the case management vendor to explore options for making documentation efforts more automated and user friendly.
- Utilize the available parent portals to further streamline communication efforts and receive digital signatures for consent.
- Integrate student accommodations into the student information system.

Risk Level for Observation 1: Medium²

² See Attachment 1 for Definition of Risk Level.

Management Response

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response: The Section 504 Department acknowledges that our administrative processes can be further streamlined. Currently, Section 504 chairpersons must access information outside of the EdPlan data management system to prepare for meetings. An integrated platform that combines meeting modules and student-specific data would significantly improve efficiency.

It is neither expected nor part of our training for chairpersons to conduct meetings on paper and later input the information into EdPlan. We will continue to emphasize training that discourages this practice.

We agree that our current method, implemented just this school year, for capturing committee member signatures during meetings can be improved. At present, electronic signatures must be captured using the chairperson's device. This often results in printing and circulating the signature page instead, which is not feasible in virtual meetings which are more common now than in-person meetings. However, resolving this limitation requires enhancements by the platform developers.

Communicating 504 accommodations to teachers and other staff remains a challenge. Chairpersons are currently responsible for manually distributing 504 plans and collecting signatures on the Individual Accommodation Receipt. While plans can be shared via email, signature collection must still be completed manually unless DocuSign is available. Even then, many chairpersons report that DocuSign is a time-consuming process. Ideally, teachers would have independent access to student 504 plans, with access events being automatically time-stamped.

We place a strong emphasis on principal involvement in 504 compliance monitoring at the campus level. This includes reviewing trends, overseeing IAP implementation, and occasionally observing Section 504 meetings to assess effectiveness. Currently, principals receive a monthly report via email that provides a high-level overview of their campus's compliance status for that particular month.

The department has begun exploring the PowerSchool Insights and Analytics application's ability to meet the needs noted above.

The district plans to adopt a new data management system within three years. We will collaborate with Specialized Data Management Support (SDMS) and the developers of the new system to ensure it includes a more feasible way of obtaining committee signatures. While the department is exploring PowerSchool Analytics as an option, it is not certain that this will be the chosen platform for the Section 504 modules.

Estimated Implementation Date: December 2025

Individuals responsible for implementation: Section 504 Manager

Observation 2 – Processes for addressing Section 504 concerns could be enhanced.

Condition

Auditors reviewed processes in place surrounding how concerns are addressed noting the 504 department has various channels in place for constituents to voice concerns. Although the District generally addresses concerns in a timely fashion, the department does not currently take a strategic approach to enable it to address concerns proactively vs. reactively. The following are areas where processes could be further enhanced to allow for more efficient, preemptive, and robust communications:

- The District's website includes information for where/how parents can submit concerns. Because complaints/concerns are received via multiple formal and informal channels, they are not consolidated to facilitate analysis of trends, the need for training/process enhancements, and the development of more robust responses. The Let's Talk channel accumulates data, but concerns/complaints are not as frequently communicated via this method and its information is not currently analyzed.
- Although the department has processes in place to address concerns/complaints, the procedures are not documented. Additionally, campuses are not specifically trained on addressing parent concerns. Implementing standard guidelines and tools to address concerns/complaints and then training the campuses would benefit the District and its constituents.
- In addition to any information provided to parents by the campus, the 504 department recently implemented parent trainings; however, this only allows for periodic communication and may not reach all applicable constituents. Parents may also benefit from more frequent communication regarding 504.

Cause

The 504 department's primary focus is on addressing concerns sufficiently and timely and ensuring campuses are in compliance with 504 requirements, which has left little time for the small team to focus on how to utilize available data to improve the program and its outcomes.

Effect

The lack of strategic analysis of data surrounding concerns/complaints hampers the department's ability to gain actionable insights that could drive improvements in both departmental operations and the delivery of services to students.

Recommendation

To more strategically manage, analyze, and monitor complaints and concerns from parents and community members regarding students not receiving the accommodations, the 504 department should consider the following:

- Consolidate and analyze complaints/concerns data to assess trends, identify/understand root causes, and address them as necessary with tailored training and process revisions.
- Document and standardize, where appropriate, processes for addressing common parent concerns. Create tools, such as scripts, for campuses to utilize to ensure

- concerns are effectively addressed.
- Communicate with parents more frequently by developing newsletters and/or brochures containing helpful information regarding 504. Information could include a primer on the overall program, resources available to parents to manage and monitor their students' 504 plan, instructions for how concerns can be best communicated via existing channels, and updates regarding resources available. Handouts could be sent automatically through the case management system or other available parent portals to automate the process.
- Send automated surveys to parents after each annual review meeting to request feedback on 504 processes, which can then be reviewed and analyzed periodically.
- Send surveys to the 504 chair or other applicable campus staff to request feedback on process improvement suggestions and how further support could be provided.

Risk Level for Observation 2: Medium³

Management Response

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response: While the Section 504 Department responds to parent concerns in a timely manner, we acknowledge that there is currently no formalized process for documenting these concerns and their resolutions. The district's official platform for tracking stakeholder concerns is *Let's Talk*; however, not all internal staff and stakeholders use this system to communicate.

To ensure consistency and improve tracking, the department will establish a trial process for entering concerns received via email or phone into *Let's Talk*. This will allow us to capture all parent concerns in a centralized location and more effectively monitor trends and resolutions over time. In addition, the department will regularly review *Let's Talk* analytics to identify common themes and areas of need, using this data to inform targeted training for staff and to improve the timeliness and quality of responses to families.

Estimated Implementation Date: December 2025

Individuals responsible for implementation: Section 504 Manager

³ See Attachment 1 for Definition of Risk Level.

Conclusion

Overall, the Section 504 Department has processes and controls in place to manage the District's 504 compliance requirements. Implementation of the recommendations in this report would assist the District in having more effective and efficient processes to continue to best serve students in the 504 program.

We would like to thank Section 504 personnel for their cooperation and assistance with this audit.

The audit was conducted in accordance with the Institute of Internal Auditors' *Global Internal Audit Standards*. Those standards require OIA to plan and perform the audit to obtain sufficient, reliable, and relevant evidence to provide a reasonable basis for our observations and conclusions based on our audit objectives. OIA believes the evidence obtained provides a reasonable basis for our observations and conclusions based on our audit objectives.

Respectfully submitted,

Robert Rubel

Robert Rubel, MBA, CPA, CIA, CISA
Chief Internal Audit Officer

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Definition of Risk Level

Risk Level	Definition
High	These risks could directly impact achievement of a strategic or important operational objective of the District. There is a high probability of occurrence that would significantly impact the District and/or have a significant financial, reputational, or compliance risk.
Medium	Risks are considered to be substantially undesirable and pose a moderate level of risk exposure to District operations. Without appropriate controls, the risk will happen on a consistent basis.
Low	The risks are considered to be undesirable and could moderately expose the District. Without appropriate controls, the risk will occur some of the time.

Management Response

Observation 1 – Section 504 administrative processes could be further streamlined.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management Response:

The Section 504 Department acknowledges that our administrative processes can be further streamlined. Currently, Section 504 chairpersons must access information outside of the EdPlan data management system to prepare for meetings. An integrated platform that combines meeting modules and student-specific data would significantly improve efficiency.

It is neither expected nor part of our training for chairpersons to conduct meetings on paper and later input the information into EdPlan. We will continue to emphasize training that discourages this practice.

We agree that our current method, implemented just this school year, for capturing committee member signatures during meetings can be improved. At present, electronic signatures must be captured using the chairperson's device. This often results in printing and circulating the signature page instead, which is not feasible in virtual meetings which are more common now than in-person meetings. However, resolving this limitation requires enhancements by the platform developers.

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We place a strong emphasis on principal involvement in 504 compliance monitoring at the campus level. This includes reviewing trends, overseeing IAP implementation, and occasionally observing Section 504 meetings to assess effectiveness. Currently, principals receive a monthly report via email that provides a high-level overview of their campus's compliance status for that particular month.

The department has begun exploring the PowerSchool Insights and Analytics application's ability to meet the needs noted above.

The district plans to adopt a new data management system within three years. We will collaborate with Specialized Data Management Support (SDMS) and the developers of the new system to ensure it includes a more feasible way of obtaining committee signatures. While the department is exploring PowerSchool Analytics as an option, it is not certain that this will be the chosen platform for the Section 504 modules.

Estimated Implementation Date: December 2025

Individuals responsible for implementation: Section 504 Manager

Observation 2 – Processes for addressing Section 504 concerns could be enhanced.

Acknowledgement of observation:

- ☒ Agree
- ☐ Disagree

Management Response:

While the Section 504 Department responds to parent concerns in a timely manner, we acknowledge that there is currently no formalized process for documenting these concerns and their resolutions. The district's official platform for tracking stakeholder concerns is *Let's Talk*; however, not all internal staff and stakeholders use this system to communicate.

To ensure consistency and improve tracking, the department will establish a trial process for entering concerns received via email or phone into *Let's Talk*. This will allow us to capture all parent concerns in a centralized location and more effectively monitor trends and resolutions over time. In addition, the department will regularly review *Let's Talk* analytics to identify common themes and areas of need, using this data to inform targeted training for staff and to improve the timeliness and quality of responses to families.

Estimated Implementation Date: December 2025

Individuals responsible for implementation: Section 504 Manager

Criteria by Observation

Observation 1 - Criteria

TEA's Effective Districts Framework (EDF) Version 1.0, 2024

- **Key Practice 6.4.4: Non-curricular Software Systems (i.e., LMS,SIS,HR mgmt., etc.)**
District acquires or develops information systems to support non-curricular actions within the district and each campus that limit extraneous actions from teachers and administrators and maximize learning time for students.

Observation 2 - Criteria

TEA's Effective Districts Framework (EDF) Version 1.0, 2024

- **Key Practice 1.4.2: Data Setup**
District assesses current data systems and increases capacity and systems as needed to meet measurement and monitoring.
- **Key Practice 1.4.3: Data Collection**
District collects and synthesizes data and information related to progress in executing implementation plan and achieving the district's vision and goals.
- **Key Practice 3.1.4: Family Engagement**
District sets expectations and provides staff training and time to meaningfully engage parents/caregivers, promote parent/caregiver understanding of student progress and campus expectations, and facilitate a parent/caregiver partnership to support overall student development and success.
- **Key Practice 6.3.1: Student-focused Enrollment Systems**
District develops and implements enrollment systems that prioritize students and families in areas of unmet need and prioritizes the highest quality options for students with the greatest need.
- **Key Practice 6.3.2: Student Recruitment and Marketing**
District develops and implements an effective family and student marketing strategy to fill all quality seats within available campuses, focusing on community needs and how the school or campus is responsive to those needs.