



An Audit Report on

The Texas School Safety Center at Texas State University

- The Center did not have a process to verify that the self-reported safety and security audit results data it received from school districts for the 2020-2023 District Audit Report were accurate and complete.
- The Center administered districts' multihazard emergency operations plans and the Texas School Safety and Security Consultant Registry in accordance with key requirements.

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State Auditor

The Texas School Safety Center (Center) overall had processes and controls in place to ensure that it administered select school safety programs in accordance with most applicable requirements and in support of its mission. However, the Center did not have a process to ensure that the self-reported safety and security audit results it received from school districts to create its 2020-2023 District Audit Report were accurate and complete.

- [Background](#) | p. 3
- [Audit Objective](#) | p. 15

This audit was conducted in accordance with Texas Government Code, Sections 321.013 and 321.0131.

HIGH

SCHOOL DISTRICT SAFETY AND SECURITY AUDITS

The Center did not ensure that the audit results it received from districts for the 2020-2023 District Audit Report were accurate and complete.

[Chapter 1 | p. 5](#)

LOW

MULTIHAZARD EMERGENCY OPERATIONS PLANS

The Center administered districts' multihazard emergency operations plans in accordance with key requirements.

[Chapter 2 | p. 9](#)

MEDIUM

TEXAS SCHOOL SAFETY AND SECURITY CONSULTANT REGISTRY

The Center administered the Texas School Safety and Security Consultant Registry in accordance with key requirements.

[Chapter 3 | p. 12](#)

For more information about this audit, contact Audit Manager Courtney Ambres-Wade or State Auditor Lisa Collier at 512-936-9500.

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Summary of Management's Response

Auditors made recommendations to address the issues identified during this audit, provided at the end of each chapter in this report. The Center agreed with the recommendations.

Ratings Definitions

Auditors used professional judgment and rated the audit findings identified in this report. The issue ratings identified for each chapter were determined based on the degree of risk or effect of the findings in relation to the audit objective(s).

PRIORITY: Issues identified present risks or effects that if not addressed could ***critically affect*** the audited entity's ability to effectively administer the program(s)/function(s) audited. Immediate action is required to address the noted concern(s) and reduce risks to the audited entity.

HIGH: Issues identified present risks or effects that if not addressed could ***substantially affect*** the audited entity's ability to effectively administer the program(s)/function(s) audited. Prompt action is essential to address the noted concern(s) and reduce risks to the audited entity.

MEDIUM: Issues identified present risks or effects that if not addressed could ***moderately affect*** the audited entity's ability to effectively administer the program(s)/function(s) audited. Action is needed to address the noted concern(s) and reduce risks to a more desirable level.

LOW: The audit identified strengths that support the audited entity's ability to administer the program(s)/function(s) audited or the issues identified do not present significant risks ***or*** effects that would negatively affect the audited entity's ability to effectively administer the program(s)/function(s) audited.

For more on the methodology for issue ratings, see [Report Ratings](#) in Appendix 1.

Background Information

Texas School Safety Center at Texas State University

The Texas School Safety Center (Center) at Texas State University serves as a central location for school safety and security information in Texas and provides training, research, and technical assistance to school districts (districts), open-enrollment charter schools, and public junior college districts. Its mission is to serve schools and communities to create safe, secure, and healthy environments.

The Center carries out its mission through the development and delivery of training and resources on a variety of topics, as well as reporting on school safety and security in its statewide District Audit Report, reviewing multihazard emergency operations plans, and managing a safety and security consultant registry.



School District Safety and Security Audits (Chapter 1)

Texas Education Code, Section 37.108(b), requires each school district to conduct a safety and security audit of its facilities at least once every three years. Using audit procedures developed by the Center, districts:

- Complete a safety and security audit of each district facility and submit a report to the school principal or facility administrator.
- Compile the facility reports into a district audit report that it submits to the district's board of trustees.

Each district also self-reports safety and security audit results through an electronic survey from the Center that must be signed by the superintendent and the board of trustees.

The Center used the districts' self-reported audit results to compile its 2020-2023 District Audit Report, which contains statewide findings and recommendations.



Multihazard Emergency Operations Plans (Chapter 2)

Texas Education Code, Section 37.108(a), requires each district to develop a multihazard emergency operations plan (Emergency Plan), consisting of a basic plan and up to 13 annexes, which are additional plans, as applicable.

Texas Education Code, Section 37.2071(a), requires the Center to review districts' Emergency Plans at a regular interval determined by the Center. The Center reviews the basic plans annually and any additional plans on a rotating basis. The Center requires districts to submit their Emergency Plans electronically using its Emergency Operations Plan (EOP) Review Software.

After it reviews each district's plan, the Center notifies the district of any deficiencies, provides recommendations to correct them, and communicates a deadline for resolution. The Center notifies the district once all deficiencies have been resolved.



Texas School Safety and Security Consultant Registry (Chapter 3)

Texas Education Code, Section 37.2091, requires the Center to establish a registry of persons providing school safety or security consulting services in Texas. A district must confirm that a person is included in the registry before hiring that person to provide school safety or security consulting services.

Persons registering with the Center must provide information about their background, education, and experience and any complaints or pending litigation. Texas Education Code, Section 37.2091(d), requires the Center to verify this information before adding a person to the registry.



HIGH

Chapter 1 School District Safety and Security Audits



The Texas School Safety Center (Center) compiled school districts' self-reported safety and security audit results for its 2020-2023 District Audit Report (Statewide Report) as required by the Texas Education Code. However, the Center did not have a process to ensure that the audit results it received from the districts were accurate and complete.

The Center did not have a process to verify the accuracy of districts' audit results.

The Center did not compare audit results it received from a survey sent to the districts to data in the districts' audit reports or multihazard emergency operations plans (Emergency Plans).¹ As a result, the Center's Statewide Report was not consistent with individual districts' audit results. Specifically:

- Of 18 districts tested that responded in the survey that they had completed all required safety drills, 5 (28 percent) submitted district audit reports stating that they did not conduct at least one of these drills.
- Of 25 districts tested, 10 (40 percent) reported in their Emergency Plans that their safety and security committees did not include all required categories of members. However, these districts responded in their surveys that the committees included all required categories of members. For example, four of these districts reported on their surveys

¹ Emergency Plans, which are discussed in Chapter 2, contain some of the same data that districts report in the survey.

that there was a classroom teacher on the safety and security committee as required but submitted rosters of safety and security committees with their Emergency Plans that did not include teachers.

It is important to note that it may be reasonable for some inconsistency to exist due to differences between the completion dates of the district audits, Emergency Plans, and the district survey submission. However, the Center did not have a process to determine whether districts' data is inconsistent due to inaccuracies or other reasons.

In addition, the system used for the survey did not prevent districts from entering inconsistent audit results. For example, 932 (91 percent) of the State's 1,021 districts reported that they had noninstructional facilities, such as stadiums or warehouses, as part of their district campuses. However, when asked in a separate part of the survey whether they conducted the required annual fire evacuation drills at their noninstructional facilities, 99 (11 percent) of those 932 districts provided the response "N/A, No Non-Instructional facilities."

The Center did not ensure that the districts complied with certain statutory requirements.

Texas Education Code, Section 37.108(c), requires districts' boards of trustees and superintendents to sign the audit report (in this case the survey) that the district submits to the Center. However, the Center did not verify that districts obtained these signatures. Only 1 (20 percent) of 5 districts that provided copies of their surveys provided evidence that the surveys had the appropriate signatures. Obtaining appropriate signatures helps ensure that these officials are aware of any safety deficiencies reported to the Center.

Although the Center required the person submitting the survey from the district to assert that the audit results are accurate and that the superintendent is aware of what is being reported, this process did not ensure that the board of trustees signed the survey. Verifying compliance with Texas Education Code, Section 37.108(c), could increase districts' accountability for the audit results they submit for the Statewide Report.

The Center accurately compiled districts' audit results and self-reported safety deficiencies.

The Center had processes to help ensure that it accurately summarized the districts' self-reported audit results that were used in the Statewide Report. For example, key members of the Center's management reviewed the report for accuracy throughout the drafting process; the Center updated draft reports based on reviewers' comments; and the Center limited access to the districts' audit results to current employees with a business need.

In addition, as part of its compilation process, the Center accurately reported districts' specific areas of self-reported noncompliance to the Texas Education Agency (Agency), as required by Texas Education Code, Section 37.207(a)(3).

Recommendations

The Center should implement controls to improve the accuracy of the audit results data provided by the districts, which could include:

- Developing a process that will help ensure consistency or reasonableness between the survey and districts' other school safety data, such as district audits.
- Strengthening automated controls in the survey to prevent districts from entering contradictory audit results data.
- Implementing a process to confirm that the districts' board of trustees and superintendent signed the survey.

Management's Response

Recommendation 1: Developing a process that will help ensure consistency or reasonableness between the survey and districts' other school safety data, such as district audits.

TxSSC Response: The TxSSC agrees with this recommendation that there needs to be a process to help ensure consistency between the survey

data and districts' other school safety data, such as district audits. The TxSSC Director and Associate Director of Research and Evaluation will develop internal processes and/or collaborative partnerships to ensure consistency or reasonableness between the survey and districts' other school safety data, effective May 1, 2025.

Recommendation 2: Strengthening automated controls in the survey to prevent districts from entering contradictory audit results data.

TxSSC Response: The TxSSC agrees with this recommendation and the TxSSC Director implemented corrective action to ensure automated controls in the survey prevented the entering of contradictory data as of August 2, 2024.

Recommendation 3: Implementing a process to confirm that the districts' board of trustees and superintendent signed the survey.

TxSSC Response: The TxSSC agrees with this recommendation. Effective April 8, 2025, the TxSSC Director will implement corrective action to ensure an attestation statement will be included in all audit surveys moving forward to confirm that all board members and the superintendent have reviewed, signed, and retained the signed copy of the survey audit results submitted to the TxSSC.

In addition, a process was implemented at the beginning of the 2024-2025 school year when TEA began requiring school districts selected for a district vulnerability assessment to submit the signature page of the audit survey data to the TEA in the TEA Sentinel System. The TxSSC will coordinate efforts with TEA to develop internal procedures to confirm the signatures.

Chapter 2

LOW**Multihazard Emergency Operations Plans**

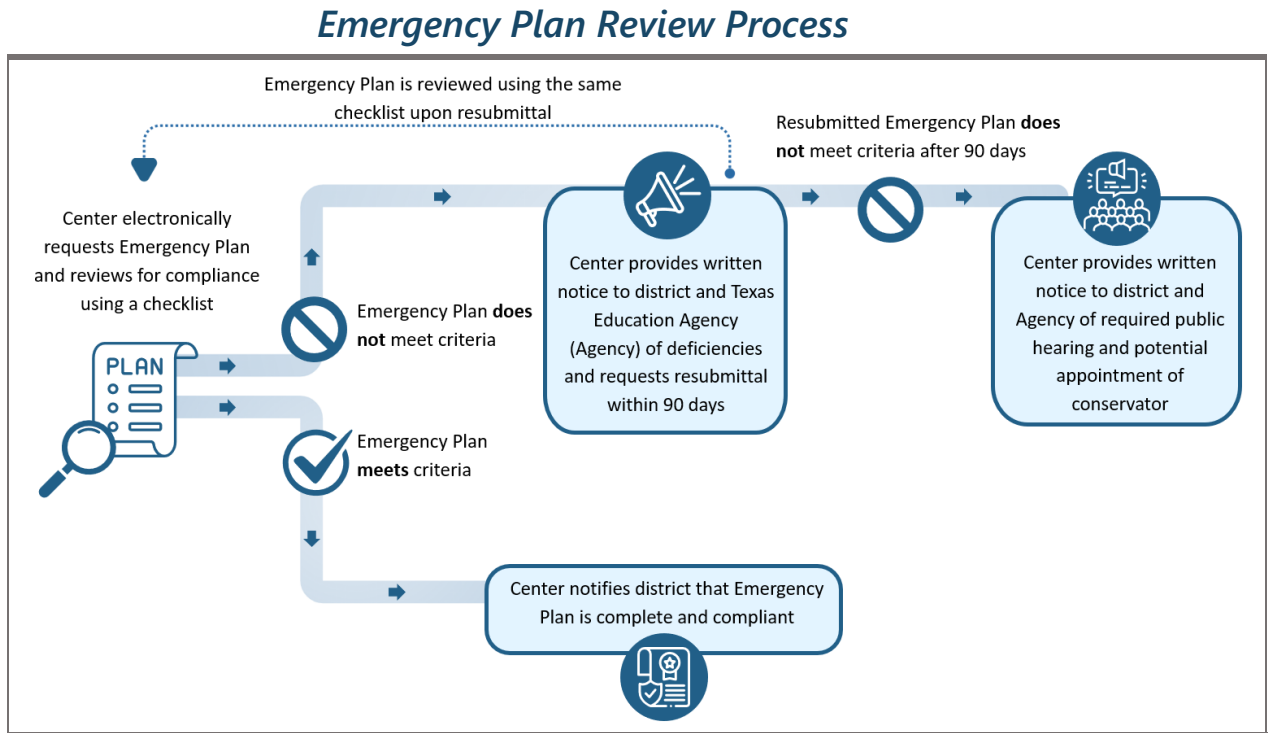
The Center had processes and related controls to ensure that it administered districts' Emergency Plans in accordance with key requirements. In addition, the Center's records showed that in fiscal year 2023, all 1,021 districts' Emergency Plans contained key statutorily required elements.

The Center verified that districts' Emergency Plans contained key statutorily required elements.

The Center implemented an internal review process to help ensure Emergency Plans comply with the Texas Education Code. All 25 Emergency Plans tested contained key statutorily required elements. Additionally, the Center required certain districts to submit additional plans related to severe weather, hazardous materials, and train derailment. Those additional plans generally contained key statutorily required elements.

The Center also provided the applicable districts tested with written notice of any Emergency Plan deficiencies, including descriptions of the deficiencies, and made recommendations to correct those deficiencies to the districts, as required by statute. See Figure 1 on the next page for an overview of the Center's Emergency Plan review process.

Figure 1



Sources: The Center and Texas Education Code, Sections 37.2071 and 37.1082.

The Center’s EOP Review Software did not ensure segregation of duties.

The Center implemented its Emergency Operations Plan (EOP) Review Software to help facilitate its internal review process. The Center conducted an initial review of the Emergency Plan, and a secondary reviewer was required to approve the final Emergency Plan. However, that system did not have controls to ensure that the initial reviewer was different from the secondary reviewer. Auditors did not identify any instances in which the same person performed both reviews.

Recommendation

The Center should ensure that its EOP Review Software identifies the specific staff reviewing and approving Emergency Plans.

Management's Response

The TxSSC agrees with this recommendation. The TxSSC Associate Director of Information Technology implemented corrective action effective September 23, 2024 to ensure that the TxSSC's EOP Review Software identifies the specific staff reviewing and approving Emergency Plans.

Chapter 3

MEDIUM

Texas School Safety and Security Consultant Registry



The Center had processes and related controls in place to help ensure that it administered the Texas School Safety and Security Consultant Registry (Registry) in accordance with key statutory requirements.

Texas Education Code, Section 37.2091, requires the Center to specify information that Registry applicants must provide (see text box for details) and to verify the information. The statute also requires districts to confirm that persons hired to provide school safety and security consulting services are included in the Registry.

Required Applicant Information

Texas Education Code, Section 37.2091(c), requires the persons applying to be included on the Registry to provide relevant information about themselves in the following areas, as specified by the Center:

- Background.
- Education.
- Experience.
- Complaints.
- Pending Litigation.

The Center verified most information that applicants were required to submit to be included in the Registry, but it did not verify all information.

Background and Education. The Center performed procedures to verify the background and education of all 58 applicants tested. Specifically, the Center examined state and national sex offender registries to see if applicants were listed. In addition, the Center's records showed that it requested Federal Bureau of Investigation fingerprint checks on all applicants. The Center also obtained training records showing that applicants had met the education requirements for their disciplines.²

Experience. The Center stated that it verified documentation of relevant optional certifications, professional licenses, and specialized training. Although applicants sign a statement attesting that their information is accurate, the Center did not verify applicants' self-reported years of experience and

² Registrants must offer services in one of the following disciplines: 1. Audit, 2. Emergency Plans, 3. School Behavioral Threat Assessment, 4. Other. The Center specified basic training requirements for all disciplines, except Other.

statements about whether they had provided services in a discipline in the past.

Complaints and Litigation. For all 58 applicants tested, the Center determined whether the applicants were listed on the Agency’s Registry of Persons Ineligible for Employment. However, the Center did not require applicants to state whether they had complaints against them, and it did not verify applicants’ statements about whether they were subject to litigation. The Center stated in the Registry that school districts were responsible for verifying the representations regarding litigation on each registrant’s listing.

The Center ensured that only appropriate users could modify the Registry.

The Center had automated controls to protect the integrity of Registry data. Only Center staff members designated by management could update the Registry. All staff members’ access was appropriate based on their job descriptions.

Recommendations

The Center should:

- Verify all statutorily required information submitted by applicants for the Registry, including applicants’ statements about relevant experience, litigation, and complaints.
- Describe its verification processes in the Registry to help school districts determine what additional procedures to use in selecting safety and security consultants.

Management’s Response

The TxSSC agrees with both recommendations, as the TxSSC was already in the process of reorganizing the Safety and Security Consultant Registry with a complete launch date of June 1, 2025. The

Associate Director of School Safety Readiness will ensure the updated Safety and Security Consultant Registry will include the following enhancements to better serve Texas school districts:

- Replacing applicant self-reporting of relevant experience with a standardized reference check conducted by the TxSSC Registry Specialist to verify relevant experience.
- In addition to the applicant self-reporting of pending litigation, a standardized litigation search will be performed by the TxSSC Registry Specialist, utilizing:
 - Texas Appeals Management and eFiling System (TAMES) case search.
 - Public Access to Court Electronic Records (PACER) national index search.
- Updating and republishing the TxSSC's verification processes, so they are detailed, but simple to access and understand for applicants, current consultants, school district leadership, and regional Education Service Centers. This will include a marketing campaign in early 2025 to educate current Registry Consultants, school district leadership, and regional Education Service Centers about the enhancements the TxSSC will be making to the Safety and Security Consultant Registry.



Appendix 1

Objective, Scope, and Methodology

Objective

The objective of this audit was to determine whether the Texas School Safety Center (Center) has processes and related controls to ensure that it administers select school safety programs in accordance with applicable requirements and in support of its mission.

Scope

The scope of this audit covered:

- The Center's Texas School Safety and Security Consultant Registry (Registry) as of July 1, 2024.
- Texas independent school districts' (districts') safety and security audits for fiscal years 2020 through 2023.
- Districts' multihazard emergency operations plans (Emergency Plans) for fiscal year 2023.

The following members of the State Auditor's staff performed the audit:



- Gregory S. Adams, CPA, MPA, CGFM (Project Manager)
- Lindsay Escalante, MPSA (Assistant Project Manager)
- Michael Bennett
- Shea Cavner
- Benjamin Hikida, MAcy, CFE
- Theodore Ulmer
- Michelle Ann Duncan Feller, CPA, CIA (Quality Control Reviewer)
- Courtney Ambres-Wade, CIA, CFE, CGAP (Audit Manager)

The scope also included a review of significant internal control components related to the select school safety programs overseen by the Center.

Methodology

We conducted this performance audit from April 2024 through September 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. In addition, during the audit, matters not required to be reported in accordance with *Government Auditing Standards* were communicated to the Center’s management for consideration.

Addressing the Audit Objective

During the audit, we performed the following:

- Interviewed Center staff to gain an understanding of school safety and security operations and responsibilities of the Center.
- Interviewed Texas Education Agency (Agency) staff to gain an understanding of Agency school safety and security operations and coordination between the Center and the Agency.
- Identified the relevant criteria:
 - Texas Education Code, Chapter 37.
 - Texas Administrative Code; Title 43, Section 25.103; Title 25, Section 295.5; and Title 19, Section 103.1209.
 - The Center’s policies and procedures, checklists, toolkits, and online courses.
 - Texas State University’s policies and procedures.
- Tested the following samples:
 - A random, stratified sample of 25 districts based on total statewide enrollment of 4,954,044, which was used to test the accuracy of the audit results used to create the Center’s 2020-2023 District Audit

Report (Statewide Report) and the effectiveness of the Center's review of Emergency Plans. This methodology resulted in a selection of 25 of the State's 1,021 school districts. This design was chosen to ensure that the sample included a cross section of districts.

- A targeted sample of 14 of 138 sets of tables and figures created by the Center using school safety and security audit survey questions. Auditors used this sample to test the accuracy of the tables and figures presented in the Center's Statewide Report against the audit results that the districts self-reported in the audit surveys. This sample design was selected so that a cross section of data would be tested.
- A nonstatistical random sample of 52 consultants and a risk-based selection of 6 additional consultants. Auditors selected these samples from a total population of 513 consultants approved for the Registry as of July 1, 2024, to determine whether the Center administered the Registry in accordance with Texas Education Code, Section 37.2091. This sampling design was chosen to ensure a cross section of consultants, as well as address specific risk factors identified in the population.
- A targeted sample of 77 of 321 school safety and security audit survey questions from the analysis template the Center uses to compile the Statewide Report. The sample was selected so the test results could address specific risk factors that are key to the audit objective.

Note that these samples were not representative of the populations; therefore, it would not be appropriate to project the test results to the populations.

- Obtained and reviewed sampled districts' original school safety and security audit reports and compared them to the districts' audit survey responses submitted to the Center to assess accuracy, completeness, and consistency between the districts' survey responses and their actual audit reports.
- Obtained and reviewed sampled districts' Emergency Plans to determine whether the Center had processes and controls to (1) help ensure that school districts' Emergency Plans contained key statutorily required elements and (2) review and approve districts' Emergency

Plans, as well as to determine whether the Center took statutorily defined actions for districts that had plan deficiencies or did not submit their plans.

- Reviewed the Center’s website to determine whether the Registry disclosed the information verified by the Center.
- Tested user access to the systems the Center used to maintain the Registry, collect audit results through the survey, and review Emergency Plans.
- Performed limited procedures to identify any instances of civil litigation for the sample of Registry consultants.

Data Reliability and Completeness

Auditors determined that the data sets listed in Figure 2 were sufficiently reliable for the purposes of the audit.

Figure 2

Data Reliability

Data	Methodology for Assessing Reliability
Registry Population	(1) Observed Center staff extract requested population and (2) reviewed key fields for accuracy and completeness. Auditors performed additional procedures to determine that the Center’s Registry records in the system used by the Center’s automated application, Architect, were reliable for purposes of this audit. Those procedures included conducting user access testing of Architect.
School District Enrollment Population	Compared the enrollment numbers used in the Center’s Statewide Report to Agency enrollment numbers.
EOP Review Software	Conducted user access testing of EOP Review Software, the system used by the Center to review districts’ Emergency Plan documents.

As discussed in this report, the following data set is not sufficiently reliable for the Center to accurately report on the safety conditions at school districts due to data accuracy exceptions that auditors identified during testing: **audit results recorded in Qualtrics, the system used by the Center to collect districts’ survey responses for the Statewide Report.** Auditors (1) compared

actual results of the sampled districts' audits to the audit results that the districts reported in Qualtrics, (2) compared some contents of the sample districts' Emergency Plans to the audit results reported in Qualtrics, and (3) conducted user access testing of Qualtrics.

The Center used the audit results from Qualtrics to create its Statewide Report. Auditors used the audit results to evaluate the Center's processes for compiling the Statewide Report for completeness and consistency with the source data.

Report Ratings

In determining the ratings of audit findings, auditors considered factors such as financial impact; potential failure to meet program/function objectives; noncompliance with state statute(s), rules, regulations, and other requirements or criteria; and the inadequacy of the design and/or operating effectiveness of internal controls. In addition, evidence of potential fraud, waste, or abuse; significant control environment issues; and little to no corrective action for issues previously identified could increase the ratings for audit findings. Auditors also identified and considered other factors when appropriate.



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The Honorable Greg Abbott, Governor

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