

An In-Depth Follow-Up Audit of the

Salt Lake City School District

Review of Shared Governance and
Follow-Up Audit

Office of the Legislative
Auditor General

Report to the UTAH LEGISLATURE





**LEGISLATIVE
AUDITOR GENERAL**



THE MISSION OF THE LEGISLATIVE AUDITOR GENERAL IS TO

AUDIT · LEAD · ACHIEVE

WE HELP ORGANIZATIONS IMPROVE.

Audit Subcommittee

President J. Stuart Adams, Co-Chair
President of the Senate

Senator Evan J. Vickers
Senate Majority Leader

Senator Luz Escamilla
Senate Minority Leader

Speaker Mike Schultz, Co-Chair
Speaker of the House

Representative Jefferson Moss
House Majority Leader

Representative Angela Romero
House Minority Leader

Audit Staff

Kade R. Minchey, Auditor General, CIA,
CFE

Brian Dean, Manager, CIA, CFE

Christopher McClelland, Audit
Supervisor, CIA, CFE

Kitty Mui, Audit Staff

Office of the Legislative Auditor General

olag.utah.gov





Office of the Legislative Auditor General

Kade R. Minchey, Legislative Auditor General

W315 House Building State Capitol Complex | Salt Lake City, UT 84114 | Phone: 801.538.1033

Audit Subcommittee of the Legislative Management Committee
President J. Stuart Adams, Co-Chair | Speaker Mike Schultz, Co-Chair
Senator Evan J. Vickers | Representative Jefferson Moss
Senator Luz Escamilla | Representative Angela Romero

November 19, 2024

TO: THE UTAH STATE LEGISLATURE

Transmitted herewith is our report:

“An In-Depth Follow-Up Audit of the Salt Lake City School District” [Report #2024-21].

An audit summary is found at the front of the report. The scope and objectives of the audit are included in the audit summary. In addition, each chapter has a corresponding chapter summary found at its beginning.

[Utah Code 36-12-15.3\(2\)](#) requires the Office of the Legislative Auditor General to designate an audited entity’s chief officer. Therefore, the designated chief officer for the Salt Lake City School District is Dr. Elizabeth Grant. Dr. Grant has been notified that they must comply with the audit response and reporting requirements as outlined in this section of *Utah Code*.

We will be happy to meet with appropriate legislative committees, individual legislators, and other state officials to discuss any item contained in the report in order to facilitate the implementation of the recommendations.

Sincerely,

Kade R. Minchey, CIA, CFE

Auditor General

kminchey@le.utah.gov





PERFORMANCE AUDIT

SALT LAKE CITY SCHOOL DISTRICT



KEY FINDINGS

- ✓ 1.2 Shared governance has contributed to problems with the basic functions of transporting students to and from school.
- ✓ 1.3 More can be done to ensure shared governance and its application does not negatively impact student instructional hours.
- ✓ 1.4 Concerns remain about shared-governance constraints on a principal's ability to lead their schools.



RECOMMENDATIONS

- ✓ 1.1 The Salt Lake City Board of Education should work to clarify that they have the power to operate the school scheduling process, including the scheduling of early-release days, and can delegate this authority to the Salt Lake City School District.
- ✓ 1.2 The Salt Lake City Board of Education should work to clarify that school improvement councils do not have decision-making authority over school schedules.
- ✓ 1.5 The Salt Lake City Board of Education should work to ensure principals are able to implement programs at their schools and hold professional development during faculty meetings.
- ✓ 1.6 The Salt Lake City Board of Education should evaluate whether shared governance is an appropriate model for the Salt Lake City School District.
- ✓ 1.7 The Legislature should consider whether shared governance, as seen in the Salt Lake City School District, is an appropriate model for Utah school districts.

▶ AUDIT REQUEST

The Legislative Audit Subcommittee prioritized an in-depth follow-up audit of the Salt Lake City School District in its June 2024 meeting.

▶ BACKGROUND

This audit follows up on the implementation status of recommendations made in the original audit of the Salt Lake City School District in December 2022. That audit made 17 recommendations—10 for the Salt Lake City School District, 5 for the Salt Lake City Board of Education, and 2 for the Legislature.

This audit expands our review from the previous audit of shared governance in the Salt Lake City School District and its impact on students. Shared governance divides up certain roles and responsibilities between the Salt Lake City Board of Education, district administration, and members of school improvement councils at individual schools. Shared governance is outlined in the district's written agreement with the teachers' association.

Summary continues on back >>

 REPORT
SUMMARY

Shared Governance Has Had Some Negative Impacts on the Salt Lake City School District's Ability to Make Decisions in the Best Interest of Students

Based on conversations with district staff and administrators as well as data reviewed, shared governance and confusion about shared governance have contributed to decisions made that negatively impacted students in several key areas. These include transportation to and from school, as well as the number of instructional hours at West High School. Other aspects of shared governance such as restrictions on a principal's ability to impact school performance also appear to be problematic.

The Salt Lake City School District Has Implemented a Significant Number of Recommendations from the Previous Legislative Audit

We reviewed documentation provided by the district to determine if it was sufficient to demonstrate recommendation implementation. Of the 17 total recommendations, 12 have been implemented and 5 are in process. Overall, the district has taken significant steps to implement recommendations from the 2022 audit. For example, the district studied whether any elementary schools needed to be closed as a result of declining enrollment. The district ultimately closed four elementary schools before the 2025 school year. More work needs to be done for implementation of all audit recommendations.

Transportation Problems at West High School Appear to Have Resulted from a Lack of Coordination Between School Start-and-End Times

West High School had three bus routes arrive 30 minutes after school ended every day during the 2024 school year. According to the district, this impacted approximately 165 students and resulted from school schedule conflicts with another school in the district.

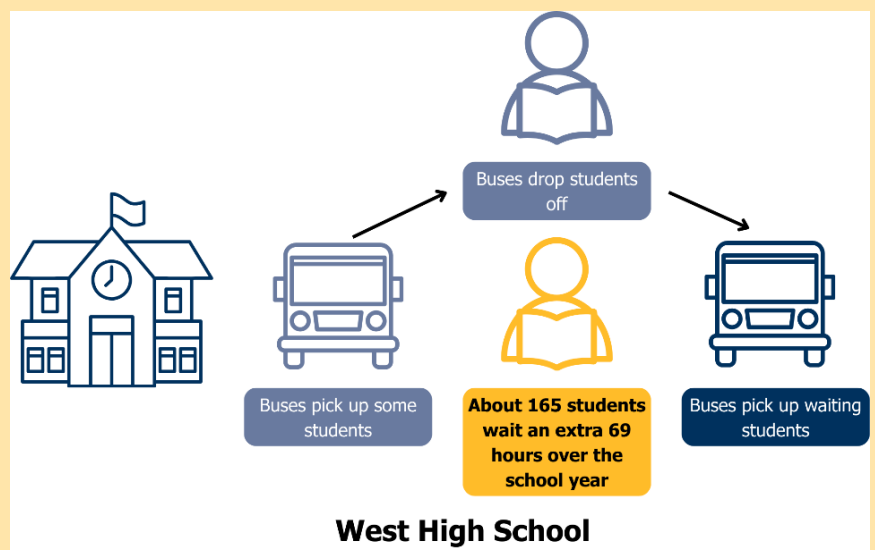


Table of Contents

Chapter 1 Shared Governance Has Had Some Negative Impacts on the Salt Lake City School District’s Ability to Make Decisions in the Best Interest of Students.....	3
1.1 Governance Is a Foundational Principle for Organizational Success	4
1.2 Shared Governance Has Contributed to Problems with the Basic Functions of Transporting Students to and from School.....	4
1.3 More Can Be Done to Ensure Shared Governance and Its Application Does Not Negatively Impact Student Instructional Hours	9
1.4 Concerns Remain About Shared-Governance Constraints on a Principal’s Ability to Lead Their Schools.....	12
Chapter 2 The Salt Lake City School District Has Implemented a Significant Number of Recommendations from the Previous Legislative Audit	19
2.1 Review of Chapter 1 Recommendations	20
2.2 Review of Chapter 2 Recommendations	22
2.3 Review of Chapter 3 Recommendations	25
2.4 Review of Chapter 4 Recommendations	26
2.5 Review of Chapter 5 Recommendations	28
Complete List of Audit Recommendations	29
Agency Response Plan	33





BACKGROUND

We were asked to perform an in-depth follow-up audit of “An In-Depth Budget Review of the Salt Lake City School District (Report No. 2022-16).” As part of this follow up, we looked at the implementation status of recommendations made and looked closely at the district’s governance structure. Governance describes the division of decision-making authority and how accountability works within an organization.

FINDING 1.1

Governance Is a Foundational Principle for Organizational Success

NO RECOMMENDATION

FINDING 1.2

Shared Governance Has Contributed to Problems with the Basic Functions of Transporting Students to and from School

RECOMMENDATION 1.1

The Salt Lake City Board of Education should work to clarify that they have the power to operate the school scheduling process, including the scheduling of early-release days, and can delegate this authority to the Salt Lake City School District.

RECOMMENDATION 1.2

The Salt Lake City Board of Education should work to clarify that school improvement councils do not have decision-making authority over school schedules.

RECOMMENDATION 1.3

The Salt Lake City Board of Education should place the board motion made in May 2021 regarding school scheduling into policy to increase awareness.

FINDING 1.3

More Can Be Done to Ensure Shared Governance and Its Application Does Not Negatively Impact Student Instructional Hours

RECOMMENDATION 1.4

The Salt Lake City School District should develop adequate internal controls to ensure all policies and procedures are followed for school schedules and instructional hours. These internal controls should address approval processes and identify who has the ability to change school schedules.

FINDING 1.4

Concerns Remain About Shared-Governance Constraints on a Principal's Ability to Lead Their Schools

RECOMMENDATION 1.5

The Salt Lake City Board of Education should work to ensure principals are able to implement programs at their schools and hold professional development during faculty meetings.

RECOMMENDATION 1.6

The Salt Lake City Board of Education should evaluate whether shared governance is an appropriate model for the Salt Lake City School District.

RECOMMENDATION 1.7

The Legislature should consider whether shared governance, as seen in the Salt Lake City School District, is an appropriate model for Utah school districts.

**CONCLUSION**

The Salt Lake City School District's shared governance structure has contributed to problems with student transportation, instructional hours, and the ability of principals to affect change in their schools. The school board and district should work to clarify responsibilities within the district, adopt adequate internal controls, and empower principals. This should address confusion on crucial transportation and scheduling decisions and enable the district to meet its students' needs.



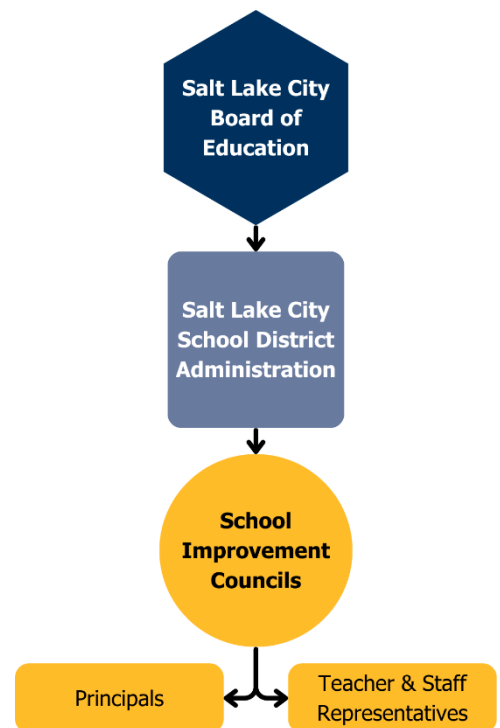
Chapter 1

Shared Governance Has Had Some Negative Impacts on the Salt Lake City School District’s Ability to Make Decisions in the Best Interest of Students

We were asked to perform an in-depth follow up of our 2022 audit of the Salt Lake City School District (SLCSD or district).¹ As part of this follow up, we looked at both recommendations from the past audit and concerns brought to our attention about shared governance in the district.

Shared governance divides certain roles and responsibilities between the Salt Lake City Board of Education (SLCSD board or board), district administration, and members of school improvement councils at individual schools. Depending on the type of school, these councils are comprised of teacher representatives, representatives of other employee groups such as counselors, and principals. Staff and principals operate in parity meaning principals can’t impose certain school decisions on the other members of the council and vice versa, as seen in the infographic to the right. Shared governance, as outlined in the district’s written agreement with the teachers’ association, has existed since 1974.

Based on conversations with district staff and administrators as well as data reviewed, shared governance and confusion about shared governance have contributed to decisions that negatively impacted students in several key areas. These include transportation to and from school, as well as the number of instructional hours at West High School (West High). Other aspects of shared governance such as restrictions on a principal’s ability to impact school performance also appear to be problematic. Governance in SLCSD should be reevaluated and modified so that the school district and principals are not restricted in their ability to make decisions that meet the needs of students.



Source: Auditor generated.

¹ An In-Depth Budget Review of the Salt Lake City School District (#2022-16). https://olag.utleg.gov/olag-doc/2022-16_RPT.pdf.



1.1 Governance Is a Foundational Principle for Organizational Success

According to the U.S. Government Accountability Office, governance is “an institutionalized system of decision rights and accountabilities for planning, overseeing, and managing standards... [which includes] establishing clear policies and procedures.” Our office published a Best Practice Handbook² which states:

Best Practice Handbook:

“Effective governance broadly establishes the structures and processes necessary to direct, inform, manage, and monitor an organization. When the governing body applies principles of good governance, it fosters organizational success and augments the value the organization provides.”

This has a direct application for public education. Our office conducted a comprehensive review of public education in Utah over the course of several years.³ One conclusion from those audits was that:

Comprehensive Education Audit Capstone:

“Every decision to improve education is based on the foundation of education’s governance. As such, governance should continue to be at the forefront of the discussion.”

The work on the previous audit of SLCS D indicated that changes needed to be made in the district’s governance structure. Despite positive steps the district has taken, more work needs to be done. The following sections discuss areas where the district can improve governance in order to improve student outcomes.

1.2 Shared Governance Has Contributed to Problems with the Basic Functions of Transporting Students to and from School

In our previous audit, we noted that schools in the district used to be able to choose their start-and-end times, which made it logistically difficult to get students to and from school. This is different from peer school districts in which the district or school board determines school times. While the SLCS D board passed a motion to limit school options, problems with busing have persisted. During the 2024 school year, about 165 students at West High had to wait after

² *The Best Practice Handbook* (2023-05). <https://le.utah.gov/interim/2023/pdf/00002695.pdf>.






³ *Comprehensive Education Audit Capstone* (#2022-08). https://olag.utleg.gov/olag-doc/2022-08_RPT.pdf.



school for close to half an hour every school day. In addition, students at two middle schools consistently had trouble getting home on time on early-release days. Busing conflicts resulted from the district allowing individual schools to choose their schedules. This is in contrast with SLCS D’s peer districts that develop school schedules at the district level and provide schools a limited set of options. The SLCS D board should work to clarify that the board is responsible for school scheduling and can delegate this authority to the district. The board should also work to clarify that school improvement councils do not have decision-making authority over school schedules.

Unlike SLCS D, Peer Districts or Their Boards Establish Schedules for Their Schools

We contacted SLCS D’s demographic peer districts and found consistency in their practices for school scheduling. All the districts or their school boards either set school schedules, with some giving certain schools a set of options, or require close collaboration with the transportation department. For example:

	<p>Granite School District sets times for all their schools according to busing availability with limited flexibility. Early-release days are consistent districtwide. Early-release decisions involve the school district and school board.</p>
<p>Ogden School District sets times for all their schools according to busing availability with limited flexibility. Early-release days are consistent districtwide and determined by the school district.</p>	
	<p>Logan City School District sets times for all their schools according to busing availability with limited flexibility. Early-release days are consistent districtwide and determined by the school board.</p>
<p>Murray City School District's school board sets times for all their schools according to busing availability. Early-release days are consistent districtwide and determined by their school board.</p>	
	<p>Salt Lake City School District schedules for elementary and middle schools are determined by school improvement councils, with approval by the district. Schools have some flexibility in determining the number of early-release days and the day of the week these days occur.</p>

Source: Auditor generated.

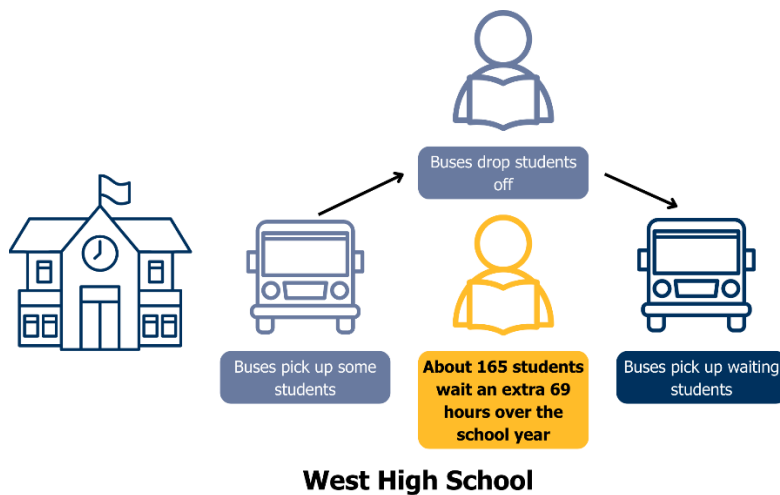


The process in SLCS D appears to be guided by a motion made by their board over three years ago and language in the written agreement with the teachers' association. These elements will be discussed in greater detail later in this chapter.

Conflicts Between School Schedules Led to Students Regularly Being Transported Home Late

Many students at West High, Glendale Middle School (Glendale), and Northwest Middle School (Northwest) experienced difficulties in getting home from school on buses on a regular basis during the 2024 school year. Administration at the impacted schools had the additional responsibility of supervising students while waiting for late buses. Late buses resulted from conflicts between school schedules within the district.

Transportation Problems at West High School Appear to Have Resulted from a Lack of Coordination Between School Start-and-End Times. At West High, the district scheduled three buses to arrive 30 minutes after school ended, which is 23 minutes later than other afternoon buses at West High.



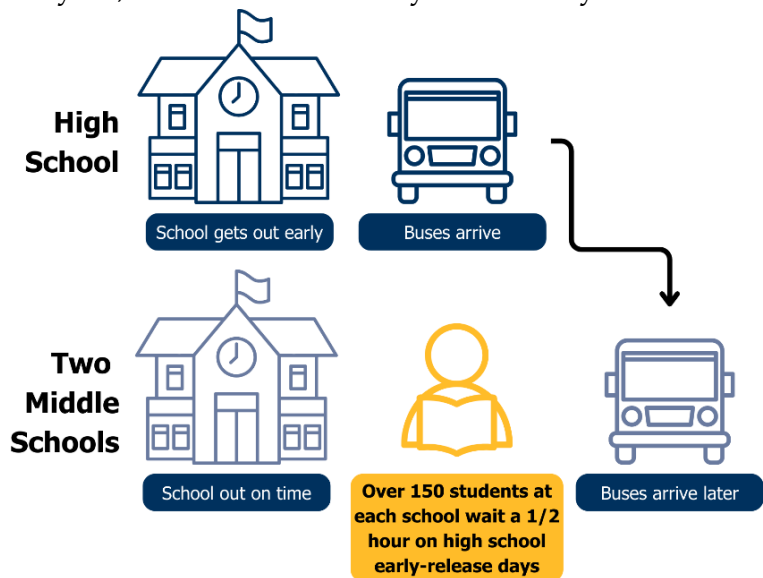
Source: Auditor generated.

According to the district, these three late routes impacted about 165 students. Over the course of a 180-day school year, each impacted student would have waited for their afternoon bus 69 hours more than their peers. According to district administration, this delay was caused by a

conflict with afternoon buses taking home students from Bryant Middle School (Bryant). The Bryant principal at the time reported that the school was allowed to pick an 8:45am start time instead of 8:00am, which created a conflict with West High in the afternoon. While bus driver shortages may have contributed to the situation, the district told us they would have had enough drivers to get West High students home on time if Bryant had chosen the earlier time.

Problems at Glendale Middle School and Northwest Middle School Resulted from Early-Release-Day Conflicts. Glendale and Northwest both chose to have

fewer or different early-release days than the high schools their routes were paired with. During the 2024 school year, Glendale had 6 early-release days the entire year while East High School had those same early-release days plus 27 more. Glendale had busing conflicts on the 27 days which East High School had an early-release day and Glendale did not. On these days, East High School got out at 2:15pm and Glendale got out at 2:30pm. According to the SLCS D transportation department, Glendale could not get busing until approximately 3:00pm on these days. This 30-minute wait on 27 days impacted about 200 students on 4 bus routes.



Source: Auditor generated.

Northwest had 10 early-release days total last school year, some of which occurred on different days than West High, the high school Northwest was paired with for bus routes. Comparing the early-release days for these two schools, West High had 27 early-release days that Northwest did not. This created conflict and resulted in about 150 students waiting half an hour for the afternoon bus on those 27 early-release days.

Similar busing conflicts are expected to occur during the 2025 school year since West High has 18 early-release days that do not match up with Northwest's early-release days. The district intends to use any available drivers and transportation office staff to drive these routes. Clayton and Glendale also have conflicts on two days this year because the high schools have early release on Thursday, September 26th and Thursday, February 20th. Clayton and Glendale students have waited and will have to wait a half hour after school for buses on those days.

Shared Governance Contributed to Busing Conflicts and Students Being Transported Home Late

The district's school scheduling process appears to be guided by shared governance, the culture of shared governance, and a past motion made by the SLCS D board. The board motion in 2021 laid out the start-and-end times for high schools, prohibited early-release Fridays in high schools, and gave elementary



and middle schools flexibility in choosing their start times and early-release days according to shared governance. However, the board’s motion does not lay out approval responsibilities among parties. Similarly, the written agreement states that the “regular school day shall be scheduled in each school by the [school improvement council]...” but does not define what “regular school day” means. Combined, the board motion and written agreement do not provide clear guidance on the school scheduling process. This creates an opportunity for school improvement councils and the teachers’ association to exert decision-making authority on the process.

The busing problems discussed in this section occurred during the 2024 school year. However, the district’s efforts to streamline scheduling for the 2025 school year and the response to these efforts illustrate difficulties in overcoming the entrenched culture of shared governance. District administration attempted to improve busing by standardizing the school scheduling process with criteria and guidelines. The district’s efforts were reportedly met with complaints from the public, grievances filed by teachers and school faculties related to school schedules, and threats from the teachers’ association. The district acknowledged they could have rolled out this initiative better by including more public input as part of the process.



While collaboration can be beneficial, clear decision-making authority is necessary for an organization to function effectively.

In response to the district’s efforts that appear to be permitted under the written agreement and board motion, the teachers’ association threatened to end the negotiation process for the written agreement for the next school year. This, combined with feedback from parents and communities, ultimately led to the district approving some school schedules from school improvement councils which appear to contradict the district’s new scheduling criteria.

While collaboration can be beneficial, clear decision-making authority is necessary for an organization to function effectively. Collaboration without clear roles and responsibilities in the district contributed to late busing for students on a regular basis. The SLCSO board needs to work to clarify that they can determine school schedules, including early-release days, and can delegate this authority to the district. The board should also work to clarify that school improvement councils do not have decision-making authority over school schedules. The board and district can and should continue to work with its stakeholders and communities.



RECOMMENDATION 1.1

The Salt Lake City Board of Education should work to clarify that they have the power to operate the school scheduling process, including the scheduling of early-release days, and can delegate this authority to the Salt Lake City School District.

RECOMMENDATION 1.2

The Salt Lake City Board of Education should work to clarify that school improvement councils do not have decision-making authority over school schedules.

Given the fact that the board motion is not universally followed for high school early-release days, the board should also adopt the board motion into policy. That may increase knowledge of the board's intent for school scheduling.

RECOMMENDATION 1.3

The Salt Lake City Board of Education should place the board motion made in May 2021 regarding school scheduling into policy to increase awareness.

1.3 More Can Be Done to Ensure Shared Governance and Its Application Does Not Negatively Impact Student Instructional Hours

SLCSD schools are required to provide at least 1,000 instructional hours to their students every school year according to SLCSD board policy. As part of a larger program to address student absenteeism, West High increased transition time between classes. This contributed to West High falling below the 1,000-hour requirement during the 2024 school year. Confusion over shared governance and how it applies to school scheduling as well as potentially inadequate controls led to West High falling short on instructional hours. The SLCSD board should implement the recommendations earlier in this chapter to clarify school scheduling. The district should develop adequate internal controls to ensure all policies and procedures are followed for school schedules and instructional hours.



West High School Increased Transition Time Which Decreased Instructional Hours Below District Standards

According to documentation provided by West High administration, they took steps to address student absenteeism and other attendance issues through a program introduced during the 2023 school year. This program included activity holds that prevented students from participating in school sports and activities if attendance did not improve. The program also included an increase in transition time between classes from six minutes to seven minutes, which seems reasonable given the size and layout of the school. On a recent visit to the school, we found it difficult to move from one end of the building to another in under seven minutes. However, decreasing instructional time by three minutes per day contributed to the school having 983 instructional hours for the subsequent school year. This is below the district standard of 1,000 hours established in SLCS board policy. Over the course of a school year, students at West High lost nine hours of instruction as a result of longer transition times.⁴



Decreasing instructional time by three minutes per day contributed to the school having 983 instructional hours for the subsequent school year, below the district's required 1,000 hours of instructional time.

Shared Governance and Inadequate Controls Likely Contributed to Insufficient Instructional Hours at West High

The change in transition time at West High over the course of a full year contributed to inadequate instructional hours for the 2024 school year. The district was unaware that the school had implemented longer transition times for the 2024 school year and was therefore unaware of the shortfall in hours until late in the year. This indicates that internal controls over bell schedules can be improved.

At some point in the past, all three high schools in the district standardized their schedules to make scheduling easier for a district program. It appears the only way to make up for decreased instructional hours while still abiding by the start-and-end times in the board's 2021 motion would be decreasing the number of early-release days. According to West High administration, they did not pursue decreasing the number of early-release days because they believed this was not an option due to the need for consistent schedules among high schools. District administration confirmed, however, that the school never asked to do this and that the option to decrease early-release days was available to the school.

⁴ Although we were unable to account for the full deficit of instructional hours, the number of early-release days and the length of transition times likely contributed.



This example at West High illustrates confusion surrounding shared governance and potential problems with the district’s internal controls.

	<p>The district should have been aware of the new bell schedule and then worked with West High to ensure they were able to adopt their new attendance program while maintaining instructional hours. West High has two underperforming student groups that likely cannot afford to lose out on instructional hours, English-language learners and students with disabilities. Both of these groups are designated under federal guidelines as needing targeted support.</p>
<p>West High should have asked to decrease early-release days, and the school should have been aware of what was available to them in terms of busing. According to the district’s transportation department, busing was available to West High if they had replaced some of their early-release days with full school days.</p>	
	<p>As previously mentioned, the district is not enforcing the board motion from 2021 that prohibited early-release Fridays for high schools.</p>

Source: Auditor generated.

The requirements for school scheduling and busing in the district, including the board motion, instructional hour policy, and language in the written agreement, lay out processes for the district. As discussed in the previous section of this chapter, these processes need to be improved. The instructional hour requirement was not followed in this instance, nor was the prohibition on high school early-release Fridays. The district also didn’t have controls in place to identify unapproved bell schedule changes. A recommendation made earlier in this chapter to put the board motion in policy should raise awareness of district requirements. However, more work is needed to ensure policies and procedures for instructional hours and school scheduling are followed once the district’s role is strengthened and more clearly defined. The district should adopt adequate internal controls to ensure all scheduling and instructional hour requirements are followed and properly approved by the district.

RECOMMENDATION 1.4

The Salt Lake City School District should develop adequate internal controls to ensure all policies and procedures are followed for school schedules and instructional hours. These internal controls should address approval processes and identify who has the ability to change school schedules.



1.4 Concerns Remain About Shared-Governance Constraints on a Principal's Ability to Lead Their Schools

We revisited one of the 2022 audit findings in which we raised concerns about how the written agreement and elements of shared governance limited the ability of principals to affect positive change in their schools. The district has taken positive steps through negotiations with the teachers' association, but more work should be done. The board should work to ensure principals can implement programs at their schools and provide professional development at faculty meetings. Given the long history of shared governance and the problems documented in this audit and the previous audit, work needs to be done to fix the district's governance issues. The district's governance structure should be reevaluated and modified so that the school district and principals are not restricted in their ability to make decisions that meet the needs of students.

In the previous audit, we noted that principals are accountable for school-level performance, but shared governance constrains a principal's ability to impact school performance. Previously, principals were only able to require professional development for all their teachers if the teachers on the school improvement council approved the professional development. The previous audit reads:

An In-Depth Budget Review of the Salt Lake City School District:

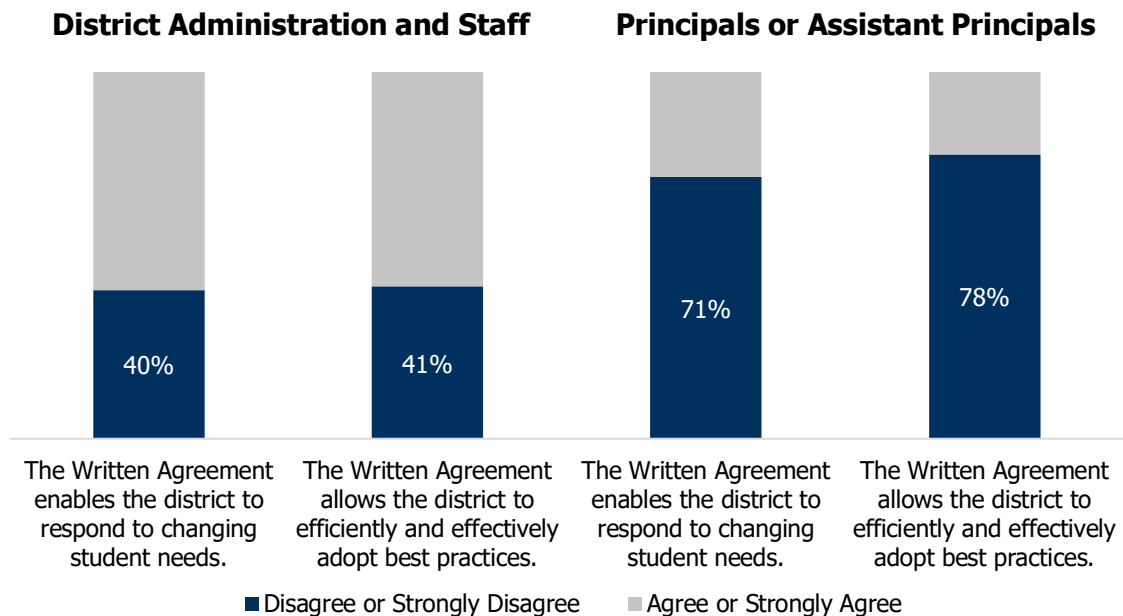
"SLCSD's framework for evaluating school principals makes it clear that principals are responsible for implementing effective professional development at their schools. Principals provide instructional leadership through coaching and mentoring. Taking away a principal's ability to decide how to develop the skills and capacity of their faculty hinders the principal's ability to improve school performance. In addition, ... the written agreement confuses who is ultimately responsible for teacher growth and school improvement, impacting accountability."

Following recommendations from the previous audit, the district worked with the teachers' association to change the written agreement to allow principals to require five professional development sessions at faculty meetings. In addition, the written agreement now requires teachers to attend faculty meetings unless they are excused. We believe these are positive steps that help principals lead their schools. However, more can be done to empower principals to improve their schools. Results from a recent survey we conducted on SLCSD employees



appear to confirm this. Figure 1.1 summarizes the results of two questions asked about the written agreement.

Figure 1.1 District Administration and Staff* as Well as Principals Expressed Concerns About the Written Agreement. Both groups expressed skepticism that the written agreement helps the district respond to changing student needs and adopt best practices. However, a higher percentage of principals disagreed with these statements.



Source: Office of the Legislative Auditor General survey results.

*Survey results indicate 188 district administration or staff and 49 principals or assistant principals answered both questions.

The survey asked district staff, district administration, and principals whether they agreed that the written agreement enables the district to adapt to changing student needs and adopt best practices. Over 40 percent of district administrators and district staff and over 70 percent of principals disagreed with these statements. These numbers, especially those for principals, are consistent with the opinions of district-level administrators that shared governance can lead to decisions made that are not in the best interest of students.






Provisions of Shared Governance Limit the Power of Principals to Make Changes Targeted at Improving School Performance. For example, one secondary school principal attempted to reduce the number of class periods at their school from 7 to 6 to increase time in core subjects from 47 minutes per class to 58 minutes. The students at this school underperformed relative to another school in the district that had similarly reduced the number of class periods. The principal brought the plan to their faculty for approval, and the majority of the faculty rejected it. According to the principal, every core subject teacher voted in favor of the change, but electives teacher voted against it. The principal could



have appealed to the superintendent to override the decision of their faculty but did not do so because they did not want to create friction with their faculty.

This is the type of situation that we identified in the previous audit. In the 2022 audit, we pointed out best practices used at Parkview Elementary that contributed to high student performance given its demographics. We recommended the district identify high-performing teachers and schools and seek to replicate best practices in other schools. The secondary principal we spoke to on the current audit attempted to replicate a successful practice from another school in the district, but a majority of the school’s faculty prevented the school from adopting the new class schedule aimed at improving student achievement.

Principals Can Generally Adopt New Programs and Faculty Meetings Can Be Used for Professional Development in Peer Districts. We surveyed Granite, Ogden, Murray, and Logan School Districts and found near uniformity in their practices.

	<p>Principals in the Granite School District can hold one 60-minute faculty meeting a month without approval from the district which can all be dedicated to professional development. Principals have latitude to adopt new programs.</p>
<p>Principals in the Ogden City School District can hold 20 45-minute faculty meetings a year that can be used for professional development. Principals can adopt new programs for their schools consistent with the district’s strategic plan and approved by the district.</p>	
	<p>Principals in the Logan City School District can call faculty meetings with no set number in teacher agreements which can be used for professional development. Principals can adopt programs for their schools with district approval.</p>
<p>Principals in the Murray City School District can hold faculty meetings as often as they choose, but most principals hold two a month. Principals can decide to do professional development at faculty meetings. Principals can adopt new programs at their school to target school improvement.</p>	
	<p>Shared governance limits a principal’s ability to adopt programs for their schools and provide schoolwide training for their teachers.</p>

Source: Auditor generated.



Principals in peer districts are able to implement new programs and provide professional development without asking permission from their teachers. We believe collaboration in a school is a sound principle in decision-making. However, some decisions should be made by principals who are responsible for developing their teachers and providing instructional leadership. The board should work to ensure that principals can implement school-level programs and professional development.

RECOMMENDATION 1.5

The Salt Lake City Board of Education should work to ensure principals are able to implement programs at their schools and hold professional development during faculty meetings.

We believe this recommendation and the others contained in this chapter will help SLCS D move forward with best practices in governance that can improve transportation and school administration. However, more may be needed to address the shortcomings of shared governance. We detailed our concerns about shared governance in our 2022 audit. The district has since taken positive steps to address issues with shared governance, but problems persist. Shared governance as seen in SLCS D and its written agreement has been utilized for approximately 50 years and:

- Is unlike what is seen in other districts in the state, according to current and former district administrators
- Has positive aspects, including collaboration, but also negative aspects
- May continue to hinder the district's ability to efficiently and effectively operate the district, given their recent experiences

We believe that decisions made by school boards and school districts should prioritize the needs of students. The district's governance structure should be reevaluated and modified so that the school district and principals are not restricted in their ability to make decisions that meet the needs of students.

RECOMMENDATION 1.6

The Salt Lake City Board of Education should evaluate whether shared governance is an appropriate model for the Salt Lake City School District.



Given the difficulties in changing the district’s long-held governance structure, the Legislature may want to weigh in regarding shared governance as an appropriate model for school districts in Utah.

RECOMMENDATION 1.7

The Legislature should consider whether shared governance, as seen in the Salt Lake City School District, is an appropriate model for Utah school districts.



BACKGROUND

The Legislative Audit Subcommittee prioritized this in-depth follow-up audit in its June 2024 meeting. This followed the release of “An In-Depth Budget Review of the Salt Lake City School District (Report No. 2022-16)” in December 2022. The 2022 audit report identified 17 recommendations – 9 for the Salt Lake City School District (SLCSD, or district), 6 for the Salt Lake City Board of Education (SLCSD board, or board), and 2 for the Legislature. Of the 17 total recommendations, 12 have been implemented and 5 are in process. This chapter summarizes the implementation status of the recommendations from the 2022 audit. The district has implemented a significant number of recommendations.

Recommendation	Implementation Status
1.1 The Salt Lake City School District should plan future expenditures with demographic changes in mind.	Implemented
1.2 The Salt Lake City School District should ensure it is using an efficient number of administrative staff to meet child nutrition program needs.	In Process
1.3 The Salt Lake City School District should develop a structured preventative maintenance plan and carefully consider the recommendations made in Ch.4 of the 2022 In-Depth Budget Review.	Implemented
1.4 The Salt Lake City School District should implement a more robust internal audit function that includes a risk assessment of district programs and report findings directly to the Board of Finance Committee.	In Process
2.1 The Salt Lake City Board of Education and its members should review and follow the board’s policies and handbook that make it clear that board members should not be involved in day-to day administration of the district.	Implemented
2.2 The Salt Lake City Board of Education should continue to self-assess their compliance with policies, statute, and rule and their progress towards board goals at least every other year.	In Process
2.3 The Legislature should consider whether additional options should be placed in statute to allow school boards to hold individual board members accountable.	Implemented
2.4 The Salt Lake City Board of Education, in cooperation with the teachers’ association, should survey other districts, carefully consider best practices, and determine how to improve the written agreement.	In Process
2.5 The Salt Lake City School District should use semi-annual shared governance trainings to clarify responsibilities for different parties and address areas frequently misunderstood.	Implemented

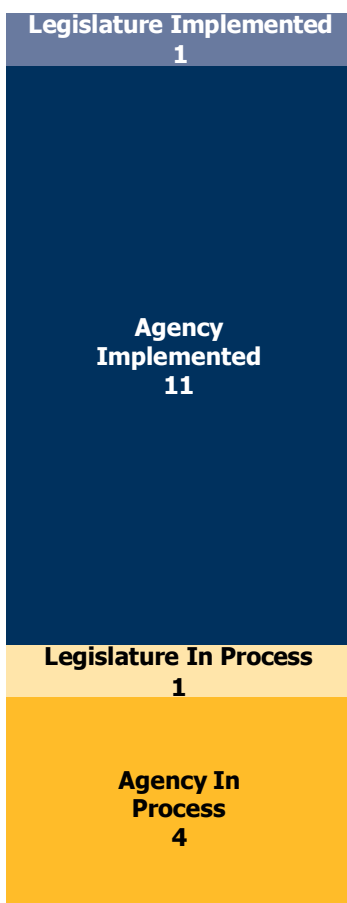
Recommendation	Implementation Status
<p>3.1 The Salt Lake City School District, in an effort to promote student proficiency and growth, should focus on identifying high performing teachers and schools, and replicating their successful practices with other teachers and schools where needed.</p>	<p>Implemented</p>
<p>3.2 The Salt Lake City School District should establish consistent procedures for submission and approval of Student Success Plans to be completed in an efficient timeline.</p>	<p>Implemented</p>
<p>3.3 The Salt Lake City School District should establish consistent procedures for holding schools accountable to their school goals according to statutory requirements.</p>	<p>Implemented</p>
<p>3.4 The Salt Lake City School District should withhold Teacher and Student Success Act funds from schools until their Student Success Plans have been approved.</p>	<p>Implemented</p>
<p>4.1 The Salt Lake City Board of Education should evaluate possible elementary schools for permanent closure.</p>	<p>Implemented</p>
<p>4.2 The Salt Lake City School District should create a formal process outlined in district procedures that annually considers the need for boundary changes or school closures. This process should not depend on the leadership of the superintendent.</p>	<p>Implemented</p>
<p>4.3 The Salt Lake City Board of Education should continue to ensure that the Salt Lake City School District undertakes an annual review of district enrollment and the configuration of district schools.</p>	<p>Implemented</p>
<p>5.1 The Legislature should consider modifying statute for new tax increment financing agreements or future renewals of current tax increment financing agreements so that:</p> <ul style="list-style-type: none"> a) Mitigation funds received are taken into account when calculating guaranteed public education funding from the state, or b) School districts can no longer receive mitigation funds. 	<p>In Process</p>



Chapter 2

The Salt Lake City School District Has Implemented a Significant Number of Recommendations from the Previous Legislative Audit

The Legislative Audit Subcommittee prioritized this in-depth follow-up audit in its June 2024 meeting. This followed the release of “*An In-Depth Budget Review of the Salt Lake City School District* (Report No. 2022-16)” in December 2022. The 2022 audit report identified 17 recommendations – 10 for the Salt Lake City School



Source: Auditor generated.

District (SLCSD, or district), 5 for the Salt Lake City Board of Education (SLCSD board, or board), and 2 for the Legislature. Of the 17 total recommendations, 12 have been implemented and 5 are in process. This chapter summarizes the implementation status of the recommendations from the 2022 audit. We will continue to follow up on any recommendations still listed as “in process” during our annual follow-up process next year.

The information in this chapter is based on documentation provided by the district as part of the annual follow-up we conducted in fall 2023 as well as additional information reported by the district as part of this in-depth follow up. We reviewed the documentation provided to determine if it was sufficient to demonstrate recommendation implementation. Overall, the district has taken significant steps to implement recommendations from the 2022 audit. For example, the district studied whether any elementary schools needed to be closed as a result of declining enrollment. The district ultimately closed four elementary schools before the 2025 school year. More work needs to be done for implementation of all audit recommendations.



2.1 Review of Chapter 1 Recommendations

Chapter 1 of the 2022 audit focused on non-instructional areas of district operations and finances. Compared with the other 40 school districts in Utah, SLCS D has one of the highest percentages of students that require additional programming and funds to meet student needs. The district has also experienced one of the largest declines in enrollment in the state. Demographic shifts have caused non-construction costs per student to rise. The remainder of this section lists each recommendation and the Office of the Legislative Auditor General’s (OLAG) determined implementation status for every Chapter 1 recommendation found in the 2022 audit.

Recommendation	Implementation Status
<p>1.1 The Salt Lake City School District should plan future expenditures with demographic changes in mind.</p>	<p>Implemented</p>

Source: Auditor generated.

The SLCS D board revised policy and accompanying administrative procedures to ensure regular reviews of demographic/enrollment information guide future expenditures and boundary studies. The district indicated that they will continue to monitor decreasing enrollment and its impact on district funding and budgets. The board approved these revisions to board policy in September 2023.

Recommendation	Implementation Status
<p>1.2 The Salt Lake City School District should ensure it is using an efficient number of administrative staff to meet child nutrition program needs.</p>	<p>In Process</p>

Source: Auditor generated.

The 2022 audit determined that the district’s proportion of child nutrition department expenditure dedicated to administrative staff exceeds the expected proportion as seen in peer school districts. We previously recommended that the child nutrition program could become more efficient by evaluating the number of administrative staff employed. According to the district’s reorganization plan,



they did not replace vacated manager positions, replaced assistant managers at three schools with hourly nutrition technicians, and eliminated certain positions during school closures. The district also transitioned other child nutrition staff into equivalent vacant positions in the district.

We confirmed staff reductions, but all eliminated positions appear to be under school kitchen operations and not administrative staff. The primary focus of Recommendation 1.2 is directed towards administrative staff. The district has proposed consolidating certain responsibilities, but these have not yet been approved. The district should continue to evaluate the number of administrative staff in the child nutrition department to account for future changes in the student population.

Recommendation	Implementation Status
1.3 The Salt Lake City School District should develop a structured preventative maintenance plan and carefully consider the recommendations made in Ch.4 of the 2022 In-Depth Budget Review.	Implemented

Source: Auditor generated.

The district contracted an outside firm to produce information on the district's buildings and the buildings' needs. They then compiled the data into a preventative maintenance plan. During the 2023 annual follow up, the district provided documentation showing a 5-year capital plan, equipment inventory tracking, and planned preventative maintenance scheduling. They also indicated that there are ongoing updates to maintain the 5- and 10-year capital plan to guarantee long-term maintenance and a foundation for effective facility management. See the discussion later in this chapter about Chapter 4 recommendations from the 2022 audit.

Recommendation	Implementation Status
1.4 The Salt Lake City School District should implement a more robust internal audit function that includes a risk assessment of district programs and report findings directly to the Board of Finance Committee.	In Process

Source: Auditor generated.



In order to better address risks, the board's finance committee approved a contract with an auditing firm to evaluate the efficiency and effectiveness of district programs. The board then contracted with an outside firm to produce a risk assessment which the firm presented directly to the board finance committee in January 2024. The report identified high-risk areas of district operations and responsibilities, including cybersecurity, student fees, and student experience and equality. Their contractor then produced a regulatory compliance audit based on identified concerns from the risk assessment and presented it to the board finance committee in August 2024.

The district has 1) contracted for audit services, 2) received an initial risk assessment from their audits, and 3) had one audit already completed by their auditors. While the district stated their intention to have the outside firm do three to five audits a year, the contract does not explicitly call for this. We believe more time is needed to evaluate the effectiveness of the district's internal audit function. As a result, we will evaluate progress as the auditing firm completes future audits.

2.2 Review of Chapter 2 Recommendations

Chapter 2 of the 2022 audit report focused on areas where school district governance could be improved. The audit found instances of board member involvement at the district that led to questions whether board members are acting within their roles and duties. The lack of clearly defined boundaries between the district and the board negatively impacted district culture. Board members misunderstanding board duties and not following best practices increased the risk of unrealized district goals and noncompliance. The board-approved governance structure known as shared governance also created significant confusion that impacted efficiency in district-wide decisions and the effectiveness of school-based decisions. The remainder of this section outlines each recommendation and OLAG's implementation status for every Chapter 2 recommendation from the 2022 audit.



Recommendation	Implementation Status
2.1 The Salt Lake City Board of Education and its members should review and follow the board’s policies and handbook that make it clear that board members should not be involved in day-to day administration of the district.	Implemented
2.2 The Salt Lake City Board of Education should continue to self-assess their compliance with policies, statute, and rule and their progress towards board goals at least every other year.	In Progress
2.3 The Legislature should consider whether additional options should be placed in statute to allow school boards to hold individual board members accountable.	Implemented

Source: Auditor generated.

In response to Recommendation 2.1, the board revised their internal handbook to include language that clarifies that the board should not be involved in the district’s daily operations. As of the most recently approved revision of the handbook in October 2023, language is clarified in sections related to board responsibilities and relationships with the superintendent.

In response to Recommendation 2.2, the board solidified its commitment to continuing self-assessment by revising its handbook to mandate an annual self-assessment, rather than a recommended one every other year. However, the board has not conducted a self-assessment since the 2022 audit. We will review Recommendation 2.2’s implementation status during the annual follow-up in 2025.

Previous audit findings also pointed out that there are limited options for school boards to correct improper board member behavior, resulting in Recommendation 2.3. The Legislature passed Senate Bill 227 during the 2023 Legislative General Session. The resulting statute clarifies the process for ethics complaints regarding school board members and requires the Political Subdivisions Ethics Review Commission to review any ethics complaints against local school board members.



Recommendation	Implementation Status
2.4 The Salt Lake City Board of Education, in cooperation with the teachers' association, should survey other districts, carefully consider best practices, and determine how to improve the written agreement.	In Process
2.5 The Salt Lake City School District should use semi-annual shared governance trainings to clarify responsibilities for different parties and address areas frequently misunderstood.	Implemented

Source: Auditor generated.

The 2022 audit found that the board-approved governance structure appeared to create inefficiencies and confused accountability. Recommendation 2.4 required the district to consider best practices from other districts in order to improve the written agreement. The district reported that they have since reviewed written agreements or equivalent policies from Granite, Alpine, Nebo, Ogden, Davis, Jordan, and Canyon School Districts. Through negotiations between the district and their teachers' association, principals can now hold five professional development sessions at faculty meetings each school year. Changes to the written agreement also make it clear attendance at faculty meeting is mandatory unless a teacher is excused. However, we have identified further concerns with the written agreement and shared governance in this follow-up audit. See Chapter 1 of this report for our findings on shared governance.

In response to Recommendation 2.5, the district has updated shared governance training after addressing commonly misunderstood areas through the negotiation process with the teachers' association. The district held a new shared governance training for all administrators in September 2023, and another with further updated information in October 2024.



2.3 Review of Chapter 3 Recommendations

Chapter 3 of the 2022 audit report focused on replicating best practices found in high-performing schools and compliance with state requirements for a specific funding source. The audit identified Parkview Elementary as an exemplary school with high proficiency compared to demographic peer schools. The audit also suggested that the district should review the written agreement with the teachers’ association and remove impediments to implementing best practices. We also expressed concern about the administration of Student Success Plans (SSP). The district provided limited oversight of SSPs, and distributed funds before the board approved SSPs, which happened late in the process. The remainder of this section outlines each recommendation and OLAG’s implementation status for every Chapter 3 recommendation from the 2022 audit.

Recommendation	Implementation Status
<p>3.1 The Salt Lake City School District, in an effort to promote student proficiency and growth, should focus on identifying high performing teachers and schools, and replicating their successful practices with other teachers and schools where needed.</p>	<p>Implemented</p>

Source: Auditor generated.

The district has since recognized high-performing schools and individuals as “Shining Stars” and created an outline for performance recognition and replication. The district reported several strategies they have used to help replicate successful practices in other schools. These included targeted professional development and administrator professional learning communities. The district has also reported three instances of best practice implementations, with observational data planned for release at the end of 2024, and spring 2025. Notably, some of the training provided connects to best practices we highlighted at Parkview Elementary in the 2022 audit.

According to results from the survey we administered during the current audit, district administrators and staff (including principals and assistant principals) were more likely to disagree that the written agreement allowed the district to efficiently and effectively adopt best practices, compared to teachers and school staff. Furthermore, shared governance in the written agreement still limits the ability of a principal to implement new programs at their school. We are aware of attempts to implement improvement strategies at schools that were not



approved through the process of shared governance. We believe the district should focus on examining methods to eliminate impediments to best practices.

Recommendation	Implementation Status
<p>3.2 The Salt Lake City School District should establish consistent procedures for submission and approval of Student Success Plans to be completed in an efficient timeline.</p>	<p>Implemented</p>
<p>3.3 The Salt Lake City School District should establish consistent procedures for holding schools accountable to their school goals according to statutory requirements.</p>	<p>Implemented</p>
<p>3.4 The Salt Lake City School District should withhold Teacher and Student Success Act funds from schools until their Student Success Plans have been approved.</p>	<p>Implemented</p>

Source: Auditor generated.

To address Recommendations 3.2 and 3.4, the district changed the deadline for submission and approval of SSPs from the fall to spring. Board meeting minutes demonstrate that the board approved plans in May 2023 for the 2024 school year, and the funds are made available in July, allowing for a less rushed timeline. SSPs are approved prior to the TSSA funds being allocated to schools for the upcoming school year.

With regards to Recommendation 3.3, the district provided considerations for evaluating school improvement plans per the Utah School Accountability System framework referenced in statutory requirements. The district also provided a school improvement plan evaluation rubric for school use.

2.4 Review of Chapter 4 Recommendations

Chapter 4 of the 2022 audit report focused on enrollment decline in the district and the district’s need to consider schools for closure. The district’s elementary enrollment had been declining since 2014 and elementary schools were underutilized. As of the 2022 audit, we found that the district would have to close six elementary schools to reach 75 percent utilization. Though the district and board were aware of the demographic changes and projections, the board



rebuilt three elementary schools, delayed decisions on school closures, and increased property taxes twice. We expressed concern that board decisions and inaction are unnecessarily costing taxpayers and possibly creating inferior learning environments. The remainder of this section outlines each recommendation and OLAG’s implementation status for every Chapter 4 recommendation from the 2022 audit.

Recommendation	Implementation Status
4.1 The Salt Lake City Board of Education should evaluate possible elementary schools for permanent closure.	Implemented

Source: Auditor generated.

In February 2023, the board studied all 27 elementary schools for potential closure and all elementary school boundaries for potential adjustments. After the required public comment periods and public hearing, the district and board announced four elementary school closures in January 2024.

Recommendation	Implementation Status
4.2 The Salt Lake City School District should create a formal process outlined in district procedures that annually considers the need for boundary changes or school closures. This process should not depend on the leadership of the superintendent.	Implemented
4.3 The Salt Lake City Board of Education should continue to ensure that the Salt Lake City School District undertakes an annual review of district enrollment and the configuration of district schools.	Implemented

Source: Auditor generated.

In response to Recommendation 4.2, the district provided documentation of a review of criteria related to school closures and boundary changes. The district also created an administrator position and outlined the roles of this administrator to ensure that the annual review process isn’t dependent on the leadership of the superintendent. This recommendation was originally made because it appeared that the district’s high superintendent turnover had made it difficult for the district to consider school closures.



To address Recommendation 4.3, the board revised board policy in February 2024 to now require an annual review of district enrollment and school configuration. The district reported that since the board closed four elementary schools and approved redrawn boundaries, there would be no further changes considered for the upcoming 2025 school year.

2.5 Review of Chapter 5 Recommendations

Chapter 5 of the 2022 audit report focused on the impact of tax increment financing (TIF) agreements on state funding for public education. With TIF agreements, redevelopment agencies collect some or all of the property taxes derived from increased property values in the TIF project area. Taxing entities participating in the TIF, such as school districts, cities, and counties, collect property taxes on the predevelopment value of the properties in the TIF area, before the project starts. In the audit, we found that a district that chooses to forego property tax revenues as part of a TIF agreement can receive mitigation funds that do not count towards state funding guarantees. This allows a district to receive additional state funding. Utah spent \$4.4 million more on public education due to TIFs in fiscal year 2021, with SLCSD getting \$2.8 million of those funds. Although we are not aware of any school districts that have intentionally manipulated TIF agreements, our concern lies with the ability for districts to manipulate tax increments in exchange for mitigation funds.

Recommendation	Implementation Status
<p>5.1 The Legislature should consider modifying statute for new tax increment financing agreements or future renewals of current tax increment financing agreements so that:</p> <ul style="list-style-type: none"> a) Mitigation funds received are taken into account when calculating guaranteed public education funding from the state, or b) School districts can no longer receive mitigation funds. 	<div style="border: 2px solid #ccc; padding: 10px; width: 100px; margin: 0 auto;"> <p>In Process</p> </div>

Source: Auditor generated.

The audit team presented the 2022 audit to the Legislative Audit Subcommittee in December 2022 and to the Public Education Appropriations Subcommittee in January 2023. We are unaware of legislation that addresses this recommendation.



Complete List of Audit Recommendations





Complete List of Audit Recommendations

This report made the following seven recommendations. The numbering convention assigned to each recommendation consists of its chapter followed by a period and recommendation number within that chapter.

Recommendation 1.1

We recommend that the Salt Lake City Board of Education work to clarify that they have the power to operate the school scheduling process, including the scheduling of early-release days, and can delegate this authority to the Salt Lake City School District.

Recommendation 1.2

We recommend that the Salt Lake City Board of Education work to clarify that school improvement councils do not have decision-making authority over school schedules.

Recommendation 1.3

We recommend that the Salt Lake City Board of Education place the board motion made in May 2021 regarding school scheduling into policy to increase awareness.

Recommendation 1.4

We recommend that the Salt Lake City School District develop adequate internal controls to ensure all policies and procedures are followed for school schedules and instructional hours. These internal controls should address approval processes and identify who has the ability to change school schedules.

Recommendation 1.5

We recommend that the Salt Lake City Board of Education work to ensure principals are able to implement programs at their schools and hold professional development during faculty meetings.

Recommendation 1.6

We recommend that the Salt Lake City Board of Education evaluate whether shared governance is an appropriate model for the Salt Lake City School District.

Recommendation 1.7

We recommend that the Legislature consider whether shared governance, as seen in the Salt Lake City School District, is an appropriate model for Utah school districts.





Agency Response Plan





SUPERINTENDENT'S OFFICE
440 East 100 South
Salt Lake City, Utah 84111
801.578.8351

November 7, 2024

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

Re: An In-Depth Follow-Up Audit of the Salt Lake City School District, Review of Shared Governance and Follow-Up Audit, Report # 2024-21

Dear Mr. Minchey:

Thank you for the opportunity to provide a written response to *An In-Depth Follow-Up Audit of the Salt Lake City School District, Review of Shared Governance and Follow-Up Audit, Report # 2024-21* ("2024 Audit"). The Salt Lake City Board of Education ("Board") and Salt Lake City School District ("SLCSD" or "District") appreciate the time and effort that your office put into understanding the intricacies of SLCSD's shared governance model, both in its written form and its interpretation over the course of many decades. We also would like to take the opportunity to commend your office's commitment to open communication and collaboration throughout this entire process.

As the 2024 Audit highlights, shared governance has been a cornerstone of SLCSD for over fifty years. For decades, the District has represented the ideals of shared governance as a process of participatory decision-making that values community participation and shared ownership of district goals. Shared governance holds the promise of strengthening our collective capacity to arrive at and implement decisions that improve education and increase student achievement. While the concept of shared governance is rooted in establishing a structure for transparent decision-making through the active engagement of stakeholders, we recognize that the current shared governance model can be updated and improved to promote positive student outcomes while still fostering a culture of transparency and shared interests. While the 2024 Audit findings highlight that changes are needed to the Salt Lake Education Association Written Agreement ("Written Agreement"), it is important to understand that such changes can only be effectuated through a negotiation process. Each year, the Board, through District leadership, enters into negotiations with the Salt Lake Education Association ("SLEA") to make changes to the Written Agreement. In this process, both sides have an equal vote on any proposed revision, and thus significant revisions are necessarily achieved through consensus.

The 2024 Audit presents another unique challenge in that many of the recommendations can only be accomplished through Board action. As you know, the Board can only take action in an open meeting if a majority of its elected members vote to approve the proposed action. While the Superintendent of

Schools and Board President are committed to ensuring that the recommendations are placed on upcoming board agendas for discussion and potential action, it would be inappropriate for this response to include any assumptions related to future official Board action.

As Chapter 2 of the 2024 Audit simply outlines the current implementation status of the recommendations that were made in the previous legislative audit, we are not including a response to that chapter. In accordance with requirements of Utah Code §36-12-15.3, the Board and District provide the following response to Recommendations 1.1 through 1.6.¹

CHAPTER 1

Recommendation 1.1: The Salt Lake City Board of Education should work to clarify that they have the power to operate the school scheduling process, including the scheduling of early-release days, and can delegate this authority to the Salt Lake City School District.

Response:

1. *Who:* Nate Salazar, Board President, nate.salazar@slcschools.org

2. *What:* Full implementation of this recommendation will require clarification and potential revision of the Written Agreement which is a contract between the Board and the Salt Lake Education Association ("SLEA").

3. *How:* Board President Salazar will place this topic on the discussion agenda of at least two public board meetings. By doing so, the Board can have multiple in-depth conversations about the concerns raised in the 2024 Audit related to the District's current school scheduling process and the identified need for centralized oversight of this process by the Board or District. Subsequent to those discussions, Board President Salazar will request that the Board take action on this recommendation either by providing direction to the District for upcoming negotiations and/or by taking direct action on the Written Agreement.

4. *Documentation:* Board agendas and official meeting minutes as well as copies of any revisions to the Written Agreement will be used to validate the implementation status of this recommendation.

5. *Timetable:* As negotiations with SLEA begin each spring, the Board will discuss this recommendation initially in a January 2025 or February 2025 public board meeting, with potential Board action occurring before negotiations begin in the spring of 2025.

6. *When:* Full implementation of this recommendation is expected to occur before the end of the 2025-2026 school year.

¹ As Recommendation 1.7 is directed at the Legislature, no response from the Board or District will be provided.

Recommendation 1.2: The Salt Lake City Board of Education should work to clarify that school improvement councils do not have decision-making authority over school schedules.

Response:

1. *Who:* Nate Salazar, Board President, nate.salazar@slcschools.org
2. *What:* Consistent with the response above, full implementation of this recommendation will require clarification and potential revision of the Written Agreement.
3. *How:* Board President Salazar will place this topic on the discussion agenda of at least two public board meetings. By doing so, the Board can have multiple in-depth conversations about what decisions are appropriate for a school improvement council and the need for decision-making authority over school schedules to rest with the Board or be delegated to the District. Subsequent to those discussions, Board President Salazar will request that the Board take action on this recommendation either by providing direction to the District for upcoming negotiations and/or by taking direct action on the Written Agreement.
4. *Documentation:* Board agendas and official meeting minutes as well as copies of any revisions to the Written Agreement will be used to validate the implementation status of this recommendation.
5. *Timetable:* As negotiations with SLEA begin each spring, the Board will discuss this recommendation initially in a January 2025 and/or February 2025 public board meeting, with potential Board action occurring before negotiations begin in the spring of 2025.
6. *When:* Full implementation of this recommendation is expected to occur before the end of the 2025-2026 school year.

Recommendation 1.3: The Salt Lake City Board of Education should place the board motion made in May 2021 regarding school scheduling into policy to increase awareness.

Response:

1. *Who:* Nate Salazar, Board President, nate.salazar@slcschools.org
2. *What:* The May 2021 board motion will be placed into Board Policy I-5: School Day for Students.
3. *How:* Board Policy I-5, with language from the May 2021 board motion, was placed on the discussion agenda of the Board's November 6, 2024, board meeting. After discussing the board policy and the recommendation that it include the language from the prior board motion, the Board indicated that more discussion was needed before taking final action on this policy. The revised policy will be discussed

in Board policy subcommittee on November 20, 2024, and will be placed on an upcoming Board agenda for further discussion by the entire Board. After a second reading by the entire Board, Board President Salazar will seek a motion to approve the revised policy containing the language from the May 2021 board meeting.

4. *Documentation*: Board agendas and official meeting minutes as well as a copy of the revised Board Policy I-5 will be used to validate the implementation status of this recommendation.

5. *Timetable/When*: Full implementation of this recommendation is expected to occur by the end of December 2024.

Recommendation 1.4: The Salt Lake City School District should develop adequate internal controls to ensure all policies and procedures are followed for school schedules and instructional hours. These internal controls should address approval processes and identify who has the ability to change school schedules.

Response:

1. *Who*: Dr. Elizabeth Grant, Superintendent of Schools, elizabeth.grant@slcschools.org

2. *What*: The District is committed to ensuring that all students receive the requisite number of instructional hours and that school schedules are adopted that not only meet students' educational needs but also efficiently provide for their transportation needs.

3. *How*: In conjunction with the Board's work related to school scheduling, the District will implement internal controls to ensure that all approved school schedules provide for the minimum number of instructional hours as outlined in board policy and that no school schedules are changed that would result in this threshold not being met. These internal controls will include school schedules going through multiple layers of review and approval, including the superintendent, before finally being submitted to the Board for final approval. Moreover, the District will engage in a comprehensive study of school schedules to ensure that no particular school's schedule will adversely impact another school's ability to provide its students with timely transportation. The outcome of this study will be to ensure that the District's transportation department can provide busing to all transportation-eligible students, without any group of students being subjected to delayed transportation due to conflicting school schedules.

4. *Documentation*: Administrative memoranda, written directives, board agendas, official board meeting minutes, and administrative procedures will be used to validate the implementation status of this recommendation.

5. *Timetable*: The District is in the process of creating a committee to conduct a comprehensive busing study and that study should be completed before the end of the 2024-2025 school year. The District is also drafting the necessary internal controls related to school schedules and instructional hours, and these should be in place before any school schedules are approved for the 2025-2026 school year.
6. *When*: Full implementation of this recommendation is expected to occur before the end of the 2024-2025 school year.

Recommendation 1.5: The Salt Lake City Board of Education should work to ensure principals are able to implement programs at their schools and hold professional development during faculty meetings.

Response:

1. *Who*: Nate Salazar, Board President, nate.salazar@sicschools.org

2. *What*: As stated in prior responses above, full implementation of this recommendation will require clarification and potential revision of the Written Agreement. As noted in the 2024 Audit, the Board and District made significant strides related to increasing the number of professional development opportunities that principals could hold during faculty meetings in response to the prior 2022 audit. The Board and District are committed to continuing the work to solidify the authority of principals to implement programs at their schools and hold professional development.

3. *How*: Board President Salazar will place this topic on the discussion agenda of at least two public board meetings. By doing so, the Board can have multiple in-depth discussions about the need for a principal to have the authority, independent of the faculty, to implement programs and hold professional development at their schools. Subsequent to those discussions, Board President Salazar will request that the Board take action on this recommendation either by providing direction to the District for upcoming negotiations and/or by taking direct action on the Written Agreement.

4. *Documentation*: Board agendas and official meeting minutes as well as copies of any revisions to the Written Agreement will be used to validate the implementation status of this recommendation.

5. *Timetable*: As negotiations with SLEA begin each spring, the Board will discuss this recommendation initially in a January 2025 and/or February 2025 public board meeting, with potential Board action occurring before negotiations begin in the spring of 2025. After the 2024-2025 negotiation cycle, if the Board determines that further revisions to the Written Agreement are needed in order to fully implement this recommendation, the Board will discuss and potentially act on this topic in public board meetings held during the 2025-2026 school year.

6. *When*: Full implementation of this recommendation is expected to occur before the end of the 2025-2026 school year.

Recommendation 1.6: The Salt Lake City Board of Education should evaluate whether shared governance is an appropriate model for the Salt Lake City School District.

Response:

1. *Who:* Nate Salazar, Board President, nate.salazar@slcschools.org

2. *What:* The Board will annually analyze whether the negotiations process with SLEA is yielding sufficient revisions to the Written Agreement to adequately address the concerns outlined in the 2024 Audit. After two negotiation cycles, the Board will discuss whether additional negotiations are likely to resolve any outstanding concerns and/or whether shared governance is an appropriate governance model for Salt Lake City School District.

3. *How:* Board President Salazar will place this topic on the discussion agenda of at least two public board meetings. By doing so, the Board can have multiple in-depth conversations about the nature and appropriateness of the shared governance model as it is currently being implemented in the District. Subsequent to those discussions, Board President Salazar will request that the Board take action on this recommendation either by providing direction to the District for upcoming negotiations and/or by taking direct action on the Written Agreement.


4. *Documentation:* Board agendas and official meeting minutes will be used to validate the implementation status of this recommendation.

5. *Timetable:* Each August, starting in August of 2025, the Board will evaluate the progress made during the preceding negotiation cycle toward addressing the concerns outlined in the 2024 Audit.

6. *When:* Full implementation of this recommendation is expected to occur by July of 2026.

In closing, we continue to appreciate your office's professionalism and shared goal of improving the educational experience of students in the Salt Lake City School District. Thank you for the opportunity to provide a response to the 2024 Audit and, as always, please contact us if you have any questions or concerns we can address at this juncture.

Sincerely,



Dr. Elizabeth Grant
Superintendent of Schools
Salt Lake City School District



Nate Salazar
Board President
Salt Lake City School District





THE MISSION OF THE LEGISLATIVE AUDITOR GENERAL IS TO

AUDIT · LEAD · ACHIEVE

WE HELP ORGANIZATIONS IMPROVE
