



June 10, 2025

Kade R. Minchey, CIA, CFE, Auditor General  
Office of the Legislative Auditor General  
Utah State Capitol Complex  
Rebecca Lockhart House Building, Suite W315

PO Box 145315  
Salt Lake City, UT 84114-5315

Dear Mr. Minchey,

We appreciate the opportunity to respond to the recommendations from A Systemic Performance Audit of the Tooele County School District. The professionalism, trust, and collaborative spirit demonstrated by the audit team resulted in a positive experience. We welcomed the opportunity for an external review of the Tooele County School District and embraced this audit with full cooperation, transparency, and humility. We are committed to continuous learning and improvement to ensure the Tooele County School District students have the knowledge, skills, and dispositions they need to achieve their potential.

We agree with the recommendations presented by the audit team and commit to implementing them. The following pages contain our specific responses to each recommendation, the primary contact for implementation, as well as what our plan is, how we will take steps to accomplish the plan, the documentation we will produce to show progress, and when we desire to have full implementation of the recommendation. I am confident in the capacity of our organization and those assigned to these efforts to implement the audit recommendations successfully.

The Tooele County School District embraces continuous improvement for our employees and students. We value feedback and growth opportunities to improve our practice. This audit serves as a valuable assessment of our work, giving actionable insights into the efforts we should continue and areas in which we can learn and improve.

Dr. Mark Ernst, Superintendent

Melissa Rich, Board President

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**BOARD OF EDUCATION**

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Dr. Mark Ernst, Superintendent Lark Reynolds, Business Administrator



## Chapter 1

**Recommendation 1.1: The Tooele County School District should prioritize student achievement by establishing an assistant superintendent devoted to academics, who will have the direct authority to centralize the approach to improving student outcomes in the district.**

District Response: The district concurs.

Contact: Dr. Mark Ernst, Superintendent, mernst@tooeleschools.org, (435) 833-1900.

What: TCSD will recommend the establishment of an assistant superintendent devoted to academics to the Board of Education. This assistant superintendent will be responsible for centralizing our academic approach and improving student academic performance.

How: The assistant superintendent devoted to academics will oversee the Academic Strategy Team (AST). Members of the AST include the Superintendency, Area Directors, Director of Special Education, Director of Student Services, Director of Assessment, and the Assistant Director of Teaching and Learning. The AST will work in concert to establish the academic approach for TCSD.

Documentation: Minutes from TCSD Board Meeting will document the discussion and decision of an assistant superintendent devoted to academics. Agendas from AST meetings will document the district's approach to academics. The AST will identify assessment data to track the effectiveness of the TCSD academic approach and make necessary adjustments.

When: The TCSD Board of Education will discuss and decide on an assistant superintendent devoted to Academics no later than the September 9, 2025, board meeting. The assistant superintendent devoted to academics and the AST will establish the TCSD academic approach and identify relevant assessment data no later than January 2026.

**Recommendation 1.2: Tooele County School District School Board should consider ways to improve student achievement, including adjusting policy to allow for an additional assistant superintendent.**

District Response: The district concurs

Contact: Melissa Rich, President of the Tooele County School District Board of Education, mrich@tooeleschools.org, (702) 622-5186.

What: The TCSD will recommend to the Board of Education a change in policy to allow for an additional assistant superintendent. The Board of Education will work with the Superintendency to improve student academic performance.

How: The TCSD will recommend The Board of Education change policy 2002 to allow for more than one assistant superintendent. The Board of Education will ask for regular academic updates from a superintendency member and consider additional implementation strategies that will directly impact student academic performance.



Documentation: Minutes from board meetings will show the discussion and decision to change policy 2002. Additionally, the minutes will reflect the academic updates the TCSD staff gives to the Board of Education. TCSD's response to Recommendation 1.4 addresses additional documentation.

When: The recommendation of an additional assistant superintendent to the Board of Education change policy 2002 no later than the September 9, 2025 board meeting and establish a timeline for regular academic updates from TCSD staff. TCSD will fully implement this recommendation by October 2025.

**Recommendation 1.3: Tooele County School District's assistant superintendent devoted to academics should establish excellence plans for each grade and subject content area that establishes curriculum standards and performance goals to improve student outcomes across the district.**

District Response: The district concurs.

Contact: Dr. Cody Reutzel, Executive Director of Teaching & Learning, creutzel@tooeleschools.org, (435) 833-1900.

What: Excellence plans to improve student outcomes for each grade level will be established.

How: The assistant superintendent devoted to academics will work collaboratively with other district leaders to establish plans that detail specific strategies and performance goals to improve student outcomes. In conjunction with area directors, school leaders, and other relevant personnel, the assistant superintendent devoted to academics will lead and manage the execution of each plan throughout each year.

Documentation: The assistant superintendent devoted to academics will publish each excellence plan annually.

When: All excellence plans for the respective school year will be completed and published to the district website no later than October 1<sup>st</sup>.

**Recommendation 1.4: Tooele County School District's Board should establish a plan for tracking and monitoring performance goals established by the district.**

District Response: The district concurs.

Contact: Melissa Rich, President of the Tooele County School District Board of Education, mrich@tooeleschools.org, (702) 622-5186.

What: The Board of Education will track the performance goals established by the district throughout each school year.

How: The assistant superintendent devoted to academics will present the excellence plans (referenced in recommendation 1.3) for initial review by the Board of Education in September. In February and June, the assistant superintendent devoted to academics will provide an update to the Board of Education on the progress of each excellence plan. The Board of Education will discuss the progress and provide recommendations and further direction as appropriate.



Documentation: Board meetings in September, February, and June will contain an agenda item for the presentation or review of excellence plans.

When: Presentation and review of excellence plans as described will commence during the 2025-2026 school year.

## **Chapter 2**

**Recommendation 2.1: The Tooele County School District Board should prioritize student achievement in its current policies on board power and duties, as well as mission statement and district goals.**

District Response: The district concurs.

Contact: Melissa Rich, President of the Tooele County School District Board of Education, mrich@tooeleschools.org, (702) 622-5186.

What: The Board of Education will more intentionally prioritize student achievement policy and district goals.

How: Tooele County School District will recommend to the Board of Education to modify policy 1001 to emphasize student achievement. District goals and key actions for improvement will also emphasize student achievement.

Documentation: Minutes from board meetings will reflect recommended modifications to policy 1001. Minutes will also reflect annual review of the district mission and goals to ensure alignment with desired academic outcomes.

When: Changes to policy 1001, if approved, will occur no later than the September 9, 2025 board meeting. The board will then establish a timeline for the annual review of mission and goals. Implementation is ongoing based on the schedule established.

**Recommendation 2.2: The Tooele County School District Board should maintain a standing agenda item on all school board meetings that addresses the district's progress on student achievement.**

District Response: The district concurs.

Contact: Melissa Rich, President of the Tooele County School District Board of Education, mrich@tooeleschools.org, (702) 622-5186.

What: The TCSD Board of Education will create a standing agenda item for each board meeting to address the district's progress on student achievement.

How: The TCSD Board of Education President will create a standing agenda item about student academic achievement. The Board President will work with the superintendency to establish criteria for executive staff members to brief the board during board meetings. This agenda item will be in harmony with the implementation of recommendation 1.4.

Documentation: The board meeting agenda and minutes will reflect this recommendation's implementation.

When: The board president will establish the standing agenda item during the August 12, 2025 board meeting.



**Recommendation 2.3: The Tooele County School District should align its policies and goals to unify its governance message by creating a job description for the director of policy that includes clear authority for ensuring policies are unified and consistently updated and created.**

District Response: The district concurs.

Contact: Dr. Mark Ernst, Superintendent, mernst@tooeleschools.org, (435) 833-1900

What: TCSD will create a job description for the director of policy with clear authority for ensuring unification of and the consistent updating of policy.

How: The Superintendent will work with the Directors of Policy and Human Resources to create a job description for the Director of Policy.

Documentation: The creation of the job description will serve as documentation.

When: The responsible parties will complete the job description creation no later than September 24, 2025. The policy director will begin immediately implementing the duties therein.

**Recommendation 2.4: The human resources department should implement systems for ensuring consistency across the district with human resources policies and procedures, including proper documentation acquisition and maintenance being met.**

District Response: The district concurs

Contact: Dr. Mark Ernst, Superintendent, mernst@tooeleschools.org, (435) 833-1900

What: TCSD will review policies and procedures, then implement systems to ensure consistency with human resource practices. These systems will include proper documentation acquisition and maintenance.

How: The Superintendent will meet with the Human Resources Director and team to determine the best course of action to fulfill this recommendation. The review of current policy and procedures will focus on determining what systems need changing and what new measures need to be instituted.

Documentation: The systems put in place, the training modules for the systems, the proper documentation acquisition of human resources materials, and the maintenance of the materials will serve as evidence.

When: The Superintendent and Human Resources team will meet no later than September 30, 2025 to establish a strategy and timeline to meet this recommendation. The review of current policy and procedures will impact the timeline and implementation. Our initial target is to have systems in place and training complete by March 31, before the hiring season for the 2026-2027 school year.

**Recommendation 2.5: The human resources department should develop an accountability report to ensure administrators adhere to the district hiring policies, specifically related to verifying documentation of eligibility for hired individuals.**

District Response: The district concurs.

Contact: Dr. Mark Ernst, Superintendent, mernst@tooeleschools.org, (435) 833-1900



**What:** The Superintendent, Director of Human Resources, and Assistant Director of Human Resources will create an accountability report around the verification of documents of eligibility for new hires. The report will adhere to current policy and allow the human resources directors to hold administrators accountable for properly verifying potential employees.

**How:** The Superintendent will meet with the Human Resources team to determine the best course of action to fulfill this recommendation. The review of current policy and procedures will focus on determining what systems need changing and what new measures need to be instituted.

**Documentation:** The systems put in place, the training modules for the systems, and the proper verification of eligibility documents will serve as evidence.

**When:** The Superintendent and Human Resources team will meet no later than September 30, 2025 to establish a strategy and timeline to meet this recommendation. The review of current policy and procedures will impact the timeline and implementation. Our initial target is to have systems in place and training complete by March 31, before the hiring season for the 2026-2027 school year.

**Recommendation 2.6: The Tooele County School Board and its superintendent should develop an implementation plan and system of accountability for all departments to reverse the culture of policy noncompliance.**

**District Response:** The district concurs that policy compliance among some employees can improve.

**Contact:** Melissa Rich, President of the Tooele County School District Board of Education, [mrich@tooeleschools.org](mailto:mrich@tooeleschools.org), (702) 622-5186 & Dr. Mark Ernst, Superintendent, [mernst@tooeleschools.org](mailto:mernst@tooeleschools.org), (435) 833-1900

**What:** A district wide implementation plan and system of accountability will be put in place to ensure all employees are aware of their responsibilities as employees of Tooele County School District. The plan will follow current TCSD policies and procedures. If, during the development of the plan and system, there is a determination that a policy change must occur, these changes will follow current procedures for policy changes. The implementation plan and accountability system will maintain employee rights outlined in Federal, State, and District policies, codes, and regulations.

**How:** The Board of Education and Superintendent will determine the best course of action to fulfill this recommendation. The review of current policy and procedures will focus on determining what systems need changing and what new measures need to be instituted.

**Documentation:** The implementation plan and system of accountability will act as documentation for applying this recommendation. In addition to the execution of the plan and system, training materials and other training items will serve to show the measures taken by TCSD to fulfill the recommendation.

**When:** Board Leadership and the Superintendent will meet no later than September 16, 2025, to determine a timeline and course of action to meet the requirements of this recommendation. Once this project's scope is determined, a concrete date for full implementation will be set. However, an initial target date of April 1, 2026, is in place.



## Chapter 3

### **Recommendation 3.1: Tooele County School District should align the leadership academy training to school governance best practices.**

District Response: The district concurs.

Contact: Dr. Jeffrey D. Hamm, Assistant Superintendent, jhamm@tooeleschools.org, (435) 833-1900.

What: We are already in the process of aligning next year's leadership academy schedule with Utah's leadership standards. In addition, we will emphasize and highlight how our leadership topics align with the leadership standards each month.

How: As indicated above, we are currently refining next year's leadership academy curriculum to align with Utah's Standards for Educational Leadership. The assistant superintendents will continue attending the area directors' principal trainings at our monthly leadership meetings, as well as their monthly provisional principals' meetings and collaboration meetings with the Superintendent.

Documentation: An annual schedule that accounts for all eight months of leadership academy will be provided to all participants, including dates, presenters, curriculum, and the leadership standard(s), covered during each session. In addition, a library of the monthly presentations will be maintained that can be accessed throughout the year.

When: The practices and procedures will be in place by August 1, 2025.

### **Recommendation 3.2: Tooele County School District should ensure that area directors are better involved in the leadership training academy.**

District Response: The district concurs.

Contact: Dr. Jeffrey D. Hamm, Assistant Superintendent, jhamm@tooeleschools.org, (435) 833-1900.

What: The superintendency will collaborate and coordinate with the area directors and their various principal trainings (e.g., monthly district leadership meetings, provisional principal meetings, and area director meetings with the superintendent).

How: The superintendency will continue attending the area directors' principal trainings at our monthly leadership meetings.

Documentation: The superintendency and the area directors will create an annual schedule accounting for all eight months of leadership academy, including dates, presenters, curriculum, and the leadership standard(s), covered during each session. In addition, a library of the monthly presentations will be maintained that can be accessed throughout the year.

When: The practices and procedures will be in place by August 1, 2025.





**Recommendation 3.3: Tooele County School District should assess the area director role to create strategic guiding documents to focus and evaluate their work on principal’s growth as instructional leaders.**

District Response: The district concurs.

Contact: Dr. Sarah Jarnagin, Area Director – Stansbury, [sjarnagin@tooeleschools.org](mailto:sjarnagin@tooeleschools.org), (435) 833-1900

What: District leadership affirms a commitment to aligning practices with the Principal Supervisor Performance Standards, as established by the District Leadership Design Lab at the University of Washington and cited by OLAG. Our leadership team including area directors, the superintendent, and the assistant superintendent began this effort in Fall 2023 by attending an AASA institute focused on these standards. However, because of the budget shortfall in December, priorities shifted to immediate, necessary changes, and we ceased our participation. Despite leadership transitions, we have strengthened our alignment efforts this year. The recommended actions in this assessment were already planned for summer, reinforcing our commitment to continuous improvement.

How: Area Directors have established their purpose with the assistance of the superintendent. Collective expertise among area directors and aligned with Utah’s Educational Leadership Standards was leveraged to develop a plan to strategically guide and cultivate knowledgeable, confident, and capable school leaders. The next steps will include aligning practices to the purpose. Area directors will use time in the summer to synthesize strategies and create new ones to meet the elements of the purpose statement.

Documentation: All area directors will utilize common documents to ensure consistency in school visits, provisional and lead principal meetings, guiding documents, timelines, and goal setting. These records will provide valuable data on visit frequency, discussion topics, and coaching time focused on Utah’s Leadership Standards, supporting informed decision-making and continuous improvement.

When: Research and development of common systems and a theory of action based on the Principal Supervisor Performance Standards will take place in June and July 2025, with implementation beginning in August of the same year. Monthly informal self-evaluations will track progress, culminating in a formal evaluation with the Superintendent in May 2026.

**Recommendation 3.4: After Tooele County School District creates guiding documents, the superintendent should ensure, through regular performance evaluations, that area directors prioritize growing principals into exceptional instructional leaders.**

District Response: The district concurs

Contact: Dr. Mark Ernst, Superintendent, [mernst@tooeleschools.org](mailto:mernst@tooeleschools.org), (435) 833-1900

What: The superintendent will strengthen the leadership capacity of principals by embedding robust evaluation processes for area directors and engaging in the work they are doing as described in recommendation 3.3, ensuring their focus on instructional leadership.

How: Collaboratively creating comprehensive guiding documents, continuing superintendent-led feedback sessions and evaluations, providing professional development related to the Principal Supervisor Performance Standards, monitoring progress, and adjusting strategies and ensuring accountability.





**Documentation:** The superintendent will establish an evaluation process that includes monthly one-on-one feedback with a formal evaluation tool based on the Principal Supervisor Performance Standards to be used to review area director performance at the end of the school year. The tool will also include principal feedback. Ensuring alignment between the evaluation tools and leadership development actions in the Principal Supervisor Performance Standards will help maintain consistency and accountability.

**When:**

Implementation of Principal Supervisor Performance Standards:

- By August 2025, the finalized elements reflecting the Principal Supervisor Performance Standards (as described in recommendation 3.3) will be integrated into area director practices.

Ongoing Monitoring & Alignment:

- The superintendent will incorporate these elements into already scheduled weekly meetings with area directors.
- Monthly individual meetings will be conducted with each area director to review their actions and ensure alignment with the Principal Supervisor Performance Standards.

Evaluation & Accountability:

- A formal evaluation tool, based on the Principal Supervisor Performance Standards and aligned with the elements in section 3.3, will be developed by September 30, 2025.
- This tool will be shared with area directors to facilitate consistent assessment and accountability.

Completing the first full cycle by May 2026 will provide valuable insights into the effectiveness of the process and allow for adjustments based on performance.

**Recommendation 3.5: Tooele County School District should coordinate the work of the Departments of Teaching and Learning, Special Education, and Student Services through the leadership of an assistant superintendent devoted to academics, who can ensure that each department's Annual High Leverage Practices are explicitly tied to the Strategic Model components and elements to improve classroom instruction and student outcomes.**

**District Response:** The district concurs.

**Contact:** Dr. Jeffrey D. Hamm, Assistant Superintendent, [jhamm@tooeleschools.org](mailto:jhamm@tooeleschools.org), (435) 833-1900; Dr. Cody Reutzel, Executive Director of Teaching & Learning, [creutzel@tooeleschools.org](mailto:creutzel@tooeleschools.org), (435) 833-1900.

**What:** The assistant superintendents will work collaboratively with executive staff members to develop each of the Annual High Leverage Practices to ensure that each aligns explicitly to specific elements of the Strategic Model. Final approval of the Annual High Leverage Practices, including assurance of alignment to the Strategic Model, will be provided by the superintendent and assistant superintendents.

**Documentation:** A document recording the Annual High Leverage Practices, accompanying implementation strategies, and the explicit alignment to the Strategic Model for the next three years will be published and maintained by the assistant superintendents.

**When:** Annual High Leverage Practices, the accompanying implementation strategies, and the explicit alignment to the Strategic Model for the next three years will be developed by October 1, 2025.



**Recommendation 3.6: The Tooele County School District Departments of Special Education and Student Services should adopt the same implementation strategy for their Annual High Leverage Practices as the Department of Teaching and Learning.**

District Response: The district concurs.

Contact: Dr. Jeffrey D. Hamm, Assistant Superintendent, [jhamm@tooeleschools.org](mailto:jhamm@tooeleschools.org), (435) 833-1900; Dr. Cody Reutzel, Executive Director of Teaching & Learning, [creutzel@tooeleschools.org](mailto:creutzel@tooeleschools.org), (435) 833-1900.

What: The departments of Special Education and Student Services will adopt an implementation approach for the Annual High Leverage Practices that mirror the principles that guide the Teaching & Learning Department's strategy.

How: The superintendency will work collaboratively with executive staff members to develop each of the Annual High Leverage Practices and accompanying implementation strategies. Final approval of the Annual High Leverage Practices, including assurance of high-quality implementation plans, will be provided by the superintendency.

Documentation: A document recording the Annual High Leverage Practices and the accompanying implementation strategies for the next three years will be published and maintained by the superintendency.

When: Annual High Leverage Practices and the accompanying implementation strategies for the next three years will be developed by October 1<sup>st</sup>, 2025.

**Recommendation 4.1: Tooele County School District should separately account for funding received from specific contracts based on student enrollment and ensure funds are not utilized or encumbered for expenses that span longer than the length of the contract, including termination clauses.**

District Response: The district agrees with the finding and will comply if it enters another contract with another Education Service Provider (ESP). While the recommendation is sound in principle, it is important to note that, in practice, achieving different outcomes may not be feasible unless revenue data is disaggregated by location—which it currently is not. It is recommended that the USBE assist LEAs in breaking out revenue by location. This would enhance transparency and enable more accurate financial assessments. However, as was noted in the audit, “ability to review and assess the funds distinctly was limited.” It should be clarified that this limitation was not due to an inability to track expenditures by location, but rather because revenue data is not disaggregated. Additionally, LEAs do not have access to the funding formulas necessary to model revenue scenarios for individual schools.

Contact: Lark Reynolds, Business Administrator, [lreynolds@tooeleschools.org](mailto:lreynolds@tooeleschools.org), (435) 833-1900.

What: The district is committed to navigating current financial challenges and is implementing necessary changes over several years to adapt to reduced revenues following the departure of online students. As noted during the audit process, our beginning teacher salary increased significantly—from \$33,142 in FY17 to \$61,200 in FY24. Because much of the surplus between revenues and expenditures in previous years was allocated to salary increases, the district anticipates that it will take multiple years to fully adjust to the new financial reality.



How: The district plans to strategically utilize reserves to manage ongoing costs until state and local revenues increase sufficiently. Our goal is to maintain staffing levels and avoid unnecessary disruptions. Concurrently, the district will continue to evaluate program efficiencies annually as part of the budgeting process to ensure long-term sustainability.

Documentation: There is nothing to document for this finding.

When: This finding is complete as we no longer have any open contracts with ESPs.