



**PGCPS GRADUATION RATE REVIEW  
2018 INVESTIGATION**



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

**October 26<sup>th</sup>, 2018**

**CONTAINS SENSITIVE INFORMATION**

**Submitted To:**

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## I. Executive Summary

Alvarez & Marsal (A&M) was hired by the Maryland State Department of Education (MSDE) to conduct an independent performance audit (2018 Audit) of Prince George’s County Public Schools (PGCPS). The 2018 Audit which occurred between July 9, 2018 and October 1, 2018, was requested by MSDE as a follow-up from A&M’s previous Audit in 2017 (2017 Audit). In accordance with the Statement of Work (SOW), A&M’s efforts consisted of three phases: An **Action Plan Assessment**, a follow-up **Performance Audit**, and a consolidation of **Best Practices and Lessons Learned** from the 2017 and 2018 Audits. Key findings and observations from each phase of the 2018 Audit are presented below:

### Action Plan Assessment

A&M evaluated PGCPS’s efforts to address the 40 unique recommendations from the 2017 Audit, reviewing PGCPS’s Action Plan to identify gaps and assessing the implementation of the Action Plan to identify any recommendation that were partially implemented or not implemented.

- The Action Plan Gap Analysis found that PGCPS written Action Plan:
  - Fully addressed 33 recommendations;
  - Partially addressed four recommendations;
  - Did not address three recommendations in their Action Plan.
- The Implementation Assessment found that PGCPS:
  - Fully implemented 28 recommendations;
  - Partially implemented ten recommendations;
  - And did not implement two recommendations from the 2017 Audit.

The table below provides a summary of A&M’s Action Plan Gap Analysis and Implementation Assessment, highlighting **only recommendations which were not fully addressed in the PGCPS Action Plan or were not fully implemented by PGCPS during SY 17-18**. Recommendations that were fully addressed and implemented do not appear in the table below.

Figure 1: 2017 Audit Remediation Gaps

Category & Subcategory	2017 Audit Recommendation <sup>1</sup>	Recommendation Addressed in PGCPs Action Plan?	Recommendation Implemented by PGCPs?
<b>Attendance:</b> Systems / Technology	“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.”	Yes	No
<b>Grade Changes &amp; Appeals:</b> Monitoring /Accountability	“Implement an independent review function for grade changes at the school-level. “	Partially	Partially
	“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.”	Yes	Partially
	“Report results to PGCPs administration, internal auditor and school board.”	Partially	Partially
<b>Graduation Certification:</b> Overall Policies / Procedures	“Require all schools to utilize PDS Tally Cards.”	Yes	Partially
	“Develop and implement an administrative procedure which specifies tools and processes required to place a student on the graduation list and issue a diploma.”	Yes	Partially
<b>Graduation Certification:</b> Monitoring / Accountability	“Develop standardized accountability practices that would detect students being improperly certified for graduation.”	Yes	Partially
<b>Records Access and Controls:</b> Monitoring / Accountability	“Establish a program of monitoring, reporting, and following up on excessive grade changes, or grade changes which are clearly outside of compliance with procedures.”	Partially	Partially

<sup>1</sup> These recommendations are quoted directly from A&M’s 2017 Audit report.

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Category & Subcategory	2017 Audit Recommendation <sup>1</sup>	Recommendation Addressed in PGCPS Action Plan?	Recommendation Implemented by PGCPS?
<b>General Findings and Observations on Governance of the District:</b> Monitoring / Accountability	“To improve school-level accountability, PGCPS leadership 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.”	No	No
	“Increase accountability via reviews completed by an independent third party. Either: 1) expand the auditor role to complete performance audits of both academic and non-academic areas of the District or 2) create an accountability officer outside of the auditor function to provide independent oversight of academic policies and procedures and student performance.”	Partially	Partially
<b>General Findings and Observations on Governance of the District:</b>	“PGCPS leadership should ensure timely investigation and response into complaints to avoid press involvement with internal complaints.”	No	Partially
Reporting Complaints of Misuse or Fraud	“The Board should receive regular briefings into any complaints of fraud impacting student outcomes.”	No	Partially

For more details on PGCPS’s actions to address the 2017 Audit recommendations, please see the Action Plan Assessment section.

**Performance Audit**

A&M conducted a comprehensive performance audit, including data analysis, site visits, and records review at each of PGCPS’s 27 high schools.

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Through a combination of records review, data analysis, interviews, and site visits, A&M identified the following key findings:

1. **PGCPS greatly reduced the degree to which grade changes were used and misused.**
2. **PGCPS nearly eliminated issues with graduating students who have not met transcript or service learning requirements.**
3. **PGCPS significantly increased awareness of and compliance with administrative procedure (AP) and state requirements.**
4. **PGCPS did not provide sufficient oversight and support to enforce attendance accountability. - PGCPS leadership did not communicate the expectation of compliance with attendance-related grading requirements and failed to provide tools and processes to ensure adherence or verify data accuracy.**
5. **Coding errors contributed to inappropriate identification of five of the students in the sample as eligible to graduate although school certified graduate lists reflected students as non-graduates.**

A&M selected a sample of 1,085 students from the 7,273 2018 graduates to understand PGCPS compliance with graduation policies and procedures. The performance audit produced the following results:

*Figure 2: 2018 Audit Sample Results*

PGCPS Review Summary	2018	
2018 PGCPS graduates	7,273	
Students included in sample	1,085	
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation	6	0.6%
Ineligible to graduate	6	0.6%
Count of unique students graduated despite one or more Administrative Procedure violation	12	1.1%
Students without grade change or transcript policy violations	1,073	98.9%

In addition to assessing grade changes and transcript eligibility, A&M analyzed PGCPS’s adherence to attendance-related grading requirements. The figure below presents additional analysis that summarizes the number of attendance and grading violations according to Administrative Procedure 5121.3 in SY 17-18, which requires that students with excessive unlawful absences (5 or more in a .5 credit course or 10 or more in a full credit course) be given a failing grade.

*Figure 3: 2018 Audit Sample Results – Attendance and Grading Violations*

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more required course	654	60.3%
Graduated without excessive unlawful absences in any course	431	39.7%
<b>Total 2018 Sample Students</b>	<b>1085</b>	<b>100.0%</b>

The 60.3% of sample students identified within this group gives further indication that PGCPS did not attempt to adhere to attendance-related grading policies, and that PGCPS Central Office did not support appropriate tools and analysis needed to support enforcement of this rule. This analysis was directly impacted by system errors leading to coding inconsistencies across. Accordingly, A&M made adjustments to attendance categorization based on PGCPS Student Applications Team guidance. Further information regarding attendance analysis will be presented in the 2018 Graduation Audit.

### **Lessons Learned and Best Practices**

As an outcome of the Action Plan Assessment and Performance Audit, A&M compiled a series of Lessons Learned and Best Practices. The Lessons Learned and Best Practices section is intended to provide guidance for PGCPS and other Maryland School Districts as they address challenges with attendance, grading, and graduation certification.

## II. Introduction

Alvarez & Marsal was hired by the Maryland State Department of Education to conduct an independent performance audit of PGCPS. The 2018 Audit was requested by MSDE as a follow-up from the audit of PGCPS carried out by A&M in 2017. The 2018 Audit occurred between July 9, 2018 and October 1, 2018. In accordance with the Statement of Work (SOW), A&M's efforts consisted of three phases:

- (1) An **Action Plan Assessment**, consisting of an analysis of gaps between PGCPS's Action Plan published in December 2017 (Action Plan) and the recommendations included in A&M's 2017 Audit. This analysis was followed by district and school-level interviews to obtain details about implementation efforts surrounding Action Plan items.
- (2) A follow-up **Performance Audit**, including visits to 27 schools to collect student cumulative records related to grade changes and graduation certification. This effort was supported by data analysis of student records in PGCPS's SchoolMAX student information system (SchoolMAX). The A&M Team identified a random sample of 1,085 students from an identified 2018 Graduate Population of 7,273 students graduates from SY 17-18 across 27 PGCPS High Schools. In accordance with the SOW, A&M chose a random sampling methodology to allow extrapolation of the 2018 Graduate Sample results to the larger 2018 Graduate Population from SY 17-18.
- (3) A consolidation of **Best Practices and Lessons Learned** from the 2017 Audit and the 2018 Audit, which speak to PGCPS's successes and challenges addressing problems in the areas of grade changes, graduation certification, attendance and credit recovery programs.

The following report details A&M's approach to conducting each phase of the 2018 Audit, presents findings and recommendations associated with the Action Plan Assessment and Performance Audit, and concludes with Lessons Learned and Best Practices which can be applied by districts across Maryland.



### III. Action Plan Assessment

#### A. Introduction

In response to A&M's 2017 Audit findings and recommendations, PGCPs released a detailed Action Plan on December 19, 2017<sup>2</sup>. Task 1 of the SOW required A&M to assess the degree to which the planned approach in the Action Plan addressed the 2017 Audit recommendations and PGCPs's implementation of each recommendation.

#### B. Approach

A&M compared the Action Plan to each recommendation from the 2017 Audit, evaluating the extent to which PGCPs fully addressed recommendations in the following focus areas: attendance, grade changes and appeals, grading, credit recovery, graduation certification, records access and controls, and general findings and observations on governance of the District. Then, A&M worked to validate the implementation of these recommendations through onsite interviews and document review—both at the district-level and the school level. A&M's Action Plan assessment included the following key activities:

- Review the Action Plan and evaluate the degree to which the plan addresses each of A&M's 2017 findings:
  - Determine if the public plan and any internal plans were sufficiently documented to facilitate the successful implementation of the recommended actions
  - Identify recommendations which the Action Plan failed to address
  - Evaluate the degree to which PGCPs's planned response addresses irregularities found across PGCPs High Schools, Central Office departments, and Records facilities
- Assess PGCPs's implementation of the Action Plan and related efforts to mitigate issues identified in the 2017 Audit and assess effectiveness of improvements, including:
  - Evaluate changes and improvements to policies, processes, and tools, including:
    - Grading and grade change policies
    - Graduation requirements and certification procedures
    - SchoolMAX Policies, including user access/permissions
    - Recordkeeping policies and procedures
    - Multiple Pathways to Success (MPTS) handbook, policies, and grading.
    - Consider that some action items are to be phased in and may not be fully implemented at end of SY 17-18
- Assess PGCPs's efforts to automate processes to reduce risk of error or manipulation, including:
  - Automation of the Grade Change Authorization Form PS-140 process
  - Implementation of improved system access controls

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<sup>2</sup> PGCPs issued monitoring updates to MSDE from April 2018 through September 2018.

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- Determine the degree to which changes in policies, procedures, and tools have been appropriately supported with communications and training, including:
  - Training on updated policies, including the disciplinary steps associated with administrative procedure violations
  - Communication to students and families about the updated standards and the subsequent changes to timelines and/or expectations
- Assess PGCPs’s approach to holding schools accountable for proper implementation of policies and procedures and make recommendations on improving administrative procedure adherence:
  - Review and assess PGCPs’s monitoring of the 2018 graduating class
  - Review and assess PGCPs’s oversight regarding implementation of all new/modified policies and procedures at each high school
- Assess course corrections, including administrative procedure changes, communications and training efforts made by PGCPs to determine the efficacy of mid-year changes
- Evaluate the successful implementation of intended changes across all PGCPs high schools
- Assess updated timelines and associated controls, including changes in grading deadlines, and report on their impact

A&M evaluated PGCPs’s implementation of 2017 Audit recommendations by interviewing 34 district-level personnel and requesting follow-up documentation and data to validate their stated progress. A&M also performed interviews of various school personnel at 27 PGCPs high schools which further informed the Action Plan Implementation Assessment.

### C. Gap Analysis

The Gap Analysis summarized below assesses PGCPs’s Action Plan responses to the 2017 Audit recommendations. The totals in Figure 4: Action Plan Gap Analysis Summary represent the number of 2017 Audit recommendations that were fully addressed, partially addressed, or not addressed in the Action Plan.

*Figure 4: Action Plan Gap Analysis Summary*

Categories	Recommendations Fully Addressed	Recommendations Partially Addressed	Recommendations Not Addressed
Attendance	5	0	0
Grade Changes & Appeals	6	2	0
Grading	6	0	0
Credit Recovery	4	0	0
Graduation Certification	6	0	0
Records Access & Controls	5	1	0
General Findings and Observations on Governance of the District	1	1	3
<b>Total</b>	<b>33</b>	<b>4</b>	<b>3</b>

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**Of the 40 recommendations from the 2017 Audit, 33 were fully addressed in the Action Plan. Four recommendations were only partially addressed by the Action Plan, and three recommendations were not addressed in the Action Plan at all.** For a detailed list of all 2017 Audit recommendations and PGCPs's corresponding Action Plan responses, refer to Appendix A: Detailed Action Plan Gap Analysis.

## 1. Partially Addressed

In the 2017 Audit, A&M recommended that PGCPs "implement an independent review function for grade changes at the school-level." **PGCPs partially addressed this recommendation**, stating that "starting January 2018, PGCPs will produce individual school quarterly grade change reports." Although this contributes to enhanced awareness of grade change levels, simply producing individual school level reports provides no specific accountability or monitoring function.

A&M also recommended that PGCPs "report [random sampling] results to PGCPs administration, internal auditor and school board." PGCPs stated that they would "work with the Board of Education to determine how to best report the information." This Action Plan statement only **partially addressed this recommendation** because it did not establish how or when random sampling results would be reported to the specified stakeholders.

Additionally, A&M recommended that PGCPs "establish a program of monitoring, reporting, and following up on excessive grade changes, or grade changes outside of compliance with procedures." PGCPs's response only **partially addressed this recommendation** by stating that the "using reports [created by the Division of Information Technology], the Deputy Superintendent will monitor excessive grade changes and weekly grade inputs." This response did not provide sufficient detail on the expected follow-up from the Deputy Superintendent when irregularities are discovered (e.g., on-site investigations, interviews, and recourse for identified misuse).

Furthermore, A&M recommended that PGCPs "Increase accountability via reviews completed by an independent third party. Either: 1) expand the auditor role to complete performance audits of both academic and non-academic areas of the District or 2) create an accountability officer outside of the auditor function to provide independent oversight of academic policies and procedures and student performance." While PGCPs's Action Plan **partially addressed this recommendation**, indicating that "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." The Action Plan did not state that that PGCPs would establish an internal accountability.<sup>3</sup>

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<sup>3</sup> Though not fully-addressed in the Action Plan, PGCPs ultimately has established an accountability function as recommended.

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## 2. Not Addressed

A&M recommended that “to improve school-level accountability, PGCPs leadership 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.” PGCPs’s Action Plan **did not address this recommendation**—specifically, their response did not establish metrics that would be used and did not state how PGCPs leadership would provide accountability and leadership once the metrics have been provided.

Additionally, PGCPs **did not include Action Plan statements to address the two recommendations** that “PGCPs leadership should ensure timely investigation and response into complaints to avoid press involvement with internal complaints,” and “the Board should receive regular briefings into any complaints of fraud impacting student outcomes.”

### D. Implementation Assessment

The following table summarizes A&M’s findings regarding PGCPs’s implementation of the 2017 Audit recommendations. For additional details, please see Appendix A: Detailed Action Plan Gap Analysis.

*Figure 5: Implementation Assessment Summary*

Categories	PGCPs Fully Implemented Recommendation	PGCPs Partially Implemented Recommendation	PGCPs Did Not Implement Recommendation
Attendance	4	0	1
Grade Changes and Appeals	5	3	0
Grading	6	0	0
Credit Recovery	4	0	0
Graduation Certification	3	3	0
Records Access & Controls <sup>4</sup>	5	1	0
General Findings and Observations on Governance of the District	1	3	1
<b>Total</b>	<b>28</b>	<b>10</b>	<b>2</b>

Of the 40 recommendations from the 2017 Audit, 28 were fully implemented; however, ten recommendations were partially implemented, and two were not implemented at all. Summaries of the

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<sup>4</sup> Evaluation and analysis of Records Access and Controls can be found throughout the other sections.

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“partially implemented” and “not implemented” Action Plan statements can be viewed within the “Implementation Gaps” subheadings within each section below.

## 1. Implementation Assessment by Category

The following sections outline key observations and recommendations related to the implementation of 2017 Audit recommendations and PGCPs’s Action Plan. The areas for further enhancement provided within the following sections below can further improve consistency and accountability related to the issues identified in this investigation.

### *a) Attendance*

**The District did not communicate or enforce the attendance-related grading requirements within administrative procedures. PGCPs high schools were not expected to assign the letter grade “E” to students who had more than five unlawful absences in a semester long course or ten unlawful absences in a year-long course.**

The response from most school staff interviewed was that the attendance-related grading requirements were not enforced at their school during SY 17-18. Administrators acknowledged that their schools did not consistently follow the automatic “E” grade for excessive absences, and that individually, they did very little to enforce this requirement. Nevertheless, most administrators emphasized the many efforts at their schools to get truant students to attend. At one school, an Administrator outlined a process to compare absences to grades; however, most Administrators did not indicate that they had performed this type of review.

### (1) Implementation Gaps

Despite incorporating A&M’s recommendation to configure SchoolMAX to support monitoring and enforcement of excessive absence procedures for grading into the Action Plan, **PGCPs did not implement this recommendation.** PGCPs did not implement new tools to allow monitoring at the school-level or standardize attendance record keeping and monitoring processes. The Teaching and Learning and Information Technology (IT) departments validated that all schools could run a weekly school-level attendance reports. The Action Plan noted that IT would explore the capability of SchoolMAX to convert excessive unlawful absences to a failing grade. IT did not implement this system change.

## (2) Areas for Further Enhancement

### **A&M recommends that PGCPs:**

- Investigates additional features of SchoolMAX that could support school-level attendance accountability. Given the AP 5113 modifications, PGCPs should now consider whether SchoolMAX can automatically assign a zero for missed assignments when a student is unlawfully absent.
- Develops a district-level monitoring process including data analysis on the reports from SchoolMAX to ensure all schools are following the policies outlined in AP 5113.
- Provides more substantial training for all administrators on how to implement and monitor adherence to AP 5113 at their schools.

### *b) Grade Changes and Appeals*

**Processes and controls for grade changes have significantly improved, and PGCPs has developed an online grade change form that was piloted and will be used starting in SY 18-19.**

In visits to individual schools, A&M validated PGCPs's actions to improve understanding of the grade change and appeals processes. The clarity on expectations for grade changes has significantly improved, and PGCPs has developed an online grade change form that was piloted and will be used starting in SY 18-19. The Student Interventions (SIT) team is now being used for grade appeals to provide a system of controls for grade appeal approvals. Some schools also use the SIT approval process for all grade changes, though this is not required by Administrative Procedure 5116. Starting in SY 17-18, principals could download a report that provided a list grade changes that occurred outside of grading window.

Additionally, PGCPs has added controls around user roles in SchoolMAX. The principal must submit new access requests to authorize a maximum of two employees per role (grade manager and transcript manager) unless it is a large school (1500+ students), which can authorize three employees. Authorized employees are required to attend a mandatory training session with the Technology Training Team before they are assigned their role in SchoolMAX. The only exception to the authorization and training requirement is if there is an emergency, at which point the principal can request temporary access for a user.

### (1) Implementation Gaps

A&M recommended that PGCPs "implement an independent review function for grade changes at the school-level," and "perform Representative Random Sampling of grade changes to evaluate adherence to policies, procedures, and timelines, as well as appropriate inclusion of documentation requirements." **PGCPs partially implemented these two recommendations** - they did conduct random sampling of student records after the Q1 and Q2 grading periods of SY 17-18; however, PGCPs did not produce quarterly grade change reports for individual schools and did not audit Q3 and Q4 grading periods.

Additionally, A&M recommended that PGCPs should “report results [of the Representative Random Sampling] to PGCPs administration, internal auditor and school board.” **PGCPs did not implement this recommendation.** According to A&M’s interviews with the seven members of the Board of Education, they were not aware of the results of the random sample audits completed by PGCPs.

A&M also recommended that “PGCPs establish a program of monitoring, reporting, and following up on excessive grade changes, or grade changes which are clearly outside of compliance with procedures.”<sup>5</sup> **PGCPs did not implement this recommendation.** Though PGCPs’ Action Plan stated that the Deputy Superintendent would monitor grade changes, during the 2018 Audit, A&M found no evidence that the Deputy Superintendent or other central office personnel was monitoring grade changes and weekly grade inputs.

## (2) Areas for Further Enhancement

### **A&M recommends that PGCPs:**

- Adds detail to AP 5116 regarding execution and enforcement.
- Adds a step in the electronic PS-140 Form process that requires the teacher to agree or disagree with a grade change initiated by the principal or SIT chair, in accordance with the process outlined in AP 5116.
- Outlines a clearer process that explains: when to use the online PS-140 form, expected timelines, and record keeping.
- Defines procedures for late grade entries.

### *c) Grading*

**In SY 17-18, accountability for verifying compliance with grading was left to the individual principals and assistant principals.**

Administrative Procedure 5121.3 outlined general expectations for make-up work, grade entry, and Good Faith Effort, but principals each interpreted the policy differently and chose how to monitor and enforce policies in their own schools.

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<sup>5</sup> This recommendation was included in the Records Access and Controls section of the PGCPs Action Plan and is therefore tallied under that category in [Figure 5: Implementation Summary](#).

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(1) Areas for Further Enhancement

**A&M recommends that PGCPs:**

- Establishes clear repercussions for grading and reporting procedure violations.
- Provides additional training for both principals and assistant principals on how to implement AP 5121.3 in their schools and continue to share training materials that school administrators can use with their staff.

*d) Credit Recovery*

**PGCPs did not have any gaps in the implementation of the credit recovery recommendations. PGCPs contracted a new State approved vendor for its Educational Online Program.**

PGCPs cancelled the contract with their third-party online credit recovery vendor prior to the start of SY 17-18. During the first half of SY 17-18 students were not able to utilize these credit recovery options due to the contract cancellation. Students had the option to attend night school to recover credits in absence of other credit recovery options.

PGCPs replaced the previous online credit recovery vendor with a new State-approved vendor, and students were able to begin enrolling in January 2018. The online platform includes all components of the course including lessons, assignments, tools, and teacher resources and supports consistent grading. With the new online platform, many of the accountability issues associated with past programs have been resolved: to receive credit for the course, a student must complete 100% of the course with at least a 60% on each assignment. PGCPs's new Administrative Procedure 5182 (Educational Online Programs) also outlines attendance expectations – students can only miss five days before being removed from a course unless they have verified reasons. The main responsibility of the school is to support students as they complete the course and track attendance and participation.

Unlike previous online learning options used in PGCPs, online course grades are now entered directly into SchoolMAX by the teacher and show up just like any other course on a student's transcript. Therefore, manual transcript changes<sup>6</sup> of credit recovery grades onto a student's transcript are no longer needed.

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<sup>6</sup> In PGCPs, manual transcript changes are referred to as "pramming."

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## (1) Areas for Further Enhancement

### A&M recommends that PGCPs:

- Clarifies procedures around repeat courses. For example, when can a student repeat a course for a higher grade? And how many times can a course be repeated?
- Adds monitoring and compliance guidelines to the roles and responsibilities of EOP teachers, school coordinators, principals and the EOP office.
- Adds a process to AP 5182 that outlines how student progress is tracked and specify clear checkpoints for course completion.

### *e) Graduation Certification*

**PGCPS high schools have significantly improved their recordkeeping procedures for graduation certification since the 2017 Audit.**

This can be attributed to the following changes:

- District personnel, including area Associate Superintendents, Instructional Directors, and central office administrators have visited schools more frequently to audit student cumulative folders and graduation certification records.
- Expectations for the registrar role are more defined and standardized.
- The new graduation certification process completed by professional school counselors with the support of registrars and principals has improve compliance with PDS Tally Card requirements.

## (1) Implementation Gaps

A&M recommended that PGCPs “require all schools to utilize PDS Tally Cards,” and “develop and implement an administrative procedure which specifies tools and processes required to place a student on the graduation list and issue a diploma.” PGCPs **partially implemented these two recommendations**. Although PGCPs did create many new processes, tools, and trainings to support the graduation certification process, the District did not develop or implement an administrative procedure. Additionally, during the document review process, A&M found that not every school used the same version of the PDS Tally Card. Specifically, some schools used versions of the PDS Tally Card that prompted counselors to verify that students had taken a math class in each year of high school, while at other schools PDS Tally Cards did not include an explicit statement that all students should take a math course in each year of high school.

A&M also recommended that PGCPs “develop standardized accountability practices that would detect students being improperly certified for graduation.” **PGCPS partially implemented this recommendation**. PGCPs did implement new accountability practices, monitoring, and tools. However, as found in this audit, some students who were identified in SchoolMAX as eligible to graduate had not

met all PGCPs and MSDE requirements to graduate. See the 2018 Graduation Audit for more information on these students.

## (2) Areas for Further Enhancement

### A&M recommends that PGCPs:

- Continues conducting quarterly audits of the Graduation Certification Checklists and PDS Tally Cards, using a standardized audit process and timeline to help ensure that no student gets overlooked and that all counselors are completing the process in a timely and accurate manner (this was also a 2017 Audit recommendation that has not been fully implemented).
- Trains principals and assistant principals over seniors on the graduation requirements and certification process so that they are informed when supporting the counselors and signing transcripts or PDS Tally Cards.
- Delivers annual trainings for school registrars focusing on aspects of their role that are impacted by administrative procedures and other policy changes.
- Institutes a more formal process for schools to report issues found in student records.
- Increases the level of detail in trainings regarding pramming of transfer student data to ensure all schools are entering credits accurately.

## f) Monitoring and Accountability

**While PGCPs has taken initial steps to create an accountability function and perform district-level audits, the District has not yet created consistent operating procedures around monitoring, reporting, and enforcement of policies and procedures.**

### (1) Implementation Gaps

PGCPs **did not address the 2017 Audit recommendation** “to improve school-level accountability, PGCPs leadership 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.” A&M found that no performance metrics were created, and PGCPs did not provide school leaders with a standardized process or tools to monitor grade changes.

Furthermore, PGCPs only **partially addressed A&M’s recommendation** to “increase accountability via reviews completed by an independent third party. Either: 1) expand the auditor role to complete performance audits of both academic and non-academic areas of the District or 2) create an accountability officer outside of the auditor function to provide independent oversight of academic policies and procedures and student performance.” Interviews with the Internal Audit Department revealed few changes to the department’s investigative focus since the release of the Action Plan. The

focus of the Internal Audit Department remains largely financial in nature; only one administrative procedure violation investigation specifically related to grading, grade changes, or graduation certification was conducted by this department during SY 17-18. In late August 2018, PGCPs appointed a new Chief Accountability Officer, who has developed plans to apply rigorous data analytics to Administrative Procedure adherence related to grading, grade changes, attendance, and other areas going forward. This position was filled just before the start of SY 18-19, so these initiatives were not implemented during SY 17-18.

PGCPs **did not address A&M’s recommendations that** “PGCPs leadership should ensure timely investigation and response into complaints to avoid press involvement with internal complaints,” and “the Board should receive regular briefings into any complaints of fraud impacting student outcomes.” PGCPs’s Internal Audit Department provided regular reports to the Board of Education regarding issues highlighted on the compliance hotline; however, none of the PGCPs Board members interviewed recalled being briefed on items related to grading and graduation. PGCPs’s Internal Audit Department received multiple complaints about grading and graduation, but these complaints were categorized on their complaint summaries as “other” – not calling attention to their relevance to grading and graduation issues. Internal Audit’s remediation notes specifically detail sending information to the PGCPs Board Chair, Vice Chair, and Executive Director, but do not detail sharing complaints with the full board as recommended.

## (2) Areas for Further Enhancement

### **A&M recommends that PGCPs:**

- Provides support and resources for the newly-empowered Chief Accountability Officer organization to continue to make progress in closing the accountability gaps identified in the 2017 Audit.

## IV. Performance Audit

### A. Introduction

A&M conducted a district-wide performance audit to assess the degree to which changes implemented by PGCPs have impacted administrative procedure adherence (related to grading and graduation) and reassess the fidelity of controls and processes at high schools. In addition to informing the findings and observations included within the 2018 Audit, A&M's site visits, data analysis, and records review provided insight on PGCPs's implementation of the Action Plan and contributed to the individual School Summaries.

### B. Approach Background

In accordance with Task 2 of the SOW, A&M performed an in-depth audit of SY 17-18 graduation certification processes and documentation for a sample of graduating students at each PGCPs high school from SY 17-18 and evaluated processes and controls. The goal was to evaluate the progress made by PGCPs in improving the integrity of grading, attendance taking, record-keeping, and graduation processes. Key activities included:

- Select a representative sample of SY 17-18 graduating seniors across the PGCPs system, including students at each high school.
- Within the sample, identify any grade changes or application of extra credit which have been applied outside of appropriate time windows or otherwise out of compliance with administrative procedures.
  - For the 2018 graduate sample with fail to pass grade changes, review transcripts and cumulative folders to ascertain whether grade changes are appropriately documented and supported.
- Investigate grade changes which had fail-to-pass impacts on final grades and/or impacted graduation eligibility.
- Perform site visits to each PGCPs high school to conduct interviews with appropriate key staff to evaluate policies and procedures communication and compliance.
- Collect applicable student records, electronically and on-site to support review and analysis of the sample student records.
- Develop a consolidated workbook for all graduation certification tests applied against the random sample of graduating seniors. Evaluate whether their graduation was facilitated by nonadherence to any grading or graduation requirements.
- Identify the number of students in the sample who graduated with the assistance of administrative procedure violations, the number of students aided by multiple administrative procedure violations, and those who graduated without any administrative procedure violations.

- Assess intersection between excessive unlawful absences and passing final grades and/or graduation, and report instances in which students have passed and graduated in violation of attendance policies.
- Review alternative programs records associated with sample students and identify any inappropriate or inadequately documented grades or grade changes due to MPTS and other alternative programs.
- Develop comprehensive report with district-wide and by-school reporting on the number of students within the sample whose final grades and/or graduations were impacted by administrative procedure violations, including:
  - Inappropriate and/or undocumented grade changes
  - Ineligibility for graduation in accordance with MSDE and PGCPs requirements
  - Ineligibility to graduate due to missing coursework or service learning requirements

## 1. District-Level Interviews

To inform both the 2018 Audit, and the Action Plan Assessment outlined above, A&M conducted interviews with members of the PGCPs Board of Education, executives, and key subject matter experts.

*Figure 6: District-Level Interviews*

Interviewee Area	Positions/Departments	Number of Individuals
Board of Education	<ul style="list-style-type: none"> <li>• Members of the Board of Education, including the Chair and Vice Chair</li> </ul>	7
Executive Team	<ul style="list-style-type: none"> <li>• Interim Chief Executive Officer</li> <li>• Chief Accountability Officer</li> <li>• Chief Operating Officer</li> <li>• Chief Information Officer</li> <li>• Communications Officer</li> <li>• Associate Superintendents, Areas 1, 2, and 3</li> <li>• Chief of Staff</li> <li>• Chief of Special Education and Student Services</li> </ul>	10
Administration	<ul style="list-style-type: none"> <li>• Supervisor of Student Records, Transfer, and Archival Services</li> <li>• Director of Internal Audit</li> <li>• Department of Testing, Research, and Evaluation</li> </ul>	4
Counseling	<ul style="list-style-type: none"> <li>• Counseling Instructional Specialists</li> </ul>	3
Attendance	<ul style="list-style-type: none"> <li>• Pupil Accounting</li> </ul>	2
Information Technology	<ul style="list-style-type: none"> <li>• Student Applications Team</li> <li>• Director of Data Quality</li> </ul>	4

Alternative Programs	<ul style="list-style-type: none"> <li>• Educational Online Program</li> <li>• EOP Coordinators</li> </ul>	4
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## 2. Develop an Understanding of PGCPs Student System and Data

Before analyzing data in support of the 2018 Audit, A&M developed an understanding of PGCPs systems and data through key interviews and review of reference materials.

### *a) Key Interviews*

The PGCPs Student Applications team was the primary contact for all student data-related requests in both the 2017 Audit and the 2018 Audit. To develop a more in-depth understanding of PGCPs’s data collection and reporting practices and identify any changes in SY 17-18, A&M conducted interviews (in-person and by phone) with the IT Team and Student Applications Team, including the Chief Information Officer, Student Applications Supervisor, Student Information Services Technical Lead, and Director of Data Quality. Throughout the 2018 Audit, A&M remained in contact with the IT and Student Applications Teams to obtain required documentation through secure file transfer and to clarify system questions.

### *b) Review of SchoolMAX Training Materials*

A&M reviewed standard training materials provided by SchoolMAX, including the SchoolMAX Enterprise Configuration Guide and additional training materials and reference guides provided by PGCPs to better understand PGCPs’s grading and attendance systems. The following documents served as references:

- *SchoolMAX Enterprise Configuration Guide*: Supported A&M’s understanding of key data elements within the student information system.
- *PGCPs Internal Training guides*: Supported A&M’s understanding of the user interface and features that PGCPs teachers, grade managers, and transcript managers utilize, including information on publishing grades, entering service hours, and using SchoolMAX.

## 3. Collection of Data

On July 23, 2018, A&M began to work with the PGCPs Student Applications Team to acquire data from the SchoolMAX student information system (the primary electronic data source for this investigation). PGCPs uses this third-party software to record attendance, grades, assignments, report cards, discipline incidents and other information about students. Teachers and school personnel input student information into the system, and parents can view information in real time. SchoolMAX has three key modules that support the daily, quarterly, and yearly grade reporting. The following three grading modules were relevant to the investigation:

1. **Gradebook Module (Daily input)**: The lowest level in SchoolMAX that teachers have access to every day – where they enter grades for assignments, participation, classwork, and tests.

2. Grade Module (Quarterly input): Publishes progress, quarterly, and final grades.
3. Transcript Module (Annual input): Primarily used at the end of the year, containing the official student grades and credit completion. Final transcripts are sent to parents from this module.

On July 23, 2018, A&M provided a list of data table requests, and the Student Applications Team uploaded the data tables to A&M's secure upload portal between July 27, 2018 and August 13, 2018. A&M then created a consolidated data set that allows for comparison across grading, graduation, and attendance. The following data elements were critical to A&M's analysis:

- List of all graduating students in SY 17-18, exit code 60<sup>7</sup> in SchoolMAX
- Users
  - Faculty and staff associated with courses
  - Usernames and details associated with SchoolMAX entries
- Attendance
  - All records for period attendance
  - The audit table that maintains the history of all changes to period attendance records, e.g. from absent to tardy
  - A list of absence reason codes
- Grades / Courses
  - Recorded course level grades by student, class, grading period, and type
  - Audit table that maintains the history of all changes to recorded course level grades
- Transcripts
  - Manual Transcript Updates ("Prarming")
- Summer School graduate list

To analyze compliance with attendance-related grading requirements, A&M accessed data from the Attendance Module which tracks initial student attendance input by teachers as well as subsequent updates to attendance by attendance counselors. This attendance data is tracked on the period level, allowing insight into student attendance as it relates to grading.

#### 4. Selection of Sample

On July 30, 2018, A&M received a file from the Student Applications Team that included all SY 17-18 graduates that received a standard Maryland High School Diploma. The 2018 Graduate Population students were coded as "C60 eligible to graduate" in SchoolMAX for only May and June Graduates – as of the date of data collection, summer school graduations had not occurred, therefore summer graduates are not reflected in the 2018 Audit.

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<sup>7</sup>2018 Graduation Population students were coded as "C60 eligible to graduate" in SchoolMAX for only May and June Graduates

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Throughout this report, A&M identifies these 7,273 graduates in SY 17-18 as the “2018 Graduate Population.” A&M then determined the number of students required to obtain a statistically significant sample of the 2018 Graduate Population<sup>8</sup>.

- Sample Size: 12% of the 2018 Graduate Population of each school, with a minimum school sample size of 30 students. In schools where the 2018 Graduate Population contained fewer than 30 students, all students were selected in the sample for that school.
- Selection Criteria: Random sampling across the SY 17-18 graduating class.

A&M’s 2018 applied random sampling methodology to allow for extrapolation from the results. This methodology varies from the 2017 Audit which sampled only students with late grade changes and could therefore not be extrapolated to the full SY 15-16 and SY 16-17 graduating classes. Consequently, the 2017 Audit sample results cannot be directly compared to the 2018 Audit sample results. Throughout this report, A&M references sample students identified for document review as the “2018 Graduate Sample”.

## 5. Analysis of Data

After data collection and sample selection, A&M performed data analysis to support the on-site investigation and analyze critical elements of PGCP’s compliance with administrative procedures and State of Maryland requirements. This task included detailed analysis to verify graduation eligibility of the 2018 Graduate Sample and administrative procedure adherence by the high schools. Additional analysis was performed on the total 2018 Graduate Population of 7,273 students to provide additional context, and where possible present a comprehensive view of administrative procedure adherence across PGCP schools. The results of A&M’s data analysis findings are presented in the Sample Results section of this report.

### *a) Grade Changes*

For all 2018 Graduates, A&M reviewed SchoolMAX’s grade change audit trail to identify: 1) when quarterly grade changes occurred after the grade entry cutoff date for teachers and 2) where manual updates were made directly to final grades and transcripts after system-wide calculation of final grades. A&M referenced the SY 17-18 Grade and Retention Processing guide to identify the appropriate grading timelines applicable to graduating seniors in SY 17-18. Figure 10: Grade Entry Cutoff Dates identifies the dates used in A&M’s analysis.

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<sup>8</sup> This 2018 Graduates Sample was selected to maintain statistical significance while meeting best practices for minimum sampling.

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**Figure 7: Grade Entry Cutoff Dates**

Grade Period	Grade Type	Grade Entry End Date
1	Quarter	11/29/2017
2	Quarter	01/26/2018
3	Quarter	03/29/2018
4	Quarter - Seniors	05/11/2018
Final	Crossland HS	05/23/2018
Final	All others	05/21/2018

A&M analyzed the number of unique students with grade entries or changes that occurred after quarterly grade cutoff dates (requiring the use of the PS-140 Form). A&M reviewed available grade change forms for all applicable grade changes and conducted analysis to identify the impact of grade changes. A&M only marked students as graduating in violation of administrative procedures if an undocumented or inappropriate grade change affected “fail-to-pass<sup>9</sup>” impact on a required<sup>10</sup> course.

Grade entries overwriting previously blank entries or “incomplete” entries are considered “late grade entries” within A&M’s analysis and do not contribute to the grade change analysis. To close out findings on irregular activity in the Transcript Module identified in the 2017 Audit, A&M analyzed entries to the Transcript Module to verify consistency with year-end grading procedures, or where appropriate, transfer student procedures. Analysis and related document review findings associated with 2018 Graduate Sample grade change analysis can be found in the Sample Results.

A&M performed additional analysis on the total number of late grade entries and grade changes across the entire PGCPSS 2018 Graduate Population to provide understanding of the scale and scope of grade changes at PGCPSS in SY 17-18. To allow for comparison with the previous analysis of the SY 15-16 and SY 16-17 grade changes and late grade entries, these 2018 Graduate Population results are presented in the Additional Findings and Analysis section. 2018 Graduate Population analysis results do not control for core vs. non-core classes and are presented in like terms to the 2017 Audit to allow for comparison across the 2018 Graduate Population. Each of these 2018 Graduate Population analyses identifies the unique number of students affected by potential administrative procedure violations.

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<sup>9</sup> Quarterly grade changes where modifications to quarterly grades took place after the grade entry window and increased the student’s Final Grade from an “E” grade (below a 60-point average) to a passing grade greater than or equal to 60 points (“fail-to-pass” changes).

<sup>10</sup> Required courses are categorized as courses required to satisfy Maryland graduation requirements.

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### *b) Attendance and Grading*

An added component of the 2018 Audit is attendance analysis which demonstrates the degree to which severe absenteeism affects students in PGCPs high schools. A&M evaluated PGCPs's level of compliance with attendance and grading requirements as outlined in Administrative Procedure 5121.3 (Grading and Reporting for High Schools) in effect during SY 17-18<sup>11</sup> which states that "In secondary schools, five (5) days of unlawful absence per semester course or ten (10) days of unlawful absence per full year course will result in the assignment of an "E" for the course." A&M identified each student who passed despite this administrative procedure requirement by either:

- 1) Receiving a passing final grade in one or more full-year (1.0 credit) course in which the student was unlawfully absent for more than 10 days.
- 2) Receiving a passing final grade in one or more half-year (.5 credit) course in which the student was unlawfully absent for more than 5 days.

A&M identified the number of students in the 2018 Graduate Sample with excessive unlawful absences in required courses for which they received a passing grade as "Graduated Despite Excessive Unlawful Absences in One or More Required Courses." Strict adherence to Administrative Procedure 5121.3 would have resulted in each of these students failing core courses, and most likely being ineligible to graduate. Analysis associated with attendance and grading can be found in the Attendance Analysis section which also includes analysis on the total level of unlawful absences across the 2018 Graduate Population.

### *c) Service Learning*

To assess the degree to which PGCPs graduates met the Service Learning hours required by COMAR,<sup>12</sup> A&M analyzed the service learning table in SchoolMAX for all 2018 Graduates and identified the total number of graduates with less than the 24 hours of service learning. Students within the 2018 Graduate Sample who did not meet Service Learning requirements are identified as "Service Learning Ineligible" within the Sample Results section of this report.

Additional analysis of service learning eligibility of the population of 2018 Graduates includes all students who failed to meet Service Learning eligibility requirements.

## 6. School Site Visits

School site visits informed A&M's assessment of the Action Plan implementation as well as the audit of the 2018 Graduate Sample. A&M performed site visits to each PGCPs high school with three primary goals:

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<sup>11</sup> PGCPs revised attendance related requirements in AP 5121.3 as of July 1, 2018, removing the threshold numbers of unlawful absences.

<sup>12</sup> COMAR 13A.03.02.05.

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- 1) To assess whether the relevant goals of the Action Plan were implemented at the school-level with fidelity.
- 2) To understand how each school implemented the policies and procedures related to grading and recordkeeping that are outlined in PGCPs policies and procedures and State of Maryland laws and regulations in SY 17-18.
- 3) To review student records the 2018 Graduate Sample so that specific attributes related to grade changes and graduation certification could be tested. A&M deployed a team of 12 over the course of six weeks to scheduled site visits of 27 PGCPs high schools.

#### *a) Interviews*

During school site visits, A&M focused on interviewing school personnel involved with grade entry and graduation certification, including principals, grade managers, senior professional school counselors, senior administrators, registrars, attendance secretaries and EOP coordinators. A&M interviewed over 100 school personnel, including 27 principals, and more than 20 grade managers, 10 registrars, 20 assistant principals, and 20 senior professional school counselors. School-level interviews focused on understanding the:

- Processes around grade changes and recordkeeping.
- Process and timing to certify students for graduation.
- Culture within the school and PGCPs.
- Interviewees' observations of the changes made in SY 17-18 and the effectiveness of such changes.
- School's understanding of, and adherence to, PGCPs grading, attendance, and graduation certification procedures.

#### *b) Document Collection & Review*

In addition to performing interviews of school personnel, A&M obtained supporting documentation for each student in the 2018 Graduate Sample. A&M manually reviewed final student transcripts to identify students who did not meet Graduation Requirements<sup>13</sup> for Public High Schools in Maryland. A&M's goal in testing the 2018 Graduate Sample at each high school was to assess compliance with PGCPs Administrative Procedures on grade changes and graduation certification and to verify the presence of necessary graduation certification records<sup>14</sup>. The records that were tested include:

- Grade Change Authorization Form PS-140
- PDS Tally Cards
- Final Transcripts
- Service Learning Verification Form

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<sup>13</sup> COMAR 13A.03.02.00

<sup>14</sup> Information on how findings were categorized can be found in Documentation and Categorization of Findings

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## *(1) Graduation Eligibility Evaluation*

During document review, A&M evaluated each set of student records to identify which records failed to meet any requirements for grade changes or graduation standards and categorized student information to demonstrate the degree of non-compliance. The graduation requirements for the class of 2018 are as follows:

- 4 English credits
- Enrollment in a math course each year in high school, passing Algebra 1, Geometry and 1 additional mathematics credit<sup>15</sup>
- 3 Science, including 1 in Biology and 2 additional credits that must include laboratory experience
- 3 Social Studies, including 1 in U.S. History, 1 in Local, State, and National Government, and 1 in World History
- 1 Fine Arts
- 0.5 Personal Fitness
- 0.5 Health Issues
- 1 Technology Education
- Completer Electives – one of the following:
  - 2 credits of world language, which may include American Sign Language;
  - 2 credits of advanced technology education; or
  - Successfully complete a State-approved career and technology program.
- Twenty-one (21) credits are required. PGCPs has notified the MSDE that four (4) credits must be earned after completion of Grade 11.
- The student must complete four years of approved study beyond the 8th grade unless on an approved option.<sup>16</sup>
- Student Service-Learning: The student shall complete a locally-developed, state-approved program that includes service-learning infusion in designated courses, preparation, reflection and a specified number of hours of independent service.<sup>17</sup>

## *(2) Grade Change Form Evaluation*

For each grade change associated with a student within the 2018 Graduate Sample, A&M collected grade change forms and supporting documentation from the student cumulative folders. A&M recorded the following information about each grade change form collected:

- Is there a Grade Change Authorization Form PS-140 in the Student's Records that supports the change?
- Is the form appropriately signed off?
- If missing a signature, whose?

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<sup>15</sup> COMAR 13A.03.02.03

<sup>16</sup> COMAR 13A.03.02.11

<sup>17</sup> COMAR 13A.03.02.05

- Reason for change noted on the PS-140 Form?
- Is there support attached to the form?

Based on this review, A&M categorized grade changes findings as fully-documented, partially-documented, or undocumented.

### *(3) Transcript Evaluation*

To establish graduation eligibility, A&M analyzed each final transcript from the 2018 Graduate Sample to determine if the student had the necessary courses and credits utilizing the requirements listed above in Graduation Eligibility Evaluation. A&M utilized the PGPCS academic catalog and identified all courses which met these requirements. From that analysis, A&M produced a list of ineligible transcripts – students that did not have the required number of credits or that did not pass the necessary courses for their graduation cohort. A&M recorded the following information about each student transcript in the 2018 Graduate Sample:

- Is there a final transcript in the student file?
- Transcript printed date
- Transcript signature date
- Does the PDS Tally Card match the information on the transcript?
- Does the transcript meet graduation course requirements?
- Missing course(s)

Based on this review, A&M both evaluated adherence to graduation certification requirements and identified any students within the 2018 Graduate Sample for whom transcripts did not support graduation certification.

### *(4) PDS Tally Card Evaluation*

According to the Maryland Student Records System Manual, “The Student Record (SR) Cards...comprise a system for keeping written student records.” The PDS Tally Cards A&M collected are categorized as SR Card 3: Annual Secondary School Performance – Grades 9-12. SR Cards are defined as “The record system prescribed by the state to assure that accurate and comparable data are maintained for each student prekindergarten to grade 12 in Maryland. A&M reviewed the PDS Tally Cards to test the use of state required controls by examining if they were properly completed, signed, and dated. A&M also verified that the credits tallied matched the student transcript, looking for any errors or missing information. A&M recorded the following information about each PDS Tally Card:

- Is there a PDS Tally Card in the student file?
- Date of completion
- Who prepared/signed it?
- Signature Date
- Does the PDS Tally Card identify the student as eligible to graduate?

Although information from this review was not used to identify students as ineligible to graduate, A&M reviewed the use of these forms to inform findings on the graduation certification process across PGCPs, and within Additional Findings and Analysis and School Summaries sections.

## 7. Documentation and Categorization of Findings

During the 2018 Audit, A&M used a combination of data and graduation eligibility analysis to determine the degree to which students were aided to graduation by non-adherence to administrative procedures. A&M's overall audit findings are presented for 2018 Graduate Sample students only and use unique student IDs for each of the 1,085 students to identify each time as student was affected by an administrative procedure violation. The results presented within Sample Results identify each time a student was aided by administrative procedure violations. As a result, the number of total students exhibiting each type of violation does not sum to the total number of students. All analysis and document review of students was performed on a statistically significant random sample, and thus, can be used to extrapolate on a percentage base to the entire student body.

A&M used the following definitions to categorize document review findings across the 2018 Graduate Sample

1. All Grade Changes Fully Documented
  - Any grades fully-documented in accordance with Administrative Procedures
2. Any Grade Change with Partial Documentation
  - Grade Change Authorization Form PS-140 is present, but not appropriately signed off or completed in accordance with PGCPs procedures.
  - Grade change form indicates that make-up work is the reason for the grade change, but no evidence of make-up work has been provided.
3. Any Grade Change without Documentation
  - No documentation is provided to support grade change.
4. Transcript ineligible:
  - Missing one or more core classes or short of required total credits.
5. Service learning ineligible
  - Any student with fewer than 24 recorded service learning hours

Separately from the master table, A&M identified the number of students who Graduated Despite Excessive Unlawful Absences in a required course

- Student received credit towards graduation for a required course in which student was unlawfully absent ten (10) or more days in a 1 credit course.
- Student received credit towards graduation for a required course in which student was unlawfully absent five (5) or more days in a 0.5 credit course.

## C. Results

The following section outlines key observations from 1) A&M’s analysis and record review of the 2018 Graduate Sample which represent A&M’s key findings for the 2018 Audit and 2) Additional Findings and Analysis which provides more detailed insight into recordkeeping, grading, graduation, and attendance at PGCPs.

### 1. 2018 Graduate Sample Results

The 2018 Graduate Sample of 1,085 students tested was randomly identified from the 2018 Graduate Population of 7,273 graduating seniors at relevant schools in PGCPs. The 2017 Graduate Sample included only PGCPs graduates impacted by late grade changes. Because the 2017 Audit sample was selected from a targeted student population, 2017 Audit results could not be extrapolated across the entire 2018 Graduate Population. Through the 2018 Audit sampling methodology, these results can be extrapolated across the 2018 Graduate Population. Further information on A&M’s methodology for conducting analyses and record review can be found in the Analysis of Data section above.

**Figure 8: Master Summary Table** <sup>18,19</sup>

PGCPS Review Summary		2018	
2018 PGCPS graduates		7,273	
Students included in sample		1,085	
Results from Sample Testing			
Student Category		Students	% of Sample
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes		964	88.8%
Students with grade changes that do not impact graduation eligibility		98	9.0%
Students with grade changes that impact graduation eligibility		23	2.1%
1. With all grade changes fully documented		17	1.6%
2. Any grade change with partial documentation		1	0.1%
3. Any grade change without documentation		5	0.5%
Total Sample Students		1,085	100.0%
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements		6	0.6%
4. Transcript ineligible		5	0.5%
5. Service learning ineligible		1	0.1%
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)		6	0.6%
Ineligible to graduate (Cat. 4 + Cat. 5)		6	0.6%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation		12	1.1%
Students without grade change or transcript policy violations		1,073	98.9%

<sup>18</sup> 2018 Graduate Sample students number does not include students from Chesapeake Public Charter School or the Incarcerated Youth Center.

<sup>19</sup> Grade Changes that impact graduation eligibility must move a student from a “pass-to-fail” grade and must occur in a core course.

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Based on document review, A&M identified that of the 1,085 students within the 2018 Graduate Sample:

1. **1,073 (98.9%) of the 1,085 2018 Graduate Sample students were not impacted by any grade change or transcript related Administrative Procedure violation. A&M categorized these students as: “students without grade change or transcript policy violations.”**
2. **Six (0.6%) were ineligible to graduate.** Five of the ineligible graduates had final transcripts that did not meet PGCPs graduation requirements while one graduate had not met service learning requirements.
3. All five of the transcript-ineligible to graduate students were coded incorrectly as graduates though they were identified as non-graduates by their schools.<sup>20</sup> After following up with schools and PGCPs, A&M determined that none of the five students attended summer school. Three of the five codes were corrected when those students enrolled in school for SY 18-19 or transferred to another school. Two students remain improperly coded as graduates.

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the 2017 Audit; therefore, the findings in the table below cannot be compared to A&M’s first PGCPs report.

**Figure 9: 2018 Audit Sample Results – Attendance and Grading Sample Violations**

<b>Attendance and Grading Violations</b>	<b>Students</b>	<b>% of Sample</b>
Graduated despite excessive unlawful absences in one or more required course	654	60.3%
Graduated without excessive unlawful absences in any course	431	39.7%
<b>Total 2018 Sample Students</b>	<b>1085</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more required course and found that **60.3% of the graduate sample passed one or more core courses in their senior year with excessive unlawful absences.** This finding was significantly impacted by the miscategorization of unlawful absences as neither lawful nor unlawful in SchoolMAX outlined in Areas for Further Review.

Based on guidance received from the PGCPs Student Applications Team, A&M believes the recategorization of uncoded as unlawful to be accurate and to inform accurate analysis of Attendance and Grading Violations and Total Absence analysis.

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<sup>20</sup> Schools provided A&M with copies of their 2018 certified graduate lists which reflected all five students as non-graduates and listed the courses required for the students to graduate. For further details regarding this issue, see Key Findings section of this report.

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**A&M recommends that PGCPs:**

- Conducts a complete system configuration audit to verify the quality and validity of its attendance data.

## D. Key Findings

The findings outlined below represent A&M's key takeaways from the 2018 Audit, informed by the results of data analysis, interviews, and document review.

### 1. PGCPs greatly reduced the degree to which grade changes were used and misused.

PGCPs made great strides in improving the controls and accountability around the grade change process, increasing awareness of administrative procedures, providing training to grade managers and other school staff, and requiring timely grade submission to reduce the demand for grade changes.

**Overall, PGCPs was successful in significantly reducing the number of late grade entries during SY 17-18, reducing both the need for and risks associated with grade changes.**

In addition to a reduction of late grade entries, among the grade changes analyzed within A&M's 2018 Graduate Sample, PGCPs demonstrated increased levels of documentation and support. Additionally, PGCPs improved its process for allowing late grade changes, by providing clear guidance and updated administrative procedures for grade changes and appeals.

**A&M recommends that PGCPs:**

- Continues to improve the timeliness of grade submissions to further improve grade entry timeline compliance.
- Works to improve the consistent use of grade change forms across high schools and standardize the late grade entry process district-wide.

### 2. PGCPs nearly eliminated issues with graduating students who have not met transcript or service learning requirements.

As noted in the Master Summary Table, only 6 graduates from the 2018 Graduate Sample did not meet graduation requirements. **PGCPs instituted various tools and processes that led to fewer errors, and professional school counselors were able to identify problems before the students graduated because most PDS Tally Cards were completed before graduation.** Some of the proactive measure that PGCPs implemented during SY 17-18 include the Graduation Certification Checklist and mandatory peer and

administrator review (more detail about these processes and tools can be found in the Graduation Certification section of this report). **The graduation certification process, although greatly improved, still has risks.** The current graduation timelines make it very difficult for some schools to complete PDS Tally Cards after final grades have posted but before graduation.

**A&M recommends that PGCPs:**

- Continues to ensure PDS Tally Cards are kept up to date annually and list correct graduation standards to assist the tallying process.

**3. PGCPs significantly increased awareness of and compliance with administrative procedures and state requirements.**

Based on A&M's document review and data analysis, it was evident that PGCPs significantly increased awareness of and compliance with administrative procedures, processes, and other PGCPs policies. Across schools, A&M found increased standardization of record keeping, graduation certification, and grade change usage and documentation. When interviewed, most PGCPs staff were well-versed in the administrative procedures and understood their role in successful implementation. Some staff commented on how much they appreciated the increased clarity – they now know exactly what is expected from them in their role. **In general, individuals appear to be taking responsibility for their own adherence to administrative procedures, processes, and policies.**

**A&M recommends that PGCPs:**

- Continues communicating future changes and provide robust training for staff to sustain the current culture of compliance.

**4. PGCPs did not provide sufficient oversight and support to enforce attendance accountability. - PGCPs leadership did not communicate the expectation of compliance with attendance-related grading requirements and failed to provide tools and processes to ensure adherence or verify data accuracy.**

In analyzing PGCPs's attendance data to evaluate adherence with attendance and grading requirements, A&M **identified that 33.5% of PGCPs's period-level absences among the 2018 Graduate Population were not properly categorized as lawful or unlawful** within SchoolMAX. PGCPs Student Applications Team and School-Level staff believed that uncategorized (missing reason code) absences would be automatically marked as unlawful in SchoolMAX after two days, however, the SchoolMAX system was not properly configured to make these changes. As a result, PGCPs had identified just 97,536 period-

level absences as “Unlawful” when, 595,202 absences were without an excuse code or unlawful. **This miscategorization of absences contributed to more than 60.3% of sample students passing core classes with excessive unlawful absences.**

**Should school Administrators and teachers rely on SchoolMAX data to enforce grading or attendance policies, this configuration issue** would make it impossible to rely on reporting from SchoolMAX to enforce requirements. Despite recent changes to the administrative procedures removing this specific requirement, data integrity related to attendance is critical to adhering to the new administrative procedure and informing appropriate attendance reporting and interventions.

In addition to SchoolMAX configuration issues greatly understating the number of unlawful absences within PGCPs, A&M identified that **PGCPs high schools received no clear guidance on the appropriate process for attendance entry and modification and lacked the tools and insights required to monitor and enforce attendance policies. PGCPs currently lacks clear processes and controls required to ensure consistent recording of attendance data.** Additional information on attendance data irregularities are outlined in Attendance Data Quality Analysis.

**A&M recommends that PGCPs:**

- Establish a standardized attendance recording process supported by administrative procedures and provide comprehensive training, monitoring, and reporting on attendance entry and updates. The administrative procedure should include requirements for timely entry and should clearly communicate the expectation that every absence should be appropriately recorded as lawful or unlawful.
- Proactively identify and addresses systems configuration issues, improve data quality and improve school level understanding and use of data:
  - Perform an initial audit of SchoolMAX to verify the quality and validity of its attendance data.
  - Perform regular audits of SchoolMAX data to illuminate potential system configuration problems, including a focus on whether automatic processes function as expected.
  - Designate personnel within the Accountability function to continuously monitor SchoolMAX data for anomalies, irregularities, and potential data quality issues, and facilitate coordination between the Accountability and Student Applications teams to ensure alignment.
  - Produce tailored data outputs and/or develop training to allow schools to interpret and act appropriately upon anomalies within their own SchoolMAX data with validation and follow-up from the Accountability function where necessary.

**5. Coding errors contributed to the miscoding of five students in the 2018 Graduate Sample as eligible to graduate although school certified graduate lists reflected students as non-graduates.**

A&M's 2018 Graduate Sample analysis identified five students as ineligible to graduate due to their transcripts not meeting graduation requirements. Yet, these students were identified as part of the 2018 Graduate Population based on their C-60 exit codes in SchoolMAX.

During site visits and follow-up communications, school personnel stated that these students were not certified as graduates by their staff. The schools provided their certified graduate lists that confirmed these five students were coded as non-graduates, listing the missing courses required for these students to graduate. It is A&M's understanding (based on interviews and the diploma request process) that none of these five students obtained diplomas from PGCPs during the May/June graduations. In addition, A&M found that none of the five students either attended or graduated from summer school. Of the five miscoded graduates, the error for three students was ultimately caught and corrected when the students either enrolled in school for SY 18-19 or transferred out of PGCPs; however, two remaining students are still miscoded as they have not returned to school to complete their missing coursework. The schools were unaware that the students had been coded as graduates until A&M identified the issue during site visits and record review.

PGCPs does not appear to have a complete understanding of why these issues have occurred. Most schools were adamant that they had properly coded the students as non-graduates in SchoolMAX. Individuals at PGCPs Pupil Personnel Services believe that some of these issues may be partially due to an unidentified glitch in the SchoolMAX system that occurs when it rolls over students to a new school year. Yet, the Student Applications Team researched the issue and believes that it is likely due to human error. Though this coding issue may not necessarily result in students receiving Maryland diplomas, it does **lead to an overstatement of the number of graduates reported to the State**. If students do not return to school to make up the missing credits, this miscoding may never be discovered. As such, miscoded students could obtain certified transcripts from schools which show them as graduates even though they have not met graduation requirements.

**A&M recommends that PGCPs:**

- At the District-level, verify that no students listed as "non-grads" on the school certified graduate lists are incorrectly recorded with as exit code C-60 in SchoolMAX and that any errors identified are quickly resolved.

## 1. Areas for Further Review

As indicated previously, A&M learned in conversations with the PGCPs Student Applications Team that there were issues with PGCPs' automatic absence reason code update process in the SchoolMAX system. The Student Applications Team intended for SchoolMAX to automatically update absences without a marked reason code to an unlawful absence reason code after 2 days. However, this

functionality was not appropriately functioning during SY 17-18 and possibly for years prior to this date. This system configuration issue hindered school and administration ability to enforce PGCPs grading and attendance procedures. This issue also reduced overall data quality at PGCPs, which limits central office, school administration, and even teacher transparency into levels of lawful vs unlawful absences. PGCPs administrative procedures in effect during SY 17-18 and prior rely on insight into levels of unlawful absences due to the attendance-related grading implications of Administrative Procedure 5121.3. In SY

**A&M recommends that PGCPs:**

- Conducts a complete system configuration audit to verify the quality and validity of attendance data.
- Investigates whether SchoolMAX can enforce the SY18-19 version of AP 5121.3.
- Develops tools and processes to compare attendance and grading appropriately to enforce compliance with AP 5121.3

17-18, Administrative Procedure 5121.3 required that students with excessive unlawful absences in a course be awarded an “E” for that course. Problems with data quality due to failure of the automatic absence reason code update process limited teacher and school ability to enforce this procedure. The updated administrative procedures for SY 18-19 similarly rely on reliable and high-quality data for administration by teachers and analysis by leadership in the schools and central office. Teachers require visibility into whether an absence has been designated as lawful or unlawful to give make-up work to students under the new administrative procedures. Likewise, the Accountability function as well as central and school-based administration require good quality and reliable data for key insights that drive critical decision-making within PGCPs.

## 2. Extreme Irregularities

In the 2017 Audit, A&M identified issues at many schools that required further review or investigation by PGCPs. Although the scope of the 2018 Audit did not include further investigation of these irregularities, A&M found no evidence that the irregularities identified in the 2017 Audit continued into SY 17-18. Further, A&M identified no additional extreme irregularities during the 2018 Audit.

## E. Additional Analysis and Observations

The following sections includes additional analysis and observations to provide insight into recordkeeping, grading, graduation, and attendance at PGCPs. In addition to reviewing documentation and analysis to determine the graduation eligibility of 2018 Graduate Sample students, A&M collected information on the completion and accuracy of other key records and controls. **The analysis presented below does not directly impact graduation eligibility as identified in 2018 Graduate Sample Results.** While these findings do not directly impact graduation eligibility, these observations will help PGCPs identify ways to further enhance internal controls around graduation rate requirements, minimizing the possibility of graduating students inappropriately.

### 1. PDS Tally Card Review

The following tables outline A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduate Sample.

*Figure 10: 2018 Graduate Sample PDS Tally Card Observations*

PDS Tally Cards	2018 Sample Graduates	% of Sample
# not completed (or not found)	13	1.2%
# completed	1,072	98.8%
<b>Total PDS Tally Cards</b>	<b>1,085</b>	<b>100.0%</b>

Of the PGCPs 1,085 students in the 2018 Graduate Sample, 98.8% had completed PDS Tally Cards. Only 13 students (1.2%) had incomplete or missing PDS Tally cards.

A&M conducted further review of the 1,072 completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately.

*Figure 11: 2018 Graduate Sample PDS Tally Card Error Findings*

PDS Tally Card Error Findings	2018 Sample Graduates	% of Sample
# of cards with date of completion not filled out	170	15.7%
# of cards without final signature	74	6.8%
# of cards with signature date not filled out	43	4.0%
# of cards that do not identify student as eligible to graduate	31	2.9%
# of cards completed after graduation	38	3.5%
<b>Total Unique PDS Tally Cards with At Least One Error*</b>	<b>249</b>	<b>23.2%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>823</b>	<b>76.8%</b>
*Total Unique PDS Tally Cards with At Least One Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error line.		

Although most cards were completed without error, 23.2% of completed PDS Tally Cards had at least one error. Inconsistent application of the PDS Tally Card process can lead to student scheduling issues (not placing students in required courses they need to graduate) and contribute to graduating students who have not met graduation requirements.

**A&M recommends that PGCPs:**

- Continues to improve staff training and standardization around the graduation certification process and perform independent reviews to ensure the appropriate completion of PDS cards for all graduates.

## 2. Transcript Review

In addition to the recordkeeping challenges outlined above, **A&M found that 17 students (1.5% of the record review sample) did not meet State Graduation Requirements** outlined in COMAR 13A.03.02.03 which require that “each student shall enroll in a mathematics course in each year of high school that the student attends, up to a maximum of four years of attendance, unless in the fifth or sixth year a mathematics course is needed to meet a graduation requirement.” These 17 students met the requirement to pass three math courses but were not enrolled in a math course in all four years in a PGCPs high school. SY 17-18 was the first year in which this standard was applicable to graduates. A&M confirmed with MSDE that multiple districts within Maryland experienced similar challenges and sought and received approval to waive this requirement. As such, **A&M did not categorize these students as ineligible to graduate within the master summary of sample data.**

**A&M recommends that PGCPs:**

- Proactively ensures that students at each high school grade level are scheduled in accordance with the Maryland Graduation Requirements for their respective graduating cohort. In instances when unique student circumstances do not allow a student to meet graduation requirements, PGCPs must seek guidance from MSDE in advance of graduation.

### 3. Grade Change Analysis

Under PGCPs Administrative Procedure 5121.3 (in effect through SY 17-18) there is no requirement for quarterly grade changes to be completed within any specific period following the grade entry deadline – so late grade changes do not reflect a violation of SY 17-18 requirements.<sup>21</sup> However, PGCPs does maintain the grade change timeline in SchoolMAX outlined in *Figure 10: Grade Entry Cutoff Dates*. Any late grade entries are required to receive approval from the principal, or in some cases, district personnel. Accordingly, A&M performed analysis using the PGCPs Grade Entry Cutoff Dates that were in place during SY 17-18 to assess adherence to these guidelines.

A&M analyzed the number of unique students with grade entries or changes which occurred after quarterly grade cutoff dates and the number of quarterly grade changes that increased the student’s quarterly grade from below 60 points to greater than or equal to 60 points (“fail-to-pass” changes). The table below identifies the number of unique students within the 2018 Graduate Population of 7,273 students with grade changes that increased a student’s quarter grade from fail-to-pass. In addition, the table shows the distribution of those grade changes by the number of points added.

**Figure 12: Distribution of Late Grade Changes for 2018 Graduate Population by Point Change Range<sup>22</sup>**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	273	372	33
Between 11 and 20 points	201	298	62
Between 21 and 30 points	185	222	56
Greater than 30 points	516	424	187
No Grade Entry Before Cutoff date	4,202	7,541	2,337

In SY 17-18, PGCPs reduced the number of students with grade changes across all point change ranges, reflecting improved adherence to grade entry timelines and a reduced reliance on grade changes across PGCPs.

Most of the late grade changes were not actual grade changes but rather reflected late grade entries in which teachers did not enter grades for these students until after the quarterly grade deadline. These students are demonstrated in the above table as “No Grade Entry Before Cutoff Date” to evaluate

<sup>21</sup> The new AP 5116, introduced in July 2018, specifies a 15-day grade appeal timeline, which has the potential to reduce the total number of late grade changes, further reducing risks of error and misuse.

<sup>22</sup> Figure 14 details the number of fail-to-pass grade changes that impacted quarter grades by point change range. The figures represented in this table reflect the number of students affected by changes within each category. Therefore, some students fall into multiple categories. As such, this table cannot be summed to identify the total number of unique students.



PGCPS’s compliance with grading timelines in accordance with administrative procedures. The significant decrease in late grade entries indicates that PGCPS has greatly improved adherence to the grading timeline within SchoolMAX and the timeliness of grade entry, reducing the need for manual adjustments by grade managers and the risk for error and misuse associated with late grade entries.

Of the quarterly grade changes with a previously-entered grade, the largest number of students moving from fail-to-pass experienced grade changes more than 30 points. This distribution is logical given the minimal impact on fail-to-pass status that more minor grade changes would have on final grades.

To expand upon the examination of the grade change timeline, A&M further examined the fail-to-pass quarterly grade changes *excluding* students with no grade entry before cut-off date. For these students, the distribution of the timing of the grade changes relative to quarterly grade cutoffs is displayed below:

**Figure 13: Grade Change Dates Relative to Deadlines for 2016-2018 Graduate Population<sup>23</sup>**

Range	Graduating Class		
	2016	2017	2018
Grade Changes made within 7 days of deadline	190	508	54
Grade Changes made between 8 and 30 days after deadline	137	119	45
Grade Changes made more than 30 days after deadline	758	596	232

Prior to SY 17-18 many PGCPS students benefited from quarterly grade changes which occurred well after grade entry cutoffs. **PGCPS has exhibited a significant decline in total fail-to-pass grade changes, reducing the number of grade changes across all categories. Most notably, PGCPS has greatly reduced the number of grade changes in the first seven days following the grade entry deadline – demonstrating an increased compliance with the grading timeline and reduced reliance on the grade change process.**

According to site visit interviews, the reduction in the number of “less than or equal to 7 days” grade changes reflects teachers improving timely grade entry and finalization, and grade managers enforcing stricter documentation requirements to substantiate grade changes. This assertion is supported by document review which found fewer late grade entries and better documentation associated with changes requiring PS-140 Forms.

Despite the overall reductions in grade changes across all day ranges, the largest number of true grade changes in the 2018 Graduate Population occurred more than 30 days after the grade entry deadline.

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<sup>23</sup> The figures represented in this table reflect the total number of students affected by changes within each category. Therefore, some students fall into multiple categories. As such, this table cannot be summed to identify the total number of unique students.

These 232 grade changes reflect instances in which either the grade change process was not initiated immediately following grade entry, or the appeal process was followed, resulting in delayed grade change.

Further analysis of fail-to-pass quarterly grade changes demonstrates the distribution of grade changes categorized based on the impact on the student’s final grade. The following table presents the number of unique students by the resulting final grade bands after a fail-to-pass grade change was made on a quarter grade:

**Figure 14: Grade Changes Impact on Final Grades for 2016-2018 Graduate Population** <sup>24</sup>

Final Grade	Graduating Class		
	2016	2017	2018
Avg Grade is 60	251	304	23
Avg Grade between 61 and 65	438	763	75
Avg Grade between 66 and 70	197	361	55
Avg Grade greater than 70	423	943	197

In SY 15-16 and SY 16-17, PGCPs processed many grade changes to meet passing grade requirements, taking students from failing to between 60-70. This finding in the 2017 Audit aligned with evidence and reports of “goal seeking” (changing grades just enough for a student to pass). In SY 17-18, PGCPs greatly reduced the number of grade changes resulting in grades associated with past “goal seeking”. Although this does not eliminate all risk that grade changes were used as a tool to push borderline students from failing to passing, this demonstrates significantly reduced risk.

**PGCPs has made significant progress in reducing the risk of misuse of grade changes by controlling the number of and impact associated with grade changes.** This progress reflects significant improvements to overall awareness of administrative procedure requirements, and improvements to controls associated with grade changes.

**A&M recommends that PGCPs:**

- Continues its efforts to control the use of grade changes and maintaining focus on grade entry timeline adherence.

#### 4. Attendance Data Quality Analysis

<sup>24</sup> The numbers represented within these tables reflect the number of unique students affected by changes within each category, and as such, cannot be summed to identify the total number of unique students.

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Based on experiences with other school districts, and previous findings related to grade changes at PGCPs, A&M recognized the importance of reviewing the audit history associated with attendance marks at PGCPs. Initially, A&M identified that Eleanor Roosevelt High School recorded changes from unlawful to lawful absences far more often than any other PGCPs high school. A&M investigated this finding with additional analysis, interviews, and on-site investigation which pointed to a disparity in timely attendance entry practices between schools. Follow-up interviews with the Eleanor Roosevelt team and their counterparts at several PGCPs high schools indicated inconsistencies in attendance marking processes. The Eleanor Roosevelt attendance team and staff takes a proactive approach to accurately recording all absences with the appropriate associated code on the day that the absence occurs. If absences are not excused in advance, they mark them as unlawful, while lawful excuses are processed as updates. A&M found that at most schools, less emphasis is placed on timely attendance entry. As a result, in SY 17-18 Eleanor Roosevelt updated an average of 28 period-level attendance marks per student as compared to an average of five attendance mark changes district-wide.

A&M identified potential weaknesses in the attendance marking process across PGCPs high schools, which could result in underreporting of unlawful absences. At most PGCPs schools, when teachers mark students absent (who have not been excused in advance), they do not apply a reason code. In these examples, a teacher or attendance staff member would need to go back and mark the absences as “unlawful” for the unlawful absence to be recorded appropriately. Based on interviews with PGCPs’s Student Applications Team, school-based staff were instructed that if these absences were left uncategorized, they would later (in two days) default to “unlawful”; however, A&M’s data analysis noted a substantial number of final attendance marks without reason codes. A&M analyzed the distribution of absences between lawful, unlawful, and uncategorized.<sup>25</sup> The results of this analysis are presented below:

*Figure 15: Initial Distribution of Absence Codes for 2018 Graduate Sample Students*

Distribution of Period-Level Absences for Sample Students	Count of Absences	% of Total Absences
Lawful Absences	125,607	58.9%
Unlawful Absences	13,576	6.4%
Absences with Blank Reason Code	74,157	34.8%
<b>Total Absences</b>	<b>213,340</b>	<b>100.0%</b>

Upon completion of this analysis, A&M approached the Student Applications Team to request more information on the notably low number of unlawful absences, and the extremely high number uncategorized absences at most PGCPs schools. **The Student Applications Team explained that the due to a technical issue, the system failed to automatically categorize absences without a reason code as unlawful. PGCPs confirmed that while this feature had not been active, schools had been operating under the assumption that it was functioning; therefore, PGCPs High Schools did not proactively mark these absences as “unlawful”.** The PGCPs Student Applications Team instructed A&M to interpret the

<sup>25</sup> Due to the size of the overall data set for absences, A&M analyzed this issue using the sample.

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uncategorized absences as unlawful – leading 34.8% of total absences to be re-coded as “unlawful” to support accurate analysis. The Student Applications Team confirmed that automated system process described above has been enabled for the SY 18 – 19 such that the default code 20 – “Unlawful Absence” will be automatically assigned after two days if the absence code is left blank, but this has yet to be externally verified. Based on guidance from PGCPs, A&M recategorized these Absences with Blank Reason Codes as “Unlawful Absences” for the purpose of analysis within the 2018 Audit. The adjusted distribution of absence codes with blank reason codes incorporated as unlawful absences can be found below:

**Figure 16: Adjusted Distribution of Absence Codes for 2018 Graduate Sample Students**

Distribution of Period-Level Absences for Sample Students	Count of Absences	% of Total Absences
Lawful Absences	125,607	58.9%
Unlawful Absences	87,733	41.1%
<b>Total Absences</b>	<b>213,340</b>	<b>100.0%</b>

The recategorization of blank absent codes as “unlawful” further impacted A&M’s analysis and findings presented in Figure 3: Sample Summary Master – Attendance and Grading Violations and Figure 13: Attendance and Grading Sample Analysis.

The following tables demonstrate the impact of this recategorization within A&M’s analysis of 2018 Sample Students that graduated despite excessive unlawful absences.

**Figure 17: Initial Analysis of 2018 Sample Students that Graduated with Violation of SY 17-18 5121.3**

Before Blank Codes Adjusted - Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more required course	81	7.5%

Prior to discovering that SchoolMAX was not properly identifying unlawful absenteeism, PGCPs’s data indicated that 81 students graduated despite excessive unlawful absences in one or more required course. The figure below indicates the adjusted number once all blank codes were categorized as unlawful (in accordance with PGCPs’s recommendation):

**Figure 18: Adjusted 2018 Sample Students that Graduated with Violation of SY 17-18 AP 5121.3**

After Blank Codes Adjusted - Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more required course	654	60.3%

A&M’s adjusted analysis of students that graduated despite excessive unlawful absences in one or more required course indicates that PGCPs graduated the majority of 2018 PGCPs seniors in violation Administrative Procedure 5121.3

**PGCPS provided limited support and guidance to encourage consistent application of the SchoolMAX attendance recording and reporting capabilities.** Based on school-level interviews, PGCPS did not provide schools with formal guidance or timeline for attendance entry and has not stipulated that all absences must either be marked with a reason code or marked as unlawful. PGCPS currently lacks clear processes and controls required to ensure consistent recording of attendance data. PGCPS also does not specify minimum staffing requirements for attendance counselors across schools, impairing consistent tracking or enforcement of any attendance procedures that do exist.

**The lack of standardized procedures regarding the enforcement of grading and attendance policies and data quality issues present a significant risk to quality and accuracy of PGCPS's attendance data and any efforts related to enforcement.** PGCPS High Schools were not provided with the necessary resources to properly enforce the SY17-18 version of Administrative Procedure 5121.3.

In accordance with the Action Plan, PGCPS has updated Administrative Procedure 5121.3 for SY 18-19, removing the requirement to fail students based directly on the number of unlawful absences. For reference, both versions of Administrative Procedure 5121.3 have been displayed below:

- **SY 17-18 AP 5121.3** – “In secondary schools, five (5) days of unlawful absence per semester course or ten (10) days of unlawful absence per full year course will result in the assignment of an “E” for the course.”
- **SY 18-19 AP 5121.3** – In secondary schools, a student with unlawful absences will receive a “failing” grade of zero for any day(s) of such absence(s). The failing grade of zero will be averaged with other daily grades. Teachers should enter “0” (zero) in SchoolMAX for unexcused absences and add a comment to the note section for each applicable assignment “unexcused absence.”

**A&M recommends that PGCPS:**

- Addresses systems configuration issues, improve data quality and improve school level understanding and use of data through several steps:
  - Perform an initial audit of SchoolMAX to verify the quality and validity of its attendance data.
  - Perform regular audits of SchoolMAX data to illuminate potential system configuration problems, including a focus on whether automatic processes function as expected.
  - Designate personnel within the Accountability function to continuously monitor SchoolMAX data for anomalies, irregularities, and potential data quality issues, and facilitate coordination between the Accountability and Student Applications teams to ensure alignment.
  - Produce tailored data outputs and/or develop training to allow schools to interpret and act appropriately upon anomalies within their own SchoolMAX data with validation and follow-up from the Accountability function where necessary.

Despite these changes in required procedures, which may reduce the impact of attendance and grading requirements on passing and graduating students, PGCPS High Schools will not be able to properly implement the SY 18-19 version of Administrative Procedure 5121.3 without further guidance and

training from PGCPs, standardized attendance processes, and an accurate system of record for attendance.

## 5. Course Level Attendance Analysis

To further understand issues regarding data quality and unlawful absences, A&M analyzed the senior-year course attendance marks for all 2018 Graduates. In reviewing the absence codes, A&M noted that absences coded as 97 – “Scheduled Non School Day” represented 47% of all absences. This 2018 graduate initial absence code analysis can be found in the table below which also provides additional information on the re-coding of uncoded absences:

**Figure 19: 2018 Graduate Population Period-level Absence Analysis**

Code	Definition	PGCPS Period Categorization	A&M Period Categorization	Period Attendance Marks	% of Total Period-Level Attendance Marks
1	Death in Family	Lawful	Absent - Lawful	3,908	0.1%
2	Illness of Student	Lawful	Absent - Lawful	72,691	1.5%
4	Court Summons	Lawful	Absent - Lawful	545	0.0%
7	Hazardous Weather	Lawful	Absent - Lawful	2,056	0.0%
8	Approved Work	Lawful	Absent - Lawful	18,706	0.4%
9	Religious Holiday	Lawful	Absent - Lawful	140	0.0%
10	State Emergency	Lawful	Absent - Lawful	32	0.0%
13	Other Lawful Absence	Lawful	Absent - Lawful	31,306	0.6%
17	Health Exclusion	Lawful	Absent - Lawful	2,155	0.0%
18	Suspension	Lawful	Absent - Lawful	5,137	0.1%
19	Lack of Authorized Transportation	Lawful	Absent - Lawful	605	0.0%
94	Alternate Administrative Services	Lawful	Absent - Lawful	154	0.0%
95	Home and Hospital	Lawful	Absent - Lawful	1,208	0.0%
20	Unlawful Absence	Unlawful	Absent - Unlawful	90,534	1.8%
99	Unexplained	Unlawful	Absent - Unlawful	7,002	0.1%
Uncoded	Uncoded	Uncoded	Absent - Unlawful	497,666	10.1%
<b>Periods Classified as Absent by A&amp;M</b>				<b>733,845</b>	<b>14.8%</b>
96	In School Suspension	Lawful	Present	963	0.0%
AO	Administrative Office	Lawful	Present	327	0.0%
FT	Field Trip	Lawful	Present	8,889	0.2%
GO	Guidance Office	Lawful	Present	261	0.0%
HR	Health Room	Lawful	Present	110	0.0%
OT	Other Approved School Activity	Lawful	Present	22,199	0.4%
SA	Sports Activity	Lawful	Present	2,473	0.0%
TE	Testing	Lawful	Present	19,489	0.4%
P	Present	N/A	Present	3,459,827	69.9%
<b>Periods Classified as Present by A&amp;M</b>				<b>3,514,538</b>	<b>71.0%</b>
<b>Total Period-Level Attendance Marks included in Analysis</b>				<b>4,248,383</b>	<b>85.9%</b>
97	Scheduled Non School Day	Lawful	Removed from Analysis	698,761	14.1%
<b>Codes Removed From Analysis by A&amp;M</b>				<b>698,761</b>	<b>14.1%</b>
<b>Total Period-Level Attendance Marks</b>				<b>4,947,144</b>	<b>100.0%</b>

During A&M’s follow-up discussions with the PGCPs Student Applications Team, A&M learned the following:

- **Absences coded as 97 “Scheduled Non School Day”:** The Student Applications Team confirmed that these absences reflect lawful absences where students are not required to be at school. As the last day of school for PGCPs seniors is well in advance of other PGCPs High School students,

code 97 is used to indicate days that PGCPs schools are in session that seniors are not required to attend. All course attendance marks for graduating seniors after their last required day of school are marked as code 97, lawful absences. As such, A&M did not treat periods coded as such as true absences in the analysis below as students are not required to be at school in this scenario.

To arrive at the total attendance marks analyzed in Figure 21: 2018 Graduate Attendance Record Data by Periods, A&M excluded all lawful absences marked with the absence reason code 97- Scheduled Non School Day. A&M also excluded reason codes related to other school-approved activities<sup>26</sup> representing approximately 3.6% of marked absences. A&M summed all absences marked with unlawful absence reason codes (20 - Unlawful Absence and 99 – Unexplained) in addition to all absences with blank reason codes (i.e. absences that should have been automatically converted to unlawful absences after 2 days).

**Figure 20: 2018 Graduate Attendance Record Data by Period**

Types of Periods	Count of Periods	% of Total Periods
Total Present Periods	3,514,538	82.7%
Total Absent Periods	733,845	17.3%
Absent Periods - Lawful	138,643	3.3%
Absent Periods - Unlawful	595,202	14.0%
<b>Total Periods</b>	<b>4,248,383</b>	<b>100%</b>

This analysis reveals that most 2018 PGCPs graduate absence period marks fell into the “unlawful” category.

**A&M recommends that PGCPs:**

- Proactively communicate expectations around attendance policies and procedures.
- Train school leaders to utilize data analysis to improve visibility and ensure compliance with attendance policies and procedures.
- Regularly review attendance data to identify data irregularities and ensure school compliance with attendance policies and procedures.
- Support high schools to implement programs to address truancy and chronic absenteeism at schools that are most impacted by this analysis.

## 6. Unlawful Absence Analysis

According to SY 17-18 Administrative Procedure 5121.3, “in secondary schools, five (5) days of unlawful absence per semester course or ten (10) days of unlawful absence per full year course will result in the

<sup>26</sup> Other school-approved activities include the following: AO - Administrative Office, FT - Field Trip, GO - Guidance Office, HR - Health Room, OT - Other Approved School Activity, SA - Sports Activity, and TE – Testing.

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assignment of an “E” for the course.”<sup>27</sup> A&M analyzed students who passed despite excessive unlawful absences.

**A&M’s attendance and grading analysis identified that 60.3% of graduates in the 2018 Graduate Sample passed graduation-required courses despite excessive unlawful absences.** To better understand the absences and to evaluate processes and controls around attendance entry at PGCPs, A&M performed additional analysis on the entire 2018 Graduate Population. The analysis presented below summarizes the maximum number of absences 2018 Graduates had in any one of their senior year classes, regardless of whether they passed the class or whether the course was required for graduation. Because PGCPs high schools record attendance for each period of the school day, a student absence in a specific period of a class does not mean that the student missed an entire day of school. This table does not distinguish between half-year and full-year courses.

**Figure 21: Unlawful Absence Distribution by Student for 2018 Graduate Population<sup>28</sup>**

<b>2018 Graduate Population Unlawful Absence Distribution</b> <i>Analysis completed on Senior-Year, Core-Courses</i>	<b>2018 Graduates</b>	<b>% of Population</b>
Less than 10 Periods Absent in any course	2,585	35.5%
Between 10 and 19 Periods Absent in at least one course	2,715	37.3%
Between 20 and 49 Periods Absent in at least one course	1,848	25.4%
More than 50 Periods Absent in any course	125	1.7%
<b>Total</b>	<b>7,273</b>	<b>100.0%</b>

In SY 17-18, only 35.5% of graduates had fewer than 10 unlawful absences in every core senior-year course they enrolled in. Across the graduate population, 64.5% of students had ten or more unlawful absences in a core course in their senior year. 125 students graduated after incurring more than 50 unlawful absences in one or more course.

**Although this analysis provides helpful insight on the distribution of absences marked as unlawful, lack of standard attendance data entry process across all high schools and errors within the attendance system itself potentially minimized the number of graduates reported as unlawfully**

<sup>27</sup> A&M evaluated compliance with AP5121.3, which was in place during SY 17-18. PGCPs published an updated administrative procedure that will be in place during SY 18-19 that no longer ties the number of absences to an automatic “E” grade.

<sup>28</sup> Students from the 2018 Graduate Population have been placed into one of the 4 categories based on senior-year, course-level attendance data. Students represented in the "less than 10 absences in all courses" did not miss more than 10 class periods in any of their senior year courses. The "students that had between 11 and 20 absences in at least one course" missed at least 10 class periods in a single senior-year course but not more than 20 class periods in that same course. For the purposes of this table, A&M has not distinguished between absences in half-credit and full-credit courses.

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absent in the 2018 graduate analysis. This presents a significant risk to overall PGCPs attendance data quality.

## 7. Service Learning Analysis

A&M analyzed data from SchoolMAX for SY 17-18 and compared it to the results from the 2017 Audit to assess the degree to which the 2018 Graduate Population met MSDE requirements for service learning.<sup>29</sup> In PGCPs, students are required to complete 24 independent service learning hours. Figure 19: 2018 Graduation Population Without Required Service Learning Hours below identifies the number of graduates that did not meet that requirement by school year.

*Figure 22: 2018 Graduate Population without Required Service Learning Hours*

Service Learning Ineligible	Graduating Class		
	2016	2017	2018
Students	6	13	8

Eight PGCPs seniors who graduated in 2018 did not meet the 24-hour requirement for service learning hours and were therefore ineligible to graduate. **PGCPs improved its controls over Service Learning for SY 17-18. The newly established Chief Accountability Officer should implement additional measures to ensure PGCPs's compliance with MSDE Service Learning requirements in SY 18-19.**

**A&M recommends that PGCPs:**

- Includes service learning verification as part of the graduation checklist process to confirm that each graduate has successfully met the 24-hour requirement before marking them as graduates.

## V. Lessons Learned and Best Practices

A&M documented lessons learned from the PGCPs 2017 and 2018 Audits and identified related best practices. Key activities performed included:

- Identification of common challenges and best practices associated with grading and graduation policies and their implementation
- Recommendations for record keeping, access, and control processes to reduce risk and prevent misuse
- Identification of opportunities for local school systems to improve accountability and integrity in the grading and graduation process

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<sup>29</sup> COMAR 13A.03.02.05: The student shall complete a locally-developed, state-approved program that includes service-learning infusion in designated courses, preparation, reflection, and a specified number of hours of independent service

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- Recommendations for changes in state law or regulation which may improve accountability statewide, where applicable

A&M identified challenges PGCPs encountered (lessons learned) which could be instructive for other Maryland districts as they address grading, graduation, and attendance accountability issues. PGCPs has improved significantly since the 2017 Audit. So, A&M also identified successful approaches implemented in PGCPs (best practices) that could be reproduced in other Maryland districts.

## A. Attendance

### 1. **Grading administrative procedure for the application of excessive unlawful absences should include unique attendance standards for block schedules, semester courses and full-year courses.**

PGCPs's administrative procedure for attendance in effect for SY 17-18 that students with 5 unlawful absences in semester courses and 10 unlawful absences in year-long courses receive failing grades. Like many school districts, PGCPs offers a number of course configurations, including block scheduling (courses meet 2-3 times a week) and traditional scheduling with daily class meetings. For a year-long course that meets 2 times per week (approximately 72 days in a school year), PGCPs applies the same 10-day standard to this class as it does to a class that meets 5 days per week (180 days) for the entire school year. Analyzing the total raw number of unlawful absences irrespective of course meetings does not accurately identify students with severe attendance issues and may inequitably impact students in courses that meet more frequently. **Any attendance-related grading requirements should be established in relation to the total number of course meetings, either specifying the allowable unlawful absences for each course configuration or establishing a threshold based on a percentage of the course meetings missed.**

## B. Grading

### 2. **"Good Faith Effort" grading policies must clearly define the "good-faith" standard to ensure consistent application across schools.**

PGCPs's Good Faith Effort policy requires that teachers give students a minimum assignment grade of 50% when they demonstrate a good faith effort in completing an assignment. The policy was rolled out by PGCPs for SY 15-16; however, "good faith effort" was not clearly defined, and there has been limited oversight at the school and district-level over compliance with this policy. As a result, individual school and teacher application of the Good Faith Effort policy is inconsistent.

In the new update to Administrative Procedure 5121.3 released on August 1, 2018, PGCPs states: "Teachers shall assign a minimum grade of 50% to assignments or assessments for which the student completed the entire assignment and made a good faith effort. Good faith effort is evidenced by the student displaying persistence, striving for accuracy, time on task, and/or trying an alternative method to solve a problem (which may not be accurate). It is also a display of thinking as a student works to sort

through ideas, apply context or figure out how to solve problems. If a student does not work on an assignment, the teacher shall assign a grade of zero.” This Administrative Procedure clearly outlines the standard a student must reach to receive the 50% minimum grade. PGCPs trained principals and teachers on the Good Faith Effort policy to help ensure all teachers understand how to implement it in their classrooms. **When a minimum grade policy is detailed with examples and the policy is well-communicated, consistent application of the policy will be more likely to occur across the District.**

**3. Maryland districts should actively monitor grading policy adherence with available data through centralized data analytics.**

PGCPs employs a data specialist that tracks timely entry of grades with data analytics, including a school by school breakdown of grade entry timeliness with weekly summary reporting visible at the central office level. This tracking allows central administration to ensure that grades are being entered timely and that students and parents have sufficient information on student performance to respond appropriately. PGCPs and other Maryland districts have extensive data on grade entry and many other aspects of grading policy adherence. This data can be leveraged to drive insights into policy adherence, including the timeliness of grade entry, and the frequency, timeline, and impact of grade changes. **Districts should establish reporting and analytics on grade entry and other aspects of grading policy adherence to add transparency and increase monitoring and accountability.**

### C. Grade Changes and Appeals

**4. Uniform policies and procedures for grade changes must be developed, communicated and monitored by the school and central office.**

On July 1, 2018, PGPS released a new Administrative Procedure 5116: Grade Change Authorization and Appeals. Administrative Procedure 5116 clearly outlines the grade change and appeal process and timeline, including the responsibilities of all stakeholders involved. To support stakeholder engagement, PGCPs developed a flowchart as an attachment to the Administrative Procedure so that everyone involved in a grade change or appeal understands the process, timeline, and decision points. The initiator of a grade change or appeal is required to provide documentation to prove the grade change is warranted and the Student Interventions Team works together to come to a decision in the case of an appeal.

However, across PGCPs high schools, grade changes practices based on late grade entry vary widely and include processes which detract from accountability. Examples of practices exhibited at some, but not all PGCPs schools include:

- Grade managers accepting late grade entries via email, while others require in person delivery with supporting documentation.
- Grade managers allowing teachers to make their own late grade entries using the grade manager’s log in.

- Grade managers employ the practice of assigning a passing placeholder grade to all when teacher entries are late.
- Grade managers assigning themselves as co-teachers so that they can publish grades on behalf of teachers.

In contrast, some grade managers developed their own processes which supported proper entry and accountability:

- Requiring teachers to print out Gradebook reports for each student that was missing a quarter grade to submit to the grade manager. In instances where teachers missed the grade submission deadline, they were subject to the Districts progressive discipline process.
- Requiring teachers to use grade change forms for each grade entry after the teacher cutoff date, whether the student had a previously entered grade.

**School districts should implement a procedure that defines why a grade may be eligible for change, documents the appropriate timeline, documentation, and approvals required to support the change, and establishes a central office function that monitors grade changes. Districts need to also establish a standardized process for late grade entries. In addition to training district personnel and school staff, grade change and appeal policies and procedures must be clearly communicated to students and parents.**

**5. Use of a well-designed electronic tool to track and approve grade changes can increase controls over grading while improving process efficiency and increasing transparency around the grade change process.**

The PGCPs Student Applications Team developed an online grade change form that mirrors the existing PS-140 Form fields. The online grade change tool includes workflow functionality which integrates with PGCPs’s login credentials and automatically routes the form to appropriate points of individuals for approval, and users are required to attach evidence that supports each grade change. The Student Applications Team piloted this tool with several schools in Spring 2018 and is rolling it out district-wide in SY 18-19.

This online grade change tool provides an effective control by requiring review and electronic signatures from the required stakeholders, eases form dissemination through an automated workflow, and provides more visibility into the process for central office administration. **Districts with grade change processes should develop web-based tools to increase the accountability and monitoring of grade changes.**

**6. Lack of a uniform process for updating grades from substitute teachers could lead to increased grade changes and appeals.**

Some grade changes and appeals during SY 17-18 occurred due to grade entry issues created by the presence of long-term substitutes. Each school in PGCPs has varying expectations for grading and recordkeeping by substitute teachers. Some substitutes keep careful track of grades and submit the

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grade entries and supporting evidence to the primary teacher in a timely manner to avoid future grade changes. However, other substitutes either enter grades late or lose the student work and the SIT team cannot verify student grade appeal claims. **Districts should establish clear processes for timely and consistent grade entry in instances of short-term teacher absences, relying on the trained teacher or grade manager to enter grades as appropriate. Long-term substitutes must be trained on district policy and procedures for grading and record keeping and should be held to the same expectations.**

#### D. Graduation Certification

- 7. Districts should designate a school-based individual at each school to verify service learning hours to ensure each student has complied with MSDE Service Learning Guidelines and related district requirements.**

PGCPS requires students to earn 24 hours of independent service learning in an approved non-profit community service function aligned with MSDE's Service-Learning Guidelines. PGCPS requires students to submit completed forms documenting their service-learning activities; however, PGCPS has established no formal process across high schools to verify that the services were performed by the student or that the organizations where students performed those services are approved by PGCPS. As a result, some students at PGCPS High Schools receive service learning hours by performing services for for-profit organizations, donating goods to charities and other unapproved non-approved activities.

Several PGCPS high schools have a staff member dedicated to verifying service learning hours. In some cases, this individual performs follow up with service learning providers to verify the authenticity of the organization. Random check ins with notification to students also provides an effective means of driving student adherence to this graduation requirement.

- 8. Graduation dates scheduled close to final grade calculation for graduating seniors do not allow sufficient time for record keeping and graduation certification.**

PGCPS class of 2018 graduated between May 22, 2018 and June 4, 2018 (high schools graduate on different dates that alternate each year). The Fourth Quarter grade entry deadline for SY 17-18 was on May 11, 2018 and final grades were calculated by SchoolMAX on May 21, 2018. At schools with earlier graduation dates, A&M frequently heard that professional school counselors did not have sufficient time to certify graduates. In some schools, professional school counselors were not able to generate final transcripts before completing the certification process. Before transcripts are final, they display numerical grades for each quarter. In some instances, professional school counselors had to manually calculate final grades, introducing significant opportunity for error. Tight graduation timelines can complicate certification of graduates and introduce significant opportunity for error. **Districts should consider the time between final grade posting and high school graduation dates to determine whether sufficient time is provided for students to be certified.**

**9. Districts should provide dedicated time for professional school counselors to update PDS Tally Cards and implement a standard process and timeline to increase the accuracy and consistency of the graduation certification process.**

In SY 17-18, PGCPs instituted a district-wide counseling “shut-down” for professional school counselors to review PDS Tally Cards for errors. This approach was instituted to catch the District up with the tallying process and to identify problems with tallying that might inappropriately classify students as on track to graduate. Professional school counselors were supportive of this process and indicated that it helped to catch errors. Schools that utilized this process most successfully redistributed counselor duties to other staff members to support the counseling office “shut down.” This allowed professional school counselors to focus entirely on the tally and PDS Tally Card review process.

In addition to the shutdown, PGCPs implemented a checklist and timeline for counselors that will be used going forward. The professional school counselor completes steps monthly, and the principal is required to sign off on completion of the work. The checklist verification process helps counselors stay current with PDS Tally Cards and identify potential issues early and address issues before it is too late in the school year. **A detailed process and dedicated time for PDS Tally Card review helps to reduce both tallying errors and misidentification of graduates.**

**10. Districts should support students with regular check-ins and meaningful tools such as senior contracts to improve awareness of graduation requirements and reduce risk of graduating students who do not meet graduation requirements.**

PGCPs schools have a clear process to ensure that students are aware of the courses that they are required to take to meet graduation requirements and to ensure that students remain on track to meet those requirements. In PGCPs, students meet with professional school counselors at the beginning of their senior year to discuss the what the students’ needs to do to meet PGCPs graduation requirements. At that time, students are required to sign senior contracts to acknowledge that they understand what is required of them. Then, professional school counselors conduct mid-year check-ins which enables them to identify whether the students are still on track to graduate. It is also an opportunity to notify those students who will have to attend Summer School to meet graduation requirements based on their current grades in classes. **Proactive efforts, such as Senior contracts and mid-year check-ins provide additional allow professional school counselors to stay on top of student records and allow students to know what they need to do to earn their diplomas.**

**11. Districts should strive to maintain a simple and standardized course catalogue and look for opportunities to reduce the volume of courses IDs and course names.**

PGCPs has over 1,000 courses available for schools to choose from when creating their master schedule each year; furthermore, for every course, there are often multiple course IDs used across different schools within PGCPs. The large number of course options makes it challenging to accurately verify

credits against the graduation standards. Additionally, when students transfer between schools in PGCPs or Maryland, it is difficult to accurately manually update or “pram” the courses onto transcripts. The high number of course names and numbers also add complexity to the task of automating credit checks and graduation certification. **Districts should consider creating a standardized course catalogue with a clear code for each required course. Cooperation between districts Statewide could streamline the process of transferring students and simplify graduation certification.**

## E. Credit Recovery Programs

### **12. Before modifying and/or eliminating credit recovery programs, districts should understand which students are impacted and ensure alternative options are in place.**

To improve accountability and consistency across PGCPs, the District opted to make major changes to the program formerly termed “Multiple Pathways to Success.” Before the start of SY 17-18, PGCPs allowed its contract with its online alternative program vendor to lapse. A contract with a new vendor was not in place until February of 2018. The updated eligibility practices and improved alignment with state curriculum associated with broader use of the new vendor has improved the consistency and scalability of PGCPs’s credit recovery programs. Without a viable credit recovery program in the first half of SY 17-18, many students were left with limited options to make up credits for failed courses. Evening and summer school courses were the only available options for credit recovery.

### **13. “Retake” credit recovery programs limit opportunities for uncontrolled grade changes.**

Previously, PGCPs’s credit recovery programs utilized grade change forms to assign grades to students. Credit recovery courses were treated as modifications of previously taken courses wherein a previous failing original course grade would be changed through work in a credit recovery course. This practice resulted in an increased use of grade changes, unclear integration with applicable seat hour requirements, and increase in opportunities for error and misuse. In SY 17-18 PGCPs implemented a new credit recovery program that require students to retake the full course if they fail an original course. These retake courses appear on the transcript and do not require grade changes to previously-failed classes, increasing transparency and accountability.

**Districts can increase accountability related to recovery programs by treating them as full retakes of previously-failed courses thereby aligning recovery programs with seat hour, grading, and recordkeeping standards and reducing opportunities for error or misuse.**

### **14. Credit recovery programs aligned with state requirements improve accountability and course alignment.**

PGCPs previously used “recovery packets” and other credit recovery options which were produced internally and used to award a student additional points in an original failed course. Local variations of recovery packets were widely-used, and course standards were unclear. After these options were

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cancelled in SY 17-18, PGCPs incorporated new online credit recovery options which are MSDE-approved, promoting the legitimacy of course offerings. **Maryland districts could benefit from aligning their credit recovery options with approved state-offered credit recovery courses and curriculums.**

## F. Records and Controls

### **15. Student information system user roles must be clearly defined and communicated, and user access must be centrally controlled.**

Some PGCPs high school personnel fail to secure their user credentials by allowing others to make changes to the SchoolMAX system under their name. In some instances, grade managers have allowed teachers to enter student grades using their logins after teacher grade entry cutoffs (i.e., during the window where only grade managers have access to publish grades).

### **16. Transcript manager responsibilities must be clearly separated from grade manager responsibilities to ensure the proper segregation of duties and prevent potential grade manipulation in the system.**

In SY 17-18, PGCPs improved its SchoolMAX access controls by separating transcript manager and grade manager duties so that no one person at each school could hold both levels of access. The grade manager can modify grades after teacher access is cut-off while transcript managers can make changes directly to student transcripts. **Separating the duties of the transcript and grade managers prevents one person from having access to manipulate student records without oversight.**

### **17. Lack of separation of duties among critical roles regarding grading and graduation certification increases risk of misconduct.**

Some PGCPs high schools have assigned school counselors as their grade or transcript managers. Prior to SY 17-18, some schools assigned the roles of grade and transcript manager to the same individual opening the school up to risk that records could be manipulated with no awareness or oversight of others. School counselors have the responsibility of ensuring that they notify students of courses needed to meet graduation requirements and often indicated that they feel the pressure to help students graduate. The ability to change grades can enable a counselor to fix their mistakes made by adding classes to transcripts that students were not informed that they needed or by changing students grades to passing grades to help students meet requirements. **A clear separation of duties limits the ability of staff to modify student records without oversight ensuring the integrity of the student records.**

### **18. Archival of student cumulative records and verification of graduation certification should be completed in a timely manner, ideally within one (1) year of graduation.**

PGCPs has a significant backlog of student records still stored at schools which have yet to be archived. The District is currently in the process of archiving records for SY 14-15 graduates at most high schools



and at one school, they recently completed the archival of SY 12-13 graduate records. These delays can be partially attributed to the manual process used to certify graduates, and related challenges around the timely completion of senior records and organization of record rooms, and limited records management staffing which have led to a backlog. In the archival process, PGCPs's Office of Student Records verifies that graduates have met graduation requirements. In instances where this verification reveals that schools inappropriately graduated students, there is a process that schools must follow to invalidate the graduation. However, due to the delay between the date a student graduates and when the records archival process takes place, students who improperly graduated may not be identified by the Office of Student Records until years after the student has graduated. PGCPs has not implemented a specific follow up process to verify that the school has completed all steps to invalidate those graduations. Many of the changes made by PGCPs in SY 17-18 regarding graduation certification will facilitate the archival process; however, the Office of Student Records will still need to mull through two more years of poor recordkeeping at most high schools before seeing the benefits of the SY 17-18 changes. **A timely student records archival process ensures that students records meet PGCPs requirements and that any issues identified are addressed soon after students graduate.**

## G. Monitoring and Compliance

### **19. Districts should specify minimum staffing requirements for counselors, attendance secretaries, and grade manager staffing, even in the presence of school-based budgeting arrangements that give principals autonomy over school budgets.**

In accordance with PGCPs's school-based budgeting process, principals choose numbers and types of staff according to their needs, with very few positions mandated by PGCPs. Some schools expressed that they had fewer counselors than recommended due to a shortage of qualified counselors, while other schools expressed insufficient funding. In SY 17-18 Counselors had significant new accountability tasks in addition to their existing counseling tasks with no new staffing to cover these added responsibilities. Some schools expressed that a similar lack of staffing exists in attendance roles, where not every school is required to have an attendance counselor. The lack of an attendance counselor at a school may increase the risk of attendance data to be misreported. **Establishing and maintaining minimal staffing levels for these positions will allow for better control and information surrounding adherence to critical policies.**

### **20. Field audits should be conducted annually, and 2018 Graduate Sample selection should be informed by data analytics and the identification of key risk areas.**

PGCPs conducted field audits of a sample of student documents in Q1 and Q2 of SY 17-18. Random field audits are an important component to ensuring accountability within school districts, particularly in absence of a robust continuous monitoring process. In PGCPs's case, field audits drove important insights into school level practice in the areas of recordkeeping, grading, graduation certification, and alternative programs. **Field audits are an important accountability mechanism for districts, particularly when continuous monitoring systems and robust data analysis capacity do not exist within a district.**

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PGCPS performed field audits of student cumulative folders in Q1 and Q2 of SY 17-18. However, PGCPS did not use data analysis of SchoolMAX records to inform areas for further investigation or to track adherence to policies and procedures for appropriate follow up. Examination of data prior to field audit visits is important to direct investigation into specific areas of compliance. Use of existing system data can provide important insights into lacking compliance or understanding at individual schools, or even at the teacher level. **Districts should conduct regular audits of student files backed by data analysis to drive insights into school level practices and remediate where necessary.**

**21. The School Instructional Team process, while generally helpful in establishing accountability can in some cases lead to inconsistent interpretation of administrative procedure requirements.**

Across PGCPS, the process for reviewing and approving grade changes has been improved over the course of SY 17-18, reducing the number of grade changes, and increasing the utilization of appropriate processes. At many PGCPS high schools, principals have increased their reliance on the School Instructional Team or “SIT” process, in which a controversial grading decision can be reviewed by a group of school leaders and the decision of the teacher can be reviewed or overturned by the consensus of the committee. The SIT team process improves accountability by including objective third parties to interpret and apply administrative procedures appropriately and approve select exceptions to requirements which can’t be tailored to every individual situation. However, SIT teams across PGCPS have implemented inconsistent processes by which grade changes that are not initiated by the teacher are handled, in some cases allowing the teacher to participate, and in other cases not keeping the teacher informed. Additionally, members of the SIT team did not have clear and consistent guidance as to whether the SIT process allowed for waivers of PGCPS administrative procedures. In some cases, school leaders justified making exceptions to administrative procedures based on SIT decisions. **The SIT team process should be used consistently and carefully to enforce administrative procedures and other requirements and provide limited and well-documented exceptions based on extreme circumstances.**

**22. Progressive discipline process can help hold teachers accountable.**

Like many districts, PGCPS utilizes a progressive discipline process for teachers and other professional staff. During the 2017 Audit, A&M identified that at many PGCPS schools, exceptions to grading and reporting requirements were made frequently and were often excused due to previous misses in record keeping or reporting. For example, if a teacher failed to perform appropriate follow-up for students who were excessively unlawfully absent or otherwise failing (e.g. did not perform parent outreach or notify pupil personnel workers), school leaders would allow exceptions to grading policies rather than holding teachers accountable to these standards. In SY 17-18, PGCPS leadership provided clear instructions that shortfalls in recordkeeping and follow-up would not be acceptable reasons to make grade changes in favor of students, and that these issues should be addressed through the progressive discipline process. Increased awareness around progressive discipline implications of administrative procedure violations at

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PGCPS high schools contributed to improved compliance with timely grade entry, adherence to makeup work requirements, and reduced use and misuse of the grade change process. **Districts should utilize existing progressive discipline and other performance management processes to encourage compliance with policies and reduce the risk of misuse or error.**

**23. Internal accountability function supported by data analysts can drive increased insight into school-level administrative procedure adherence.**

PGCPS established a Chief Accountability Officer who reports to the CEO. The Chief Accountability Officer is responsible for Monitoring and Accountability, Testing Research and Evaluation, Essa and Title 1, and Strategic Planning and Resource Management. This function was appropriately empowered with individuals that understand the importance of data analysis in driving insights to compliance. An appropriately empowered accountability officer that uses data to verify administrative procedure adherence is an effective means of ensuring that monitoring and accountability sections of administrative procedures are followed. **Districts should create and empower accountability officers that verify adherence to administrative procedures and are appropriately staffed with data specialists to enable greater insights to potential issues.**

## H. Other

**24. Districts should develop a central online repository to store the most recent versions of procedures and any applicable forms or documentation to minimize confusion with old standards and local interpretations.**

PGCPS schools use different versions of important forms such as PDS Tally Cards and Grade Change Authorization Forms (PS-140). Often, personnel use out-of-date forms, which may lead to inconsistencies and errors. For example, some schools were using PDS Tally Cards with the wrong graduation standards. In some cases, this led to issues with tallying. **Districts in Maryland should require their schools to reference administrative procedures, forms, and presentations through links to a central online repository of documents controlled and updated by the Central Office. Districts should also discourage the production of local presentations on administrative procedures or forms to limit misinterpretation of procedures.**

**25. Schools should link their websites directly to the District website whenever possible so that stakeholders, including teachers, parents, and students always have the correct district-wide policies and procedures.**

PGCPS was very successful in communicating important changes and new policies and procedures to their stakeholders. They utilized various communication strategies such as school newsletters, memos, emails, robo-calls, postings on the District website, and meetings to try to reach community members,

parents, students, and all PGCPS staff. Through their increased communication strategy, PGCPS endeavored to ensure that no stakeholder could say: “I didn’t know.” The increased communication methods and frequency helped stakeholders stay informed and involved in PGCPS.

However, A&M reviewed school websites and found that nine PGCPS high schools featured outdated administrative procedures even after the release of new administrative procedures by the central office. In some cases, the administrative procedures were more than one year out of date and are no longer in effect or have been replaced or modified by new administrative procedures. Since school websites are often the most visited webpage for school communities, outdated administrative procedures, forms, presentations, and other documents can lead to parent, student, faculty, and staff confusion. **Some schools link all District policies and procedures back to the main PGCPS website to ensure stakeholders accessing their website have the latest information.**

**26. An over reliance on the “train the trainer” model can lead to inconsistent interpretation and implementation of important policies and procedures.**

In PGCPS, a heavy burden is placed on principals to train other administrators and their staff. Information is shared at principals’ meetings and trainings, then principals are expected bring the new policies and procedures back to their school. Unfortunately, this leads to a lot of inconsistencies in interpretation of important information like administrative procedures – information gets lost in translation.

## VI. Appendix

### A. Detailed Action Plan Gap Analysis

The audit recommendations presented in this table are quoted from A&M’s 2017 Audit, and the Action Plan Responses are pulled directly from PGCP’s Action Plan. A&M’s evaluated each 2017 Audit recommendation to determine if PGCP sufficiently addressed each recommendation in their Action Plan. Then, A&M evaluated the degree to which each 2017 Audit recommendation was implemented in SY 17-18.

Attendance				
Area	Audit Recommendations	Action Plan Response	Addressed within Action Plan?	Recommendation Implemented by PGCP?
Overall Policies and Procedures	1. Update procedure to more-clearly define the grading impacts of excessive unlawful absences in situations where schools have not adequately communicated remediation options to parents.	By April 2018, PGCP 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.	Fully Addressed	Fully Implemented
	2. Clarify procedures related to make-up work from lawful absences, require approved exceptions to make-up work to be documented and kept in cumulative folders.		Fully Addressed	Fully Implemented
	3. Clarify that a student with unlawful absences (with an ‘E’ grade) earns a 0 or 50 for the course, quarter, or day.		Fully Addressed	Fully Implemented

Attendance				
Area	Audit Recommendations	Action Plan Response	Addressed within Action Plan?	Recommendation Implemented by PGCPS?
Overall Policies and Procedures	No recommendation	PGCPS will continue to leverage opportunities to emphasize the importance of regular school attendance and educate stakeholder groups about attendance policies and procedures.	N/A	N/A <sup>30</sup>
Systems / Technology	4. 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.	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.	Fully Addressed	Not Implemented
Monitoring and Accountability	5. Strengthen attendance tracking procedures to increase the documentation and communication of absences.	By April 2018, PGCPs will update Administrative Procedure 5113 to strengthen attendance tracking procedures.	Fully Addressed	Fully Implemented

<sup>30</sup> Even though there was no recommendation regarding "General Awareness of Grading Policies and Procedures" in the 2017, PGCPs included a statement in their Action Plan that they implemented fully.

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Grade Changes and Appeals				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
Overall Policies and Procedures	6. Establish and communicate grade change process for MPTS related grade changes to also use the PS-140 Form for any grade changes.	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.	Fully Addressed	Fully Implemented
	7. Clearly articulate make-up work requirements for grade changes both in the Administrative Procedure and on the PS-140 Form.	All principals, Professional School Counselors and grade managers were provided with the current grade change form.	Fully Addressed	Fully Implemented
	8. Require all schools to use the current version of PS-140 Form.	By April 2018, PGCPs will align all procedures related to academic grades for consistent messaging.	Fully Addressed	Fully Implemented
Communications and Training	9. 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.	Starting January 2018, PGCPs will produce individual school quarterly grade change reports.	Partially Addressed	Partially Implemented
Monitoring & Accountability	10. Implement an independent review function for grade changes at the school-level.			

Grade Changes and Appeals				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
	11. Perform Representative Random Sampling of grade changes to evaluate adherence to policies, procedures, and timelines, as well as appropriate inclusion of documentation requirements.	A random sampling of grade changes will be evaluated for compliance with policies, procedures and timelines.	Fully Addressed	Partially Implemented
	12. Report results to PGCPs administration, internal auditor and school board.	PGCPs will work with the Board of Education to determine how to best report the information.	Partially Addressed	Partially Implemented
Systems / Technology	13. Emphasize the role of a Grade Manager as independent from Professional School Counselor, transcript manager, MPTS coordinator and administrator responsible for verifying all documentation requirements before affecting grade changes.	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.	Fully Addressed	Fully Implemented

Grading				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
Overall Policies and Procedures	14. Update the PGCPs grading administrative procedures with more specifics related to make-up work and further specification on what constitutes a good faith effort.	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.	Fully Addressed	Fully Implemented



Grading				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
	15. If QLM continues in SY 17-18, MPTS requirement should be reconciled with make-up work requirements of PGCPs grading procedures.	QLMs were discontinued for SY 17-18.	Fully Addressed	Fully Implemented
Communications and Training	16. Support system-wide procedure changes with all-staff communications, trainings, and job aids to reduce risk of misinterpretations.	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.	Fully Addressed	Fully Implemented
	17. Create a standard PGCPs Staff and Faculty Handbook to ensure proper understanding and uniform application of procedures across schools.	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.	Fully Addressed	Fully Implemented
Monitoring and Accountability	18. Develop more-detailed guidelines on what and how principals should monitor to ensure adherence to the grading procedures within their school.	By April 2018, PGCPs will update Administrative Procedure 5121.3 to clearly define the compliance and monitoring requirements for implementing the procedure.	Fully Addressed	Fully Implemented

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Grading				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
	19. Include grading integrity requirements, for all teachers, counselors, administrators, and staff which specify prohibited actions related to unsupported grade changes and align procedure violations with repercussions.	In addition, PGCPs will create a new Grade Change Administrative Procedure that addresses grading integrity for all PGCPs staff.	Fully Addressed	Fully Implemented

Credit Recovery				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
Overall Policies and Procedures	20. Develop stronger procedures to govern QLMs and prevent the misuse of the program.	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).	Fully Addressed	Fully Implemented
	21. Require graded make-up packets be returned to the school as evidence of completion of make-up work and included in the cumulative folder for audit and review.	Quarterly Learning Modules were discontinued in July 2017 for credit recovery. There are no grade make-up packets in use throughout PGCPs.	Fully Addressed	Fully Implemented
Communications and Training	22. Develop stronger procedures to govern QLMs and prevent the misuse of the program. Require graded make-up packets be returned to the school as evidence of completion of make-up work and included in the cumulative folder for audit and review.	Quarterly Learning Modules were discontinued in July 2017 for credit recovery. There are no grade make-up packets in use throughout PGCPs.	Fully Addressed	Fully Implemented

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Credit Recovery				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
Systems / Technology	No Recommendation	PGCPS agrees with the auditor's observations. Quarterly Learning Modules were discontinued in July 2017 for credit recovery.	N/A	N/A
Monitoring and Accountability	23. Area III office should consider implementing reporting requirements to ensure that grades from recovery programs are input in accordance with the MPTS handbook.	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.	Fully Addressed	Fully Implemented

Graduation Certification				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
Overall Policies and Procedures	24. Require all schools to utilize PDS Tally Cards.	By January 2018, processes will be implemented to ensure that the PDS Tally Card is updated and used in all schools.	Fully Addressed	Partially Implemented
	25. Develop and implement an administrative procedure which specifies tools and processes required to place a student on the graduation list and issue a diploma.	By April 2018, a new administrative procedure will be created that clearly defines the steps to certify graduates.	Fully Addressed	Partially Implemented

Graduation Certification				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
	26. Reiterate the importance of completing the PDS Tally Cards 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.	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.	Fully Addressed	Fully Implemented
Communications and Training	27. Develop appropriate training and communications on graduation certification process for professional school counselors and administrators involved in the process.	PGCPS will continue to provide training to Professional School Counselors and Senior Grade-Level Administrators on the process for certifying graduates.	Fully Addressed	Fully Implemented
Systems / Technology	28. Consider utilizing School MAX's automated capabilities to support graduation certification. Utilizing automated tools to increase consistency and accuracy, and decrease administrative burden associated with graduation certification.	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.	Fully Addressed	Fully Implemented
Monitoring and Accountability	29. Develop standardized accountability practices that would detect students being improperly certified for graduation.	Starting January 2018, accountability processes will be established that allow for random audits of senior students' files annually prior to graduation.	Fully Addressed	Partially Implemented

Records Access and Controls				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
Overall Policies and Process	30. Improve controls over user roles and access in SchoolMAX and take steps to enhance accountability in the process of granting user access.	Controls were implemented in August 2017 to limit the number of grade managers and transcript managers at each school.	Fully Addressed	Fully Implemented
	31. 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.	By January 2018, the Division of Information Technology will complete an audit of users to ensure demonstrated need for access.	Fully Addressed	Fully Implemented
	32. Require user access requests to be approved by a central office administrator who is familiar with the grading procedure and SchoolMAX roles.	In September 2017, the Division of Information Technology mandated training in order to access the approved grading or transcript module.	Fully Addressed	Fully Implemented
Systems / Technology	33. Assess user role alignment with responsibilities and accountability requirements.	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.	Fully Addressed	Fully Implemented
Communications and Training	34. Develop communications and training related to timelines for grading, requirements for grade changes, user roles and permissions, and other controls over error and fraud.	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	Fully Addressed	Fully Implemented

Records Access and Controls				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
		close of the progress report grading window. Required training will continue for any new users of the grading or transcript module.		
Monitoring and Accountability	35. Establish a program of monitoring, reporting, and following up on excessive grade changes, or grade changes which are clearly outside of compliance with procedures.	Through the use of these reports, the Deputy Superintendent will monitor excessive grade changes and weekly grade inputs. 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.	Partially Addressed	Partially Implemented
			Fully Addressed	Fully Implemented

General Findings and Observations on Governance of the District				
Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
General Awareness of Grading Policies and Procedures	No recommendation	The school system will continue to increase awareness of grading policies, graduation certification processes and credit recovery options among stakeholder groups.	N/A	N/A <sup>31</sup>
Monitoring and Accountability	36. To improve school-level accountability, PGCPs leadership should develop	The school system has initiated steps to improve understanding of the grade appeals	Not Addressed	Not Implemented

<sup>31</sup> Even though there was no recommendation regarding “General Awareness of Grading Policies and Procedures” in the 2017, PGCPs included a statement in their Action Plan that they implemented fully.

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**General Findings and Observations on Governance of the District**

Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
	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.	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		
Monitoring and Accountability	37. Increase accountability via reviews completed by an independent third party. Either: 1) expand the auditor role to complete performance audits of both academic and non-academic areas of the District or 2) create an accountability officer outside of the auditor function to provide independent oversight of academic policies and procedures and student performance.	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.	Partially Addressed	Partially Implemented
Use of Incentives	No recommendation	PGCPS does not plan to offer student performance-based incentives.	N/A	N/A

**General Findings and Observations on Governance of the District**

Area	Audit Recommendations	Action Plan Response	Action Plan Gap Analysis	Implementation Analysis
Reporting Complaints of Misuse or Fraud	38. PGCPs leadership should regularly communicate the hotline information for employees or public stakeholders to report any potential fraud.	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. 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”).	Fully Addressed	Fully Implemented
	39. PGCPs leadership should ensure timely investigation and response into complaints to avoid press involvement with internal complaints.	No response	Not Addressed	Partially Implemented
	40. The Board should receive regular briefings into any complaints of fraud impacting student outcomes.	No response	Not Addressed	Partially Implemented



## B. Detailed Action Plan Implementation Assessment

### 1. Attendance

#### *a) Course Corrections*

On February 23, 2018, the PGCPs central office released a memo to staff indicating that teachers had a window of time to retroactively update any unlawful attendance records for students who were able to provide evidence that they were lawfully absent. Specifically, the PGCPs Executives requested that the Student Application Team disable the standard three-day window requirements in SchoolMAX, allowing teachers to update any “unlawful” records until March 16<sup>th</sup> for any dates within the range of October 1, 2017 to March 16, 2018. For SY 18-19, the window has been extended to 16 days so that teachers have more time to modify student absence categories once students return to school. Data analysis of attendance record changes can be found in the Attendance Analysis section of this report.

#### *b) Communications and Training*

School staff stated there was little communication on attendance policies and processes in SY 17-18. However, PGCPs provided A&M with the following evidence of training and communications which supported staff understanding of various aspects of Administrative Procedure 5113 (Student Attendance, Absence and Truancy).

- February 23, 2018: Memorandum from the District office reminding schools of the steps they should take to address truancy and the expectations for communication with parents.
- March 20, 2018: PGCPs reviewed a few components of Administrative Procedure 5113 at a principals meeting, including a reminder of the definition of a truant or habitually truant student, reasons that constitute a lawful absence, and actions the school should take to address attendance concerns.
- July 5, 2018: PGCPs published an updated administrative procedure regarding attendance (Administrative Procedure 5113).
- August 8, 2018: Principals received training on the updated administrative procedure during the Systemic Principals’ Meeting. During the breakout session regarding attendance, District staff gave an overview of the new administrative procedures and tools but did not go into detail. Principals asked for more clarity on many of the items in Administrative Procedure 5113 and expressed concerns about the impact of the new policies on their students, especially for schools that have truancy challenges. Additionally, trainers communicated that teachers *are not required* to give make-up work to students who are unlawfully absent. However, Administrative Procedure 5113 states, “students who are considered unlawfully absent from a school or a class will not have the opportunity to make up missed assignments.” There was confusion about how to monitor grade entry and hold teachers accountable.
- August 21, 2018: PGCPs hosted a meeting with all principals to review and clarify the updates to Administrative Procedure 5113: Student Attendance, Absence and Truancy.

- August 27, 2018: PGCPs sent an email with follow-up responses to the questions from the Systemic Principals Meeting on Administrative Procedure 5113. The responses addressed the principals' questions from the meeting but did not provide specific details on school level process or implementation.

*c) Administrative Procedure Revisions*

On July 5, 2018, PGCPs published an updated Administrative Procedure 5113: Student Attendance, Absence, and Truancy. The following table outlines key changes related to the recommendations of the 2017 Audit and provides analysis on the impact of each change.

**Figure 23: Attendance Administrative Procedure Revision Analysis**

Category	Relevant Changes	Analysis
Lawful & Unlawful Absences	Detailed definitions and conditions added for “chronic absences”, “habitual truant” and “unlawful absence”.	Detailed definitions provide clarity on terms related to unlawful absences, enabling referral of students to appropriate support mechanisms.
	Includes the “possibility of legal consequences” if a student is habitually truant.	The inclusion of a “legal consequences” aspect in cases of habitual truancy strengthens the administrative procedure.
Procedures	Pupil Personnel Workers will now be required to report monthly (to the school principal) the names of students who have been habitually truant and chronically absent the previous month.	The new absence reporting procedures provide detailed and comprehensive guidance on reporting absences under different scenarios.
	The procedure now states, “the principal will ensure that students who are identified as habitual truant/chronic absences are referred to the SST and or SIT.”	The “chain of command” is clear and provides guidance to teachers, principals, and SIT or SST teams about their responsibilities. However, the new administrative procedure does not outline the extent to which the SIT team can make exceptions to policies stated in the administrative procedure.
Missed Classwork	PGCPs’s requirement for make-up work for lawful absences has been augmented to include policies about the timeline for the teacher to provide make-up work and the student to complete it, grading and grade entry.	Clarifies the rights of the student to complete make-up work when they are lawfully absent.

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	The procedure now states that students should not be provided make-up work for missed work on days of unlawful absence from class. In such cases students will automatically receive a grade of a zero.	Defines how teachers should manage the make-up work process and limits the distribution of make-up work to students with lawful absences.
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A section titled “Monitoring and Compliance” was added to the updated Administrative Procedure 5113. Highlights of this new section included:

- The Supervisor of Pupil Personnel Workers must maintain documentation to show that all principals received their list of habitually truant and chronically absent students monthly.
- A file will be kept in the attendance or main office that contains documentation filed by the teacher demonstrating that communication has been made with the parent/guardian of students who were absent three or more consecutive days.
- Principals, or a designee, must run the Missing Attendance Report weekly to ensure all teachers are recording student attendance daily. Written notification must be provided to teachers that are not adhering to the daily attendance entry requirement.

## 2. Grade Changes and Appeals

### *a) Course Corrections*

Following the 2017 Audit, the District emphasized appropriate signatures and support and began auditing random samples of students to ensure schools were following the appropriate procedures and that grade changes were well-documented and appropriately signed off. District personnel, such as Associate Superintendents and Instructional Directors, conducted audits of Quarter 1 and Quarter 2 of SY 17-18. These audits examined a random sample of 10% in students at each school, looking for grade change forms and documentation. PGCPS reviewed the results of their audit with principals at a meeting on March 20, 2018.

### *b) Communications and Training*

PGCPS trained principals on expectations for proper documentation and support of grade changes. Additionally, grade managers received training on their job roles and responsibilities. Schools communicated to parents and students through newsletters and robo-calls, notifying them of the timeline and process for appeals. The following communications and trainings were provided to principals and school staff by PGCPS:

- December 19, 2017: Memo via email to high school principals summarizing grade changes for the SY 16-17.
- January 11, 2018: The Student Applications Team added Grade Changes dates/windows to the Grading Calendar document and shared with schools via SchoolMAX message.

- January 19 and 22, 2018: PGcps conducted trainings on grade change procedures for high school principals.
- February 3, 2018: PGcps posted additional Grade Manager and Transcript Manager training opportunities on the staff portal.
- February 12, 2018: Memo sent to high school principals with Grade Change Audit summary findings for first quarter grade change requests.
- February 22, 2018: Webinar made available to high school principals with important information about grade changes.
- March 20, 2018: Principals meeting to review random audit findings and go over how to properly complete a Grade Change Authorization Form PS-140. The meeting also reviewed the grade change process and necessary documentation and signatures.
- March 29, 2018: PGcps Board of Education Meeting reviewed the Graduation Rate Audit response first quarter grade changes and process updates.
- August 8, 2018: Systemic Principals' Meeting with a presentation by PGcps staff during a breakout session, including Q&As. During a breakout session, principals were trained on the new electronic grade change process.
- August 9, 2018: Email to high school principals with attached PGcps Administrative Procedure Handbook for review with school staff.
- September 5, 2018: Email to all PGcps employees with the new administrative procedure on grade changes and appeals: Administrative Procedure 5116.

### *c) Systems and Technology*

PGcps developed an online Grade Change Authorization Form PS-140 that automates the process and implements controls. The online Grade Change Authorization Form was piloted at one PGcps high school in Q3 of SY 17-18. The online form will be used for all grade changes at all PGcps schools commencing with SY 18-19. Key features of the online form include:

- Teachers, Principals, and SIT Chairs are required to use the online tool, logging in with their PGcps credentials.
- Required approval by the principal and/or SIT Chair, depending on who initially submitted the form. Without the required approvals, the request will not proceed to the grade or transcript manager.
- Users are required to attach supporting documentation. Approvers can view the evidence and determine if they need further input or documentation.
- Teachers are only able to submit grade change requests within the grade change window. Outside of the window, the principal or SIT Chair must submit the PS-140 Form to be approved by the Associate Superintendent.

*d) Administrative Procedure Revisions*

The new Administrative Procedure 5116: Grade Change Authorization and Appeals was published on July 1, 2018 to provide direction regarding PGCPs’s policies on grade change authorization and grade appeal process. Previously, policies regarding grade changes were in Administrative Procedure 5121.3. The following table outlines key changes related to the recommendations of the 2017 Audit and provides analysis on the impact of each change.

**Figure 24: Grade Change and Appeal Administrative Procedure Revision Analysis**

Category	Relevant Changes	Analysis
Grade Entry	Defines the roles and responsibilities of the Grade Manager & principal during the grade entry window for individual schools.	The newly defined roles and responsibilities will help support accurate entry of quarterly grades.
	Establishes the timeline by which teachers must make their final grade submissions.	The timeline will reduce late grade submissions by teachers, requiring principals to submit a grade change after the window.
Appeals	The SIT Committee is engaged earlier in the appeals process.	The SIT Committee involvement will help prevent fraud or misuse of grade changes.
	Parents can appeal decisions of the SIT committee directly to an Instructional Director. Previously, additional appeals were sent to the Area Associate Superintendent.	This should expedite the appeals process.
Grade Changes	Grade changes can be initiated by the SIT Chairperson, principal, or teacher.	The outlined roles and responsibilities help ensure that principals are aware of all grade changes made in their school building.
	The Grade Manager is the only stakeholder that can change grades once the grade entry deadline has passed.	The independent role of the Grade Manager will help reduce improper grade changes and enforce policy and procedure.
	If a grade must be changed outside of the established submission window, a principal is required to receive approval from the Instructional Director.	This outside verification will reduce the potential for error and fraud.
	The new administrative procedure establishes clear timelines and procedures for the grade change	Creates clear expectations regarding length of grade change

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Category	Relevant Changes	Analysis
	process. The grade change windows for each quarter are established by PGCPs and sent out at the beginning of each school year.	process and chronology of steps to follow.
Make-Up Work	References were added to the administrative procedure indicating that the PS-140 Form will be moving online, allowing make-up work documentation to be attached as evidence.	The move of the PS-140 Form online should enable greater accountability and tracking for make-up work related to grade changes.

A section titled “Monitoring and Compliance” has been included in Administrative Procedure 5116 to further ensure grade appeals and changes are conducted according to administrative procedure.

Highlights of the new section include:

- An annual review system whereby teachers must sign off on having reviewed grade authorization and appeals processes.
- Area Offices will run quarterly reports of all grade changes submitted and approved by the established deadline. These reports will be reviewed directly by the Deputy Superintendent no later than five school days after the deadline for quarterly grade change approval.
- Moving forward, an internal random audit of student cumulative folders will be performed once a year to ensure compliance with the grade change administrative procedure.
- Principals cannot be a part of the SIT team, which is responsible for deciding on grade appeals.

### 3. Grading

#### *a) Course Corrections*

Immediately following the release of the 2017 Audit, PGCPs made efforts to clarify the “Good Faith Effort” policy and grading procedures, including training for high school principals and documented expectations regarding Good Faith Effort that was sent in January 2018.

#### *b) Communications and Training*

PGCPs provided training documents for principals to use to retrain their staff on how to evaluate Good Faith Effort. This training material included a Good Faith Effort checklist, definition, presentation, flowchart, practice activity, and sample graded assignment. The following are communications and trainings PGCPs provided to principals and school staff:

- January 22, 2018: Training for high school principals on Good Faith Effort, including a PPT they could use with their staff.
- January 26, 2018: Email to high school principals with Administrative Procedure 5121.3 High School Grading Policy and Good Faith Efforts expectation attached.
- July 12, 2018: Principal Survey on Grading and Reporting.

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- August 8, 2018: At the Systemic Principals’ Meeting, PGCPs presented on grading procedures during a breakout session title “What’s New Administrative Procedure 5121.1 Grading and Reporting.”
- August 9, 2018: Email to high school principals with attached PGCPs Administrative Procedure Handbook for review with school staff. The handbook includes information on grade change, appeal, and grading requirements.
- September 5, 2018: Email to all PGCPs employees with the latest version of Administrative Procedure 5121.3 High School Grading Policy.

*c) Administrative Procedure Revisions*

On July 12, 2018, PGCPs published an update to Administrative Procedure 5121.3: Grading and Reporting for High Schools, Grade Nine Through Grade Twelve. Grading requirements associated with unlawful and lawful absences were moved to Administrative Procedure 5113 (Attendance), and grade changes and grade appeals have been moved to the new Administrative Procedure 5116 (Grade Changes and Appeals). The following table outlines key changes related to the recommendations of the 2017 Audit and provides analysis on the impact of each change.

**Figure 25: Grading Administrative Procedure Revision Analysis**

Category	Relevant Changes	Analysis
Recording	The new procedure provides a more detailed description of the requirements for students to demonstrate a "Good Faith Effort" and defines instances when a student should be assigned a grade of zero.	The added detail in the definition of a "Good Faith Effort" pushes teachers to adhere to a more rigorous assessment of the quality of work that earns the 50% minimum grade.
	Principals (or their designees) are assigned responsibility for monitoring the weekly grade entry process in SchoolMAX.	Principal oversight improves system-wide accountability efforts.
	The automatic grade "E" for students with excessive lawful or unlawful absences has been removed.	Now, students only receive zeros for any worked missed when they are unlawfully absent. There is no longer a threshold number of absences that triggers a student to fail a course.

In the update to Administrative Procedure 5121.3, a section titled “Monitoring and Compliance” was added to outline accountability procedures and expectations. Highlights of this new section include:

- Each year, all staff are required to review grading policies and procedures prior to the start of each year and must sign a form signifying their understanding.
- The Deputy Superintendent of Teaching and Learning is now required to generate a report each semester to monitor any missing quarter grades.
- Principals or designees are responsible for ensuring prompt grade entry throughout the year.

#### 4. Credit Recovery

##### *a) Course Corrections*

Throughout the first half of SY 17-18, PGCPs reviewed online and blended learning program options received from third-party offerors through an RFP issued on June 15, 2017. Starting on January 23, 2018, students were able to begin enrolling in courses on the new, state approved, online platform. PGCPs’s chosen platform for credit recovery courses officially opened for students on February 12, 2018, with a completion date of May 4, 2018. PGCPs no longer offers quarterly credit recovery programs; only semester-based and full-year credit recovery.

When PGCPs selected a new vendor for their online credit recovery, it underwent evaluation and approval by MSDE - the course curriculum is built on the Maryland College and Career Ready and Maryland Content Standards. MSDE provided PGCPs with an approved list of courses from which they selected courses to offer beginning in 2018.

##### *b) Communications and Training*

PGCPs communicated to staff, parents, and students that online credit recovery was suspended. Then, when the new platform became available, PGCPs worked with professional school counselors and other school staff to enroll students who were eligible.

The District transitioned from their previous original credit and credit recovery program (MPTS) to a new program they named the Educational Online Program (EOP). With the transition to the EOP, PGCPs created an updated handbook, EOP 101 Guide for Principals, EOP Scheduling and Grading Guide, and EOP calendar. On September 5, 2018 an email was sent to all PGCPs employees with the new Administrative Procedure: Administrative Procedure 5182 Educational Online Programs. Additional communications and trainings related to the EOP include:

- January 22, 2018: EOP Coordinators Implementation Meeting.
- January 22, 2018: PGCPs delivered training entitled “Educational Online Program 101” at a high school principal meeting that included an overview of programs offered, enrollment fees, and grading and reporting for EOP courses.



- January 24, 2018: The District required that all high schools submit PGCPs Educational Online Program Spring 2018: School Site Blueprint & Implementation to the District, outlining details of how the program would be implemented at their school and by who.
- January 29, 2018: EOP Site Coordinator Platform Training.
- January 30-31, 2018: EOP School Teacher Platform Training.
- February 1, 2018: EOP School Administrator Training and EOP School Professional School Counselor & Grade Manager/Registrar Training.

*c) Administrative Procedure Revisions*

On July 1, 2018, PGCPs published a new administrative procedure that replaced the MPTS handbook - Administrative Procedure 5182: Educational Online Programs. Administrative Procedure 5182 provided systemic guidelines regarding the high school Educational Online Program, outlining program requirements, grading policies and timelines to assist schools with implementation and monitoring. Definitions and program descriptions previously outlined in the MPTS Handbook have been updated and moved to Administrative Procedure 5182. The following table outlines key changes which are relevant to the findings of A&M’s audits and provides analysis on the impact of each change.

**Figure 26: EOP Administrative Procedure Revision Analysis**

Category	Relevant Changes	Analysis
Program Options	Options for original credit and repeat credit no longer include Quarterly Learning Modules (QLMs). And, partial credit recovery is no longer an option. Now, students can repeat a course using EOP platform—the state approved online platform.	The elimination of QLMs will help regulate the credit recovery process. And, the state approved EOP platform courses will better align schools and credit recovery programs with MSDE requirements.
	Roles and responsibilities of teachers and school coordinators have been added, including an EOP office to oversee all EOP programs.	The division of roles and responsibilities is an improvement on the previous administrative procedure but does provide enough detail to ensure compliance.
Attendance Policy	The attendance policy section contains specific details regarding consequences of absences, outlining the documentation and communication processes for each absence and for eventual withdrawal from the course.	This policy provides a more comprehensive process explanation of who contacts the parents, conducts meetings, and makes decisions regarding absences and withdrawal from an EOP course.
	The new procedure stipulates that having five absences triggers a SIT team review,	The five-absence policy helps enforce attendance for EOP courses.

Category	Relevant Changes	Analysis
	which can result in removal from the program.	
Grade Reporting	Grade entry processes and timing are further defined for the fall and spring semesters.	Defined grade entry processes and timelines will reduce the number of grade changes due to EOP courses.
	The new procedure requires an EOP Progress Form for parents to be completed by the site coordinator.	Improved communication with parents will allow them to track their students' progress.
Grading Policy	New guidelines require that students complete 100% of assigned work with a mastery score of 60% or higher to earn a credit for the EOP course.	The 60% mastery requirement solidifies the expectations for students who are seeking to earn credit through an EOP.
	The new procedure outlines distinct grading policies for repeated credit and original credit.	Clearer procedures will standardize how teachers enter grades and how these grades are monitored.

## 5. Graduation Certification

### *a) Course Corrections*

During and after the 2017 Audit, PGCPs created new tools for counselors to use to certify graduates: student promotion and graduation certification process document, 20-day professional school counselor checklist, 4<sup>th</sup> quarter process for certifying graduates, and a month by month process for certifying graduates. During SY 17-18, PGCPs required the counseling offices at each high school to dedicate a week in the fall and spring to recordkeeping, allowing professional school counselors and administrators to get caught up on the PDS Tally Cards required by MSDE to verify student graduation eligibility. At various points in the school year, an internal peer review process was implemented to reduce human error—each senior PDS Tally Card and transcript had to be reviewed by another counselor before it was given to the principal for final approval. Moreover, PGCPs emphasized that PDS Tally Cards must be complete before graduation.

### *b) Communications and Training*

Transcript managers received training on August 30, 2018 that helped them standardize the process of updating student transcripts. Professional school counselors also received training on August 29, 2018 and were provided with tools to ensure careful review of student credits, including an overview of the new online PDS Tally Card. At the Systemic Principals Meeting, District staff gave an overview of the new administrative procedures and tools to principals but did not go into detail or answer the questions raised about school-level impact. Principals wanted more clarity on many of the administrative

procedures. The following are additional communications and trainings PGCPs conducted in response to the 2017 Audit:

- November 13, 2017: Training high school principals on the student promotion and graduation certification process.
- November 15, 2017: Memo to high school principals on testing graduation requirements.
- January 8, 2018: Memo to high school principals on student requirement certification follow-up questions and concerns.
- January 11, 2018: Memo summarizing the results of the internal audit of cumulative records.
- January 26, 2018: Memo to high school principals reviewing graduate records compliance.
- April 9, 2018: Conference call with high school principals to address any questions or concerns about the graduation certification process.
- April 23, 2018: Training for high school principals on certifying students for graduation.
- May 24, 2018: Email to high school professional school counselors on the process of certifying the final SR3 Card.
- July 17, 2018: Email to all PGCPs staff with an update on the graduation rate audit.
- August 1, 2018: Memo to high school principals with an updated process for certifying graduates.
- August 8, 2018: Systemic Principals' Meeting with a presentation during a breakout session on graduation standards.

### *c) Systems and Technology*

Starting in SY 18-19, professional school counselors can view an electronic tally of student credits. As final grades are posted, SchoolMAX will keep a tally that can be viewed on the student transcript. A summary table will show what credits have been completed and which requirements have been met. Users can go to the "Graduation Page" and see a student's progress towards meeting the standards or print a complete transcript. The only courses that will not be tallied electronically will be completion courses such as foreign language and CTE – counselors will still need to check these manually.

## 6. Monitoring and Accountability

### *a) Course Corrections*

Administrators in Area Offices (including Associate Superintendents) conducted audits of PGCPs high schools in Quarter 1 and Quarter 2 of SY 17-18. These audits included a manual review of student cumulative folders for a random sample of 10% of students at each school. The Office of Research and Evaluation generated the random sample of students and aggregated final data but did not perform data analysis to direct future investigations or to follow up on findings produced from the audit report. The Area Offices produced a high-level summary of documentation findings that gave administration surface-level visibility into schools' efforts to improve documentation of the graduation certification process. While PGCPs's audits improved district visibility into school-level usage of documentation, they

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did not leverage the data PGCPs has available in the SchoolMAX system to gain the higher level of visibility needed to track administrative procedure adherence.

## C. Consolidated Recommendations

The following list consolidates all recommendations from the Action Plan Assessment and Performance Audit.

### **A&M Recommends that PGCPS:**

1. Investigates additional features of SchoolMAX that could support school-level attendance accountability. Given the AP 5113 modifications, PGCPS should now consider whether SchoolMAX can automatically assign a zero for missed assignments when a student is unlawfully absent.
2. Develops a district-level monitoring process including data analysis on the reports from SchoolMAX to ensure all schools are following the policies outlined in AP 5113.
3. Provides more substantial training for all administrators on how to implement and monitor adherence to AP 5113 at their schools.
4. Adds detail to AP 5116 regarding execution and enforcement.
5. Adds a step in the electronic PS-140 Form process that requires the teacher to agree or disagree with a grade change initiated by the principal or SIT chair, in accordance with the process outlined in AP 5116.
6. Outlines a clearer process that explains: when to use the online PS-140 Form, expected timelines, and record keeping.
7. Defines procedures for late grade entries.
8. Establishes clear repercussions for grading and reporting procedure violations.
9. Provides additional training for both principals and assistant principals on how to implement AP 5121.3 in their schools and continue to share training materials that school administrators can use with their staff.
10. Clarifies procedures around repeat courses. For example, when can a student repeat a course for a higher grade? And how many times can a course be repeated?
11. Adds monitoring and compliance guidelines to the roles and responsibilities of EOP teachers, school coordinators, principals and the EOP office.
12. Adds a process to AP 5182 that outlines how student progress is tracked and specify clear checkpoints for course completion.
13. Continues conducting quarterly audits of the Graduation Certification Checklists and PDS Tally Cards, using a standardized audit process and timeline to help ensure that no student gets overlooked and that all counselors are completing the process in a timely and accurate manner (this was also a 2017 Audit recommendation that has not been fully implemented).
14. Trains principals and assistant principals over seniors on the graduation requirements and certification process so that they are informed when supporting the counselors and signing transcripts or PDS Tally Cards.
15. Delivers annual trainings for school registrars focusing on aspects of their role that are impacted by administrative procedures and other policy changes.
16. Institutes a more formal process for schools to report issues found in student records.

17. Increases the level of detail in trainings regarding pramming of transfer student data to ensure all schools are entering credits accurately.
18. Provides support and resources for the newly-empowered Chief Accountability Officer organization to continue to make progress in closing the accountability gaps identified in the 2017 Audit.
19. Conducts a complete system configuration audit to verify the quality and validity of its attendance data.
20. Continues to improve the timeliness of grade submissions to further improve grade entry timeline compliance.
21. Works to improve the consistent use of grade change forms across high schools and standardize the late grade entry process district-wide.
22. Continues to ensure PDS Tally Cards are kept up to date annually and list correct graduation standards to assist the tallying process.
23. Continues communicating future changes and provide robust training for staff to sustain the current culture of compliance.
24. Establishes a standardized attendance recording process supported by administrative procedures and provide comprehensive training, monitoring, and reporting on attendance entry and updates. The administrative procedure should include requirements for timely entry and should clearly communicate the expectation that every absence should be appropriately recorded as lawful or unlawful.
25. Proactively identify and addresses systems configuration issues, improve data quality and improve school level understanding and use of data:
  - a. Perform an initial audit of SchoolMAX to verify the quality and validity of its attendance data.
  - b. Perform regular audits of SchoolMAX data to illuminate potential system configuration problems, including a focus on whether automatic processes function as expected.
  - c. Designate personnel within the Accountability function to continuously monitor SchoolMAX data for anomalies, irregularities, and potential data quality issues, and facilitate coordination between the Accountability and Student Applications teams to ensure alignment.
  - d. Produce tailored data outputs and/or develop training to allow schools to interpret and act appropriately upon anomalies within their own SchoolMAX data with validation and follow-up from the Accountability function where necessary.
26. At the District-level, verify that no students listed as “non-grads” on the school certified graduate lists are incorrectly recorded with as exit code C-60 in SchoolMAX and that any errors identified are quickly resolved.
27. Conducts a complete system configuration audit to verify the quality and validity of attendance data.
28. Investigates whether SchoolMAX can enforce the SY18-19 version of AP 5121.3.
29. Develops tools and processes to compare attendance and grading appropriately to enforce compliance with AP 5121.3

30. Continues to improve staff training and standardization around the graduation certification process and perform independent reviews to ensure the appropriate completion of PDS cards for all graduates.
31. Proactively ensures that students at each high school grade level are scheduled in accordance with the Maryland Graduation Requirements for their respective graduating cohort. In instances when unique student circumstances do not allow a student to meet graduation requirements, PGCPs must seek guidance from MSDE in advance of graduation.
32. Continues its efforts to control the use of grade changes and maintaining focus on grade entry timeline adherence.
33. Addresses systems configuration issues, improve data quality and improve school level understanding and use of data through several steps:
  - a. Perform an initial audit of SchoolMAX to verify the quality and validity of its attendance data.
  - b. Perform regular audits of SchoolMAX data to illuminate potential system configuration problems, including a focus on whether automatic processes function as expected.
  - c. Designate personnel within the Accountability function to continuously monitor SchoolMAX data for anomalies, irregularities, and potential data quality issues, and facilitate coordination between the Accountability and Student Applications teams to ensure alignment.
  - d. Produce tailored data outputs and/or develop training to allow schools to interpret and act appropriately upon anomalies within their own SchoolMAX data with validation and follow-up from the Accountability function where necessary.
34. Proactively communicate expectations around attendance policies and procedures.
35. Train school leaders to utilize data analysis to improve visibility and ensure compliance with attendance policies and procedures.
36. Regularly review attendance data to identify data irregularities and ensure school compliance with attendance policies and procedures.
37. Support high schools to implement programs to address truancy and chronic absenteeism at schools that are most impacted by this analysis.
38. Includes service learning verification as part of the graduation checklist process to confirm that each graduate has successfully met the 24-hour requirement before marking them as graduates.

## D. School Summaries

The following appendix presents results from data analysis and record review for each of PGCPs's High Schools.



# Academy of Health Sciences at PGCC

A&M conducted the on-site investigation on Tuesday, August 7, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
-	95.0%	95.0%	95.0%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Academy of Health Sciences at PGCC Review Summary		2018	
2018 Graduate Population		94	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	29	96.7%	
Students with grade changes that do not impact graduation eligibility	1	3.3%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>30</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	30	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCCPS was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	-	-
Graduated without excessive unlawful absences in any course	-	-
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

The Academy of Health Sciences does not have attendance data because of its partnership with the Prince George’s Community College (PGCC). Therefore, A&M did not perform attendance-related analysis for this school.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Academy of Health Sciences at PGCC - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>30</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Academy of Health	-	-	-	-	-	-	-
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

As noted above, the Academy of Health Sciences does not have attendance data because of its partnership with the Prince George’s Community College (PGCC). Therefore, A&M did not perform attendance-related analysis for this school.

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Academy of Health Sciences at PGCC's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	0	0	0
Between 11 and 20 points	0	0	0
Between 21 and 30 points	0	0	0
Greater than 30 points	88	23	94

*Population Attendance Analysis*

Figure 8 classifies each graduate of Academy of Health Sciences at PGCC from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	-	-
Between 10 and 19 Periods Absent in at least one course	-	-
Between 20 and 49 Periods Absent in at least one course	-	-
More than 50 Periods Absent in any course	-	-
<b>Total</b>	-	-

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Not Applicable - AHS's grading approach is integrated with college course schedules.</li> <li>Only one grade change was identified within the sample. This grade change did not impact graduation eligibility, however it should have been supported by a grade change form.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>AHS's PDS Cards were completed on graduation day.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- No recommendations at this time.

*Other Areas of Follow Up:*

- The old version (August 2016 version) of Administrative Procedure 5121.3 is available for download on school website.

# Bladensburg

A&M conducted the on-site investigation on Monday, August 6, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
73.4%	73.6%	73.5%	70.1%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Bladensburg Review Summary		2018	
2018 Graduate Population		307	
Students included in Sample		37	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	35	94.6%	
Students with grade changes that do not impact graduation eligibility	1	2.7%	
Students with grade changes that impact graduation eligibility	1	2.7%	
1. With all grade changes fully documented	1	2.7%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>37</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	<b>37</b>	<b>100.0%</b>	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	30	81.1%
Graduated without excessive unlawful absences in any course	7	18.9%
<b>Total 2018 Sample Students</b>	<b>37</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 81.1% of the Bladensburg 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Bladensburg - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	37	100.0%
<b>Total PDS Tally Cards</b>	<b>37</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	2	5.4%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	2	5.4%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>2</b>	<b>5.4%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>35</b>	<b>94.6%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, two had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Bladensburg	3,600	51.8%	3,348	48.2%	6,948	37	188
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Bladensburg's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	17	43	0
Between 11 and 20 points	9	26	2
Between 21 and 30 points	8	16	2
Greater than 30 points	29	26	0

*Population Attendance Analysis*

Figure 8 classifies each graduate of Bladensburg from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	46	15.0%
Between 10 and 19 Periods Absent in at least one course	122	39.7%
Between 20 and 49 Periods Absent in at least one course	135	44.0%
More than 50 Periods Absent in any course	4	1.3%
<b>Total</b>	<b>307</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>One sample student should have had a PS-140 grade change form to support a recorded grade change, but it was not found within the student's cumulative folder.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>Of the PDS Tally Cards evaluated, some were missing a date of completion.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure all grade changes are supported by PS-140 forms.
- Certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- School's 2014-2015 student handbook which includes outdated administrative procedures is available for download on school website.

# Bowie

A&M conducted the on-site investigation on Wednesday, August 1, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
89.5%	85.5%	90.2%	94.0%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Bowie Review Summary	2018	
2018 Graduate Population	547	
Students included in Sample	66	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	57	86.4%
Students with grade changes that do not impact graduation eligibility	6	9.1%
Students with grade changes that impact graduation eligibility	3	4.5%
1. With all grade changes fully documented	2	3.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	1	1.5%
Total sample students	<b>66</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	1	1.5%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	1.5%
Students without grade change or transcript policy violations	65	98.5%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	32	48.5%
Graduated without excessive unlawful absences in any course	34	51.5%
<b>Total 2018 Sample Students</b>	<b>66</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 48.5% of the Bowie 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Bowie - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	66	100.0%
<b>Total PDS Tally Cards</b>	<b>66</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	1	1.5%
# not signed	0	0.0%
# signature date not filled out	1	1.5%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>1</b>	<b>1.5%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>65</b>	<b>98.5%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, one had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Bowie	4,208	42.9%	5,604	57.1%	9,812	66	149
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Bowie's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.



*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	41	9	4
Between 11 and 20 points	6	11	7
Between 21 and 30 points	3	7	1
Greater than 30 points	15	11	9

*Population Attendance Analysis*

Figure 8 classifies each graduate of Bowie from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	236	43.1%
Between 10 and 19 Periods Absent in at least one course	202	36.9%
Between 20 and 49 Periods Absent in at least one course	102	18.6%
More than 50 Periods Absent in any course	7	1.3%
<b>Total</b>	<b>547</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, most had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>Of the PDS Tally Cards evaluated, some were missing a date of completion.</li> <li>The school used an old version of the PDS Tally Card that did not have current graduation standards.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- School's 2017-2018 parent handbook (which includes outdated administrative procedures) is available for download on school website.

# Central

A&M conducted the on-site investigation on Monday, August 13, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

*Figure 1: 4-Year Adjusted Cohort Graduation Rate*

Class of 2014	Class of 2015	Class of 2016	Class of 2017
71.5%	75.0%	73.9%	77.4%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

*Figure 2: School-Specific Student Record and Data Analysis Findings*

Central Review Summary	2018	
2018 Graduate Population	168	
Students included in Sample	30	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	29	96.7%
Students with grade changes that do not impact graduation eligibility	1	3.3%
Students with grade changes that impact graduation eligibility	0	0.0%
1. With all grade changes fully documented	0	0.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	<b>30</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%
Students without grade change or transcript policy violations	30	100.0%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	24	80.0%
Graduated without excessive unlawful absences in any course	6	20.0%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 80.0% of the Central 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Central - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	2	6.7%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>2</b>	<b>6.7%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>28</b>	<b>93.3%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, two had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Central	3,599	46.1%	4,202	53.9%	7,801	30	260
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Central's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	15	21	2
Between 11 and 20 points	4	18	1
Between 21 and 30 points	6	14	0
Greater than 30 points	15	18	3

*Population Attendance Analysis*

Figure 8 classifies each graduate of Central from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	41	24.4%
Between 10 and 19 Periods Absent in at least one course	43	25.6%
Between 20 and 49 Periods Absent in at least one course	67	39.9%
More than 50 Periods Absent in any course	17	10.1%
<b>Total</b>	<b>168</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>None of the grade changes were supported by PS-140 grade change forms.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>Of the PDS Tally Cards evaluated, some were missing a date of completion.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Charles Herbert Flowers

A&M conducted the on-site investigation on Thursday, August 2, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
86.4%	86.1%	91.0%	92.2%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Charles Herbert Flowers Review Summary		2018	
2018 Graduate Population		466	
Students included in Sample		56	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	43	76.8%	
Students with grade changes that do not impact graduation eligibility	11	19.6%	
Students with grade changes that impact graduation eligibility	2	3.6%	
1. With all grade changes fully documented	2	3.6%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	56	100.0%	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	56	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	25	44.6%
Graduated without excessive unlawful absences in any course	31	55.4%
<b>Total 2018 Sample Students</b>	<b>56</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 44.6% of the Charles Herbert Flowers 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Charles Herbert Flowers - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	1	1.8%
# completed	55	98.2%
<b>Total PDS Tally Cards</b>	<b>56</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	16	28.6%
# not signed	4	7.1%
# signature date not filled out	4	7.1%
# do not identify student as eligible to graduate	17	30.4%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>17</b>	<b>30.4%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>39</b>	<b>69.6%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, 17 had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Charles Herbert	2,408	28.1%	6,160	71.9%	8,568	56	153
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Charles Herbert Flowers's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	15	13	5
Between 11 and 20 points	8	11	7
Between 21 and 30 points	11	17	4
Greater than 30 points	29	19	3

*Population Attendance Analysis*

Figure 8 classifies each graduate of Charles Herbert Flowers from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	243	52.1%
Between 10 and 19 Periods Absent in at least one course	153	32.8%
Between 20 and 49 Periods Absent in at least one course	70	15.0%
More than 50 Periods Absent in any course	0	0.0%
<b>Total</b>	<b>466</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>• Most grade changes were supported by PS-140 grade change forms.</li> <li>• Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>• The majority of the 2018 graduates had a PDS Tally Card.</li> <li>• Of the PDS Tally Cards evaluated, most were missing key information such as the school name and address.</li> <li>• Of the PDS Tally Cards evaluated, some were missing a date of completion.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>• No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Ensure appropriate completion of PDS Tally Cards

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Community-Based Classroom

A&M conducted the on-site investigation on Thursday, August 2, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
52.6%	89.3%	76.3%	93.9%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Community-Based Classroom Review Summary		2018	
2018 Graduate Population		78	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	28	93.3%	
Students with grade changes that do not impact graduation eligibility	1	3.3%	
Students with grade changes that impact graduation eligibility	1	3.3%	
1. With all grade changes fully documented	1	3.3%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	30	100.0%	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	2	6.7%	
4. Transcript ineligible	2	6.7%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	2	6.7%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	2	6.7%	
Students without grade change or transcript policy violations	28	93.3%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.



**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	14	46.7%
Graduated without excessive unlawful absences in any course	16	53.3%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 46.7% of the Community-Based Classroom 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Community-Based Classroom - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	2	6.7%
# not signed	0	0.0%
# signature date not filled out	2	6.7%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>2</b>	<b>6.7%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>28</b>	<b>93.3%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, two had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Community-Based	889	83.3%	178	16.7%	1,067	30	36
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Community-Based Classroom's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	5	0	0
Between 11 and 20 points	7	4	1
Between 21 and 30 points	4	4	1
Greater than 30 points	10	5	3

*Population Attendance Analysis*

Figure 8 classifies each graduate of Community-Based Classroom from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	32	41.0%
Between 10 and 19 Periods Absent in at least one course	32	41.0%
Between 20 and 49 Periods Absent in at least one course	14	17.9%
More than 50 Periods Absent in any course	0	0.0%
<b>Total</b>	<b>78</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>The majority of the 2018 graduates had a PDS Tally Card.</li> <li>Two students from the sample were reflected as graduates in SchoolMAX but were reflected as Non-graduates on the school's certified graduate list. Accordingly, no final PDS cards or transcripts were available for those students.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Review final retention codes in SchoolMAX to ensure that students are coded consistent with the certified graduate list (i.e. to ensure that students who should be retained are not inadvertently reflected as graduates).

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Croom

A&M conducted the on-site investigation on Wednesday, August 15, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

*Figure 1: 4-Year Adjusted Cohort Graduation Rate*

Class of 2014	Class of 2015	Class of 2016	Class of 2017
75.9%	69.0%	61.5%	75.9%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

*Figure 2: School-Specific Student Record and Data Analysis Findings*

Croom Review Summary		2018	
2018 Graduate Population		51	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	23	76.7%	
Students with grade changes that do not impact graduation eligibility	6	20.0%	
Students with grade changes that impact graduation eligibility	1	3.3%	
1. With all grade changes fully documented	1	3.3%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>30</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	30	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	7	23.3%
Graduated without excessive unlawful absences in any course	23	76.7%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 23.3% of the Croom 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Croom - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	30	100.0%
# not signed	5	16.7%
# signature date not filled out	8	26.7%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>30</b>	<b>100.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>0</b>	<b>0.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, all had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Croom	3,606	39.6%	5,498	60.4%	9,104	30	303
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Croom's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	8	5	0
Between 11 and 20 points	3	10	3
Between 21 and 30 points	8	4	0
Greater than 30 points	5	1	1

*Population Attendance Analysis*

Figure 8 classifies each graduate of Croom from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	9	17.6%
Between 10 and 19 Periods Absent in at least one course	9	17.6%
Between 20 and 49 Periods Absent in at least one course	26	51.0%
More than 50 Periods Absent in any course	7	13.7%
<b>Total</b>	<b>51</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>Of the PDS Tally Cards evaluated, some were missing a date of completion.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure all grade changes are supported by PS-140 forms.
- Ensure appropriate completion of PDS Tally Cards
- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Crossland Evening

A&M conducted the on-site investigation on Monday, August 6, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

*Figure 1: 4-Year Adjusted Cohort Graduation Rate*

Class of 2014	Class of 2015	Class of 2016	Class of 2017
16.3%	15.7%	18.4%	52.8%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

*Figure 2: School-Specific Student Record and Data Analysis Findings*

Crossland Evening Review Summary		2018	
2018 Graduate Population		26	
Students included in Sample		26	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	25	96.2%	
Students with grade changes that do not impact graduation eligibility	1	3.8%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	26	100.0%	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	26	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	3	11.5%
Graduated without excessive unlawful absences in any course	23	88.5%
<b>Total 2018 Sample Students</b>	<b>26</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 11.5% of the Crossland Evening 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Crossland Evening - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	26	100.0%
<b>Total PDS Tally Cards</b>	<b>26</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>26</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Crossland Evening	938	78.4%	259	21.6%	1,197	26	46
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Crossland Evening's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	5	6	0
Between 11 and 20 points	2	0	0
Between 21 and 30 points	1	1	1
Greater than 30 points	2	1	0

*Population Attendance Analysis*

Figure 8 classifies each graduate of Crossland Evening from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	-74	-284.6%
Between 10 and 19 Periods Absent in at least one course	53	203.8%
Between 20 and 49 Periods Absent in at least one course	43	165.4%
More than 50 Periods Absent in any course	4	15.4%
<b>Total</b>	<b>26</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>There were not any grade changes during the 17/18 school year.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>The school used an old version of the PDS Tally Card that did not have current graduation standard.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- Graduation requirements provided on school's website are out of date.



# Crossland

A&M conducted the on-site investigation on Thursday, August 9, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
77.8%	81.3%	82.0%	78.8%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Crossland Review Summary		2018	
2018 Graduate Population		218	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	29	96.7%	
Students with grade changes that do not impact graduation eligibility	1	3.3%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>30</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	30	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	22	73.3%
Graduated without excessive unlawful absences in any course	8	26.7%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 73.3% of the Crossland 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Crossland - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	1	3.3%
# completed	29	96.7%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	1	3.3%
# not signed	1	3.3%
# signature date not filled out	1	3.3%
# do not identify student as eligible to graduate	1	3.3%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>1</b>	<b>3.3%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>29</b>	<b>96.7%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, one had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Crossland	3,125	44.6%	3,884	55.4%	7,009	30	234
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Crossland 's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	1	6	0
Between 11 and 20 points	5	10	0
Between 21 and 30 points	12	10	1
Greater than 30 points	25	23	1

*Population Attendance Analysis*

Figure 8 classifies each graduate of Crossland from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	53	24.3%
Between 10 and 19 Periods Absent in at least one course	90	41.3%
Between 20 and 49 Periods Absent in at least one course	75	34.4%
More than 50 Periods Absent in any course	0	0.0%
<b>Total</b>	<b>218</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>The majority of the 2018 graduates had a PDS Tally Card.</li> <li>One student was missing a PDS card, and two PDS cards were completed and signed for students who did not meet graduation requirements.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Retain Transcript used to certify graduate and PDS Tally card in the student cumulative folder.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- Transcripts included in the cumulative folder were signed and dated after the PDS certification date and actual graduation date for Crossland School.

# Dr Henry A Wise, Jr.

A&M conducted the on-site investigation on Thursday, August 9, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
84.0%	87.4%	89.2%	90.1%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Dr Henry A Wise, Jr. Review Summary		2018	
2018 Graduate Population		466	
Students included in Sample		56	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	51	91.1%	
Students with grade changes that do not impact graduation eligibility	3	5.4%	
Students with grade changes that impact graduation eligibility	2	3.6%	
1. With all grade changes fully documented	2	3.6%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	56	100.0%	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	56	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	43	75.0%
Graduated without excessive unlawful absences in any course	13	23.2%
<b>Total 2018 Sample Students</b>	<b>56</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 75.0% of the Dr Henry A Wise, Jr. 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Dr Henry A Wise, Jr. - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	56	100.0%
<b>Total PDS Tally Cards</b>	<b>56</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>56</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Dr Henry A Wise, Jr.	5,282	44.4%	6,619	55.6%	11,901	56	213
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Dr Henry A Wise, Jr.'s 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	21	31	2
Between 11 and 20 points	2	15	4
Between 21 and 30 points	5	17	6
Greater than 30 points	11	18	4

*Population Attendance Analysis*

Figure 8 classifies each graduate of Dr Henry A Wise, Jr. from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	158	33.9%
Between 10 and 19 Periods Absent in at least one course	199	42.7%
Between 20 and 49 Periods Absent in at least one course	107	23.0%
More than 50 Periods Absent in any course	2	0.4%
<b>Total</b>	<b>466</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure all grade changes are supported by PS-140 forms.
- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- The old version (August 2016 version) of Administrative Procedure 5121.3 is available for download on school website.

# Duval

A&M conducted the on-site investigation on Wednesday, August 22, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

*Figure 1: 4-Year Adjusted Cohort Graduation Rate*

Class of 2014	Class of 2015	Class of 2016	Class of 2017
85.1%	91.7%	92.4%	91.5%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

*Figure 2: School-Specific Student Record and Data Analysis Findings*

Duval Review Summary	2018	
2018 Graduate Population	400	
Students included in Sample	48	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	45	93.8%
Students with grade changes that do not impact graduation eligibility	3	6.3%
Students with grade changes that impact graduation eligibility	0	0.0%
1. With all grade changes fully documented	0	0.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	<b>48</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%
Students without grade change or transcript policy violations	<b>48</b>	<b>100.0%</b>

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	32	66.7%
Graduated without excessive unlawful absences in any course	16	33.3%
<b>Total 2018 Sample Students</b>	<b>48</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 66.7% of the Duval 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Duval - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	48	100.0%
<b>Total PDS Tally Cards</b>	<b>48</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>48</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Duval	3,304	44.8%	4,077	55.2%	7,381	48	154
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Duval's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.



*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	5	15	1
Between 11 and 20 points	15	28	1
Between 21 and 30 points	23	17	2
Greater than 30 points	46	30	1

*Population Attendance Analysis*

Figure 8 classifies each graduate of Duval from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	148	37.0%
Between 10 and 19 Periods Absent in at least one course	158	39.5%
Between 20 and 49 Periods Absent in at least one course	91	22.8%
More than 50 Periods Absent in any course	3	0.8%
<b>Total</b>	<b>400</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>All 2018 graduates had a PDS Tally Card.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure all grade changes are supported by PS-140 forms.
- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- School's 2014-2015 parent handbook which includes outdated administrative procedures is available for download on school website.

# Eleanor Roosevelt

A&M conducted the on-site investigation on Tuesday, August 7, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
88.3%	90.5%	91.5%	95.0%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Eleanor Roosevelt Review Summary		2018	
2018 Graduate Population		604	
Students included in Sample		73	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	69	94.5%	
Students with grade changes that do not impact graduation eligibility	4	5.5%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>73</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	<b>73</b>	<b>100.0%</b>	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	44	60.3%
Graduated without excessive unlawful absences in any course	29	39.7%
<b>Total 2018 Sample Students</b>	<b>73</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 60.3% of the Eleanor Roosevelt 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Eleanor Roosevelt - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	2	2.7%
# completed	71	97.3%
<b>Total PDS Tally Cards</b>	<b>73</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	2	2.7%
# not signed	2	2.7%
# signature date not filled out	2	2.7%
# do not identify student as eligible to graduate	2	2.7%
# after graduation	18	24.7%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>20</b>	<b>27.4%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>53</b>	<b>72.6%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, 20 had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Eleanor Roosevelt	5,070	19.9%	20,451	80.1%	25,521	73	350
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Eleanor Roosevelt's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	11	25	1
Between 11 and 20 points	23	22	2
Between 21 and 30 points	13	10	4
Greater than 30 points	26	47	6

*Population Attendance Analysis*

Figure 8 classifies each graduate of Eleanor Roosevelt from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	323	53.5%
Between 10 and 19 Periods Absent in at least one course	162	26.8%
Between 20 and 49 Periods Absent in at least one course	110	18.2%
More than 50 Periods Absent in any course	9	1.5%
<b>Total</b>	<b>604</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms that were evaluated, the majority were properly completed but did not have evidence attached to them.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>The majority of the 2018 graduates had a PDS Tally Card.</li> <li>Most PDS Cards were not completed before seniors graduated. All final transcripts were printed and signed after graduation.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Fairmont Heights

A&M conducted the on-site investigation on Wednesday, August 1, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
73.1%	86.5%	85.4%	90.2%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Fairmont Heights Review Summary		2018	
2018 Graduate Population		128	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	24	80.0%	
Students with grade changes that do not impact graduation eligibility	5	16.7%	
Students with grade changes that impact graduation eligibility	1	3.3%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	1	3.3%	
Total sample students	<b>30</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	1	3.3%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	3.3%	
Students without grade change or transcript policy violations	29	96.7%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	24	80.0%
Graduated without excessive unlawful absences in any course	6	20.0%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 80.0% of the Fairmont Heights 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Fairmont Heights - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	30	100.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>30</b>	<b>100.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>0</b>	<b>0.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, all had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Fairmont Heights	3,459	46.1%	4,047	53.9%	7,506	30	250
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Fairmont Heights's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	0	9	0
Between 11 and 20 points	3	6	1
Between 21 and 30 points	3	2	0
Greater than 30 points	10	13	0

*Population Attendance Analysis*

Figure 8 classifies each graduate of Fairmont Heights from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	24	18.8%
Between 10 and 19 Periods Absent in at least one course	36	28.1%
Between 20 and 49 Periods Absent in at least one course	56	43.8%
More than 50 Periods Absent in any course	12	9.4%
<b>Total</b>	<b>128</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms that were evaluated, the majority had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>PDS Tally Cards were generally filled out correctly, but did not include separate dates indicating the date of signature and date of completion.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure all grade changes are supported by PS-140 forms.
- Fill in both signature date and completion date on the PDS Tally Cards.
- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- The old version (August 2016 version) of Administrative Procedure 5121.3 is available for download on school website.

# Frederick Douglass

A&M conducted the on-site investigation on Thursday, August 16, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
85.8%	90.4%	92.0%	95.0%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Frederick Douglass Review Summary	2018	
2018 Graduate Population	196	
Students included in Sample	30	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	27	90.0%
Students with grade changes that do not impact graduation eligibility	0	0.0%
Students with grade changes that impact graduation eligibility	3	10.0%
1. With all grade changes fully documented	2	6.7%
2. With partial documentation	1	3.3%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	<b>30</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	1	3.3%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	3.3%
Students without grade change or transcript policy violations	29	96.7%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.



**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	24	80.0%
Graduated without excessive unlawful absences in any course	6	20.0%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 80.0% of the Frederick Douglass 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Frederick Douglass - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>30</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Frederick Douglass	2,336	35.2%	4,302	64.8%	6,638	30	221
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Frederick Douglass's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	15	7	5
Between 11 and 20 points	6	5	5
Between 21 and 30 points	4	3	2
Greater than 30 points	7	6	1

*Population Attendance Analysis*

Figure 8 classifies each graduate of Frederick Douglass from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	55	28.1%
Between 10 and 19 Periods Absent in at least one course	81	41.3%
Between 20 and 49 Periods Absent in at least one course	60	30.6%
More than 50 Periods Absent in any course	0	0.0%
<b>Total</b>	<b>196</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, most had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- School's 2013-2014 PGCPs Parent and Student Handbooks which have outdated administrative procedures are available for download on school website.

# Friendly

A&M conducted the on-site investigation on Thursday, August 16, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
79.9%	76.1%	80.7%	84.5%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Friendly Review Summary		2018	
2018 Graduate Population		152	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	23	76.7%	
Students with grade changes that do not impact graduation eligibility	7	23.3%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>30</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	30	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	25	83.3%
Graduated without excessive unlawful absences in any course	5	16.7%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 83.3% of the Friendly 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Friendly - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	1	3.3%
# completed	29	96.7%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	1	3.3%
# not signed	1	3.3%
# signature date not filled out	1	3.3%
# do not identify student as eligible to graduate	1	3.3%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>1</b>	<b>3.3%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>29</b>	<b>96.7%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, one had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Friendly	2,192	33.8%	4,294	66.2%	6,486	30	216
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Friendly's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	15	13	0
Between 11 and 20 points	6	4	1
Between 21 and 30 points	5	2	2
Greater than 30 points	13	4	1

*Population Attendance Analysis*

Figure 8 classifies each graduate of Friendly from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	47	30.9%
Between 10 and 19 Periods Absent in at least one course	68	44.7%
Between 20 and 49 Periods Absent in at least one course	36	23.7%
More than 50 Periods Absent in any course	1	0.7%
<b>Total</b>	<b>152</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>The majority of the 2018 graduates had a PDS Tally Card.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Ensure appropriate completion of PDS Tally Cards

*Other Areas of Follow Up:*

- The old version (August 2016 version) of Administrative Procedure 5121.3 is available for download on school website.

# Gwynn Park

A&M conducted the on-site investigation on Thursday, August 2, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
87.2%	87.2%	94.6%	91.2%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Gwynn Park Review Summary		2018	
2018 Graduate Population		254	
Students included in Sample		31	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	28	90.3%	
Students with grade changes that do not impact graduation eligibility	1	3.2%	
Students with grade changes that impact graduation eligibility	2	6.5%	
1. With all grade changes fully documented	2	6.5%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>31</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	<b>31</b>	<b>100.0%</b>	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	19	61.3%
Graduated without excessive unlawful absences in any course	12	38.7%
<b>Total 2018 Sample Students</b>	<b>31</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 61.3% of the Gwynn Park 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Gwynn Park - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	31	100.0%
<b>Total PDS Tally Cards</b>	<b>31</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	31	100.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>31</b>	<b>100.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>0</b>	<b>0.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, 31 had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Gwynn Park	2,422	44.1%	3,075	55.9%	5,497	31	177
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Gwynn Park's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	14	4	2
Between 11 and 20 points	13	2	7
Between 21 and 30 points	11	4	3
Greater than 30 points	18	6	6

*Population Attendance Analysis*

Figure 8 classifies each graduate of Gwynn Park from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	76	29.9%
Between 10 and 19 Periods Absent in at least one course	118	46.5%
Between 20 and 49 Periods Absent in at least one course	59	23.2%
More than 50 Periods Absent in any course	1	0.4%
<b>Total</b>	<b>254</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Ensure appropriate completion of PDS Tally Cards

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.



# High Point

A&M conducted the on-site investigation on Thursday, August 23, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
64.0%	59.2%	62.5%	62.9%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

High Point Review Summary	2018	
2018 Graduate Population	506	
Students included in Sample	61	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	57	93.4%
Students with grade changes that do not impact graduation eligibility	3	4.9%
Students with grade changes that impact graduation eligibility	1	1.6%
1. With all grade changes fully documented	1	1.6%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	<b>61</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%
Students without grade change or transcript policy violations	61	100.0%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	38	62.3%
Graduated without excessive unlawful absences in any course	23	37.7%
<b>Total 2018 Sample Students</b>	<b>61</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 62.3% of the High Point 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

High Point - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	61	100.0%
<b>Total PDS Tally Cards</b>	<b>61</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	2	3.3%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>2</b>	<b>3.3%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>59</b>	<b>96.7%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, two had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
High Point	4,579	37.6%	7,611	62.4%	12,190	61	200
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of High Point's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	1	17	1
Between 11 and 20 points	9	19	0
Between 21 and 30 points	5	8	4
Greater than 30 points	9	13	5

*Population Attendance Analysis*

Figure 8 classifies each graduate of High Point from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	205	40.5%
Between 10 and 19 Periods Absent in at least one course	203	40.1%
Between 20 and 49 Periods Absent in at least one course	94	18.6%
More than 50 Periods Absent in any course	4	0.8%
<b>Total</b>	<b>506</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms that were evaluated, the majority had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>Two PDS Tally Cards in sample were signed after graduation.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure all grade changes are supported by PS-140 forms.
- Ensure every PDS cards is signed prior to graduation.
- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Largo

A&M conducted the on-site investigation on Tuesday, August 7, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
81.6%	82.4%	84.2%	89.4%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Largo Review Summary	2018	
2018 Graduate Population	140	
Students included in Sample	30	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	28	93.3%
Students with grade changes that do not impact graduation eligibility	1	3.3%
Students with grade changes that impact graduation eligibility	1	3.3%
1. With all grade changes fully documented	0	0.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	1	3.3%
Total sample students	<b>30</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	1	3.3%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	3.3%
Students without grade change or transcript policy violations	29	96.7%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	23	76.7%
Graduated without excessive unlawful absences in any course	7	23.3%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 76.7% of the Largo 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Largo - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>30</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Largo	3,808	51.4%	3,598	48.6%	7,406	30	247
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Largo's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	5	8	0
Between 11 and 20 points	21	5	1
Between 21 and 30 points	4	5	1
Greater than 30 points	3	4	2

*Population Attendance Analysis*

Figure 8 classifies each graduate of Largo from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	36	25.7%
Between 10 and 19 Periods Absent in at least one course	51	36.4%
Between 20 and 49 Periods Absent in at least one course	51	36.4%
More than 50 Periods Absent in any course	2	1.4%
<b>Total</b>	<b>140</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>The school used an old version of the PDS Tally Card that did not have current graduation standard.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Laurel

A&M conducted the on-site investigation on Friday, August 24, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
81.4%	82.8%	85.4%	84.4%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Laurel Review Summary	2018	
2018 Graduate Population	422	
Students included in Sample	51	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	47	92.2%
Students with grade changes that do not impact graduation eligibility	2	3.9%
Students with grade changes that impact graduation eligibility	2	3.9%
1. With all grade changes fully documented	1	2.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	1	2.0%
Total sample students	<b>51</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	1	2.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	2.0%
Students without grade change or transcript policy violations	50	98.0%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	23	45.1%
Graduated without excessive unlawful absences in any course	28	54.9%
<b>Total 2018 Sample Students</b>	<b>51</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 45.1% of the Laurel 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Laurel - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	51	100.0%
<b>Total PDS Tally Cards</b>	<b>51</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>51</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Laurel	3,870	45.3%	4,670	54.7%	8,540	51	167
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Laurel's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.



*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	28	35	5
Between 11 and 20 points	6	13	4
Between 21 and 30 points	12	9	5
Greater than 30 points	33	11	11

*Population Attendance Analysis*

Figure 8 classifies each graduate of Laurel from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	205	48.6%
Between 10 and 19 Periods Absent in at least one course	142	33.6%
Between 20 and 49 Periods Absent in at least one course	69	16.4%
More than 50 Periods Absent in any course	6	1.4%
<b>Total</b>	<b>422</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Some grade changes were supported by PS-140 grade change forms. Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> <li>There was 1 missing grade change for a transfer student from another PGCPs high school at the end of Q1. Laurel HS teachers published grades based on students classwork and the grade manager updated later once grades received from previous school.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card. All PDS Tally cards were properly completed and signed by principal prior to graduation.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Northwestern Evening

A&M conducted the on-site investigation on Monday, August 6, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
8.5%	27.5%	22.2%	22.2%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Northwestern Evening Review Summary		2018	
2018 Graduate Population		41	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	28	93.3%	
Students with grade changes that do not impact graduation eligibility	2	6.7%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	30	100.0%	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	1	3.3%	
4. Transcript ineligible	1	3.3%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	1	3.3%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	3.3%	
Students without grade change or transcript policy violations	29	96.7%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	12	40.0%
Graduated without excessive unlawful absences in any course	18	60.0%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course. From this process, A&M found that 40.0% of the Northwestern Evening 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Northwestern Evening - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	1	3.3%
# completed	29	96.7%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	30	100.0%
# not signed	1	3.3%
# signature date not filled out	1	3.3%
# do not identify student as eligible to graduate	1	3.3%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>30</b>	<b>100.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>0</b>	<b>0.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, all had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Northwestern	975	90.4%	103	9.6%	1,078	30	36
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Northwestern Evening's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	2	4	0
Between 11 and 20 points	2	0	0
Between 21 and 30 points	2	1	0
Greater than 30 points	5	2	0

*Population Attendance Analysis*

Figure 8 classifies each graduate of Northwestern Evening from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	17	41.5%
Between 10 and 19 Periods Absent in at least one course	18	43.9%
Between 20 and 49 Periods Absent in at least one course	5	12.2%
More than 50 Periods Absent in any course	1	2.4%
<b>Total</b>	<b>41</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>The majority of the 2018 graduates had a PDS Tally Card.</li> <li>Of the PDS Tally Cards evaluated, most were missing key information.</li> <li>One student from the sample was reflected as a graduate in SchoolMAX but was reflected as a non-graduate on the school's certified graduate list. Accordingly, no final PDS cards or transcripts were available for those students.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Ensure appropriate completion of PDS Tally Cards
- Review final retention codes in SchoolMAX to ensure that students are coded consistent with the certified graduate list (i.e. to ensure that students who should be retained are not inadvertently reflected as graduates).

*Other Areas of Follow Up:*

- Graduation requirements provided on schools website are out of date.

# Northwestern

A&M conducted the on-site investigation on Thursday, August 23, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
68.7%	66.6%	69.3%	66.3%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Northwestern Review Summary	2018	
2018 Graduate Population	420	
Students included in Sample	51	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	45	88.2%
Students with grade changes that do not impact graduation eligibility	5	9.8%
Students with grade changes that impact graduation eligibility	1	2.0%
1. With all grade changes fully documented	1	2.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	51	100.0%
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	1	2.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	1	2.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	1	2.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	2.0%
Students without grade change or transcript policy violations	50	98.0%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	40	78.4%
Graduated without excessive unlawful absences in any course	11	21.6%
<b>Total 2018 Sample Students</b>	<b>51</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 78.4% of the Northwestern 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Northwestern - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	5	9.8%
# completed	46	90.2%
<b>Total PDS Tally Cards</b>	<b>51</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	51	100.0%
# not signed	20	39.2%
# signature date not filled out	20	39.2%
# do not identify student as eligible to graduate	5	9.8%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>51</b>	<b>100.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>0</b>	<b>0.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, all had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Northwestern	5,549	49.3%	5,703	50.7%	11,252	51	221
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Northwestern's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	8	13	0
Between 11 and 20 points	5	17	5
Between 21 and 30 points	8	10	8
Greater than 30 points	25	23	5

*Population Attendance Analysis*

Figure 8 classifies each graduate of Northwestern from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	122	29.0%
Between 10 and 19 Periods Absent in at least one course	148	35.2%
Between 20 and 49 Periods Absent in at least one course	127	30.2%
More than 50 Periods Absent in any course	23	5.5%
<b>Total</b>	<b>420</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms that were evaluated, the majority were properly completed but did not have evidence attached to them.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>The majority of the 2018 graduates had a PDS Tally Card.</li> <li>Of the PDS Tally Cards evaluated, most were missing key information.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>Northwestern graduated 1 student who had not completed the required number of service learning hours.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related and service-learning requirements.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Ensure adherence to attendance-related grading procedures.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.



# Oxon Hill

A&M conducted the on-site investigation on Monday, August 13, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
75.8%	83.7%	84.6%	88.8%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Oxon Hill Review Summary	2018	
2018 Graduate Population	306	
Students included in Sample	37	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	32	86.5%
Students with grade changes that do not impact graduation eligibility	5	13.5%
Students with grade changes that impact graduation eligibility	0	0.0%
1. With all grade changes fully documented	0	0.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	<b>37</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%
Students without grade change or transcript policy violations	<b>37</b>	<b>100.0%</b>

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	26	70.3%
Graduated without excessive unlawful absences in any course	11	29.7%
<b>Total 2018 Sample Students</b>	<b>37</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 70.3% of the Oxon Hill 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Oxon Hill - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	37	100.0%
<b>Total PDS Tally Cards</b>	<b>37</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>37</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Oxon Hill	3,371	39.6%	5,146	60.4%	8,517	37	230
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Oxon Hill's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	0	14	0
Between 11 and 20 points	1	19	5
Between 21 and 30 points	4	11	1
Greater than 30 points	7	21	0

*Population Attendance Analysis*

Figure 8 classifies each graduate of Oxon Hill from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	116	37.9%
Between 10 and 19 Periods Absent in at least one course	119	38.9%
Between 20 and 49 Periods Absent in at least one course	68	22.2%
More than 50 Periods Absent in any course	3	1.0%
<b>Total</b>	<b>306</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>For some of the PDS Tally Cards evaluated, the school used an old version of the PDS Tally Card that did not have current graduation standard.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Require final transcripts to be printed and signed prior to graduation.
- Retain Transcript used to certify graduate and PDS Tally card in the student cumulative folder. PDS Tally cards were signed on 5/29/18 while final transcripts were printed on 6/25/18 and signed 6/1/18.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Parkdale

A&M conducted the on-site investigation on Tuesday, August 21, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
76.3%	76.8%	74.5%	78.6%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Parkdale Review Summary	2018	
2018 Graduate Population	440	
Students included in Sample	53	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	49	92.5%
Students with grade changes that do not impact graduation eligibility	3	5.7%
Students with grade changes that impact graduation eligibility	1	1.9%
1. With all grade changes fully documented	1	1.9%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	<b>53</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	1	1.9%
4. Transcript ineligible	1	1.9%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	1	1.9%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	1	1.9%
Students without grade change or transcript policy violations	52	98.1%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	34	64.2%
Graduated without excessive unlawful absences in any course	19	35.8%
<b>Total 2018 Sample Students</b>	<b>53</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 64.2% of the Parkdale 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Parkdale - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	1	1.9%
# completed	52	98.1%
<b>Total PDS Tally Cards</b>	<b>53</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	1	1.9%
# not signed	1	1.9%
# signature date not filled out	1	1.9%
# do not identify student as eligible to graduate	1	1.9%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>1</b>	<b>1.9%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>52</b>	<b>98.1%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, one had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Parkdale	5,495	44.8%	6,766	55.2%	12,261	53	231
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Parkdale's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	19	21	1
Between 11 and 20 points	16	6	1
Between 21 and 30 points	12	6	4
Greater than 30 points	25	20	0

*Population Attendance Analysis*

Figure 8 classifies each graduate of Parkdale from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	192	43.6%
Between 10 and 19 Periods Absent in at least one course	137	31.1%
Between 20 and 49 Periods Absent in at least one course	95	21.6%
More than 50 Periods Absent in any course	16	3.6%
<b>Total</b>	<b>440</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>One student from the sample was reflected as a graduate in SchoolMAX but was reflected as a non-graduate on the school's certified graduate list. Accordingly, no final PDS cards or transcripts were available for those students.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Ensure appropriate completion of PDS Tally Cards
- Review final retention codes in SchoolMAX to ensure that students are coded consistent with the certified graduate list (i.e. to ensure that students who should be retained are not inadvertently reflected as graduates).

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Potomac

A&M conducted the on-site investigation on Wednesday, August 22, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

*Figure 1: 4-Year Adjusted Cohort Graduation Rate*

Class of 2014	Class of 2015	Class of 2016	Class of 2017
57.9%	71.0%	76.3%	78.9%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

*Figure 2: School-Specific Student Record and Data Analysis Findings*

Potomac Review Summary	2018	
2018 Graduate Population	273	
Students included in Sample	33	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	29	87.9%
Students with grade changes that do not impact graduation eligibility	4	12.1%
Students with grade changes that impact graduation eligibility	0	0.0%
1. With all grade changes fully documented	0	0.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	0	0.0%
Total sample students	<b>33</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	0	0.0%
4. Transcript ineligible	0	0.0%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%
Students without grade change or transcript policy violations	<b>33</b>	<b>100.0%</b>

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	26	78.8%
Graduated without excessive unlawful absences in any course	7	21.2%
<b>Total 2018 Sample Students</b>	<b>33</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 78.8% of the Potomac 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Potomac - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	33	100.0%
<b>Total PDS Tally Cards</b>	<b>33</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	7	21.2%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	1	3.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>8</b>	<b>24.2%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>25</b>	<b>75.8%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, eight had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Potomac	4,025	47.9%	4,384	52.1%	8,409	33	255
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Potomac's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.



*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	2	18	0
Between 11 and 20 points	6	15	0
Between 21 and 30 points	0	13	2
Greater than 30 points	3	22	6

*Population Attendance Analysis*

Figure 8 classifies each graduate of Potomac from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	69	25.3%
Between 10 and 19 Periods Absent in at least one course	98	35.9%
Between 20 and 49 Periods Absent in at least one course	106	38.8%
More than 50 Periods Absent in any course	0	0.0%
<b>Total</b>	<b>273</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> <li>The school used an old version of the PDS Tally Card that did not have current graduation standard.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Ensure appropriate completion of PDS Tally Cards

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Suitland

A&M conducted the on-site investigation on Wednesday, August 22, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
65.4%	72.3%	79.1%	84.0%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Suitland Review Summary	2018	
2018 Graduate Population	376	
Students included in Sample	46	
Sample Summary		
Student Category	Students	% of Sample
Grade Changes That Impact Graduation Eligibility		
Students without any grade changes	40	87.0%
Students with grade changes that do not impact graduation eligibility	5	10.9%
Students with grade changes that impact graduation eligibility	1	2.2%
1. With all grade changes fully documented	0	0.0%
2. With partial documentation	0	0.0%
3. Any grade changes in core courses without documentation	1	2.2%
Total sample students	<b>46</b>	<b>100.0%</b>
Graduates That Do Not Meet Graduation Requirements		
Does not meet graduation requirements	1	2.2%
4. Transcript ineligible	1	2.2%
5. Service learning ineligible	0	0.0%
Sample Summary		
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	1	2.2%
Ineligible to graduate (Cat. 4 + Cat. 5)	1	2.2%
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	2	4.3%
Students without grade change or transcript policy violations	44	95.7%

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	37	80.4%
Graduated without excessive unlawful absences in any course	9	19.6%
<b>Total 2018 Sample Students</b>	<b>46</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 80.4% of the Suitland 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Suitland - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	1	2.2%
# completed	45	97.8%
<b>Total PDS Tally Cards</b>	<b>46</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	1	2.2%
# not signed	1	2.2%
# signature date not filled out	2	4.3%
# do not identify student as eligible to graduate	1	2.2%
# after graduation	17	37.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>19</b>	<b>41.3%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>27</b>	<b>58.7%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, 19 had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Suitland	4,768	48.0%	5,172	52.0%	9,940	46	216
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Suitland's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	2	24	2
Between 11 and 20 points	3	27	3
Between 21 and 30 points	6	26	2
Greater than 30 points	20	42	10

*Population Attendance Analysis*

Figure 8 classifies each graduate of Suitland from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	94	25.0%
Between 10 and 19 Periods Absent in at least one course	156	41.5%
Between 20 and 49 Periods Absent in at least one course	124	33.0%
More than 50 Periods Absent in any course	2	0.5%
<b>Total</b>	<b>376</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms that were evaluated, the majority were properly completed but did not have evidence attached to them.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>The majority of the 2018 graduates had a PDS Tally Card.</li> <li>PDS Cards were not completed before seniors graduated.</li> <li>One student from the sample was reflected as a graduate in SchoolMAX but was reflected as a non-graduate on the school's certified graduate list. Accordingly, no final PDS cards or transcripts were available for those students.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation.
- Review final retention codes in SchoolMAX to ensure that students are coded consistent with the certified graduate list (i.e. to ensure that students who should be retained are not inadvertently reflected as graduates).

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.

# Surrattsville

A&M conducted the on-site investigation on Wednesday, August 15, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
76.0%	80.2%	90.8%	92.7%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Surrattsville Review Summary		2018	
2018 Graduate Population		148	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	28	93.3%	
Students with grade changes that do not impact graduation eligibility	2	6.7%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	30	100.0%	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	30	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	21	70.0%
Graduated without excessive unlawful absences in any course	9	30.0%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 70.0% of the Surrattsville 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Surrattsville - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>30</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Surrattsville	2,733	51.8%	2,540	48.2%	5,273	30	176
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Surrattsville's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	2	5	0
Between 11 and 20 points	1	2	1
Between 21 and 30 points	0	0	0
Greater than 30 points	6	6	1

*Population Attendance Analysis*

Figure 8 classifies each graduate of Surrattsville from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	50	33.8%
Between 10 and 19 Periods Absent in at least one course	61	41.2%
Between 20 and 49 Periods Absent in at least one course	36	24.3%
More than 50 Periods Absent in any course	1	0.7%
<b>Total</b>	<b>148</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms evaluated, all had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.



# Tall Oaks

A&M conducted the on-site investigation on Tuesday, August 21, 2018. During the site visit, A&M interviewed school staff and reviewed student cumulative records for the random sample of students from the graduating class of 2018 for this school. This summary presents record review findings, site visit observations, and key statistics from data analysis.

## Historical Graduation Rates (Population)

Figure 1: 4-Year Adjusted Cohort Graduation Rate

Class of 2014	Class of 2015	Class of 2016	Class of 2017
61.7%	69.2%	86.8%	90.6%

## Record Review Findings (Sample)

The following sections summarize the observations and recommendations resulting from interviews and sample testing of student files conducted during the on-site investigation.

Figure 2: School-Specific Student Record and Data Analysis Findings

Tall Oaks Review Summary		2018	
2018 Graduate Population		46	
Students included in Sample		30	
Sample Summary			
Student Category	Students	% of Sample	
Grade Changes That Impact Graduation Eligibility			
Students without any grade changes	16	53.3%	
Students with grade changes that do not impact graduation eligibility	14	46.7%	
Students with grade changes that impact graduation eligibility	0	0.0%	
1. With all grade changes fully documented	0	0.0%	
2. With partial documentation	0	0.0%	
3. Any grade changes in core courses without documentation	0	0.0%	
Total sample students	<b>30</b>	<b>100.0%</b>	
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements	0	0.0%	
4. Transcript ineligible	0	0.0%	
5. Service learning ineligible	0	0.0%	
Sample Summary			
Unable to determine graduation eligibility due to insufficient grade change documentation (Cat. 2 + Cat. 3)	0	0.0%	
Ineligible to graduate (Cat. 4 + Cat. 5)	0	0.0%	
Count of unique students graduated despite transcript ineligibility or insufficient grade change documentation	0	0.0%	
Students without grade change or transcript policy violations	30	100.0%	

In addition to analyzing compliance with grading and graduation requirements, A&M assessed the degree to which PGCPs was compliant with administrative procedures related to attendance and grading. Examination of Attendance and Grading Violations was not included within the scope of the first audit; therefore, the findings in the table below cannot be compared to 2017 Audit results.

**Figure 3: School-Specific Attendance and Grading Violations**

Attendance and Grading Violations	Students	% of Sample
Graduated despite excessive unlawful absences in one or more core-course	7	23.3%
Graduated without excessive unlawful absences in any course	23	76.7%
<b>Total 2018 Sample Students</b>	<b>30</b>	<b>100.0%</b>

A&M applied the standards outlined in Administrative Procedure 5121.3 to analyze the number of students that graduated despite excessive unlawful absences in one or more core-course.

From this process, A&M found that 23.3% of the Tall Oaks 2018 Graduate Sample passed one or more core-courses in their senior year with excessive unlawful absences.

### School-Specific Data Analysis (Sample)

The following section details additional sample findings discovered during A&M's document review and data analysis process. Figure 4 below outlines A&M's record review observations regarding the status of PDS Tally Cards for the 2018 Graduates Sample.

**Figure 4: 2018 Sample PDS Tally Card Observations**

Tall Oaks - Sample PDS Tally Card Findings	Students	% of Sample
# not completed (or not found)	0	0.0%
# completed	30	100.0%
<b>Total PDS Tally Cards</b>	<b>30</b>	<b>100.0%</b>

A&M conducted review of the completed PDS Tally Cards to determine if errors were made during the final graduation certification process. Specifically, A&M evaluated completed PDS Tally Cards to determine if all required fields were entered accurately. Those findings are presented below in Figure 5:

**Figure 5: 2018 Sample PDS Tally Card Error Findings**

PDS Tally Card Error Findings	Students	% of Sample
# date of completion not filled out	0	0.0%
# not signed	0	0.0%
# signature date not filled out	0	0.0%
# do not identify student as eligible to graduate	0	0.0%
# after graduation	0	0.0%
<b>Total Unique PDS Tally Cards with at least 1 Error*</b>	<b>0</b>	<b>0.0%</b>
<b>Total Unique PDS Tally Cards with No Errors</b>	<b>30</b>	<b>100.0%</b>

\*Total Unique PDS Tally Cards with at least 1 Error counts each unique PDS Tally Card with one or more error. A&M found instances where individual PDS Tally Cards had multiple errors. Therefore, sub-categories underneath PDS Tally Card Error Findings do not sum to the Total Unique PDS Tally Cards with At Least One Error Line.

Of the PDS Tally Cards reviewed, none had at least one error in completion.

#### Additional Sample Attendance Data Analysis

The findings presented in Figure 6 reflect SchoolMAX attendance data of students in the 2018 Graduate Sample:

**Figure 6: Distribution of Course-Level Absences (Sample)**

School	Unlawful Periods	% Unlawful of Total	Lawful Periods	% Lawful of Total	Total Absences	Total Students	Abs. Per Student
Tall Oaks	2,122	35.1%	3,916	64.9%	6,038	30	201
PGCPS Average	3,374	47.1%	4,831	52.9%	8,205	41	202

### School-Specific Data Analysis (Population)

The following section details findings from A&M's data analysis of Tall Oaks's 2018 graduating class population. Data for the population-level analysis was obtained from SchoolMAX.

*Population Grade Change Analysis*

Figure 7 identifies the number of 2018 Graduate Students who had grade changes that had a fail-to-pass impact on quarter grades and the distribution of those grade changes by the number of points added. The results of Figure 7 may differ slightly from findings presented in Figure 2 due to differences in sample v. population analysis. In addition, Figure 7 includes grade changes that occurred in both core and non-core courses.

**Figure 7: Distribution of Late Grade Changes by Point Change Range (Population)**

Point Change Range	Graduating Class		
	2016	2017	2018
Less than or equal to 10 points	3	4	1
Between 11 and 20 points	6	1	0
Between 21 and 30 points	2	5	0
Greater than 30 points	14	7	8

*Population Attendance Analysis*

Figure 8 classifies each graduate of Tall Oaks from SY 17-18 into various buckets based on the number of unlawful absences that student accumulated during his/her senior year.

**Figure 8: Unlawful Absence Period Distribution by Student (Population)**

2018 Graduate Population Unlawful Absence Distribution <i>Analysis Completed on Senior-Year, Core-Courses</i>	2018 Students	% of Population
Less than 10 Periods Absent in any course	13	28.3%
Between 10 and 19 Periods Absent in at least one course	23	50.0%
Between 20 and 49 Periods Absent in at least one course	10	21.7%
More than 50 Periods Absent in any course	0	0.0%
<b>Total</b>	<b>46</b>	<b>100.0%</b>

**School-Specific Findings and Observations**

The findings presented in the table below are based on A&M's site visit observations, data analysis, and document review of student files in the 2018 Graduate Sample.

Findings	Description
<b>Grade Changes and Appeals</b>	<ul style="list-style-type: none"> <li>Most grade changes were supported by PS-140 grade change forms.</li> <li>Of the PS-140 forms that were evaluated, the majority had evidence attached to them and were properly completed.</li> </ul>
<b>Graduation Certification</b>	<ul style="list-style-type: none"> <li>Every 2018 graduate had a PDS Tally Card.</li> </ul>
<b>Evidence of Irregularities</b>	<ul style="list-style-type: none"> <li>No Evidence of Irregularities was found during audit.</li> </ul>

**School-Specific Recommendations**

*Opportunities for Improvement:*

- Student transcripts should be signed to certify as final.
- Ensure all grade changes are supported by PS-140 forms.
- Ensure adherence to attendance-related grading procedures.
- Implement attendance systems and school based staff that support all PGCPs administrative procedures related to attendance.

*Other Areas of Follow Up:*

- No further analysis or investigation is recommended at this time.