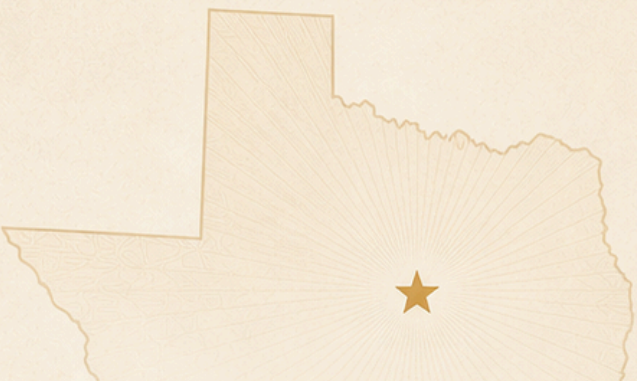


TRANSPARENCY. ACCOUNTABILITY. PARENT POWER.



TEXAS SENATE BILL 13 COMPLIANCE AUDIT

STATEWIDE REVIEW OF PUBLIC SCHOOL
DISTRICT AND CHARTER SCHOOL
IMPLEMENTATION



OUR COMMITMENT

Protecting children through transparency, accountability, and strong public policy.



OUR MISSION

Equipping families and strengthening communities through informed participation and oversight.



OUR PURPOSE

Ensuring that every Texas student is served in an environment of integrity, safety, and respect.

A COMPREHENSIVE REVIEW OF
1,207 TEXAS PUBLIC SCHOOL DISTRICTS
AND OPEN-ENROLLMENT CHARTER SCHOOLS

FINAL REPORT
SPRING 2026

JBM

JACO BOOYENS MINISTRIES
— JUSTICE. RESTORATION. HOPE. —

★ — PREPARED BY — ★

ILONKA BOOYENS DEATON
DIR. OF POLICY AND LEGISLATION



★ Letter from the Director of Policy & Legislation

Dear Members of the Texas Legislature, Education Leaders, and Fellow Texans,

On behalf of Jaco Booyens Ministries, it is my privilege to present the *Texas Senate Bill 13 Statewide Implementation Audit*, a comprehensive review of the public-facing implementation of Senate Bill 13 across Texas independent school districts and open-enrollment charter schools.

Senate Bill 13 represents a significant commitment by the Texas Legislature to strengthen transparency, promote parental engagement, and establish clear processes for the review of library materials within public schools. Effective implementation of these objectives depends not only on the existence of policies, but on whether parents can reasonably locate, understand, and utilize the information made available to them.

To better understand how these processes are presented to the public, our research team conducted a standardized review of 1,207 Texas public school districts and open-enrollment charter schools. Using a uniform evaluation framework, the audit examined publicly available information relating to library material challenge procedures, accessibility, visibility of review bodies, and overall transparency.

The purpose of this report is not to render legal conclusions regarding statutory compliance, nor to evaluate internal district operations. Rather, it provides an objective assessment of the information readily available to parents through publicly accessible district websites. The findings identify areas of notable success, opportunities for improvement, and examples of exemplary practices that may serve as models for districts throughout the state.

“

Transparency is measured not simply by whether required information exists, but by whether an ordinary parent can reasonably locate, understand, and use that information without specialized knowledge or extraordinary effort.

”

It is our hope that this report serves as a constructive resource for legislators, policymakers, educators, and local school leaders as they continue strengthening public trust, supporting parental involvement, and advancing the goals established by Senate Bill 13.

Thank you for your commitment to Texas students, families, and the continued pursuit of transparent and accountable public education.

Respectfully submitted,



ILONKA BOOYENS DEATON
Director of Policy & Legislation
Jaco Booyens Ministries

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— TEXAS SENATE BILL 13 —



I.



EXECUTIVE SUMMARY

A faint, light-colored background image of the Texas State Capitol dome and its surrounding architecture, positioned on the right side of the page.

EXECUTIVE SUMMARY

Statewide Review of Public School District and Charter School Implementation

INTRODUCTION

Texas **Senate Bill 13** became law to strengthen transparency, increase parental involvement, and establish consistent statewide procedures governing the selection and review of school library materials. The legislation requires every Texas public school district and open-enrollment charter school to implement specific policies and procedures, including the establishment of a process for challenging library materials and the use of a **School Library Advisory Committee (SLAC)** or other review process prescribed by law.

Because SB 13 is mandatory—not voluntary—the consistent implementation of these requirements is essential to achieving the Legislature’s intent of providing parents with meaningful access, transparency, and participation in decisions affecting school library collections.

To evaluate statewide implementation, this audit reviewed the publicly available websites of **1,207 Texas public school districts** and **open-enrollment charter schools**, representing one of the most comprehensive reviews of SB 13 implementation conducted since the law took effect.

Using a standardized review methodology, each district was evaluated for the public availability of challenge forms, the visibility of School Library Advisory Committees or other review bodies, the accessibility of parent resources, and the transparency of the published review process.

AUDIT OVERVIEW

1,207

Texas Public School Districts &
Open-Enrollment Charter Schools

EVALUATION CRITERIA



Challenge Form
Availability



Parent
Accessibility



Review Body
(SLAC) Visibility



Published Review
Procedures

STATEWIDE STANDARDIZED METHODOLOGY

— TEXAS SENATE BILL 13 —



II.



AUDIT METHODOLOGY





II. Audit Methodology

PURPOSE OF THE AUDIT

The purpose of this audit was to evaluate the statewide implementation of the public-facing transparency requirements established under Texas Senate Bill 13 (SB 13). Specifically, the audit examined whether parents and members of the public could readily locate the information and resources necessary to participate in the school library materials review process as contemplated by the Legislature.

Rather than evaluating internal district operations or unpublished policies, this audit focused on the information made available through official district and charter school websites. The methodology was designed to replicate the experience of an ordinary parent seeking to understand or utilize the challenge process without assistance from school personnel.

SCOPE OF THE AUDIT

The audit included a review of **1,207 Texas public school districts and open-enrollment charter schools** contained within the finalized statewide database ("True Gold Master Version 4").

Each district was reviewed using the same standardized evaluation criteria to ensure consistency across all records.

The audit examined publicly available information relating to:

- ★ Library material challenge forms
- ★ Challenge procedures
- ★ School Library Advisory Committees (SLACs)
- ★ Publicly identified review bodies
- ★ Parent instructions
- ★ Accessibility of challenge-related resources
- ★ Overall transparency of the published process



AUDIT AT A GLANCE

1,207

Texas School Districts &
Open-Enrollment Charter Schools

PUBLIC INFORMATION REVIEWED



Challenge Forms



Library Policies



SLAC Information



Review Bodies



Parent Instructions



Website Accessibility



Published Procedures

OFFICIAL PUBLIC WEBSITES ONLY





Review Methodology

Each district website was independently reviewed using a standardized audit protocol. Reviewers searched official district websites using consistent navigation methods, including:



DISTRICT LIBRARY WEBPAGES

Reviewers searched district library webpages for policies, forms, procedures, and review information.



BOARD POLICY WEBPAGES

Reviewers examined board policy webpages for library-related policies, challenge procedures, and supporting documents.



PARENT RESOURCE PAGES

Reviewers searched parent resource pages for guidance, challenge forms, instructions, and process information.



GOVERNANCE WEBPAGES

Reviewers reviewed governance-related webpages for committee information, board structures, and review bodies.



DISTRICT SEARCH FUNCTIONS

Reviewers used internal search functions to locate relevant documents and challenge-related resources.



PUBLIC POLICY MANUALS

Reviewers accessed publicly available policy manuals and supporting policy documents.



SUPPORTING DOCUMENTS

Reviewers examined additional supporting documents and resources publicly available on district websites.



ONLY PUBLICLY AVAILABLE INFORMATION WAS REVIEWED.



No login credentials, employee portals, or non-public documents were accessed during the audit.

STANDARDIZED FINDINGS CLASSIFICATION

Each district was assigned one primary legislative finding based upon the evidence identified during the review.



FINDING

A

No Publicly Accessible Challenge Form Located

No library materials challenge form could be identified through publicly available district resources.



FINDING

B

Challenge Form Located but Difficult to Find

A challenge form existed but required significant searching or was located in a manner unlikely to be readily accessible to parents.



FINDING

C

No Visible Review Body

A challenge process was identified, but no School Library Advisory Committee (SLAC) or comparable review body could be publicly identified.



FINDING

D

Review Process Unclear

Information regarding the review process was incomplete, ambiguous, or insufficient for a parent to understand how a challenge would proceed.



FINDING

E

Best Practice

The district demonstrated strong transparency by providing:

- An accessible challenge form
- A clearly identified review body
- Readily understandable parent guidance
- A transparent review process

★ ACCESSIBILITY SCORING ★

1

2

3

4

5

VERY POOR

EXCELLENT

Scores ranged from 1 (Very Poor) to 5 (Excellent) based upon the visibility and accessibility of information presented on the district's public website.

This scoring system was intended to measure the practical usability of district websites from the perspective of a parent or community member.

QUALITY ASSURANCE & LIMITATIONS



QUALITY ASSURANCE



- ✓ Standardized reviewer instructions



- ✓ Uniform data collection fields



- ✓ Single statewide master database



- ✓ Duplicate record review



- ✓ Conflict identification



- ✓ Dataset verification

These quality assurance measures were implemented to promote accuracy, consistency, and reliability across all reviewers and to strengthen the integrity of the final dataset used for statewide findings.



LIMITATIONS

- This audit is based solely on publicly available information.
- District websites change frequently; information may have changed after the date of review.
- Some documents may exist but were not located due to website structure or labeling.
- This audit does not evaluate the substantive content or legal adequacy of any district process.
- The audit does not assess actual implementation or how districts handle challenge requests.
- Results may not reflect internal practices not communicated publicly.



These limitations are inherent to a public-facing audit design and are acknowledged in the interpretation of findings.



METHODOLOGICAL STATEMENT

This audit evaluates publicly available information and observable implementation. It should not be interpreted as a legal determination of statutory compliance.

TEXAS SENATE BILL 13



III.



STATEWIDE STATISTICAL FINDINGS



STATEWIDE OVERVIEW



The statewide audit evaluated 1,207 Texas public school districts and open-enrollment charter schools to assess the public implementation of transparency measures required under Senate Bill 13.

Each district was reviewed using a standardized methodology that examined the availability of challenge forms, the visibility of School Library Advisory Committees (SLACs) or comparable review bodies, the accessibility of parent resources, and the transparency of the published review process.

While a number of districts demonstrated clear, parent-friendly implementation of Senate Bill 13, the audit found that 1,076 districts and charter schools did not provide publicly available evidence of implementing one or more of the core transparency measures evaluated under this audit.

Because SB 13 establishes mandatory statewide requirements designed to ensure public transparency and meaningful parental participation, the absence of publicly observable implementation represents a significant policy concern. If parents cannot locate the required processes through a district's official public website, the transparency objectives established by the Legislature cannot be fully realized, regardless of whether internal procedures may exist.



1,207

DISTRICTS & CHARTERS REVIEWED

Across 254 Counties • One Statewide Standard



SB 13 AUDIT AT A GLANCE



1,207

Districts & Charters
Reviewed



359

Challenge Forms
Located



175

Visible Review
Bodies



131

Best Practice
Districts



1,076

**NO PUBLIC EVIDENCE
OF SB 13 IMPLEMENTATION**

Based on publicly accessible
information available during
the statewide audit.



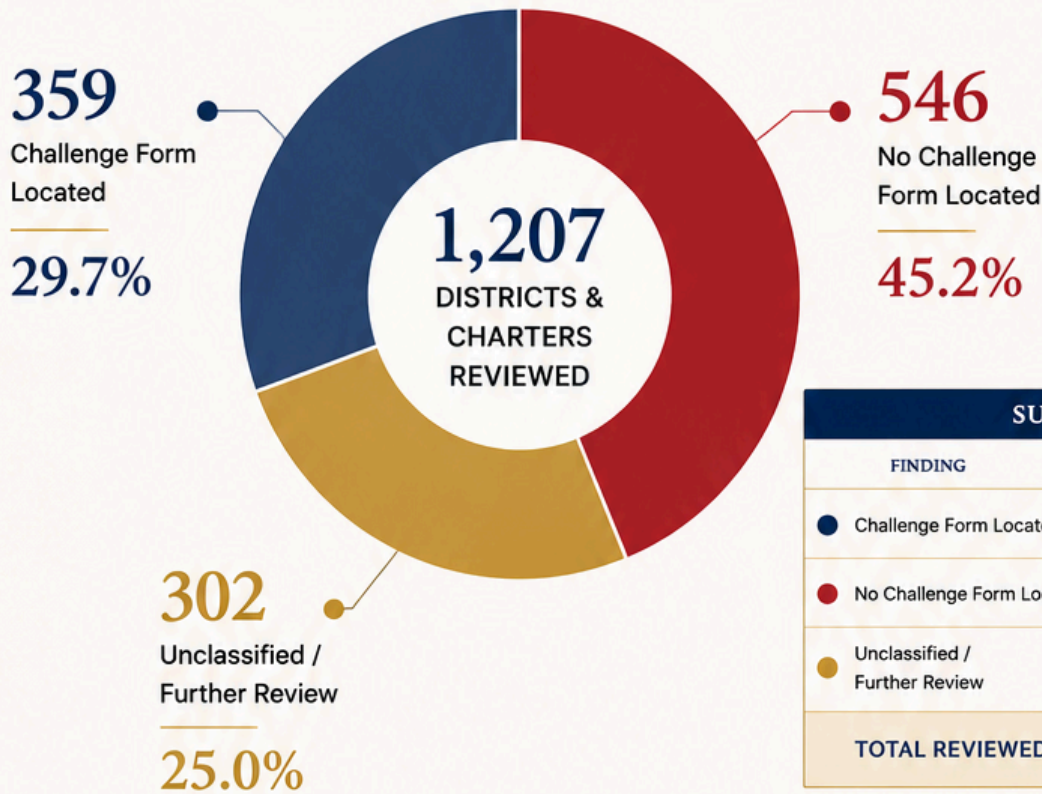
LEGISLATIVE OBSERVATION

The effectiveness of a law is measured not only by its enactment, but by whether the public can meaningfully exercise the rights it creates.

FINDING ONE

PUBLIC AVAILABILITY OF LIBRARY CHALLENGE FORMS

STATEWIDE CHALLENGE FORM AVAILABILITY



ANALYSIS



The audit found that fewer than one-third of reviewed districts had a publicly accessible library challenge form that reviewers could readily locate.



Conversely, 546 districts—representing approximately 45 percent of all districts reviewed—did not have a publicly accessible challenge form located during the audit. Because SB 13 establishes a formal process through which parents may challenge library materials, the absence of an easily identifiable challenge form may create a practical barrier for parents attempting to exercise those rights.



The remaining 302 districts were classified as requiring additional review because available public information did not permit a definitive determination.

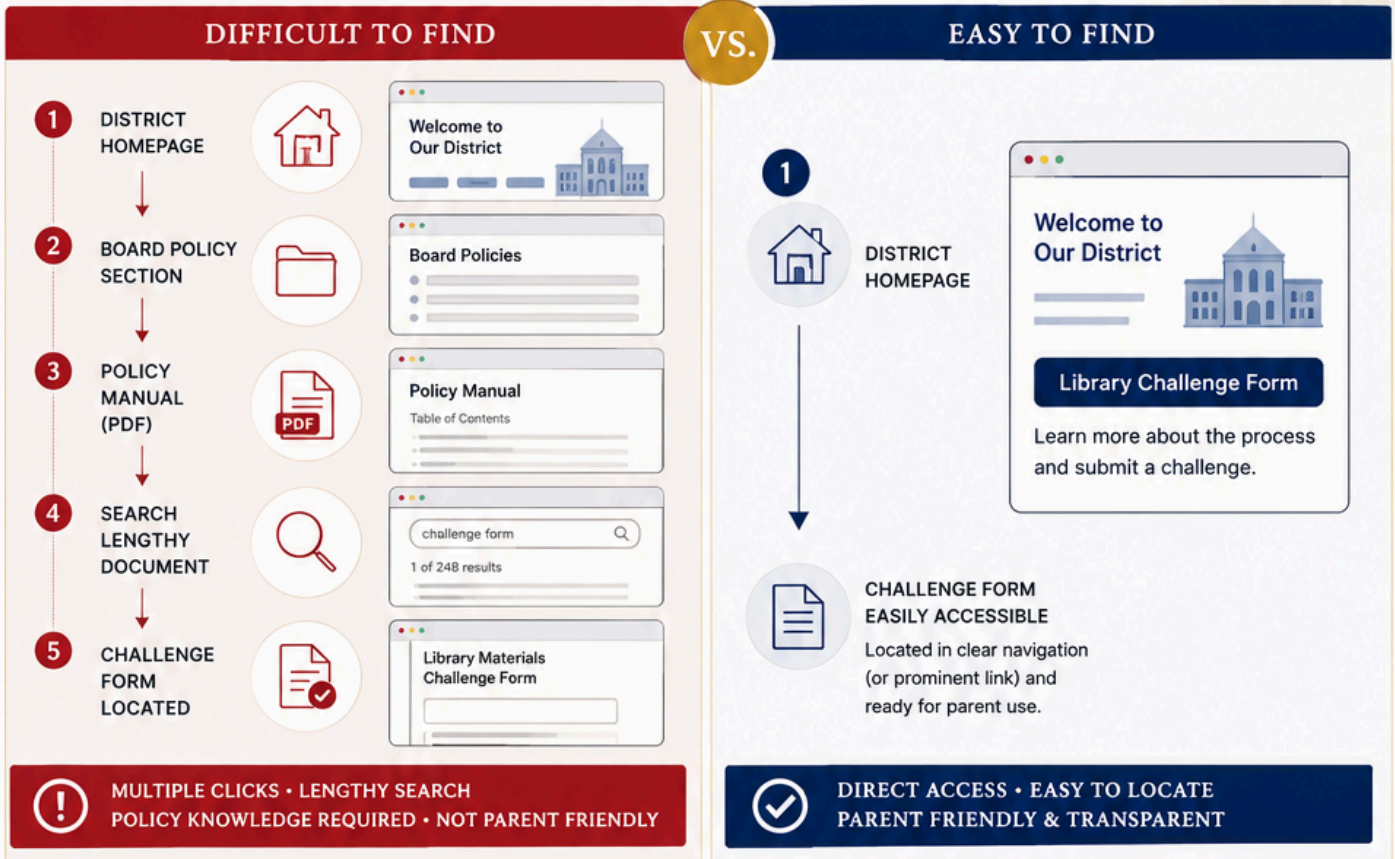


SB 13 established mandatory statewide transparency requirements—not voluntary guidance. When required transparency measures cannot be identified through public-facing resources, parents may be effectively prevented from exercising the rights the Legislature intended to protect.

FINDING B – CHALLENGE FORM LOCATED BUT NOT REASONABLY ACCESSIBLE



A small number of districts provided a library challenge form; however, the form was not readily accessible through ordinary website navigation. Instead, the form was frequently embedded within lengthy Board Policy manuals, legal policy repositories, or other locations that would be difficult for an average parent to locate without prior knowledge of district policy numbering or extensive searching.



Although the required form existed, its placement significantly reduced its practical accessibility. In many instances, a parent would have been required to:

- ★ Navigate multiple layers of Board Policy webpages.
- ★ Search lengthy policy manuals or PDF documents.
- ★ Know specific policy codes before locating the correct document.
- ★ Search outside the district website using external search engines.

While these districts demonstrated some level of implementation, the audit concluded that the challenge process was not presented in a manner that would reasonably facilitate parental access, which is a central objective of SB 13's transparency requirements.



For purposes of this audit, districts in Finding B were distinguished from Finding A because a challenge form was ultimately located. Nevertheless, the placement of these forms suggests that improvements in website organization and parent-facing navigation could substantially enhance public access without requiring significant additional resources.

LEGISLATIVE OBSERVATION



Transparency is achieved not merely by the existence of a required document, but by making that document reasonably accessible to the families the law is intended to serve. A challenge form that is technically available but effectively hidden within complex policy manuals may satisfy recordkeeping objectives while undermining the practical ability of parents to exercise their statutory rights.



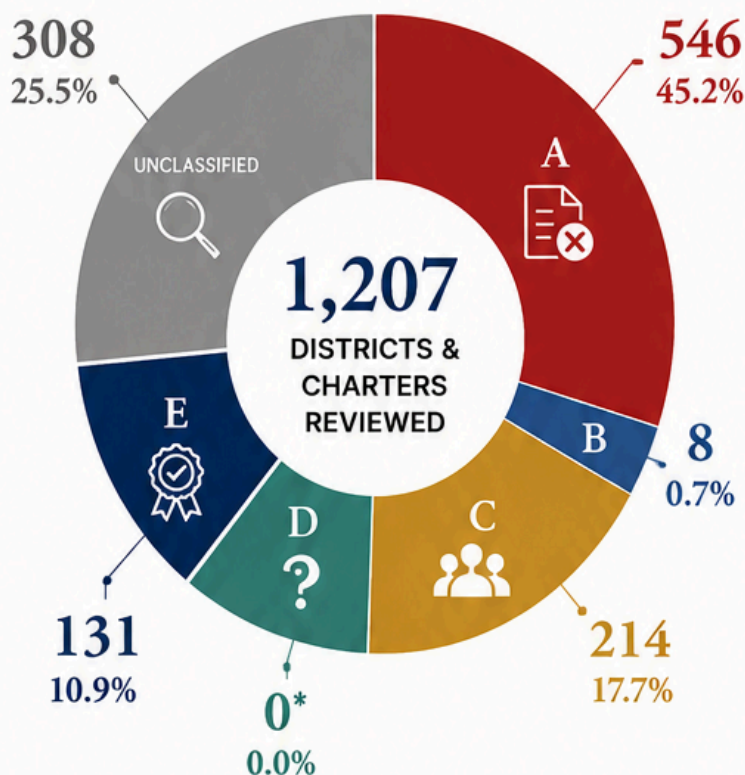
SB 13 was enacted to empower parents. When the path to a challenge process is hidden behind policies, manuals, and complex navigation, the law's promise becomes harder for Texas families to access.

FINDING THREE

LEGISLATIVE FINDINGS CLASSIFICATION

Each reviewed district was assigned a standardized legislative finding based upon publicly available evidence.

LEGISLATIVE FINDINGS DISTRIBUTION



FINDING	DESCRIPTION	DISTRICTS	PERCENTAGE
A	No Challenge Form Located	546	45.2%
B	Form Difficult to Locate	8	0.7%
C	No Visible Review Body	214	17.7%
D	Review Process Unclear	0*	0.0%
E	Best Practice	131	10.9%
U	Unclassified Additional Review Required	308	25.5%
TOTAL REVIEWED		1,207	100%

* No districts were assigned Finding D based on publicly available evidence.

ANALYSIS



The largest finding category was Finding A, indicating that no publicly accessible challenge form was located. This represents nearly half of all districts and charters reviewed.



Only 131 districts, approximately 11 percent of all districts reviewed, demonstrated the audit's highest level of transparency and accessibility by meeting the Best Practice standard.



This finding suggests that while exemplary implementation exists across Texas, it has not yet become the statewide norm.

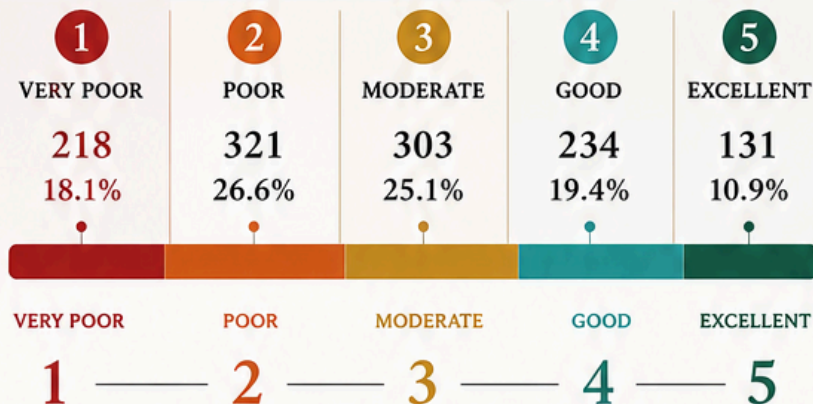


SB 13 established clear transparency requirements so parents can exercise their rights with confidence. These findings highlight both significant gaps in implementation and opportunities for meaningful improvement statewide.

ACCESSIBILITY OF PARENT RESOURCES

Districts were assigned an accessibility score ranging from 1 (Very Poor) to 5 (Excellent) based on how easily a parent could locate challenge procedures and related information.

ACCESSIBILITY SCORE DISTRIBUTION



Accessibility varied substantially across Texas.



Scores reflect how easily a parent could locate challenge procedures and related information using the district's official public-facing resources.

STATEWIDE COMPLIANCE SNAPSHOT



1,207

Districts & Charters Reviewed



359

Challenge Forms Located



175

Visible Review Bodies



131

Best Practice Districts



1,076

No Public Evidence of Key SB 13 Transparency Measures

OVERALL TRANSPARENCY INDEX



This index measures the proportion of reviewed districts that met the audit's Best Practice criteria (Finding E).

Under the Version 4 dataset,
131 of 1,207 districts (10.9%) achieved this designation.

ANALYSIS



The accessibility distribution demonstrates substantial variation among districts.



Some districts placed challenge procedures prominently within library or governance webpages, allowing parents to locate information with minimal effort.



Others required extensive navigation across multiple webpages or did not present sufficient publicly available information to permit meaningful access.



The findings indicate that the practical accessibility of SB 13 resources varies considerably throughout Texas.

While many districts have implemented portions of SB 13, relatively few demonstrated the full combination of readily accessible challenge procedures, visible review bodies, and parent-friendly transparency evaluated during this audit.



Statewide implementation of SB 13 reflects meaningful progress in some districts, but the audit demonstrates that consistent public accessibility has not yet become the statewide standard. Strengthening transparency is not simply an administrative improvement—it is essential to ensuring that the rights established by the Legislature can be effectively exercised by Texas families.

— TEXAS SENATE BILL 13 —



IV.



KEY AUDIT OBSERVATIONS



KEY AUDIT OBSERVATIONS

1

OBSERVATION 1: TRANSPARENCY REQUIRES MORE THAN POLICY ADOPTION

The audit demonstrated that the mere existence of a policy or form does not necessarily provide meaningful public access. Throughout the review, numerous districts had adopted policies relating to library material challenges; however, the practical ability of parents to locate and utilize those policies varied significantly.

In the strongest examples, districts provided a dedicated webpage containing challenge procedures, downloadable forms, timelines, committee information, and clear instructions for parents. These districts demonstrated a commitment to transparency by organizing information in a manner that was intuitive and readily accessible.

Conversely, other districts embedded challenge procedures within lengthy Board Policy manuals, legal references, or administrative documents that required extensive searching to locate. While these districts may have adopted the required procedures, the organization of publicly available information created significant barriers for parents attempting to exercise their rights under SB 13.



LEGISLATIVE PRINCIPLE

Transparency is measured not simply by whether required information exists, but by whether parents can reasonably locate, understand, and use that information without specialized knowledge or extraordinary effort.

This principle guided the audit's evaluation of website accessibility and informed the distinction between districts that merely maintained required documentation and those that made the process genuinely accessible to the public.

2

OBSERVATION 2: IMPLEMENTATION ACROSS TEXAS IS HIGHLY INCONSISTENT

The audit revealed considerable variation in how districts implemented the public-facing components of SB 13.

Some districts demonstrated exemplary transparency by providing centralized library webpages, clearly labeled challenge forms, published committee information, and detailed review procedures. Others provided only partial information, while many offered little or no publicly accessible evidence of the processes evaluated during this audit.

This inconsistency means that a parent's ability to understand and participate in the library review process depends heavily on where their child attends school rather than on a consistent statewide standard. As a result, similarly situated parents may experience vastly different levels of access to information despite being subject to the same state law.

KEY AUDIT OBSERVATIONS

3

OBSERVATION 3: WEBSITE ORGANIZATION IS A SIGNIFICANT BARRIER TO PARENT ACCESS

A recurring theme throughout the audit was the difficulty parents may encounter when attempting to locate challenge procedures through district websites.

While many districts have adopted policies and forms as required by SB 13, the way information is organized—and the obstacles parents must overcome to find it—creates a significant barrier to meaningful transparency.

The following barriers were consistently identified across the districts reviewed:

1



CHALLENGE PROCEDURES BURIED IN LENGTHY POLICY MANUALS

Many districts placed challenge procedures deep within Board Policy manuals or administrative documents that are lengthy, complex, and not written for the general public.

2



RELIANCE ON THIRD-PARTY POLICY REPOSITORIES

Some districts directed parents to third-party websites or subscription-based policy services, creating unnecessary additional steps and potential access barriers.

3



BROKEN OR OUTDATED LINKS

Multiple district websites contained links that were inactive, outdated, or redirected to irrelevant pages, preventing parents from reaching required procedures.

4



LIBRARY PAGES WITHOUT DIRECT LINKS TO CHALLENGE PROCEDURES

Several districts maintained library or media center webpages but did not provide any direct connection to challenge forms, processes, or committee information.

5



INCONSISTENT TERMINOLOGY AND LABELING

Challenge procedures were labeled using a variety of terms, such as “Reconsideration,” “Objection Process,” or “Request for Review,” making it difficult for parents to know what to search for.

6



SEARCH FUNCTIONS THAT FAILED TO RETURN RELEVANT RESULTS

Many district website search tools did not return challenge-related information even when parents used straightforward search terms.



AUDIT OBSERVATION

In many cases, the information existed but required substantial effort to locate, *reducing its practical value to parents* seeking to exercise their rights under SB 13.

KEY AUDIT OBSERVATIONS

4

OBSERVATION 4: BEST PRACTICES DEMONSTRATE THAT EFFECTIVE TRANSPARENCY IS ACHIEVABLE

The audit identified numerous districts that demonstrated strong implementation of SB 13's transparency objectives.

These districts generally shared several common characteristics:

- ★ Challenge forms prominently displayed on district websites.
- ★ Library-specific webpages containing challenge information.
- ★ Clearly identified School Library Advisory Committees or review bodies.
- ★ Step-by-step explanations of the review process.
- ★ Parent-friendly language rather than technical policy references.
- ★ Easy navigation requiring few clicks to locate relevant resources.

These examples demonstrate that effective transparency is both practical and achievable regardless of district size or geographic location.

The existence of these best-practice districts provides useful models that may assist other districts in strengthening public accessibility.

5

OBSERVATION 5: OPPORTUNITIES EXIST TO IMPROVE STATEWIDE CONSISTENCY

The audit does not suggest that every district approached implementation in the same manner, nor would such uniformity necessarily be expected. However, the significant variation observed in public accessibility indicates that additional guidance could improve consistency across the state.

Greater standardization in the public presentation of challenge procedures, committee information, and parent resources could:

- ★ Reduce confusion among parents.
- ★ Improve public confidence in the review process.
- ★ Promote more consistent implementation of SB 13.
- ★ Reduce administrative burden by making information easier to locate.
- ★ Advance the Legislature's goal of meaningful transparency.

These opportunities do not necessarily require new statutory mandates. In many instances, improvements could be achieved through clearer website organization, standardized templates, or administrative guidance from the Texas Education Agency.

— TEXAS SENATE BILL 13 —



V.



LEGISLATIVE RECOMMENDATIONS



LEGISLATIVE RECOMMENDATIONS



INTRODUCTION

The findings of this statewide audit demonstrate that while Senate Bill 13 established a strong statutory framework for transparency and parental involvement in the review of school library materials, implementation across Texas remains inconsistent.

The recommendations that follow are intended to strengthen the practical implementation of SB 13, improve statewide consistency, and ensure that parents can readily access the information and processes the Legislature intended to make available.

These recommendations are based on recurring observations identified during the review of 1,207 Texas public school districts and open-enrollment charter schools.

★ EIGHT RECOMMENDATIONS AT A GLANCE ★

-  1. ESTABLISH A STANDARDIZED PARENT ACCESS PAGE
-  2. STANDARDIZE LIBRARY CHALLENGE FORMS STATEWIDE
-  3. INCREASE TRANSPARENCY OF SCHOOL LIBRARY ADVISORY COMMITTEES
-  4. PUBLISH PARENT-FRIENDLY REVIEW PROCEDURES
-  5. DEVELOP STATEWIDE IMPLEMENTATION GUIDANCE
-  6. ENCOURAGE ANNUAL SELF-ASSESSMENTS
-  7. HIGHLIGHT AND SHARE BEST PRACTICES
-  8. CONSIDER PERIODIC STATEWIDE TRANSPARENCY REVIEWS

LEGISLATIVE RECOMMENDATIONS

1

ESTABLISH A STANDARDIZED PARENT ACCESS PAGE



AUDIT FINDING

Many districts provided challenge forms or related policies only through Board Policy manuals or scattered website locations, making them difficult for parents to locate.



RECOMMENDATION

Require each district to maintain a clearly labeled **“Library Materials Review and Challenge Process”** webpage that is accessible directly from the district’s Library Services or Parents page.



EXPECTED BENEFIT

A standardized parent-facing webpage would significantly improve transparency while reducing confusion and administrative inquiries.

AT A MINIMUM, THE WEBPAGE SHOULD INCLUDE:

- ✓ Challenge form
- ✓ Challenge procedures
- ✓ Timeline for review
- ✓ Committee membership or composition
- ✓ Meeting schedule (where applicable)
- ✓ Contact information
- ✓ Applicable Board Policy

2

STANDARDIZE LIBRARY CHALLENGE FORMS STATEWIDE



AUDIT FINDING

Challenge forms varied considerably in format, accessibility, and content.



RECOMMENDATION

Direct the Texas Education Agency to develop a model challenge form that districts may adopt or adapt while preserving local control.

The model form should promote consistency while allowing districts to include locally required information.



EXPECTED BENEFIT

A standardized form would:

- ✓ Improve parent understanding.
- ✓ Reduce administrative burden.
- ✓ Promote consistent implementation.
- ✓ Simplify statewide training.

LEGISLATIVE RECOMMENDATIONS

3

INCREASE TRANSPARENCY OF SCHOOL LIBRARY ADVISORY COMMITTEES



AUDIT FINDING

Many districts did not publicly identify the committee or review body responsible for evaluating challenged library materials.



RECOMMENDATION

Require districts to publish basic information regarding their School Library Advisory Committee or other review body, including:

- ✓ Committee purpose
- ✓ Membership categories
- ✓ Appointment process
- ✓ Meeting schedule
- ✓ Contact information
- ✓ Applicable responsibilities under SB 13



EXPECTED BENEFIT

Greater visibility would improve public confidence and reinforce accountability in the review process.

4

PUBLISH PARENT-FRIENDLY REVIEW PROCEDURES



AUDIT FINDING

Many districts relied exclusively on technical Board Policy language without providing a simplified explanation of the challenge process.



RECOMMENDATION

Require districts to publish a plain-language explanation describing:

- ✓ How to submit a challenge.
- ✓ What happens after submission.
- ✓ Expected timelines.
- ✓ Review procedures.
- ✓ Appeal opportunities.



EXPECTED BENEFIT

Parents would better understand the review process, reducing confusion and increasing meaningful participation.

LEGISLATIVE RECOMMENDATIONS

5

DEVELOP STATEWIDE IMPLEMENTATION GUIDANCE



AUDIT FINDING

The audit identified significant variation in website organization and implementation practices.



RECOMMENDATION

The Texas Education Agency should publish implementation guidance identifying best practices for:

- ✓ Website organization
- ✓ Parent accessibility
- ✓ Challenge form placement
- ✓ Committee transparency
- ✓ Frequently asked questions
- ✓ Recommended webpage layouts



EXPECTED BENEFIT

Providing implementation guidance would promote consistency without requiring additional legislation.

6

ENCOURAGE ANNUAL SELF-ASSESSMENTS



AUDIT FINDING

Several issues identified during the audit could likely be corrected through routine website maintenance.



RECOMMENDATION

Districts should conduct an annual review of their public-facing SB 13 information to ensure:

- ✓ Links remain functional.
- ✓ Forms are current.
- ✓ Committee information is updated.
- ✓ Parent resources remain easy to locate.



EXPECTED BENEFIT

Annual reviews would help maintain transparency while minimizing future compliance concerns.

LEGISLATIVE RECOMMENDATIONS

7

HIGHLIGHT AND SHARE BEST PRACTICES



AUDIT FINDING

The audit identified numerous districts demonstrating exceptional transparency.



RECOMMENDATION

The Texas Education Agency should develop a voluntary Best Practices Resource Library showcasing exemplary district webpages and implementation strategies.



EXPECTED BENEFIT

Sharing successful models would encourage continuous improvement while allowing districts to learn from one another.

8

CONSIDER PERIODIC STATEWIDE TRANSPARENCY REVIEWS



AUDIT FINDING

This audit provides a statewide snapshot of implementation following enactment of SB 13.



RECOMMENDATION

The Legislature may wish to consider periodic statewide reviews to:

- ✓ Monitor implementation over time.
- ✓ Identify emerging issues.
- ✓ Measure improvements in transparency.



EXPECTED BENEFIT

Regular assessments would provide policymakers with objective data regarding the effectiveness of SB 13 and any future amendments.



CONCLUDING LEGISLATIVE OBSERVATION

The audit demonstrates that effective implementation is not solely a matter of policy adoption—it is a matter of public accessibility.

Districts that made challenge procedures easy to locate, explained the review process in plain language, and clearly identified the responsible review body consistently demonstrated stronger transparency and greater accessibility for parents.

The Legislature's objective in enacting SB 13 was not merely to require the existence of procedures, but to ensure that parents have a meaningful opportunity to understand and participate in the review of school library materials. Continued attention to public accessibility and consistent implementation will help advance that objective across all Texas public schools.

— TEXAS SENATE BILL 13 —



VI.



CONCLUSION





CONCLUSION

The enactment of Senate Bill 13 marked a significant step toward strengthening transparency, increasing parental involvement, and promoting accountability in the review of school library materials throughout Texas. By establishing statewide expectations for challenge procedures and review processes, the Legislature affirmed the important role parents play in their children's education and sought to ensure that concerns regarding library materials are addressed through a fair, transparent, and consistent process.

This statewide audit examined the publicly accessible implementation of those requirements across **1,207 Texas public school districts and open-enrollment** charter schools. Using a standardized review methodology, the audit evaluated the availability of challenge forms, the visibility of School Library Advisory Committees or comparable review bodies, the accessibility of parent resources, and the overall transparency of district websites.

The findings reveal both meaningful progress and significant opportunities for improvement. While many districts have developed exemplary systems that make challenge procedures easy to locate and understand, substantial inconsistencies remain across the state. In numerous cases, required information was either difficult to locate or could not be identified through reasonable public navigation, limiting the ability of parents to fully exercise the rights and responsibilities contemplated by SB 13.

Importantly, this report also demonstrates that effective implementation is achievable. The districts identified as Best Practice examples illustrate that transparency, accessibility, and administrative efficiency are not mutually exclusive. Their approaches provide practical models that can be replicated by other districts without imposing significant additional costs or administrative burdens.

Ultimately, the success of SB 13 should be measured not only by the adoption of policies but by the ability of Texas families to understand and access the processes established by law. Public confidence is strengthened when information is clear, readily available, and consistently presented. Continued efforts to improve transparency will help ensure that the intent of the Legislature is fully realized in every community across the State of Texas.

— TEXAS SENATE BILL 13 —



VII.



CALL TO ACTION







CALL TO ACTION

The findings contained in this report should not be viewed solely as a measure of current implementation but as an opportunity to strengthen one of the Legislature’s most important objectives: ensuring meaningful parental access to the school library materials review process.

The recommendations presented throughout this report are intended to serve as practical, collaborative solutions rather than criticisms of local school districts. Many of the opportunities identified during this audit can be addressed through improved website organization, standardized guidance, enhanced communication, and the sharing of best practices already demonstrated by districts across Texas.

As policymakers, educators, school board members, and community stakeholders continue implementing this important legislation, this report provides a data-driven foundation for informed decision-making. The findings underscore the importance of consistency, transparency, and accessibility in building public trust and supporting meaningful parental engagement.

The Legislature has established the statutory framework. The next step is ensuring that every Texas parent—regardless of where they live or which public school their child attends—can easily locate, understand, and participate in the library materials review process envisioned by this legislation.

By working together to strengthen implementation, Texas has the opportunity to become a national model for transparency, parental engagement, and accountable governance in public education.

FINAL STATEMENT

This report is respectfully submitted in support of the continued implementation and evaluation of this legislation and with appreciation for the educators, administrators, school board members, volunteers, and parents who remain committed to transparency, accountability, and the educational success of every Texas student.

— TEXAS SENATE BILL 13 —



REFERENCES & AUTHORITIES



References & Authorities



The following sources, authorities, and public records informed the Texas Senate Bill 13 Compliance Audit. Citations are organized by category and reflect the legal, government, and data sources used to evaluate the public-facing implementation of SB 13 requirements across Texas public school districts and open-enrollment charter schools.



I. PRIMARY LEGAL AUTHORITIES

- *Texas Senate Bill 13*, 88th Legislature, Regular Session (2023). (Enacted law establishing transparency and parental involvement requirements for school library materials.)
- *Texas Education Code, Chapter 21, Subchapter H – Instructional Materials*. (Statutory provisions governing instructional materials and parental rights.)
- *Texas Education Code, § 28.0251*. (School Library Advisory Committee requirements.)
- *Texas Education Code, § 33.021*. (Public information requirements and accessibility.)
- *Texas Education Code, § 11.253*. (Open-enrollment charter school library and instructional materials.)
- *Texas Administrative Code, Title 19, Part 4*. (State Board of Education rules relating to instructional materials.)



II. OFFICIAL GOVERNMENT SOURCES

- *Texas Legislature Online*: <https://capitol.texas.gov> (Official source for Texas statutes and bills.)
- *Texas Education Agency (TEA)*: <https://tea.texas.gov> (Official state education agency; policy guidance, rules, and resources.)
- *TEA Library Resources & Instructional Materials Guidance*. (Official state guidance related to library materials and parental rights.)
- *State of Texas, Comptroller of Public Accounts*. (Public school district and charter school reference data.)



III. STATEWIDE AUDIT DATASET

- *True Gold Master Version 4*. (Finalized statewide database of 1,207 Texas public school districts and open-enrollment charter schools reviewed during the audit.)
- *Audit Methodology & Evaluation Rubrics*. (Standardized criteria, coding rules, and scoring methodology applied consistently to all districts.)



IV. DISTRICT-LEVEL PUBLIC RECORDS

- Official district and charter school websites (1,207 total). (Publicly available records reviewed between September 2 and November 7, 2025.)
- Published challenge forms, procedures, and instructions.
- School Library Advisory Committee (SLAC) or review body pages.
- Board policies, administrative regulations, and library resource pages.
- District/charter communications and announcements related to library materials review processes.



V. AUDIT-GENERATED FINDINGS

- All statistics, percentages, and findings (e.g., 359 challenge forms located, 546 no public challenge form, 756 no visible review body, 131 Best Practice districts, etc.) are derived solely from the data collected and analyzed during this audit.



METHODOLOGY NOTE

This audit reflects only publicly available information accessible on official district and charter school websites during the audit period. Findings do not evaluate internal policy adoption beyond what was publicly accessible.

— TEXAS SENATE BILL 13 —



APPENDICES A–E



STANDARDIZED FRAMEWORKS,
DATA TABLES, AND SUPPORTING
METHODOLOGIES



Standardized Compliance Audit Framework

Uniform review criteria applied across all 1,207 Texas public school districts and open-enrollment charter schools



1,207
Records Reviewed



5
Finding Categories



1–5
Accessibility Scale



100%
Standardized Method

COMPLIANCE REVIEW COMPONENTS

#	Review Component	Evaluation Performed	Status
01	District Website Verification	Official district website identified, verified, and reviewed.	✓
02	Library Challenge Form	Publicly available challenge form searched for and availability documented.	✓
03	Challenge Procedures	Published procedures, parent instructions, timelines, and appeals reviewed where available.	✓
04	SLAC / Review Body	School Library Advisory Committee or comparable review body searched for and documented.	✓
05	Website Accessibility	Navigation, search function, number of steps, and parent usability evaluated.	✓
06	Accessibility Score	Score from 1 to 5 assigned using the statewide scoring rubric.	✓
07	Legislative Finding	Standardized Finding A–E assigned based on publicly observable evidence.	✓
08	Quality Assurance	Record reviewed and verified before inclusion in statewide analysis.	✓



FRAMEWORK PURPOSE

This framework documents the uniform steps completed for each district review. A checked status confirms that the evaluation step was performed; it does not indicate that the district satisfied the underlying requirement.

PAGE 1 OF 2

Review Workflow and Evaluation Standards

How each district record moved from initial website review to final statewide analysis

STANDARDIZED REVIEW WORKFLOW



PRIMARY EVALUATION QUESTIONS

Challenge Form	Was a library materials challenge form publicly available on an official district webpage or linked policy resource?
Reasonable Accessibility	Could an ordinary parent locate the form without specialized knowledge of board policy codes or extraordinary effort?
Published Procedures	Were the submission process, review steps, timelines, and appeal information explained where publicly available?
Review Body Visibility	Was the School Library Advisory Committee or comparable review body publicly identified?
Parent Guidance	Did the district provide enough information for a parent to understand how to initiate and follow the process?
Overall Implementation	Did the district demonstrate the public-facing transparency and accessibility evaluated by this audit?

CORE AUDIT PRINCIPLES

Uniform Review Standards	Public Information Only
Objective Classification	Consistent Scoring
Comparable Statewide Results	Quality Assurance



AUDIT INTEGRITY STATEMENT

Every district and charter school included in this report was evaluated using the same review framework, identical evaluation criteria, and standardized findings methodology. This approach was designed to support fairness, objectivity, and meaningful comparison across the full statewide dataset.

PAGE 2 OF 2

Statewide Statistical Summary

Statewide statistical analysis of 1,207 Texas public school districts and open-enrollment charter schools


1,207

Records Reviewed


359

Challenge Forms Located


546

No Public Challenge Form


131

Best Practice Districts

STATEWIDE STATISTICAL SUMMARY

Audit Metric	Districts	Percentage
Districts Reviewed	1,207	100.0%
Challenge Forms Located	359	29.7%
No Challenge Form Located	546	45.2%
Unclassified / Further Review	302	25.0%
Visible Review Body	175	14.5%
No Visible Review Body	756	62.6%
Best Practice Districts	131	10.9%

STATEWIDE FINDINGS DISTRIBUTION

Legislative Finding	Districts	Percentage
A Finding A – No Challenge Form	546	45.2%
B Finding B – Difficult to Locate	8	0.7%
C Finding C – No Visible Review Body	214	17.7%
D Finding D – Review Process Unclear	0	0.0%
E Finding E – Best Practice	131	10.9%
U Additional Review Required (Unclassified)	308	25.5%



STATEWIDE STATISTICAL SUMMARY

These statistics summarize the finalized Version 4 statewide dataset and provide the quantitative foundation for the findings presented throughout this report. All percentages are based upon the standardized review methodology applied uniformly across 1,207 Texas public school districts and open-enrollment charter schools.

PAGE 1 OF 2

Transparency Indicators

CHALLENGE FORM AVAILABILITY

Category	Districts	Percent
Form Located	359	29.7%
Form Not Located	546	45.2%
Additional Review	302	25.0%

SCHOOL LIBRARY ADVISORY COMMITTEE VISIBILITY

Category	Districts	Percent
Publicly Identified	175	14.5%
Not Publicly Identified	756	62.6%
Additional Review	276	22.9%



Districts Meeting Best Practice Standard

131


Percentage of Statewide Total

10.9%


Districts Requiring Additional Improvement

1,076

CORE STATISTICAL OBSERVATIONS

- ✓ Less than one-third of reviewed districts provided a publicly accessible challenge form.
- ✓ Nearly two-thirds did not publicly identify a School Library Advisory Committee or comparable review body.
- ✓ Only 10.9% met the audit's Best Practice standard.
- ✓ The findings demonstrate substantial variation in public-facing implementation across Texas.



STATISTICAL INTERPRETATION

The statewide data indicate that implementation of the public transparency objectives evaluated in this audit remains inconsistent across Texas. While numerous districts demonstrate exemplary accessibility and parent-focused communication, the statistical distribution suggests significant opportunities to improve statewide consistency in the public presentation of challenge procedures and review processes.

PAGE 2 OF 2

Legislative Findings Framework

Standardized classification system used to evaluate public-facing implementation of SB 13 transparency requirements



1,207
Records Reviewed



5
Finding Categories



Standardized
Criteria



Objective
Classification



Comparable
Results

LEGISLATIVE FINDINGS OVERVIEW

Finding Code	Classification	Primary Meaning	Districts	Percentage	Purpose
A	Finding A No Challenge Form	No publicly accessible library materials challenge form located on the official district website.	546	45.2%	Identifies districts where parents cannot initiate a challenge due to absence of a publicly available form.
B	Finding B Difficult to Locate	A challenge form exists but is not reasonably accessible to an ordinary parent using typical navigation.	8	0.7%	Identifies districts where forms exist but are not reasonably easy to find or access.
C	Finding C No Visible Review Body	No School Library Advisory Committee (SLAC) or comparable review body is publicly identified.	214	17.7%	Identifies districts lacking transparency about who reviews challenged materials.
D	Finding D Review Process Unclear	Process exists but steps, timelines, or appeal information are not clearly explained publicly.	0	0.0%	Identifies districts where the process is confusing, incomplete, or inconsistent.
E	Finding E Best Practice	District provides both an accessible challenge form and a visible review body with clear guidance.	131	10.9%	Recognizes districts demonstrating exemplary transparency and parent accessibility.
U	Unclassified Additional Review Required	Insufficient information to complete a full classification during this audit.	308	25.5%	Indicates districts requiring further review or follow-up verification.



CLASSIFICATION PURPOSE

This classification system provides a consistent, objective, and transparent method for summarizing statewide implementation patterns. Each finding reflects publicly observable information available on official district websites at the time of review.

PAGE 1 OF 2

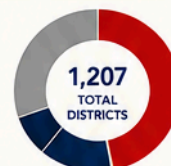
Legislative Findings Definitions and Criteria

Detailed explanation of each finding category

FINDING A	FINDING B	FINDING C	FINDING D	FINDING E
No Challenge Form	Difficult to Locate	No Visible Review Body	Review Process Unclear	Best Practice
DEFINITION No library materials challenge form was located on the official district website.	DEFINITION A challenge form exists but is not reasonably accessible to the average parent.	DEFINITION No School Library Advisory Committee (SLAC) or comparable review body is publicly identified.	DEFINITION The review process exists but is not clearly explained in public-facing materials.	DEFINITION District provides both an accessible challenge form and a visible review body with clear guidance.
PURPOSE Parents cannot initiate a challenge when the required form is not publicly available.	PURPOSE Ensures parents can find and use the form without specialized knowledge or extraordinary effort.	PURPOSE Promotes transparency by ensuring parents know who is responsible for reviewing materials.	PURPOSE Ensures parents understand the steps, timelines, and appeal rights in the process.	PURPOSE Recognizes districts exceeding expectations for transparency and parent accessibility.
TYPICAL EXAMPLE No form, link, or downloadable document exists anywhere on the district website.	TYPICAL EXAMPLE Form is hidden in board policies, buried in staff portals, or requires multiple clicks or complex searches.	TYPICAL EXAMPLE No SLAC page, committee list, membership, or review body information is available.	TYPICAL EXAMPLE Process steps are vague, incomplete, or missing timelines and appeal information.	TYPICAL EXAMPLE Form is easy to find, process is clearly explained, and SLAC information is publicly available.
546 DISTRICTS 45.2%	8 DISTRICTS 0.7%	214 DISTRICTS 17.7%	0 DISTRICTS 0.0%	131 DISTRICTS 10.9%

FINDING DISTRIBUTION SUMMARY

Finding A	Finding B	Finding C	Finding D	Finding E	Unclassified
546 45.2%	8 0.7%	214 17.7%	0 0.0%	131 10.9%	308 25.5%



Finding A	45.2%
Finding B	0.7%
Finding C	17.7%
Finding D	0.0%
Finding E	10.9%
Unclassified	25.5%



CONSISTENCY & OBJECTIVITY

Every district was evaluated using the same criteria and methodology. Findings are based solely on publicly available information and reflect a practical parent's ability to locate, understand, and utilize the challenge process.

PAGE 2 OF 2

Best Practice Framework

Characteristics of Districts Demonstrating Exemplary
Public Transparency and Parent Accessibility



131

Best Practice
Districts



10.9%

Statewide
Total



1,207

Districts
Reviewed



5

Core Transparency
Characteristics

BEST PRACTICE CHARACTERISTICS

1



Accessible Challenge Form

Challenge form easily located from the district website without specialized knowledge.

2



Visible Review Body

School Library Advisory Committee or comparable review body publicly identified.

3



Parent-Friendly Guidance

Plain-language explanation describing the challenge process, timelines, and next steps.

4



Transparent Review Process

Review procedures clearly explain committee review, recommendations, and appeals.

5



Easy Website Navigation

Information located within only a few clicks using intuitive menus.



BEST PRACTICE PRINCIPLE

Districts achieving Best Practice status consistently presented challenge procedures in a manner that was intuitive, transparent, and readily accessible to parents using publicly available information.

PAGE 1 OF 2

Model for Statewide Implementation

A replicable approach to strengthen transparency and parent involvement across Texas



BENEFITS TO PARENTS

- ✓ Easy to locate forms
- ✓ Clear expectations
- ✓ Improved understanding
- ✓ Greater confidence
- ✓ Increased participation



Website



Challenge Form



Parent Instructions



Visible Review Committee



Transparent Review Process



Public Confidence



BENEFITS TO DISTRICTS

- ✓ Reduced confusion
- ✓ Fewer administrative inquiries
- ✓ Consistent implementation
- ✓ Increased transparency
- ✓ Improved public trust

Characteristic	Typical District	Best Practice District
Challenge Form	✗ Difficult to Locate	✓ Clearly Posted
Review Body	✗ Not Visible	✓ Publicly Identified
Parent Guidance	✗ Limited	✓ Plain Language
Website Navigation	✗ Multiple Steps	✓ Easy Access
Transparency	✗ Variable	✓ High



LEGISLATIVE OBSERVATION

Best Practice districts demonstrate that meaningful transparency can be achieved regardless of district size or geographic location. Their implementation provides practical models that can be replicated statewide to strengthen the objectives of Senate Bill 13.

Accessibility Scoring Framework

Five-point scoring system used to evaluate the ease with which parents can locate and understand challenge procedures



1,207
Records Reviewed



1-5
Scoring Scale



6
Evaluation Factors



100%
Standardized Method

ACCESSIBILITY SCORE DEFINITIONS

Score	Rating	Definition	What This Means for Parents	Typical Indicators
5 ★★★★★	EXCELLENT	Information is exceptionally easy to find, understand, and use.	Parents can quickly locate the challenge form, review the process, and understand how to participate with minimal effort.	- Challenge form found in 1-2 clicks - Prominent placement on website - Plain-language instructions - Complete process clearly explained - Review body clearly identified
4 ★★★★★	GOOD	Information is easy to find and mostly easy to understand.	Parents can locate the form without difficulty and have a clear understanding of most steps in the process.	- Challenge form found in 3-4 clicks - Visible but not prominently displayed - Instructions mostly clear - Review process mostly explained - Review body identified
3 ★★★★★	FAIR	Information is somewhat difficult to find or understand.	Parents may need to search the website or interpret information to understand how to initiate a challenge.	- Challenge form found in 5-6 clicks - Buried within policies or documents - Some instructions unclear or missing - Review process partially explained - Review body not clearly visible
2 ★★★★★	POOR	Information is difficult to find and/or understand.	Parents must search extensively or interpret complex policy language to locate or understand the process.	- Challenge form found in 7+ clicks - Hidden in board policies or manuals - Instructions confusing or incomplete - Review process unclear or inconsistent - Review body not identified
1 ★★★★★	VERY POOR	Information is not reasonably accessible to an ordinary parent.	Parents cannot locate the form or meaningful information using reasonable efforts.	- Challenge form not found - No clear path to information - No instructions provided - No review process explained - No review body identified



SCORING PRINCIPLE

Scores reflect the experience of an ordinary parent using publicly available information on an official district website. Higher scores indicate greater transparency, clarity, and accessibility in the presentation of challenge procedures.

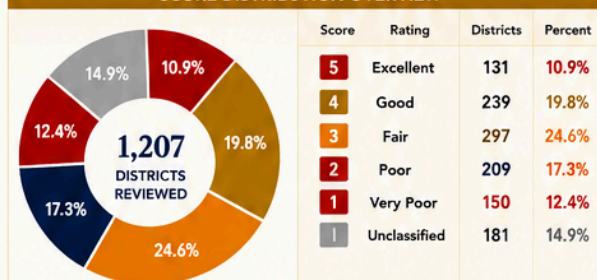
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Scoring Criteria and Evaluation Factors

Six factors evaluated to determine the overall accessibility score

	1	Location of Challenge Form	How easy it is to locate the challenge form from the district homepage.
	2	Number of Clicks	The total number of clicks required to reach the form and related instructions.
	3	Clarity of Instructions	How clearly the submission steps, timelines, and requirements are explained.
	4	Visibility of Review Body	Whether the School Library Advisory Committee (SLAC) or review body is publicly identified.
	5	Overall Website Navigation	How intuitive and user-friendly the website is for an ordinary parent.
	6	Completeness of Process Information	Whether all essential elements of the process (submission, review, appeals) are addressed.

SCORE DISTRIBUTION OVERVIEW



HOW THE SCORE IS DETERMINED

Each factor is rated on a 1-5 scale. The scores are averaged to produce the overall accessibility score for each district.

$$1 + 2 + 3 + 4 + 5 + 6$$

Average = Overall Accessibility Score (1-5)

FINDING DISTRIBUTION SUMMARY

Finding A	Finding B	Finding C	Finding D	Unclassified
546 45.2%	8 0.7%	214 17.7%	0 0.0%	308 25.5%



LEGISLATIVE OBSERVATION

Accessibility is a critical measure of transparency. Even when policies exist, they serve little purpose if parents cannot reasonably locate and use them. The scoring framework provides a consistent, objective method to assess this accessibility across all districts in Texas.

PAGE 2 OF 2