



PGCPS GRADUATION RATE REVIEW
2017 INVESTIGATION



**Independent Performance Audit
Prince George's County Public Schools Graduation Rates**

October 31st, 2017

RFP # R00R8400170

CONTAINS SENSITIVE INFORMATION

Submitted To:

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EXECUTIVE SUMMARY

Alvarez & Marsal (A&M) was hired to conduct a performance audit based on complaints of grade manipulation to alter / increase graduation rates within Prince George’s County Public Schools (hereafter “PGCPS” or “District”). The need for this independent performance audit arose from a request from the Chief Executive Officer of PGCPS to Maryland State Department of Education (MSDE) to investigate the aforementioned complaints. The intended purpose of this report is not only to follow up on complaints made, but also to identify gaps in policies and procedures and internal controls and develop recommendations that will enable PGCPS leadership to be certain that high school students have met all graduation requirements prior to graduation.

Between September 12 and October 31, 2017, approximately seven weeks, A&M conducted the performance audit of PGCPS. The performance audit was based on interviews with external PGCPS stakeholders and PGCPS leadership and staff, a review of Maryland statutes and code and PGCPS policies and procedures, student data collected from SchoolMAX, the PGCPS student information system, and student record files reviewed during site visits for 28 high schools.

In addition, A&M reviewed and logged all complaints made directly by individuals and received by MSDE, PGCPS board members and PGCPS staff and via the hotline and email addresses created during the performance audit to receive new complaints. In total, 107 individuals filed complaints that were relevant to the performance audit. Of the 107 individuals filing complaints, 60 individuals contacted A&M directly via the hotline and email address, 34 individuals submitted complaints to the PGCPS Board Members and 13 individuals filed complaints with MSDE. Nearly half of the complaints made were related to improper grade changes and graduating ineligible students. A&M was able to contact and follow-up with 84 of the individuals. Information from these complaints helped to guide the on-site school reviews.

To identify the sample of the student population to review during school visits, A&M relied on the complaints and an analysis of student grades, grade changes and transcripts in SchoolMAX. A&M selected and reviewed a sample of 1,212 students from the population of 5,496 students identified as having late grade change increases after final grade entry cutoff dates for seniors.

The interviews, complaints, review of statutes, regulations and policies and procedures and the student record review ultimately informed our findings and observations. These findings and observations can be summarized as follows:

1. PGCPS’s governance structure has performance gaps.

- The District does not consistently monitor adherence to grading policies and procedures. Leadership generally trusts school-based staff will follow policies and procedures, but does not verify adherence.
- Many policies and procedures examined by this audit lack clarity and are silent on the implications of non-compliance. The policies and procedures include: grading impact of excessive unlawful absences, requirements related to make-up work with excessive unlawful absences, attendance tracking procedures, basic requirements for “good faith effort” and its interaction with excessive attendance and credit recovery policies, attendance and grading requirements for a student to be eligible to participate in a Quarterly Learning Module

(hereafter “QLM”), graduation certification procedures and the use of make-up work or extra credit to improve grades.

- Policies and procedures are not well-communicated to schools.
- There is limited oversight and control over user access to SchoolMAX.

2. PGCPs staff does not consistently adhere to policies and procedures related to grading and graduation certification.

- Grade entry (into SchoolMAX) timelines are not followed by schools. Grades are regularly submitted and changed after quarterly cut-off dates.
- The 50% minimum grade for “good faith effort” is improperly interpreted and/or applied by some teachers and schools.
- A significant number of 2016 and 2017 graduates had unlawful absences in excess of 10 days indicating grading policies related to attendance are not being followed by some schools.
- Minimum grade requirements for credit recovery.
- Grade changes for completion of make-up work are concentrated at the end of the senior year and impact all quarterly grades. Procedures limit the timeline to submit make-up work.

3. School level recordkeeping related to grading and graduation certification is poor.

- Grade Change Authorization Form PS-140 (hereafter “PS-140 form”) are not consistently used by schools to support grade changes. Forms were either incomplete or missing.
- Certification of graduates does not take place until after students graduate.
- Service-learning forms are not properly documented and retained.

4. Irregularities in grade changes were identified.

- Examples of irregularities include graduating ineligible students, “goal seeking” a quarterly grade change to ensure a passing final grade, manipulation of transcripts post-graduation and excessive extra credit opportunities for failing students.

During on-site school reviews, A&M reviewed PS-140 forms, Annual Secondary School Performance Data Summary Cards (“PDS Tally Cards”), final transcripts, and service learning verification forms for the student sample tested. Recordkeeping practices varied by school. In certain schools, A&M identified evidence of all of the above findings while other schools had evidence of only select findings. The student files reviewed during the on-site investigation yielded the following results:

- 4.9% or 59 of the students included in the sample were determined to be ineligible to graduate due to a student not earning sufficient credits on their transcript to graduate or a student not meeting the service learning requirement.
- A&M was unable to determine graduation eligibility for 297 students or 24.5% of the sample population due to insufficient or no documentation supporting grade changes.
- Because this sample is selected randomly from the late grade change population of 5,496 students, these findings cannot be assumed to hold true to the larger population of 15,215 students in the graduating classes of 2016 and 2017.

The results of the sample testing of student records are reflected in the table below.

PGCPS Review Summary	Graduating Class				Total	
	2016		2017			
Students	7,568		7,647		15,215	
Students included in Sample	582		630		1,212	
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	405	69.6%	451	71.6%	856	70.6%
Without grade changes affecting final grades	378	64.9%	418	66.3%	796	65.7%
With all grade changes fully documented	27	4.6%	33	5.2%	60	5.0%
2. Any grade changes with limited documentation and no grade changes without documentation	37	6.4%	48	7.6%	85	7.0%
3. Any grade changes without documentation	119	20.4%	93	14.8%	212	17.5%
4. Does not meet graduation requirements	21	3.6%	38	6.0%	59	4.9%
Transcript Ineligible	20	3.4%	36	5.7%	56	4.6%
Service Learning Ineligible	1	0.2%	2	0.3%	3	0.2%
Total sample	582		630		1212	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	156	26.8%	141	22.4%	297	24.5%
Ineligible to graduate (category 4)	21	3.6%	38	6.0%	59	4.9%
<i>* This table reflects counts of unique students in each category</i>						

The sample of 1,212 students tested was from a population of 5,496 students identified as having late grade change increases after final grade entry cutoff dates for seniors. Because this sample is selected randomly from the late grade change population of 5,496 students, these findings cannot be assumed to hold true to the larger population of 15,215 students in the graduating classes of 2016 and 2017.

Further review of records outside of the late grade change population would be necessary to assess the graduation eligibility of the remaining 9,719 students for which this sample is not representative. Because our sample focused on late grade changes only, we have not recalculated graduation rates within this report.

In addition, complaints made during the performance audit included claims of systemic intimidation and fraud directed by PGCPS leadership as it relates to grade changes and graduation rate manipulation. Based on the interviews and document reviews, A&M noted no evidence of system-wide intimidation by PGCPS leadership or evidence of system-wide fraud as it relates to these allegations.

A&M identified the following recommendations for PGCPS to improve practices, oversight and accountability around grading policies, grade changes, and graduation certification. Execution of these recommendations will improve practices and internal controls, ensuring high school students meet graduation requirements prior to graduation.

1. Clarify policies and procedures and provide regular training to increase awareness and understanding and improve adherence to policies and procedures.

- The following policy areas require clarification: grading impact of excessive unlawful absences, requirements related to make-up work with excessive unlawful absences, attendance tracking procedures, basic requirements for “good faith effort” and its interaction with excessive attendance and credit recovery policies, attendance and grading requirements

for a student to be eligible to participate in a QLM, graduation certification procedures, and the use of make-up work or extra credit to improve grades.

- Conduct formal training and develop user guides and additional supporting materials for the areas identified above. Training on any policy and procedure changes should be conducted in advance of each new school year prior to ensure PGCPs staff are aware of grading policies before the first grade for a school year is entered.

2. Minimize the potential risk of mismanagement and discourage fraud through automation of recordkeeping and increased controls.

- Further automate grading and recordkeeping in SchoolMAX - to apply grading adjustments for students with excessive unlawful absences, automate graduation eligibility and certification.
- Conduct a complete audit of SchoolMAX user access to ensure proper system access is in line with user roles and responsibilities. Implement dual control processes to reduce risk of error or manipulation. Ensure proper oversight and approval of new users and user roles by the central office.
- Implement controls around when transcripts for graduated students can be accessed. Cut off access to transcript modifications prior to graduation. Modifications after graduation require approval from the central office.
- Ensure separation of duties and independent oversight of school-level roles including grade manager, transcript manager, MPTS coordinator, counselor, and administrators.

3. Increase monitoring and accountability to ensure adherence to grading policies, grade changes and graduation certification policies and procedures.

- Develop performance metrics that can be generated from data contained in SchoolMAX. Review metrics quarterly. The metrics will provide PGCPs leadership insight into adherence to policies and procedures including the timeliness of grade entry, frequency and impact of grade changes, attendance related grading procedures, and grade changes associated with MPTS.
- Expand the role of the Internal Audit function or create a new central accountability function to conduct annual reviews of academic policies and procedures. Conduct a school level review of recordkeeping practices and assess a school's adherence to policies and procedures, particularly related to the use of grade change forms, PS-140 and PDS Tally Cards.