INTRODUCTION

RESPONSE TO AUDIT FINDINGS & RECOMMENDATIONS
INTRODUCTION
On June 27, 2017, Prince George’s County Public Schools (PGCPS) Chief Executive Officer Dr. Kevin M. Maxwell and a majority of the Prince George’s County Board of Education submitted a formal request to State Superintendent of Schools Dr. Karen B. Salmon for an independent performance audit of PGCPS high school graduation rates.

On September 1, 2017, the Maryland State Department of Education (MSDE) notified PGCPS about the award of a contract to Alvarez & Marsal Public Sector Services (A&M) to conduct the audit.

On November 3, 2017, MSDE released the audit findings. The following is a summary of the audit process, findings, recommendations and next steps:

- The independent auditor focused on four key areas: Governance, Policies, Data Collection and Analysis, and On-Site Reviews / Investigations.

- Auditors interviewed internal and external stakeholders, reviewed complaints and conducted on-site investigations at all high schools, including meetings with principals, school administrators, teachers and Professional School Counselors.
Auditor received 222 relevant complaints from 107 individuals
60 individuals contacted the auditor’s hotline and email address
34 individuals contacted members of the Board of Education
13 individuals contacted the Maryland State Department of Education

Auditors met with central office staff to request and obtain data from the school system’s student information system (SchoolMAX). Auditors obtained the names of the people who entered grades, and the dates and times that grades were entered and/or changed.

SUMMARY OF FINDINGS

The auditors reviewed a sample of 1,212 student transcripts from the graduating classes of 2016 and 2017, and found that 4.9 percent did not meet all graduation requirements.
In the **Class of 2016**, 405 students’ grades were valid and documented; there were no grade changes to affect the final grades of 378 students; and fully documented grade changes were made for 27 students. There was insufficient and/or no documentation for grade changes affecting 140 students; and 21 students (3.6 percent of the sample) did not meet graduation requirements.

For the **Class of 2017**, 449 students’ grades were valid and documented; there were no grade changes to affect the final grades of 418 students; and fully documented grade changes were made for 31 students. There was insufficient and/or no documentation for grade changes affecting 141 students; and 40 students (6.3 percent of the sample) did not meet graduation requirements.
Auditors did not find any direction was given from the school system's leadership to change grades. The auditors found no financial incentives to change grades, and no evidence of systemwide intimidation or fraud related to the allegations of grade manipulation.

Auditor key findings include:

- PGCPS governance structure has performance gaps.
- PGCPS staff does not consistently adhere to policies and procedures related to grading and graduation certification.
- School-level recordkeeping related to grading and graduation certification needs improvement.
- Irregularities in grade changes and graduation certification were identified.

AUDITOR RECOMMENDATIONS

- Clarify policies and procedures and provide regular training to include awareness and understanding and improve adherence to policies and procedures.
- Minimize the potential risk management and discourage fraud through automation of recordkeeping and increased controls.
- Increase monitoring and accountability to ensure accountability to ensure adherence to grading policies, grade changes and graduation certification policies and procedures.
WORK COMPLETED TO DATE

Since the release of the audit findings, Dr. Maxwell and the school system’s leadership team have reviewed the recommendations and PGCPS school and department data. Among the work completed to date:

GRADES AND TRANSCRIPTS
Prior to the start of the current school year, PGCPS implemented stricter controls regarding access to student records. The number of grade and transcript managers for each school has been reduced to two.

CREDIT RECOVERY PROGRAMS
Quarterly Learning Modules (QLMs) were eliminated as an option for credit recovery and future Multiple Pathways to Success (MPTS) program offerings are under review.

STAFF TRAINING & SUPPORT
Grade and transcript managers attended mandatory training. Professional School Counselors received additional time to update all student records for graduation certification.
PGCPS is in the process of upgrading technology (i.e., SchoolMAX) to improve graduation certification.

The audit identified the need to increase communication. Details on the audit findings are available on various platforms, including e-messages, information sheets, parent newsletter articles, social media and the PGCPS website (www.pgcps.org/graduation-audit).

PGCPS GRADUATION RATE

CLASS OF 2012: 73%
CLASS OF 2013: 74%
CLASS OF 2014: 77%
CLASS OF 2015: 79%
CLASS OF 2016: 81%
Timeline for Implementation

Audit Finding Responses

PGCPS will work with an external third party to review and implement recommendations. The school system will request a second independent review to ensure progress.

Ongoing

- Increase awareness of grading policies, graduation certification processes and credit recovery options among stakeholder groups.
- Leverage opportunities to emphasize the importance of regular school attendance and educate stakeholder groups about attendance policies and procedures.
- Work with the Prince George's County Board of Education to determine how to best report results of random sampling of grade changes to evaluate adherence to policies, procedures and timelines, as well as appropriate inclusion of documentation requirements.
- Provide training to Professional School Counselors and Senior Grade-Level Administrators on the process for certifying graduates.
- Require mandatory training for any new users of the grading or transcript module.
- Monitor excessive grade changes and weekly grade input reports, including the number of grades per week in the gradebook, missing report card grades and excessive absences.
- Inform staff about key changes to Administrative Procedures and provide training.

August 2017

- Implemented controls to limit the number of school-level grade and transcript managers.
- Discontinued Quarterly Learning Modules (QLMs) for credit recovery.

September 2017

- Implemented mandatory training for access to grading or transcript modules.

October 2017

- Implemented new customer service initiative.
November/December 2017

- Provided all high school principals, Professional School Counselors and registrars with correct grade change form and allocated one week (November 27 to December 1, 2017) to complete PDS card tallying process.
- Began alerting parents about timeline to appeal grades.
- Began highlighting compliance hotline in systemwide communications and enhanced website visibility.
- Launched new constituent concern tracking module (“Let’s Talk”).

January 2018

- Submit Request for Proposals from external third-party groups to review and monitor fidelity of implementation of recommended actions.
- Implement Edgenuity Inc. and APEX Learning online programs for credit recovery and original credit. (pending Board of Education approval)
- Produce individual school quarterly grade change reports. Evaluate representative random sampling of grade changes for compliance with policies, procedures and timelines.
- Implement processes to ensure usage of PDS Tally Card in all schools. Establish deadlines to complete all PDS cards for graduation certification before issuing diplomas.
- Establish accountability processes allowing for random audits of senior students’ files annually prior to graduation.
- Complete audit of users to ensure demonstrated need for student records access.

February 2018

- Ensure separation of duties between grade manager, Professional School Counselor, MPTS coordinator and administrator.

March 2018

- Determine criteria for excessive absences and provide all schools with tools to run weekly school-level data reports.
- Begin pilot of electronic grade change form.
April 2018
- Align all Administrative Procedures related to academic grades for consistent messaging.
  - Create Administrative Procedures to clearly define and address:
    - How to input grades for credit recovery courses
    - Steps to certify graduates
    - Grading integrity for PGCPS staff
    - Multiple Pathways to Success program-related grade changes
  - Update Administrative Procedures to clearly define and address:
    - General impact of excessive unlawful absences on a student’s quarterly grade, including instances where parents have or have not been contacted
    - Process for makeup work
    - What constitutes makeup work and “good faith effort”
    - Requirements for QLM program that align with existing makeup work guidelines
    - Compliance and monitoring requirements
    - Attendance tracking procedures

July 2018
- Identify and maintain graduation standards in SchoolMAX to automate 2018-19 credit tallying process.

Summer 2018
- Provide standard language for inclusion in school-level Staff and Faculty Handbooks.

Fall 2018
- Continued monitoring of separation of duties between grade manager, Professional School Counselor, MPTS coordinator and administrators
- Implement electronic version of the grade change form.
- Hire independent third party to conduct random audit of student grades and graduation requirements at select high schools annually.
- Implement online programs for quarterly grade recovery.
RESPONSE TO AUDIT FINDINGS & RECOMMENDATIONS
General Findings and Observations on Governance of the District

AREA: GENERAL AWARENESS OF GRADING POLICIES AND PROCEDURES

Observations

- Overall, Board members, leadership and employees were aware of the grading policies and procedures, including procedure changes made in August 2016.
- Board members, leadership and employees were aware of the Multiple Pathways to Success (MPTS) program.

Recommendations

- No recommendations at this time.

Audit Finding Response

PGCPS agrees with the auditor’s observations. The school system will continue to increase awareness of grading policies, graduation certification processes and credit recovery options among stakeholder groups.

AREA: MONITORING AND ACCOUNTABILITY

Observations

- PGCPS management does not currently monitor adherence to grading procedures at the individual school level. Leadership generally assumes staff will follow the policies and procedures of the District, but does not currently verify that schools are following them.
- The Internal Audit (IA) function is primarily focused on conducting audits of student activity funds and responding to complaints of financial fraud. Until the summer of 2017, IA has not historically performed audits outside of this limited scope.
Recommendations

- Improve school-level accountability. PGCPS should develop performance metrics that can be generated from SchoolMAX and reviewed quarterly (at a minimum) to monitor adherence to grading procedures. The metrics will provide leadership insight into timeliness of grade entry, number of grade changes done quarterly, reasons for grade changes and the impact of the grade changes.

- Increase accountability via reviews completed by an independent third party. Either: 1) expand the IA role to complete performance audits of both academic and non-academic areas of the District or 2) create an accountability officer outside of the IA function to provide independent oversight of academic policies and procedures and student performance.

Audit Finding Response

PGCPS agrees with the auditor’s recommendations. The school system has initiated steps to improve understanding of the grade appeals process. **Beginning November 2017, parents were alerted about the timeline to appeal grades.** Notifications will continue at the conclusion of each quarter. All grade changes for the previous quarter must be completed two weeks after the grade change appeal window has closed for each quarter. Required training will continue for any new users of the grading or transcript module.

**In January 2018, PGCPS will issue a Request for Proposal from external third-party groups to review and monitor fidelity of implementation of recommended actions. PGCPS will hire an independent third party to provide an audit of a random selection of student grades and graduation requirements at several randomly selected high schools annually.**

AREA: USE OF INCENTIVES

Observations

- Currently, PGCPS does not provide financial incentives for improving student performance of the District.

Recommendations

- No recommendations at this time.

Audit Finding Response

PGCPS agrees with the auditor’s observations. The school system does not plan to offer student performance-based incentives.
AREA: REPORTING COMPLAINTS OF MISUSE OR FRAUD

Observations

- School-based personnel such as teachers, Professional School Counselors and grade managers are largely unaware of reporting hotlines and the role of IA in investigations of fraud complaints.

- Per interviews with key stakeholders, members of the PGCPS community articulated a belief that action will be taken more rapidly by PGCPS leadership if issues are communicated directly to the press than if issues are reported to and dealt with internally by leadership.

- An internal investigation requested by PGCPS leadership into potential grade changes at two schools was conducted by IA during the summer of 2017. The Board was not aware of the investigation or the outcomes.

Recommendations

- PGCPS leadership should regularly communicate the hotline information for employees or public stakeholders to report any potential fraud.

- PGCPS leadership should ensure timely investigation and response into complaints to avoid press involvement with internal complaints.

- The Board should receive regular briefings into any complaints of fraud impacting student outcomes.

Audit Finding Response

PGCPS agrees with the auditor’s recommendations. Since the release of the audit findings, the school system has prioritized highlighting the compliance hotline in systemwide communications, including the employee and parent newsletters and messages from the Chief Executive Officer, and enhanced its visibility on the PGCPS website.

This fall, PGCPS implemented a new customer service initiative and increased the Office of the Ombudsman’s presence. The school system launched a new constituent concern tracking module (“Let’s Talk”).
**Observations**

- AP 5121.3 stipulates that more than five unlawful absences per semester or 10 per full course year will result in an assignment of an “E” for the course, and requires communication of remediation options to parents. The procedure does not define the impact of failing to communicate remediation options.

- The PGCPS grading procedures lacks specificity on the grade to be entered for a student who has an excessive number of lawful absences without makeup work or excessive number of unlawful absences. If the execution of this procedure in the classroom results in an “E” grade between 50 and 59, the student could be considered eligible for QLM work for credit recovery.

**Recommendations**

- Update procedure to more clearly define the impact of excessive unlawful absences in situations where schools have not adequately communicated to parents.

- Clarify procedures related to makeup work from unlawful absences, require approved exceptions to makeup work to be documented and kept in cumulative folders.

- Clarify that a student with unlawful absences (with an “E” grade”) earns a 0 to 50 for the course, quarter, or day.

**Audit Finding Response**

PGCPS agrees with the auditor’s recommendations. By April 2018, PGCPS will update Administrative Procedure 5121.3 to clearly define the general impact of excessive unlawful absences on a student’s quarterly grade, including instances where parents have or have not been contacted, and the process for makeup work for unexcused absences.
AREA: COMMUNICATIONS AND TRAINING

Observations
- Attendance policies and procedures are communicated to students, parents and the community in section 5: Student Attendance of the PGCPS Rights and Responsibilities Handbook. This includes defining lawful absences, unlawful absences and truancy, as well as outlining consequences of unlawful absences and frequent absences.

Recommendations
- No recommendations at this time.

Audit Finding Response
PGCPS agrees with the auditor’s observations. PGCPS will continue to leverage opportunities to **emphasize the importance of regular school attendance and educate stakeholder groups** about attendance policies and procedures.

AREA: SYSTEMS/TECHNOLOGY

Observations
- **Attendance and Grading Modules are not linked together in SchoolMAX** limiting PGCPS ability to monitor grades and grading adjustments for students with excessive unlawful absences.

Recommendations
- **Configure SchoolMAX to support monitoring and enforcement of excessive absence procedures for grading**, or utilizing another automated tool to identify students who have excessive absences, and calculate appropriate grading adjustments in accordance with PGCPS procedures.

Audit Finding Response
PGCPS agrees with the auditor’s recommendations. By March 2018, the Divisions of Teaching and Learning and Information Technology will work collaboratively to **determine criteria for excessive absences and ensure that all schools have the ability to run a weekly school-level data report**. There will be additional exploration with the SchoolMAX vendor to determine the software’s capacity to convert excessive unexcused absences to failing grades.
Observations

- The rewritten version of Administrative Procedure 5113 effective July 1, 2016, which supersedes the July 1, 2017 procedures, reduced accountability measures for student attendance. The following are no longer required under the updated AP 5113:
  - Teachers must maintain daily attendance logs for each class.
  - Parents or guardians must notify the school when their child is absent. School personnel must contact the parent or guardian immediately if the school has not received notification.
  - Pupil personnel workers are required to report each month the names of students who have been truant the previous month.
  - Information Technology department is required to create an online interactive attendance report, updated daily.

Recommendations

- Strengthen attendance tracking procedures to increase the documentation and communication of absences.

Audit Finding Response

PGCPS agrees with the auditor’s recommendation. By April 2018, PGCPS will update Administrative Procedure 5113 to strengthen attendance tracking procedures.
Grading
PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES AND PROCEDURES

Observations

- PGCPS’s grading element specifying that a 50% be assigned for any “good faith effort” does not define a “good faith effort” clearly outside of completing half of a given assignment, and does not specify how this element interacts with attendance procedures outlined above. When combining this procedure with the QLM program, there is a potential that students could pass with minimal effort.

- In SY15-16 and SY16-17, QLM rules outlined in the MPTS handbook contradicted grading procedures, serving as makeup work often long after the quarter ended.

Recommendations

- Update the PGCPS grading administrative procedures with more specifics related to makeup work and further specifications as to what constitutes a “good faith effort.”

- If the QLM program continues in SY17-18, MPTS requirements should be reconciled with the makeup work requirements of PGCPS grading procedures.

Audit Finding Response

PGCPS agrees with the auditor’s recommendations. By April 2018, PGCPS will update Administrative Procedure 5121.3 to clearly define makeup work, provide direction on “good faith effort,” and include requirements for the QLM program that align with the existing makeup work requirements.

AREA: COMMUNICATIONS AND TRAINING

Observations

- When PGCPS changed its grading procedure in 2016 to assign scores of 50% for a “good faith effort,” District leadership sent an email detailing the changes to guidance Professional School Counselors and principals. The email, dated August 10, 2016, required principals to share this information with teachers when they returned to school the week of August 15, 2016.

- Communication of administrative procedures to teachers usually takes place in the form of complete administrative procedures or through inclusion of school specific staff and faculty handbooks, which provide potential for shift in meaning.
For example, the Suitland High School 2017-2018 staff handbook omits a key line regarding the “good faith effort” guideline: “If a student does no work on an assignment or assessment, the teacher shall assign a grade of a zero.”

Recommendations

- **Support systemwide procedure changes with all staff communication**, trainings and job aids to reduce risk of misinterpretations.

- **Create a standard PGCPS Staff and Faculty Handbook** to ensure proper understanding and uniform application of procedures across schools.

Audit Finding Response

PGCPS agrees with the auditor’s recommendations. Each division that revises or creates administrative procedures **will ensure that all staff are informed of the changes**. Training will be provided for clarity and understanding to reduce risk of misinterpretation.

By April 2018, PGCPS will update Administrative Procedure 5121.3 to **clearly define the compliance and monitoring requirements for implementation** and create a new Administrative Procedure regarding grade changes that will address grading integrity for PGCPS staff.

In preparation for the 2018-19 school year, **the school system will provide standard language for inclusion in each school’s Staff and Faculty Handbook.**

**AREA: MONITORING AND ACCOUNTABILITY**

Observations

- According to AP 5121.3, grading monitoring and accountability is the responsibility of the principal.

Recommendations

- **Develop more detailed guidelines** on what and how principals should monitor to ensure adherence to the grading procedures within their school.

- Include grading integrity requirements for all teachers, Professional School Counselors, administrators and staff in the grading procedure which specify prohibited actions related to unsupported grade changes and align procedure violations with repercussions.
Audit Finding Response

PGCPS agrees with the auditor’s recommendations. By April 2018, PGCPS will update Administrative Procedure 5121.3 to clearly define the compliance and monitoring requirements for implementing the procedure. In addition, PGCPS will create a new Grade Change Administrative Procedure that addresses grading integrity for all PGCPS staff.

Grade Changes
PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES AND PROCEDURES

Observations

● The PS-140 form and the associated grade change process creates a system of control which has the potential to be very effective in reducing risk or error or manipulation.

● Grade change process relies on school-level adherence to procedures with no District-level accountability measures.

● The grade change process does not appropriately account for administrator or MPTS driven grade changes.

● A&M found two versions of the PS-140 form during site visits. The older version (pre-2010) did not require teacher signature and did not clearly require attachment of makeup work.

● The current version of the form indicates that the teacher line should include a signature and date and clearly requires makeup work be attached to support grade changes.

Recommendations

● Establish and communicate the grade change process for MPTS-related grade changes to also use the PS-140 form for any grade changes.

● Require all schools to use the current version of the PS-140 form.

● Clearly articulate makeup work requirements for grade changes both in Administrative Procedure and on the PS-140 form.
Audit Finding Response
PGCPS agrees with the auditor’s recommendations. All principals, Professional School Counselors and grade managers were provided with the current grade change form. By April 2018, PGCPS will create a new Administrative Procedure regarding grade changes to include the process that must be followed for MPTS-related grade changes. The Division of Information Technology will develop an electronic version of the grade change form to be piloted in certain schools during the current school year and fully implemented for the 2018-19 school year.

AREA: COMMUNICATIONS AND TRAINING
Observations
- The grade change procedure is present in PGCPS procedures; however, A&M has not been able to identify further materials from PGCPS on communication or training related to grade changes within schools.

Recommendations
- Create consistent messaging and training around grading procedures to reduce the risk of error and manipulation, and encourage consistency in policy and procedure adherence across PGCPS high schools.

Audit Finding Response
PGCPS agrees with the auditor’s recommendation. By April 2018, PGCPS will align all procedures related to academic grades for consistent messaging.

AREA: SYSTEMS/TECHNOLOGY
Observations
- A designated data entry person is required to input the grade change information into SchoolMAX.

Recommendations
- Emphasize the role of the grade manager as independent from Professional School Counselor, transcript manager, MPTS coordinator and administrator responsible for verifying all documentation requirements before affecting grade changes.
Audit Finding Response

PGCPS agrees with the auditor’s recommendation. By February 2018, the Division of Information Technology will ensure separation of duties between the grade manager, Professional School Counselor, MPTS coordinator and administrators; monitoring will continue annually.

AREA: MONITORING AND ACCOUNTABILITY

Observations

- PGCPS procedures do not appear to require or encourage any independent monitoring function for grade changes or for cataloging the use of PS-140 forms. This process is controlled at the school level, giving administrators limited visibility and limited tools to hold schools accountable.

Recommendations

- Implement an independent review function for grade changes at the school level.
- Perform representative random sampling of grade changes to evaluate adherence to policies, procedures and timelines, as well as appropriate inclusion of documentation requirements.
- Report results to PGCPS administration, internal auditor and school board.

Audit Response Findings

PGCPS agrees with the auditor’s recommendations. Starting January 2018, PGCPS will produce individual school quarterly grade change reports. A random sampling of grade changes will be evaluated for compliance with policies, procedures and timelines. PGCPS will work with the Board of Education to determine how to best report the information.
Multiple Pathways To Success (MPTS)
PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES AND PROCEDURES

Observations

- **MPTS requirements are not outlined** through formal board policy or administrative procedures.

- MPTS programs, except for QLMs, are well-documented and have robust accountability for standardized grading and attendance requirements which align with PGCPS and MSDE requirements. QLM requirements, however, lack this level of detail and do not clearly integrate with PGCPS and MSDE policies and procedures.

- The MPTS handbook includes no stated requirement for student attendance during the failed quarter to qualify for QLMs.

Recommendations

- Develop stronger procedures and controls to govern QLMs, and prevent the misuse of the program.

- Require grade makeup packets be returned to the school as evidence of completion of makeup work, and included in cumulative folders to support audit and review.

Audit Finding Response

PGCPS agrees with the auditor’s recommendations. **Quarterly Learning Modules were discontinued in July 2017 for credit recovery.** Starting January 2018, the online programs Edgenuity Inc. and APEX Learning will be used for credit recovery and original credit. **Online programs will be used for quarterly grade recovery starting the 2018-19 school year. (pending Prince George’s County Board of Education approval).**
AREA: COMMUNICATIONS AND TRAINING

Observations
- Substantial training documentation for Credit Recovery, Quarterly Recovery, APEX and Compass online learning exists.
- PGCPS has not provided A&M any formal documentation of Board Policies and Procedures of Administrative Procedures related to MPTS, providing only annual handouts.

Recommendations
- Develop stronger procedures and controls to govern QLMs, and prevent the misuse of the program.
- Require grade makeup packets be returned to the school as evidence of completion of makeup work, and included in cumulative folders to support audit and review.

Audit Finding Response
PGCPS agrees with the auditor’s recommendations. Quarterly Learning Modules were discontinued in July 2017 for credit recovery.

AREA: SYSTEMS/TECHNOLOGY

Observations
- Various online learning platforms are used for the Credit Recovery blended learning models, as well as for MVLO and APEX Learning. Google Docs is used for keeping attendance for numerous platforms, and has served as the central repository for grading for QLMs.

Recommendations
- No recommendations at this time.

Audit Finding Response
PGCPS agrees with the auditor’s observations. Quarterly Learning Modules were discontinued in July 2017 for credit recovery.
AREA: MONITORING AND ACCOUNTABILITY

Observations

- Web-based programs appear well monitored through third party providers. QLM packets are directed to be graded by the Area III Office, but due to centralized accountability measures associated with grade changes, there is no control to ensure that QLM grade changes are input at the school level in accordance with the MPTS handbook.

Recommendations

- The Area III Office (responsible for MPTS) should consider requirements to ensure that grades from recovery programs are input in accordance with the MPTS handbook.

Audit Finding Response

PGCPS agrees with the auditor’s recommendation. **By April 2018, the school system will create a new Administrative Procedure regarding grade changes that clearly defines how to input grades for credit recovery courses.**
Promotion and Graduation
PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES AND PROCEDURES

Observations

- PGCPS promotion and graduation requirements are outlined very clearly within administrative procedures; however, **PGCPS was unable to provide a policy or procedure that explained how graduation certification should be performed.** The lack of a policy or procedure related to certification for graduation makes oversight of this process challenging. With no formal, districtwide deadlines, requirements, roles and responsibilities, or process for quality control, schools are at higher risk of error or manipulation.

Recommendations

- Require all schools to **utilize the PDS Tally Card.**

- Develop and implement an administrative procedure which specifies the appropriate tools and processes required to place students on the graduation list and issue a diploma.

- Reiterate the importance of completing the PDS Tally Card, and signing each form to certify graduation before issuing a diploma. Summer graduate forms can be completed when they have met graduation requirements, and should not be a reason not to complete forms for those graduating on time.

Audit Finding Response

PGCPS agrees with the auditor’s recommendations. **By January 2018, processes will be implemented to ensure that the PDS Tally Card is updated and used in all schools.** All high school principals, Professional School Counselors and grade managers were provided one week (November 27 to December 1, 2017) to complete the PDS card tallying process. Deadlines will be established and followed to ensure all PDS cards are completed and signed to certify graduates prior to issuing diplomas.

By April 2018, a new Administrative Procedure will be created that clearly defines the steps to certify graduates.
AREA: COMMUNICATIONS AND TRAINING

Observations
- PGCPS has shared no formal training documentation related to graduation certification processes.

Recommendations
- Develop appropriate communications and training for Professional School Counselors and administrators involved in the process.

Audit Finding Response
PGCPS agrees with the auditor’s recommendation. PGCPS will continue to provide training to Professional School Counselors and Senior Grade-Level Administrators on the process for certifying graduates.

AREA: SYSTEMS/TECHNOLOGY

Observations
- SchoolMAX enables efficient and consistent processing of graduation certification; however, PGCPS does not use the automated process, opting to have individual Professional School Counselors complete this process manually.

Recommendations
- Consider utilizing SchoolMAX’s automated capabilities to support graduation certification. Utilizing automated tools to increase consistency and accuracy, and decrease administrative burden associated with graduation certification.

Audit Finding Response
PGCPS agrees with the auditor’s recommendation. By July 2018, the Office of Academics and the Division of Information Technology will identify and maintain graduation standards in SchoolMAX to automate the credit tallying process for the 2018-19 school year.

AREA: MONITORING AND ACCOUNTABILITY

Observations
- PGCPS administrative procedures do not require immediate review of records included for graduation requirements. Procedures leave methods for implementation and accountability to the principal’s discretion.
PGCPS’s central records office performs a limited number of cumulative folder audits annually, and does not receive files of graduating students from schools for several years after graduation.

**Recommendations**

- Develop standardized accountability practices that would detect students being improperly certified for graduation.

**Audit Finding Response**

PGCPS agrees with the auditor’s recommendation. **Starting January 2018, accountability processes will be established that allow for random audits of senior students' files annually prior to graduation.**
Observations

- PGCPS has taken steps to improve control over access and modification rights within SchoolMAX in recent months. However, reviews of user access and modification logs suggest that in previous years user controls have been distributed more widely than required.

- Principals can submit user access requests for anyone in their school to have access and user access requests are approved by IT.

- User access forms are not maintained in an accessible central location. Some of the risk associated with limited controls over user access is managed through SchoolMAX audit records.

Recommendations

- Improve controls over user roles and access in SchoolMAX and take steps to enhance accountability in the process of granting user access.

- Perform a complete audit of user access to ensure that each user has a demonstrated need for their user role access which is in line with PGCPS grading policies.

- Require user access requests to be approved by a central office administrator who is familiar with the grading procedure and SchoolMAX roles.

Audit Finding Response

PGCPS agrees with the auditor’s recommendations. Controls were implemented in August 2017 to limit the number of grade managers and transcript managers at each school. In September 2017, the Division of Information Technology mandated training in order to access the approved grading or transcript module.

By January 2018, the Division of Information Technology will complete an audit of users to ensure demonstrated need for access.
AREA: COMMUNICATIONS AND TRAINING

Observations
- Training on SchoolMAX and its use is developed and distributed by the Technology training team. The training focuses on technical guidance on how to use the system.

Recommendation:
- Develop communications and training related to timelines for grading, requirements for grade changes, user roles and permissions, and other controls over error and fraud.

Audit Finding Response
PGCPS agrees with the auditor’s recommendation. The grading window is published at the beginning of each school year and announced for all progress reports and report cards. All grade changes for the previous quarter must be completed prior to the close of the progress report grading window. Required training will continue for any new users of the grading or transcript module.

AREA: SYSTEMS/TECHNOLOGY

Observations
- User roles are well-defined within SchoolMAX.
- In recent months, PGCPS has reset user roles and improved control over access.

Recommendations
- Assess user role alignment with responsibilities and accountability requirements.

Audit Finding Response
PGCPS agrees with the auditor’s recommendation. Starting August 2017, the Division of Information Technology created a new process requiring user access requests to be approved by central office administrators for greater control and accountability.
 AREA: MONITORING AND ACCOUNTABILITY

Observations

- Accountability for actions taken in SchoolMAX is handled at the school level unless circumstances necessitate District involvement. There is no clear system of controls over grade and transcript changes. PGCPS does not require individual high schools to report on trends or anomalies in SchoolMAX data, nor does the District require establishment of any process for quality assurance over grading and/or grade changes using the system.

Recommendations

- Establish a program of monitoring, reporting and following up on excessive grade changes, or grade changes which are clearly outside of compliance with procedures.

Audit Finding Response

PGCPS agrees with the auditor’s recommendation. For ongoing monitoring purposes, the Division of Information Technology has created reports that allow school and area office staff to monitor:

- Number of grades per week in the gradebook
- Missing report card grades
- Excessive absences
- Grade changes

Through the use of these reports, the Deputy Superintendent will monitor excessive grade changes and weekly grade inputs.