

# Office Of Compliance and Monitoring Annual Report



**MARYLAND STATE BOARD MEETING**

June 25, 2019

# Office of Compliance and Monitoring

- Background
- Staffing

# Office of Compliance and Monitoring Areas of Responsibility

- **Graduation Rate Validation Review**
- **Nonpublic School Textbook Program Review**
- **Principal Evaluation System Review**
- **Complaints, Waste, Fraud and Abuse**

# Graduation Rate Validation Review

- Planning and Conducting On-Site Reviews
- Self-Assessment Guide
- Executive Summary
  - Significant
  - Reportable
  - Minor
- Corrective Action Plan (CAP)

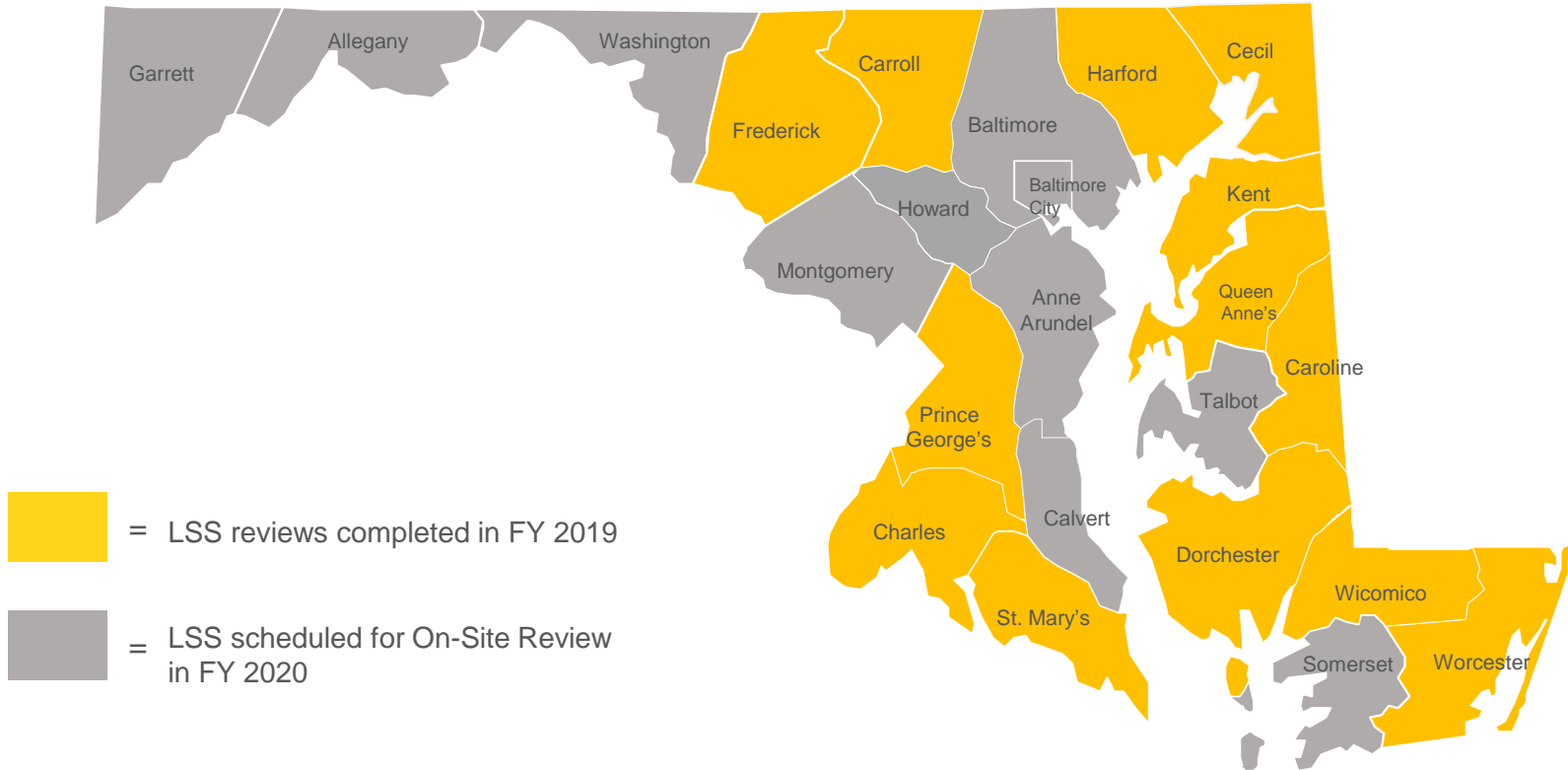
# Risk-Based Reporting

Attribute	Significant	Reportable	Minor
The Local School System (LSS) does not have written procedures to address late, incomplete, inaccurate and missing reports on data quality issues.	√		
The LSS did not have a procedure in place to ensure accuracy of data related to grade changes.	√		
The LSS did not have a written procedure concerning the granting, changing, or termination of user access rights. (LSS had formed a team to review outdated procedures.)		√	
The LSS did not have written procedures governing user access.		√	
The LSS does not have accountability measures in place to ensure integrity of grading system.			√

# Graduation Rate Validation Policy Sections

- Governance and Leadership
- Pathways To Graduation
- Attendance and Drop Out
- Grading Integrity and Grade Modifications
- Promotion and Graduation Eligibility  
Certification
- Record Access and Control

## On-Site Graduation Rate Validation Reviews



# Findings by Policy Section

Policy Section	Significant Findings	Reportable Findings	Minor Findings
Governance and Leadership	4	0	3
Pathways to Graduation	0	1	1
Attendance and Drop Out	1	0	2
Grading Integrity and Grade Modifications	24	1	6
Promotion and Graduation Eligibility Certification	2	0	3
Records Access and Control	8	0	4
<b>Total</b>	<b>39</b>	<b>2</b>	<b>19</b>

*Data as of June 12, 2019*

*LSS have adopted strategies, policies and procedures to implement based on information obtained during the on-site review process.*



# Nonpublic Student Textbook Program

- Twenty-eight (28) participating facilities and schools will be reviewed by the end of Fiscal Year 2019.
  - 19 - Fully compliant
  - 4 - Identified one or more minor findings
  - 1 - Facility was deemed non-compliant and closed
  - 4 - Facilities scheduled before the end of the fiscal year

# Principal Evaluations

- The evaluation process is an agreed-on review method to ensure compliance with the minimum standards established within COMAR and State regulations.

# Complaints, Waste, Fraud and Abuse

- Various sources submit allegations of employee or local school system misconduct.
  - External Sources
  - Internal Complaints
  - Anonymous

# Allegations of Waste, Fraud and Abuse

Source	FY 2019
Anonymous	4
Government – Non-Maryland State Department of Education	1
Ombudsman Office	3
Other	1
Private Citizen	1

# Disposition of Cases

Case Disposition	FY 2019
Insufficient Evidence	2
LSS Referral	2
Related Case / Redundant Allegations	2
Separation by Employee During Investigation	2
Referred to the Office of the Attorney General/Office of the Inspector General – City of Baltimore	2
<b>Total</b>	<b>10</b>

# OFFICE OF COMPLIANCE AND MONITORING ANNUAL REPORT

FISCAL YEAR 2019



**PREPARED FOR:**

Maryland State Board  
of Education

Presented:

**June 25, 2019**



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# OFFICE OF COMPLIANCE AND MONITORING OVERVIEW

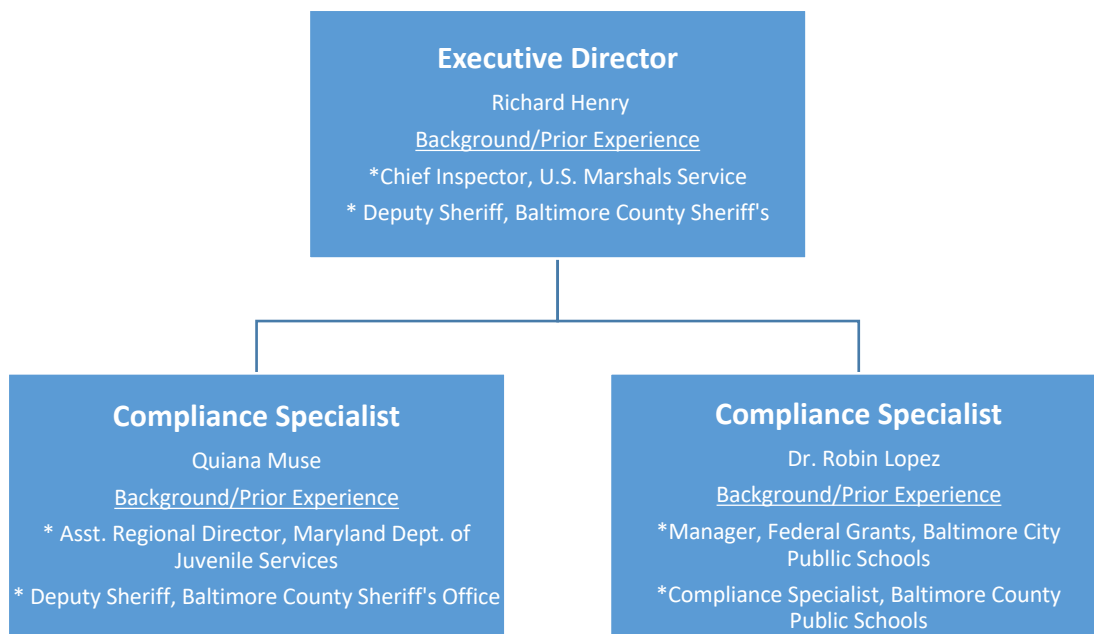
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## Background

On March 20, 2018, The Maryland State Board of Education discussed the establishment of the Office of Compliance and Monitoring (OCM) within the Maryland State Department of Education to oversee graduation rate compliance throughout the local school systems. A resolution to recognize the Board's responsibility for oversight to ensure that local systems are well-run was proposed by the State Board of Education and passed unanimously by its membership.

The main purpose of the Office of Compliance and Monitoring is to ensure local school systems are compliant with State Statutes and Regulations as well as provide monitoring to school systems in need of corrective action. Therefore, this new office is responsible for the review of local school systems as it applied to graduation rate compliance, nonpublic student textbook program review, principal evaluations and complaints of fraud, waste and abuse.

## Staffing



## Areas of Responsibility/Programs

**Graduation Rate Validation Review:** A comprehensive review of Local School Systems to ensure accountability and integrity within the graduation validation process.

**Nonpublic School Textbook Program Review:** On-site reviews of participating facilities and schools to ensure compliance with program regulations and law.

**Principal Evaluation System Review:** A review of Local School Systems to ensure principals are receiving annual training on development, observation, and evaluation of staff as part of their administrator preparation program. In addition, random checks of completion of principal evaluations are done.

**Complaints: Waste, Fraud, and Abuse:** Coordinate with Local School Systems in the investigation of allegations of grade modifications, misuse of educational funding, and other claims of fraud



## PROGRAM SUMMARY

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The core operation of the Office of Compliance and Monitoring (OCM) is to provide independent, objective assessments of LSS program activities. The OCM assists MSDE in accomplishing its objectives by executing a systematic, disciplined approach to the evaluation and improvement of risk management processes, efficiency of operations, and governance. The OCM Compliance Reviews are the Department's key internal control mechanism for all operational and administrative programs.

OCM operations directly impacts the State Board's priority to increase accountability, productivity, and compliance by providing critical support for MSDE objectives associated with Graduation Compliance and Rate Validation. OCM supports the Department's commitment to integrity and accountability by providing MSDE management with trends, observations, and recommendations culled from the successful execution of the LSS review program, and the external audit liaison function.

### Graduation Rate Validation Review

#### On-site Review Process »

Local School Systems (LSS) will be reviewed by an on-site internal review team to ensure compliance with applicable laws, regulations, policies, and procedures. The review will primarily address program areas (Governance and Leadership; Pathways to Graduation; Attendance and Drop Out; Grading Integrity and Grade Modifications; Promotion and Graduation Eligibility Certification; Record Access and Control) covered by the procedures governing grading and graduation rates (GGR). For LSS reviews, OCM may conduct process walkthroughs and interview staff members to identify additional key processes and internal controls not already captured in the GGR. Validation Reviews mainly focus on documents and data verifications, making observations, conducting interviews, and testing grading equipment. The OCM review cycle consist of 2 phases; 1) the initial review at the LSS central office, and 2) a review of randomly selected high schools within the LSS. Below are the steps taken during the review process;

1. Notification of review date
2. Onsite-Review:
  - a. Review and discussion: Graduation Rate Validation Questionnaire
  - b. Exit Conference: Held at the conclusion of the review to present an observation summary of the review team's findings and subsequent steps needed to complete the review process.
3. Post-Review: OCM will issue a Final Report and provide it to the Deputy State Superintendent of Finance within 60 days of the Review.
4. Follow-up: OCM will conduct follow-up reviews with the LSS to ensure implementation of those issues identified within their Corrective Action Plan.
5. OCM will conduct a secondary review at the high school level to ensure policy and procedures are being adhered to. This secondary review will be conducted 1 year after the initial on-site visit.

#### Self-Assessment Guide (SAG) »

In FY19, OCM introduced the SAG to all local school systems. The LSS SAG is comprised of 114 key processes and internal controls and is derived directly from State Board of Education and MSDE policy. The SAG affords all LSS's a consistent mechanism for ensuring compliance with policies, procedures, regulations, and laws applicable to their areas of responsibility; while addressing and mitigating risks facing the Department. Additionally, the SAG is an effective management tool used by the LSS's to assess their operational, administrative, and graduation processes. Annual completion of the SAG also helps prepare LSS for external audits, as well as internal compliance reviews conducted by OCM. The SAG continues to serve a valuable function as a management tool for addressing areas needing corrective action.

In collaboration with multiple program offices, OCM has conducted a thorough review of the LSS SAGs in FY19, ensuring the SAGs were reflective as possible of current State Board and MSDE policy, procedures, applicable laws and regulations, and external audit recommendations. As a result, many questions in the FY19 SAG have been revised, consolidated, and/or

added to reflect this collaborative effort. This methodology of identifying risks, key processes, internal controls, and addressing them through LSS and program collaboration will continue with every subsequent SAG release.

### Risk-Based Reporting System »

In FY19, OCM implemented a new risk-based reporting system that more accurately assesses risks facing the LSS by categorizing each Notice of Finding and Recommendation (NFR) into one of three categories – **significant, reportable, or minor**. These categories are based on the number of exceptions identified and are weighted accordingly.

- A NFR is identified as a **significant** finding when the LSS review indicates adverse findings associated with educational management, grade change procedures or failure to adhere to or maintain established COMAR regulations. The significant findings are included in the executive summary of the Compliance Review report, shown in red in the body of the report, and require a Corrective Action Plan (CAP).
- A NFR is identified as a **reportable** finding when the LSS review indicates policies and procedures are ineffective and do not fully meet established COMAR or graduation validation requirements. Reportable findings are shown in blue in the body of the report, and require a CAP.
- If the LSS is in the process of revising or integrating existing policies and procedures to address identified educational management, grade change procedures, or COMAR requirements, the exception is deemed minor and the deficiency is identified as a **minor** finding. Minor findings are denoted at the end of the Compliance Review report and do not require a CAP.

This risk-based reporting system eliminates uneven findings, raises overall compliance review scores, and more clearly identifies areas of concern for leadership to prioritize remediation efforts.

#### Accomplishments:

The OCM conducted thirteen (13) Graduation Rate Validation On-site Reviews for Caroline County; Carroll County; Cecil County; Charles County; Dorchester County; Frederick County; Harford County; Kent County; Prince George's County; Queen Anne's County; St. Mary's County; Wicomico County; and Worcester County. Feedback from the LSSs have been extremely positive. LSSs have used the SAG and On-Site review process to 1) collectively bring together subject matter experts (SMEs) in their internal review of established policies and procedures, and 2) share and adopt best practices identified throughout the on-site review process.

### Nonpublic Student Textbook Program Review

Along with SAG enhancements and risk-based reporting, OCM initiated a Nonpublic Student Textbook Program (NSTP) Review in order to mitigate risks caused by systemic issues identified during on-site compliance reviews. The on-site compliance reviews assist in ensuring compliance with NSTP guidelines developed by the Maryland State Department of Education. The guidelines address program requirements and procedures for school eligibility; funds based on per-pupil amounts; ordering textbooks, hardware, and other electronic materials.

Accomplishments: OCM staff conducted twenty-eight (28) on-site program reviews of NSTP participating schools and facilities. OCM staff was encouraged to develop a dialogue with program principals and administrators and provide guidance on program concerns. Feedback from the participating NSTP schools and facilities has been positive and the NSTP Review will expand to include additional schools and facilities in FY20.

Findings: OCM was able to recover approximately \$8,100 in MSDE provided equipment from a failed program facility. Additionally, one facility could not locate all inventory listed and is currently working with OCM and the NSTP program coordinator to rectify inventory discrepancies.

### Principal Evaluation System Review

In collaboration with the Office of Leadership Development and School Improvement, the OCM initiated a review of the local school system's principal evaluation system. The principal's evaluation system should be based on the outcomes contained in the Maryland Instructional Leadership Framework and the Interstate Leadership Consortium. The evaluation

process is an agreed-on review method to ensure compliance with the minimum standards established within COMAR and State regulations.

Accomplishments:

OCM staff have conducted six (6) reviews at Caroline County, Charles County, Dorchester County, Kent County, Queen Anne's County, and Worcester County public schools.

### Complaints: Waste, Fraud, and Abuse

Various external and internal sources submit allegations of employee or local school system misconduct. External sources include written and verbal complaints from members of the public and other governmental entities. Internal complaints are generated by division managers or other employees. Anonymous complaints are also received and investigated when sufficient facts are provided, such as dates, times, and individual or employee names. Regardless of the sources of the complaint, OCM has an obligation to conduct a thorough, objective and unbiased investigation of the allegation.

Accomplishments:

In FY18, OCM received complaints resulting in 8 waste, fraud and abuse investigations. Of those 8 cases, OCM closed 2 after a preliminary inquiry determined there was insufficient evidence to support the allegation. Another two cases were fully investigated, and forwarded to OAG and Office of the Inspector General (OIG) for the City of Baltimore for review and adjudication. Finally, in cases dealing with minor offenses and/or performance-related conduct, OCM reviewed and referred 4 of the complaints to local school systems for disposition.

# FY19 COMPLIANCE REVIEW FINDINGS AND NEXT STEPS

## Graduation Rate Validation Review

Local school system (LSS) offices must adhere to applicable laws, regulations, policies, and procedures. Additionally, LSS's are responsible for establishing and maintaining effective and efficient operations, internal controls, and ensuring reliable grade and graduation rate reporting. To meet these objectives, OCM conducted onsite validation reviews in accordance with the Maryland State Board of Education (State Board), MSDE and LSS policies and procedures. In planning and conducting Graduation Rate Validation on-site reviews, the team obtained an understanding of existing processes and internal controls and determined whether controls were operating effectively through transactional level testing.

### Trends Across the State »

- LSS staff has extensive institutional or historical knowledge regarding graduation and grading processes, but no written policy or procedures were established. (*We've always done it this way.*)
- IT user access, permissions, and account deactivation could not be identified. No written policy governing account access or user lock-outs. (*Users permissions/roles were not clearly identified*)
- LSS staff relied on outdated policies and procedures which provided limited graduation/grading guidance and did not afford a step-by-step procedure to complete the process. (*Divisions provided some guidance on a respective process, but no divisional ownership to clearly identify the process. "I had to search through parts of three different procedures to get the whole answer."*)

### Findings by Policy »

Following the review, an executive summary was developed and provided to each LSS which contained the findings; **Significant, Reportable, and Minor** identified during the on-site review.

TABLE 1: OVERALL FINDINGS BY POLICY

POLICY AREA	SIGNIFICANT FINDINGS	REPORTABLE FINDINGS	MINOR FINDINGS
Governance and Leadership	4	0	3
Pathways to Graduation	0	1	1
Attendance and Drop Out	1	0	2
Grading Integrity and Grade Modifications	24	1	6
Promotion and Graduation Eligibility Certification	2	0	3
Records Access and Control	8	0	4
<b>Total</b>	<b>39</b>	<b>2</b>	<b>19</b>

\*Note: Data as of June 12, 2019

### Significant Findings »

For each control deficiency identified, the OCM team prepared a Corrective Action Plan (CAP) for the responsible parties which addressed remediation efforts, ownership, and an expected timeline for implementation. OCM has the responsibility to evaluate the adequacy of the respective LSS's CAP reply and to provide ongoing monitoring to confirm the milestones and timelines are adhered to. Table 2 provides an overview of program areas that have been identified as **significant** during the LSS on-site review process.

TABLE 2: EXAMPLES OF SIGNIFICANT PROGRAM AREA FINDINGS

AREA	INTERNAL CONTROL	ATTRIBUTE
Governance and Leadership	Data Management Processes and Data Quality	The LSS does not have written procedures to address late, incomplete, inaccurate and missing reports on data quality issues.
Grading Integrity and Grade Modification	Policy and Procedure	The LSS did not conduct periodic reviews of grade changes by heightened permission users.
		The LSS does not have accountability measures in place to ensure integrity of grading system.
		The LSS did not have a procedure in place to ensure accuracy of data related to grade changes.
	Monitoring and Accountability	The LSS did not have a procedure in place to ensure accuracy of data related to grade changes.
	Access Controls to Data Systems Audit Logs	The LSS did not review Audit Logs on unusual activity.
		The LSS does not have the ability to review record deletions using current audit logs.
		The LSS did not have written procedures governing user access.
Records Access and Control		The LSS did not have a procedure for data management to ensure accuracy.
	Policy and Procedures	The LSS did not have appropriate controls to reduce the risk of error, misuse, or fraud.
		The LSS did not have an Audit Log which shows grade changes.
		The LSS did not have a data management team.
	User Access	The LSS did not have a written procedure concerning the granting, changing, or termination of user access rights.

**Next Steps »**

As a result of these significant findings, corrective action plans have been developed and shared with the LSSs for appropriate action. OCM will conduct a follow-up review and monitor progress to ensure compliance.

**Nonpublic School Textbook Program Review**

Of the 28 schools reviewed, 10 schools were identified as fully compliant. 1 school was identified as a Non-Compliant and 4 schools have noted “exceptions”. Table 5 categorizes the compliance rating for each school.

TABLE 5: NSTP COMPLIANCE RATINGS BY SCHOOL

COMPLIANCE RATING	NSTP SCHOOLS
Fully Compliant	<ul style="list-style-type: none"> <li>• St. Peter’s School</li> <li>• Most Blessed Sacrament Catholic School</li> <li>• The Greater Youth Academy</li> <li>• Sisters Academy of Baltimore</li> <li>• Mother Seaton Academy</li> <li>• St. Ignatius Loyola Academy</li> <li>• Cathedral Christian Academy</li> <li>• GLA School of Excellence</li> <li>• Giggle Box Learn and Play</li> <li>• Kiddie Castle Development</li> </ul>

Non-Compliant	<ul style="list-style-type: none"> <li>New Spiritual Foundation Christian Academy</li> </ul>
Technical Assistance Required	<ul style="list-style-type: none"> <li>Excellent Start Learning Center</li> <li>Blessed Lamb</li> <li>Al-Rahmah School</li> <li>St. Agnes School</li> </ul>

**Next Steps »**

OCM plans to conduct a review of 50 participating facilities/schools in the next fiscal year.

**Principal Evaluation System Review**

Results of the OCM’s review of the 6 counties found no significant findings.

**Next Steps »**

OCM plans to conduct a review of the remaining counties in the next fiscal year.

**Complaints: Waste, Fraud and Abuse**

All allegations of waste, fraud and abuse received by OCM are referred to Office of the Attorney General (OAG) or the respective local school systems accountability representative for review and classification. OCM determines which matter it will retain for investigation and which it will refer to OAG or the LSS. When the alleged misconduct concerns the abuse of an individual’s Constitutional Rights, OCM coordinates with the OAG. Table 3 provides the number of sources associated with waste, fraud and abuse allegations.

TABLE 3: SOURCES OF ALLEGATIONS OF WASTE, FRAUD AND ABUSE

SOURCE	FY19
Anonymous	4
Government – Non-MSDE	1
Ombudsman Office	3
Other	1
Private Citizen	1

Table 4 categorizes investigative agency involvement relative to OCM case initiation. OCM was the primary investigative authority in 50% of FY19 cases.

TABLE 4: INVESTIGATIVE AGENCY

INVESTIGATING AGENCY	FY19
Office of Compliance and Monitoring (OCM)	4
Office of the Attorney General (OAG)	1
Other - Inspector General Office for the City of Baltimore (OIG)	1
Other - (Non-MSDE)	4
<b>Total</b>	<b>10</b>

Table 5 identifies the disposition of closed cases.

TABLE 5: DISPOSITION OF CLOSED CASES

CASE DISPOSITION	FY19
Insufficient Evidence	2
LSS Referral	2
Related Case / Redundant Allegations	2
Separation by Employee During Investigation	2
Referred to OAG/OIG	2
<b>Total</b>	10

**Next Steps »**

OCM will continue to access allegations of waste, fraud and abuse and work with LSSs, and other State agencies as they are received.



## **Maryland State Department of Education**

2018-2019 Graduation Rate Validation Data and  
Compliance Monitoring

### **Self-Assessment Guide**



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<b>Local Education Agency(LEA):</b>	
<b>Date of On-Site Inspection:</b>	
<b>LEA Participants:</b>	
<b>Compliance &amp; Monitoring Specialist:</b>	

# Maryland State Department of Education

## Data Validation and Compliance Monitoring - Graduation Rate

### PURPOSE

The purpose of this review is to determine whether a school system implemented an effective and sufficient system of data quality and internal control over calculating and reporting graduation rates sufficient to provide reasonable assurance that the reported graduation rates are complete and accurate. Monitoring and auditing provide early identification of program or operational weaknesses and may substantially reduce the reporting of inaccurate data. Although many assessment techniques are available, one effective tool is the performance of regular and periodic compliance reviews.

### BACKGROUND

The federal Every Student Succeeds Act (ESSA), signed into law on October 15, 2015, reauthorized the Elementary and Secondary Education Act of 1965, as amended and codified a definition for calculating an Adjusted Cohort Graduation Rate (ACGR). In January 2017, the U.S. Department of Education issued guidance to states, local educational agencies (LEAs) and schools regarding implementation of the Title I graduation rate regulations (October 29, 2008.) LEAs are required to maintain written documentation on any student who transfers out of the original cohort into a private school, home school, out of state school, emigrates to another country or dies. Additional information regarding the guidance can be found in **High School Graduation Rate | Non-Regulatory Guidance**. Under 34 C.F.R. §200.19(b)(4)(ii)(A), a state and its LEAs must report the four-year graduation rate on **report cards** providing assessment results. The state must include the four-year graduation rate in AYP determinations beginning with determinations based on the assessments administered.

The ACGR is designed to provide a uniform and more accurate measure of calculating high school graduation rates that is comparable across school Districts and states and increases accountability and transparency. It is also used as an academic indicator to measure achievement and school performance. The ACGR is the percentage of students in the cohort who graduate within four years. To calculate ACGR, the States identify the “cohort”, of the first-time ninth graders in a particular school year and adjust this number by adding and new students who transfer into the cohort after ninth grade and subtracting any students who transfer out, emigrates to another country or die.

## SCOPE AND METHODOLOGY

This process reviews and validates the accuracy of the District's graduation rate data, in relation to several components of interrelated data, including graduate cohorts, other dropouts and other leavers, attendance, grading and grade modification, and the rigor and integrity within multiple pathways (course/ credit recovery options) to graduation. It assesses the quality of the district's data using established data quality dimensions of accuracy, reliability, precision, completeness, timeliness, integrity, and confidentiality. It also assesses the sufficiency and reliability of the District's internal controls to ensure that the calculation and reporting of graduation rates to MSDE is sufficient to provide reasonable assurance the reported rates are complete and accurate.

Data Validation Monitoring and Compliance Review is a shared responsibility involving the district, its component schools and MSDE. Everyone has some responsibility for compliance with State and federal accountability requirements under ESSA. Ensuring accurate and timely data is a shared responsibility that cuts across the entire organization at both the District and State level.

## COMPONENTS:

- Self-Assessment using the **Routine Data Quality Self-Assessment Monitoring Tool** - with an action plan for correcting any issues found.
- MSDE will conduct District data reviews and analysis to identify anomalies that may trigger a data validation visit/review.
- MSDE may also select Districts annually for a data validation visit/review.
- On- Site Review
  - Use **MSDE Data Quality Assessment/Monitoring/Validation Tool** to validate District self -assessment and the sufficiency of the action plan if required.
  - Review of related policies and procedures, guidance manuals, communications and training information
  - Interviews with District and school-level personnel; others as appropriate.
  - Sampling of relevant District, school and student level data.

- Monitoring/ Compliance Review Report - findings, required actions and recommendations.
- District Written Response and Timeline
- Appeal Process – See **MSDE Audit and Appeals Process Document**
- Follow- up revisions to action plan as needed - See **MSDE Action Plan Progress Monitoring Tool and MSDE Corrective Action Progress Monitoring Form**

# Graduation Data Validation and Monitoring

Governance and Leadership				
A: Policies, Procedure and Implementation				
QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
1. Has the Board established policies and procedures, roles and responsibilities related to graduation data and related areas (i.e.: attendance, dropout, and data quality)				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.02.03 Enrollment and Credit Requirements</i></li> <li>• <i>COMAR 13a.03.02.12 General Provisions</i></li> </ul>
2. Does the Board provide effective oversight, set risk tolerance, and receive assurances that risk management is done properly? (i.e.: Audit Plans, Audit Reports, Assigns Resources)				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.02.07 Annual Audits</i></li> <li>• <i>COMAR 13a.02.07.08 Inspection and Retention of Records</i></li> </ul>
3. Has District leadership developed and implemented an organizational plan establishing roles and responsibilities for implementing and monitoring compliance in accordance with federal and state accountability requirements?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.04 Local School System Testing Designates</i></li> <li>• <i>COMAR 13a.02.08.27 Local Records Policies Procedures</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
a) Including graduation rate data collection				
b) Including reporting requirements				
4. Have the Board and District leadership established, implemented and monitored a system for continuous internal data quality monitoring/auditing?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.03 Local School System Test Administration and Data Reporting Policies</i></li> </ul>
a) If yes, do they have in place a system for correcting any data issues identified?				
5. Does the District have in place a documented organizational structure/chart that clearly identifies positions that have data management responsibilities?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.02.03.01 Organization and Administration</i></li> </ul>

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>B: Communication and Training</b>				
6. Has the District developed, implemented and evaluated a training plan which includes staff involved in data-collection and reporting at all levels in the reporting process?				<ul style="list-style-type: none"> <li>See local District Administrative Policies and Procedures governing training and data collection.</li> </ul>
7. Do all relevant staff receive training on the data management processes and tools on an ongoing basis?				
<b>C: Supporting Systems and Technology</b>				
8. Has the District established / developed a data warehouse system that meets ESSA accountability requirements? (Title II of ESSA requires districts to collect and disseminate additional measures and data, including a variety of non-academic indicators. See ESSA Data Requirements				<ul style="list-style-type: none"> <li>See requirements listed in the Department of Education's document regarding Every Student Succeeds Act.</li> </ul>
<b>D: Monitoring and Accountability (Capacities, Roles and Responsibilities)</b>				
9. Has the District established a documented organizational structure/chart that clearly identifies positions that have data management / data quality responsibilities? (See ESSA Data Requirements)				<ul style="list-style-type: none"> <li>See requirements listed in the Department of Education's document regarding Every Student Succeeds Act.</li> </ul>
10. Are all staff positions dedicated to data management systems filled?				
11. Has the District identified a senior staff member who is responsible for reviewing and certifying the data prior to the submission / release to MSDE?				<ul style="list-style-type: none"> <li>See local District Administrative Policies and Procedures governing certification of data and designated staff responsibilities.</li> </ul>
12. Has the District designated staff responsible for reviewing the quality of data (i.e., accuracy, completeness, timeliness and confidentiality) received from sub-reporting levels (e.g. schools, departments)?				<ul style="list-style-type: none"> <li>COMAR 13a.03.04.03 Local School System Test Administration and Data Reporting Policies</li> </ul>



## ESSA Data Requirements

**Subgroups:** ESSA requires reporting for new subgroups of vulnerable students, including foster children, homeless students and students from military families.

**School-level data:** ESSA requires each school to report per-pupil expenditures.

**Long-term English Language Learners:** States and districts must identify the number of ELL students who have attended school in the same district for five years without becoming proficient in English.

**School climate factors:** ESSA adds new in- and out-of-classroom factors such as qualified teachers, attendance and discipline.

**Postsecondary enrollment:** ESSA requires these statistics be reported on school report cards for the first time.

**Cross-tabulation:** Different types of academic data must be presented in ways in which they can be cross-referenced to identify trends.

**Transparency:** ESSA requires schools to report more information on report cards.

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>E: Data and Reporting</b>				
13. Has the District provided written guidelines to all reporting entities (e.g., schools, departments) on reporting requirements and deadlines?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.01.04.04 Data Based Areas</i></li> </ul>
14. Has the District required that all component schools use the same reporting forms and report according to the same reporting timelines?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.01.04.06 Reporting Requirements</i></li> <li>• <i>See local District Administrative Policies and Procedures governing reporting of data.</i></li> </ul>
15. Has the District identified standard reporting forms/tools to be used by all reporting levels / forms/tools are consistently used by all levels?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures governing certification of data collection.</i></li> </ul>
16. Has the District provided clear instructions on how to complete the data collection and reporting forms/tools?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures governing certification of data collection.</i></li> </ul>
17. Does the District and its component schools have in place a data collection system that has sufficient precision to measure the indicator(s) (i.e., relevant data are collected by sex, age, etc. if the indicator specifies disaggregation by these characteristics)?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.01.04.06 Reporting Requirements</i></li> <li>• <i>See local District Administrative Policies and Procedures governing certification of data collection.</i></li> </ul>
18. Does the District have in place a written policy that states how long source documents and reporting forms need to be retained?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
19. Are all source documents and reporting forms relevant for measuring the indicator(s) available for auditing purposes including dated print-outs in case of computerized system failure?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.02.07.08 Inspection and Retention of Records</i></li> </ul>
<b>F: Data Management Processes and Data Quality Controls</b>				
20. Does the District and its component schools clearly documented data aggregation, analysis and/or manipulation steps performed at each level of the reporting system?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.01.04.04 Data Based Areas</i></li> </ul>

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
21. Does the District systematically provide feedback to all sub-reporting levels on the quality of their reporting (i.e., accuracy, completeness and timeliness)?				
22. Does the District have in place quality controls for when data from paper-based forms are entered into a computer (e.g., double entry, post-data entry verification, etc.)?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures.</li> </ul>
23. Does the District have in place a written back-up procedure for when data entry or data processing is computerized?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>
a) If yes; the latest date of back-up is appropriate given the frequency of update of the computerized system (e.g., back-ups are weekly or monthly).				
24. Does the District have in place policies and procedures to ensure that relevant personal data are maintained according to national or international confidentiality guidelines?				<ul style="list-style-type: none"> <li>• COMAR 13a.02.07.08 Inspection and Retention of Records.</li> <li>• See local District Administrative Policies and Procedures</li> </ul>
25. Does the District have in place a written procedure to address late, incomplete, inaccurate and missing reports; including following-up with sub-reporting levels on data quality issues?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>
26. If data discrepancies have been uncovered in reports from sub-reporting levels, does the District maintain documentation regarding how these inconsistencies have been resolved?				
27. Can the District demonstrate that regular supervisory site visits have taken place and that data quality has been reviewed?				

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>PATHWAYS TO GRADUATION</b>				
<b>A: Policies, Procedures and Implementation</b>				
28. Does the District have in place policies and procedures for graduation requirements that are aligned to Federal and State regulations?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.02 Graduation Requirements for Public High Schools in Maryland</i></li> </ul>
29. Does the District offer multiple pathways to graduation?				
a) If yes, what are the options?				
30. Has the District developed and implemented evidenced-based processes and procedures for the selection, implementation, monitoring and evaluation for all pathway option programs to ensure that all courses and credit bearing vendor programs have the same expected level of consistency and meet MCCR standards?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.04 Local School System Testing Designates</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
<b>B: Communication and Training</b>				
31. What training does the District provide to LSS employees (users) for submission of cohort data?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.03 Local School System Test Administration and Data Reporting Policies</i></li> </ul>
32. Does the District provide ongoing training to staff implementing credit recovery and other pathway alternatives?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures regarding training.</i></li> </ul>
33. Does the District evaluate the effectiveness of its training				
a) If yes, how do you evaluate				
b) What are the results				

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>C: Supporting Systems and Technology</b>				
34. Does the District use any commercial or locally developed Credit Recovery Software Programs?				
a) If yes, what are the selection criteria				
35. How does the District ensure rigor and alignment with course requirements?				
36. What training and oversight supervision is provided to ensure implementation with fidelity?				
<b>D: Monitoring and Accountability</b>				
37. Does the District have in place procedures and monitoring practices to ensure that credit recovery and other pathway option courses align with District course requirements for credit and are being implemented with fidelity to ensure appropriate rigor?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.02.04 Other Provisions For Earning Credit</i></li> <li>• <i>COMAR 13a.03.02.11 Alternatives For Structuring Program</i></li> </ul>
38. Does the District have in place processes and procedures to validate the accuracy of data entry?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
<b>E: Data and Reporting</b>				
39. Are internal controls in place to verify that students enrolled in credit recovery courses are meeting attendance and course assignment / completion requirements?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
a) If yes, describe these internal controls				
40. Does the District (and its component schools) maintain sufficient documentation of student attendance and course assignment/completion requirements in course recovery options?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.02.03 Enrollment and Credit Requirements</i></li> </ul>

## **RECORDING ATTENDANCE**

### **Calculating Attendance for Students Scheduled for a Full Day**

A student is counted present for a full day if the student is in attendance for four hours or more of the school day. A student is counted present for a half day if the student is in attendance for two hours or more, but less than four hours of the school day.

### **Calculating Attendance for Students Scheduled For a Partial Day**

A student scheduled for less than a full day is to be counted present based on the amount of time he/she is scheduled to attend. A student is counted as present if at school or at a school activity sponsored by the school and personally supervised by school personnel. This may include authorized independent study, work study programs, field trips, athletic events, contests, music festivals, student conventions, instruction for homebound students, and similar activities when officially authorized under policies of the local school board. It does not include “making up” school work at home, or activities supervised or sponsored by private groups or individuals. (Lawful and unlawful absences are both counted as an absence.)

### **Recording Absences**

Maryland’s compulsory attendance law is found in Section 7-301 of the Education Article, Annotated Code of Maryland. Lawful absences are set forth in COMAR 13A.08.01.03. A local superintendent, school principal, or an individual authorized by the local superintendent or principal may excuse a student for a lawful absence. Unlawful absences are set forth in COMAR 13A.08.01.04.

### **Home and Hospital Students**

Attendance for students receiving home or hospital services, not home instruction pursuant to COMAR 13A.10.01, should be maintained using one of the following methods:

1. Maintain the student on the regular school roll and count the students present, except when a student is not available for home and hospital teaching, then he or she is counted absent.

2. Establish a school for recordkeeping purposes called "Home and Hospital School" with a local school number assigned. Any child identified for home and hospital teaching, whether in special education or regular education, shall be withdrawn from the roll of the home school and transferred to the roll of the Home and Hospital School using the Withdrawal Status "T" and Withdrawal Code "10." Count attendance the same as above.

## **DROPOUT RATE**

Dropout data is collected in the Annual Cumulative Daily Membership (ADM) Data Collection each year at the end of the school year. This data identifies student enrollment dates and status as of the last day of enrollment for the school year. The dropout rate measures the number of students who dropped out of grades 9 through 12 between July 1 and July 30 against the number of enrolled students at the beginning of the school year. A dropout is defined as a student who, for any reason other than death, leaves school before graduation or the completion of a Maryland-approved education program (including a special education program) and is not known to enroll in another school or State-approved program during a current school year (COMAR 13A.08.01.07). Dropouts do not include students who are deceased, are being homeschooled, are enrolled in an alternative school, are in juvenile detention, enrolled in a foreign exchange program, received a GED degree, or an adult high school diploma. The dropout rate is not the inverse of the cohort graduation rate.

## **COMPLETER**

A completer is defined as a student who completes the student's program of study at the high school level and satisfies the graduation requirements for a Maryland High School Diploma or the requirements for a Maryland Certificate of Program Completion (COMAR 13A.08.01.07).

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>ATTENDANCE AND DROP OUT</b>				
<b>A: Policies, Procedures and Implementation</b>				
41. Does the District have written policies and procedures for calculating and reporting student attendance that align with federal and state requirements?				<ul style="list-style-type: none"> <li>COMAR 13a.08.01.01 Attendance</li> </ul>
42. Does the District have written policies and procedures for calculating and reporting drop-outs that align with federal and state requirements?				<ul style="list-style-type: none"> <li>COMAR 13a.08.01.07 Student Withdrawal Status</li> <li>See local District Administrative Policies and Procedures</li> </ul>
43. Does the District attendance policy and procedures include provisions for grade reduction for students with excused or unexcused absences, suspensions or expulsions that may have bearing on graduation credits?				<ul style="list-style-type: none"> <li>COMAR 13a.08.01.05 Student Attendance Policy</li> <li>See local District Administrative Policies and Procedures</li> </ul>
44. Does the District have written policies and procedures for a student who completes graduation requirements prior to the end of the school year?				<ul style="list-style-type: none"> <li>COMAR 13a.03.02.10 Alternatives to 4 year Enrollment Requirements</li> <li>COMAR 13a.03.02.11 Alternatives for Structuring Programs</li> <li>See local District Administrative Policies and Procedures</li> </ul>
<b>B: Communication and Training</b>				
45. Have the majority of key data-management staff received the required training in tools and processes and has it been evaluated to determine effectiveness?				
46. Is there a training plan which includes staff involved in data-collection and reporting at all levels in the reporting process?				
47. Has the District provided written guidelines to all reporting entities (e.g., schools, departments, regions) on reporting requirements and deadlines?				<ul style="list-style-type: none"> <li>COMAR 13a.08.02.05 Student Record Keeping</li> </ul>
48. Have clear instructions been provided on how to complete the data collection and reporting forms/tools?				



QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>C: Monitoring and Accountability</b>				
49. Does the District (and its component schools) accurately report attendance, leaver codes, including dropouts, in accordance with state requirements?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.01.01 Attendance</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
50. Does the District (and its component schools) report drop-out data in accordance with federal and state requirements?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.01.07 Student Withdrawal Status</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
<b>D: Data and Reporting</b>				
51. Data Roles and Responsibilities; Are key monitoring and evaluation (M&E) and data-management staff identified with clearly assigned responsibilities?				
52. Data Reporting Requirements; Has the District clearly documented (in writing) what is reported to who, and how and when reporting is required?				
53. Is there a written policy that states how long source documents and reporting forms need to be retained?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
54. Definitions; Are there operational indicator definitions meeting relevant standards that are systematically followed by all users?				
55. Data Collection and Reporting Processes; Are there standard data-collection and reporting forms that are systematically used?				
a) Are data recorded with sufficient precision/detail to measure relevant indicators?				
b) Are data maintained in accordance with international or national confidentiality guidelines?				

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION	
c) Are source documents kept and made available in accordance with a written policy?				<ul style="list-style-type: none"> <li>• COMAR 13a.08.02.05 Student Record Keeping</li> <li>• COMAR 13a.08.02.27 Local Records Policies Requirements</li> </ul>	
d) Are all source documents and reporting forms relevant for measuring the indicator(s) available for auditing purposes (including dated print-outs in case of computerized system).					
56. Data Management Processes and Data Quality Controls; Do clear documentation of collection, aggregation and manipulation steps exist?					
a) Does the District have clearly documented data aggregation, analysis and/or manipulation steps performed at each level of the reporting system?					
b) Are data quality challenges identified and are mechanisms in place for addressing them?					
c) Are there clearly defined and followed procedures to identify and reconcile discrepancies in reports?					
d) Are there clearly defined and followed procedures to periodically verify source data?					
<b>GRADING INTEGRITY AND GRADE MODIFICATIONS</b>					
<b>A: Policies, Procedures and Implementation</b>					
57. Does the District have written policies and procedures for grading, including grade modifications that align with federal and state regulations?				<ul style="list-style-type: none"> <li>• COMAR 13a.08.02.04 General Provisions</li> <li>• See local District Administrative Policies and Procedures</li> </ul>	
58. Is the District/ School adequately controlling access to their systems for grading, reporting and grade modification?				<ul style="list-style-type: none"> <li>• COMAR 13a.08.02.05 Student Record Keeping</li> <li>• COMAR 13</li> </ul>	

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
a) Are appropriate school personnel appropriately approving and documenting student grade modifications?				
b) Are access controls to the data system adequately designed and operating efficiently?				
c) Does the District have policy guidance that details the processor written documentation requirements for grade changes, retention of supporting documentation requirements and monitoring by District officials?				
d) Does the District have lock out dates?				
e) Has the District developed policy guidance relating to the procedures and requirements for making grade changes in the current year and for prior years?				
f) Does the District conduct periodic review of the grade changes made by the heightened permission users and determine the appropriateness of the grade changes?				
g) Does the System report historical grade change transactions?				
59. Has the District implemented grading policies that govern the manner in which academic grades are to be calculated, maintained, and adjusted?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.05 Student Record Keeping</i></li> <li>• <i>COMAR 13a.08.02.14 Request to Amend Student Records</i></li> <li>• <i>COMAR 13a.08.02.27 Local Records Policies Requirements</i></li> </ul>
60. Are the policies designed to ensure grading consistency, uniformity, and accuracy amongst all schools within the District?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.05 Student Record Keeping</i></li> <li>• <i>See local District Administrative Policies and Procedures regarding grading.</i></li> </ul>

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
61. Has the District established accountability measures to ensure the integrity of the grading system, including roles of principal, teacher and reasons for a grade change and timeline, internal monitoring procedures and consequences of failure to abide by the policy?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.07 Review and Updating</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
62. Does the District have in place a list of roles and responsibilities for accurate grading and reporting data at the District level, school level and teacher level?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
<b>B: Communications and Training</b>				
63. Does the District (and its component schools) have in place an effective system for communicating grading, reporting and grade modification policies and procedures to administrators, teachers and other key stakeholders?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.04 Local Accountability Coordinator</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
64. Does the District (and its component schools) provide clear and ongoing training on grading, reporting and grade modification to all stakeholders?				
65. What communication and training regarding grading, reporting and grade modifications does the District (and its component schools) provide?				
a) How often?				
b) How is it communicated?				
c) To what audiences?				
<b>C: Supporting Systems and Technology</b>				
66. Does the District use a data management system for grading and reporting?				
a) If yes, what system?				

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
67. What are the built-in internal controls of the data management system that supports accurate data entry by authorized users?				
68. Is the system using these to ensure the accuracy and integrity of the data?				
69. Are the data management system internal controls adequate to ensure the accuracy and integrity of the data?				
70. Does the system implement ongoing user training?				
71. Does the District (and its component schools) effectively implement a secure data management environment for accurate data?				
72. Does the District (and its component schools) have policy guidance regarding levels of access and timelines for data entry, lock-out, submission and verification?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures regarding IT users access.</li> </ul>
<b>D: Monitoring and Accountability</b>				
73. What procedures does the District (and its component schools) have in place for ongoing monitoring and validation of grading data, including grade modifications?				<ul style="list-style-type: none"> <li>• COMAR 13a.03.04.04 Local Accountability Coordinator</li> <li>• See local District Administrative Policies and Procedures</li> </ul>
74. Does the District conduct periodic review of the grade changes made by the heightened permission users and determine the appropriateness of the grade changes?				<ul style="list-style-type: none"> <li>• COMAR 13a.08.02.05 Student Record Keeping</li> <li>• COMAR 13a.08.02.13 Right to Review and Inspect Educational Records</li> </ul>
75. Does the District have policy guidance that details the levels of permissions for data entry and access for making data changes?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
76. Does the District have in place a process for requiring written certification of the accuracy of the grading/ grade change data that ensures the accuracy of the data in reporting the performance of the student in meeting course requirements as established by the District?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.05 Student Record Keeping</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
77. Access Controls to The Data System- User Access; Are there written procedures in place for granting, changing and terminating access rights to the Data System?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.27 Local Records Policies Requirements</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
a) Do these procedures establish who has the authority to grant or change access (e.g., supervisory approval)?				
b) Do the procedures limit individual user access rights within the System to only those functions necessary to fulfil individual job responsibilities? ( <i>Such controls limit the risk that sensitive or confidential information will be exposed to unauthorized use or modification.</i> )				
c) Do the procedures provide for immediately terminating access when employees leave the District or change roles?				
<b>E: Access Controls To Data System Audit Logs</b>				
78. Does the District's student grade data management system include audit logs or change reports that maintain a record of activity or show changes or deletions made in a computer application?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.05 Student Record Keeping</i></li> <li>• <i>COMAR 13a.08.02.07 Review and Updating</i></li> </ul>
79. Does the student grade data management system have mechanisms in place to identify when a grade modification is/was made and by which user?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.07 Review and Updating</i></li> </ul>

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT COMPLIANCE
80. Do District officials review these reports to monitor for unusual activity? <i>(These reports provide a mechanism for individual accountability and for management to reconstruct events.)</i>				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.04 Local Accountability Coordinator</i></li> </ul>
81. Does the District (and its component schools) provide clear, accurate and ongoing communication and training for individual data system users at various access levels?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
82. Does the District conduct timely user-specific electronic audits of grade entry and adjustment data that credentialed users had entered into the system?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>

## GRADUATION RATE

The federal government defines the regulatory adjusted cohort graduation rate as the percent of students from the original cohort (class) who graduated in four years with a regular high school diploma. The four-year graduation rate is calculated by dividing the number of students who receive a diploma in four years by the number of students in the original cohort adjusted by adding students who transfer into the cohort and subtracting students who transfer out, emigrate to another country, or die. School year 2010-11 was the first year states were required to use the regulatory cohort rate, so prior year data are not necessarily comparable to the 2010-11 rates. Illustrated below is the calculation for a hypothetical graduation class of 2020.

$$\text{Four-year graduation rate} = \frac{\text{Number of students in the adjusted cohort who earn a regular diploma by August of 2019}}{\text{Number of first time 9th graders in 2015-16, adjusted for transfers in and out}}$$

Maryland also calculates a five-year graduation rate for those students who will take longer than four years to complete the requirements for a high school diploma.



**PROMOTION AND GRADUATION ELIGIBILITY CERTIFICATION**

**A: Policies, Procedures and Implementation**

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
83. Does the District have in place policies and procedures for Promotion and Graduation that align with federal and state regulations?				<ul style="list-style-type: none"> <li>• COMAR 13a.03.02 Graduation Requirements for Public High Schools in Maryland</li> <li>• COMAR 13a.08.02.27 Local Records Policies Requirements</li> </ul>
84. Does the District have in place an effective system of internal controls to provide reasonable assurance that reported graduation rates are accurate and complete?				<ul style="list-style-type: none"> <li>• COMAR 13a.03.02.08 Grading and Reporting</li> <li>• See local District Administrative Policies and Procedures</li> </ul>
85. Does the District have in place an effective system to ensure: (1) the ACGR data received from its component schools is accurate and complete, (2) the students identified as graduates in the cohort met State graduation requirements, or (3) its component schools have maintained adequate documentation for the removal of students from the cohort?				<ul style="list-style-type: none"> <li>• COMAR 13a.03.02 Graduation Requirements for Public High Schools in Maryland</li> <li>• COMAR 13a.08.02.27 Local Records Policies Requirements</li> <li>• See local District Administrative Policies and Procedures</li> </ul>
86. Does the District have in place policies and procedures for calculating graduation cohorts, aligned to federal and state requirements under ESSA?				<ul style="list-style-type: none"> <li>• COMAR 13a.03.02 Graduation Requirements for Public High Schools in Maryland</li> <li>• COMAR 13a.08.02.27 Local Records Policies Requirement</li> <li>• See requirements listed in the Department of Education’s document regarding Every Student Succeeds Act.</li> </ul>
87. Does the District have in place written procedures and processes to identify inaccurate school level data?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>
88. Has the District developed and implemented a process, such as a risk-based monitoring tool, to monitor the local entities’ processes to provide assurance that the data they submit to MSDE are accurate and complete?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
89. Has the District developed and disseminated guidance to local entities about obtaining and maintaining required documentation supporting student removal from a cohort and regarding the importance of inputting accurate data?				
90. Does the District have in place policies and procedures for calculating its ACGR in accordance with federal requirements?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.27 Local Record Policies Requirements</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
91. Has the District implemented a system of internal control over calculating and reporting graduation rates sufficient to provide reasonable assurance that reported graduation rates were accurate and complete?				
<b>B: Communication and Training</b>				
92. Does the District (and its component schools) have in place an effective system for communicating policies and procedures for Graduation eligibility to administrators, teachers and other key stakeholders?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
93. Does the District (and its component schools) provide clear and ongoing training on graduation eligibility requirements to all stakeholders?				
94. What communication and training regarding graduation requirements and data reporting does the District (and its component schools) provide?				
a) How often?				
b) How is it communicated?				
c) To what audiences?				

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>C: Supporting Systems and Technology</b>				
95. Does the District use a data management system for promotion and graduation data?				
a) If yes, what system?				
96. What are the built-in internal controls of the data management system that supports accurate data entry by authorized users?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>
97. Is the system using these to ensure the accuracy and integrity of the data?				
98. Are the data management system internal controls adequate to ensure the accuracy and integrity of the data?				
99. Does the District implement ongoing user training?				
100. Does the District (and its component schools) effectively implement a secure data management environment for accurate calculating and reporting?				
101. Does the District (and its component schools) have policy guidance levels of access and timelines for data entry, lock-out, submission and verification?				
<b>D: Monitoring and Accountability</b>				
102. Does the District have in place internal controls to ensure the accuracy of the data for the calculation of the ACGR?				
103. Does the District have in place policies and procedures for data quality through the use of certifications regarding the accuracy and effectiveness of data to be submitted to MSDE?				<ul style="list-style-type: none"> <li>• COMAR 13a.08.02.27 Local Records Policies Requirements</li> <li>• See local District Administrative Policies and Procedures</li> </ul>

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>E: Data and Reporting</b>				
104. Does the District have in place reliable oversight procedures and processes to monitor and validate school and student level data reliability?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>
<b>RECORDS ACCESS AND CONTROL</b>				
<b>A: Policies, Procedures and Implementation</b>				
105. Does the District have in place data standards and policies and procedures for data management and reporting that ensures accuracy?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>
106. Does the District have in place an effective system of controls specific to ACGR data reliability or monitor its component schools for data reliability?				
107. User Access - Are there are written procedures in place for granting, changing and terminating access rights to data systems?				<ul style="list-style-type: none"> <li>• COMAR 13a.08.02.27 Local Records Policies Requirements</li> <li>• See local District Administrative Policies and Procedures</li> </ul>
a) Does the District have in place an effective system for certifying user levels of access?				
b) Do these procedures establish who has the authority to grant or change access (e.g., supervisory approval)?				<ul style="list-style-type: none"> <li>• See local District Administrative Policies and Procedures</li> </ul>
c) Does the District have in place appropriate types of control activities, including dividing or segregating key data entry and certification duties and responsibilities among different people to reduce the risk of error, misuse, or fraud?				

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
d) Do the procedures limit individual user access rights within the system to only those functions necessary to fulfil individual job responsibilities? <i>(Such controls limit the risk that sensitive or confidential information will be exposed to unauthorized use or modification.)</i>				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.04 Local Accountability Coordinator</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
e) Do the procedures provide for immediately terminating access when employees leave the District or change roles?				
108. Identity Account Access - Do District officials have in place and implement a system of strict control in the ability to grant or modify user rights in the System?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.04 Local Accountability Coordinator</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
109. Does the District have in place and implement procedures to prevent individual users from having the capability to assign themselves additional user rights beyond those rights they have already been authorized?				<ul style="list-style-type: none"> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
110. Audit Logs - Does the District's student data management system include audit logs or change reports that maintain a record of activity or show changes or deletions made in a computer application?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.28 Education and Health Records</i></li> </ul>
111. Does the student data management system have mechanisms in place to identify when changes are made and by which user?				

QUESTIONS	Y	N	N/A	DOCUMENTS THAT MAY SUPPORT VALIDATION
<b>B: Communication and Training</b>				
112. Has the District developed and disseminated guidance to its component schools about obtaining and maintaining required documentation supporting student data and regarding the importance of inputting accurate data?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.02.08.27 Local Records Policies Requirements</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>
<b>C: Monitoring and Accountability</b>				
113. Does the District have in place a data management team (data stewards) who are responsible for ensuring the completeness and accuracy of data submitted to the State?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.03.04.04 Local Accountability Coordinator</i></li> <li>• <i>COMAR 13a.08.02.28 Education and Health Records</i></li> </ul>
114. Does the District have sufficient controls for ensuring adequate supporting documentation of ACGR and related data such as cohort membership, additions, removals, attendance, dropout, course grades and a process for ongoing monitoring for completeness and accuracy?				<ul style="list-style-type: none"> <li>• <i>COMAR 13a.08.02.28 Education and Health Records</i></li> <li>• <i>See local District Administrative Policies and Procedures</i></li> </ul>

Maryland State Department of Education, Dr. Karen B. Salmon, Ph.D., State Superintendent of Schools

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## **Maryland State Department of Education**

2018-2019 Graduation Rate Validation Data and  
Compliance Monitoring

### **On-Site Review**

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<b>Local Education Agency(LEA):</b>	<b>Cecil County Public Schools</b>
<b>Date of On-Site Inspection:</b>	<b>April 2, 2019</b>
<b>LEA Participants:</b>	<b>Ann Gellrich (ED-Secondary Ed)</b>
	<b>William Ide</b>
	<b>Ricardo Ortiz (Data)</b>
	<b>Westley Zimmerman (IT)</b>
<b>Compliance &amp; Monitoring Specialist:</b>	<b>Rick Henry</b>
	<b>Robin Lopez</b>

# Maryland State Department of Education

## Data Validation and Compliance Monitoring - Graduation Rate

### PURPOSE

The purpose of this review is to determine whether a school system implemented an effective and sufficient system of data quality and internal control over calculating and reporting graduation rates sufficient to provide reasonable assurance that the reported graduation rates are complete and accurate. Monitoring and auditing provide early identification of program or operational weaknesses and may substantially reduce the reporting of inaccurate data. Although many assessment techniques are available, one effective tool is the performance of regular and periodic compliance reviews.

### BACKGROUND

The federal Every Student Succeeds Act (ESSA), signed into law on October 15, 2015, reauthorized the Elementary and Secondary Education Act of 1965, as amended and codified a definition for calculating an Adjusted Cohort Graduation Rate (ACGR). In January 2017, the U.S. Department of Education issued guidance to states, local educational agencies (LEAs) and schools regarding implementation of the Title I graduation rate regulations (October 29, 2008.) LEAs are required to maintain written documentation on any student who transfers out of the original cohort into a private school, home school, out of state school, emigrates to another country or dies. Additional information regarding the guidance can be found in **High School Graduation Rate | Non-Regulatory Guidance**. Under 34 C.F.R. §200.19(b)(4)(ii)(A), a state and its LEAs must report the four-year graduation rate on **report cards** providing assessment results. The state must include the four-year graduation rate in AYP determinations beginning with determinations based on the assessments administered.

The ACGR is designed to provide a uniform and more accurate measure of calculating high school graduation rates that is comparable across school Districts and states and increases accountability and transparency. It is also used as an academic indicator to measure achievement and school performance. The ACGR is the percentage of students in the cohort who graduate within four years. To calculate ACGR, the States identify the “cohort” of the first-time ninth graders in a particular school year and adjust this number by adding and new students who transfer into the cohort after ninth grade and subtracting any students who transfer out, emigrates to another country or die.

### SCOPE AND METHODOLOGY

This process reviews and validates the accuracy of the District’s graduation rate data, in relation to several components of interrelated data, including graduate cohorts, other dropouts and other leavers, attendance, grading and grade modification, and the rigor and integrity within multiple pathways (course/ credit recovery options) to graduation. It assesses the quality of the district’s data using established data quality dimensions of accuracy, reliability, precision, completeness, timeliness, integrity, and confidentiality. It also assesses the sufficiency and reliability of the District’s internal controls to ensure that

the calculation and reporting of graduation rates to MSDE is sufficient to provide reasonable assurance the reported rates are complete and accurate.

Data Validation Monitoring and Compliance Review is a shared responsibility involving the district, its component schools and MSDE. Everyone has some responsibility for compliance with State and federal accountability requirements under ESSA. Ensuring accurate and timely data is a shared responsibility that cuts across the entire organization at both the District and State level.

### **COMPONENTS:**

- Self-Assessment using the **Routine Data Quality Self-Assessment Monitoring Tool** - with an action plan for correcting any issues found.
- MSDE will conduct District data reviews and analysis to identify anomalies that may trigger a data validation visit/review.
- MSDE may also select Districts annually for a data validation visit/review.
- On- Site Review
  - Use **MSDE Data Quality Assessment/Monitoring/Validation Tool** to validate District self -assessment and the sufficiency of the action plan if required.
  - Review of related policies and procedures, guidance manuals, communications and training information
  - Interviews with District and school-level personnel; others as appropriate.
  - Sampling of relevant District, school and student level data.
  
- Monitoring/ Compliance Review Report - findings, required actions and recommendations.
- District Written Response and Timeline
- Appeal Process – See **MSDE Audit and Appeals Process Document**
- Follow- up revisions to action plan as needed - See **MSDE Action Plan Progress Monitoring Tool and MSDE Corrective Action Progress Monitoring Form**

# Graduation Data Validation and Monitoring

Governance and Leadership					
A: Policies, Procedure and Implementation					
Question	Y	N	N/A	Verification / Required Documents	Reviewer Comments
1. Has the Board established policies and procedures, roles and responsibilities related to graduation data and related areas (i.e.: attendance, dropout, and data quality)	X			Administrative Procedures JO and JO-RB	This is completed as a matter of practice See Procedures - JO & JO-RB
2. Does the Board provide effective oversight, set risk tolerance, and receive assurances that risk management is done properly? (i.e.: Audit Plans, Audit Reports, Assigns Resources)	X			Audit Plan is on file	No additional audit(s) are scheduled at this time
3. Has District leadership developed and implemented an organizational plan establishing roles and responsibilities for implementing and monitoring compliance in accordance with federal and state accountability requirements?	X			District leadership has appointed a coordinator who monitors compliance.	Currently no documentation is in place
a) Including graduation rate data collection	X				
b) Including reporting requirements	X				
4. Have the Board and District leadership established, implemented and monitored a system for continuous internal data quality monitoring/auditing?	X			This role is completed through the Office of Assessment and Accountability	Student Information System PowerSchool
a) If yes, do they have in place a system for correcting any data issues identified?	X				
5. Does the District have in place a documented organizational structure/chart that clearly identifies positions that have data management responsibilities?	X				

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>B: Communication and Training</b>					
6. Has the District developed, implemented and evaluated a training plan which includes staff involved in data-collection and reporting at all levels in the reporting process?	X			LAC trains school based staff Counselors & Guidance Secretaries trained on transcript review & input	Yearly training Training conducted 3x's per year for test coordinators.
7. Do all relevant staff receive training on the data management processes and tools on an ongoing basis?	X			Ongoing staff training 2 times per year Guidance Secretary & test Coordinator at each facility	
<b>C: Supporting Systems and Technology</b>					
8. Has the District established / developed a data warehouse system that meets ESSA accountability requirements? (Title II of ESSA requires districts to collect and disseminate additional measures and data, including a variety of non-academic indicators. See ESSA Data Requirements	X			PowerSchool and Data Service Center	Contract with vendor out of the State of Delaware (RedRock)
<b>D: Monitoring and Accountability (Capacities, Roles and Responsibilities)</b>					
9. Has the District established a documented organizational structure/chart that clearly identifies positions that have data management / data quality responsibilities? (See Attachment – New ESSA Data Requirements)	X			Data Management under Application Services Data Matrix	
10. Are all staff positions dedicated to data management systems filled?	X				
11. Has the District identified a senior staff member who is responsible for reviewing and certifying the data prior to the submission / release to MSDE?	X			This role has been developed and assigned to Ric Ortiz - Application Database Manager	
12. Has the District designated staff responsible for reviewing the quality of data (i.e., accuracy, completeness, timeliness and confidentiality) received from sub-reporting levels (e.g. schools, departments)?	X			Department Instructional Coordinator and those responsible for EL & SPED	Enrollment verification process conducted 3x's per year Proactive report to meet MSDE requirements

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>E: Data and Reporting</b>					
13. Has the District provided written guidelines to all reporting entities (e.g., schools, departments) on reporting requirements and deadlines?	X			September / Mid Year / End of Year following state guidelines Deadlines set through enrollment process	Procedures are based on COMAR
14. Has the District required that all component schools use the same reporting forms and report according to the same reporting timelines?	X				Electronic Format Moving from physical forms to digital New MSDE requirement
15. Has the District identified standard reporting forms/tools to be used by all reporting levels / forms/tools are consistently used by all levels?	X			All reporting is completed through the PowerSchool electronic format	
16. Has the District provided clear instructions on how to complete the data collection and reporting forms/tools?	X				
17. Does the District and its component schools have in place a data collection system that has sufficient precision to measure the indicator(s) (i.e., relevant data are collected by sex, age, etc. if the indicator specifies disaggregation by these characteristics)?	X			Through PowerSchool	Added a Military connection indicator due to large military population in the area.
18. Does the District have in place a written policy that states how long source documents and reporting forms need to be retained?	X			Follows State guidelines Procedure - ILD	Records retained from graduation date plus 5 years.
19. Are all source documents and reporting forms relevant for measuring the indicator(s) available for auditing purposes including dated print-outs in case of computerized system failure?	X			Nightly back-up of database Do not keep hard copy - but available if requested	Contractor can recover all data from midnight the night before.
<b>F: Data Management Processes and Data Quality Controls</b>					
20. Does the District and its component schools clearly documented data aggregation, analysis and/or manipulation steps performed at each level of the reporting system?	X			Procedures adheres to COMAR 13a.01.04.04	

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
21. Does the District systematically provide feedback to all sub-reporting levels on the quality of their reporting (i.e., accuracy, completeness and timeliness)?	X			Tech Services reaches out to schools to correct errors when reviews are completed	
22. Does the District have in place quality controls for when data from paper-based forms are entered into a computer (e.g., double entry, post-data entry verification, etc.)?	X			Bridge Plan - documentation and credit by exam for transfer students Procedure JEDC-RA	Completed in electronic format Entered into PowerSchool
23. Does the District have in place a written back-up procedure for when data entry or data processing is computerized?	X				Converted into an electronic format
a) If yes; the latest date of back-up is appropriate given the frequency of update of the computerized system (e.g., back-ups are weekly or monthly).				Backups are completed nightly by contractor	
24. Does the District have in place policies and procedures to ensure that relevant personal data are maintained according to national or international confidentiality guidelines?	X			Contained within the Data matrix	
25. Does the District have in place a written procedure to address late, incomplete, inaccurate and missing reports; including following-up with sub-reporting levels on data quality issues?	X			Website	Grading and report policies Updated on the website; both intra & internet formats
26. If data discrepancies have been uncovered in reports from sub-reporting levels, does the District maintain documentation regarding how these inconsistencies have been resolved?	X			Once discrepancies are identified, they are completed	There is an end of April meeting scheduled to change processes to address COMAR for next SY.
27. Can the District demonstrate that regular supervisory site visits have taken place and that data quality has been reviewed?	X			Virtual visit to ensure data quality	Executive Director of Secondary Education conducts visits with principals.



Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>PATHWAYS TO GRADUATION</b>					
<b>A: Policies, Procedures and Implementation</b>					
28. Does the District have in place policies and procedures for graduation requirements that are aligned to Federal and State regulations?	X			Procedures IKF and IKF-RA	Policy & regulations are in place Policy is approved by local Board Reviewed 2x's during Grading and Reporting
29. Does the District offer multiple pathways to graduation?	X				
a) If yes, what are the options?				Early Graduation / Early College / Online Courses / Procedures IKFA, IKA, IKA-RA	
30. Has the District developed and implemented evidenced-based processes and procedures for the selection, implementation, monitoring and evaluation for all pathway option programs to ensure that all courses and credit bearing vendor programs have the same expected level of consistency and meet MCCR standards?	X			Procedure IHM	Use of On-Line instructions
<b>B: Communication and Training</b>					
31. What training does the District provide to LSS employees (users) for submission of cohort data?	X			Initial training provided Training conducted when changes are made within PowerSchool or new regulations	
32. Does the District provide ongoing training to staff implementing credit recovery and other pathway alternatives?	X				Counselors are trained 3x's per year Principals are trained monthly
33. Does the District evaluate the effectiveness of its training	X			Evaluated and changed as concerns arise	
a) If yes, how do you evaluate				Administrative review / survey	
b) What are the results					Goal is to improve overall training and awareness to staff

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>C: Supporting Systems and Technology</b>					
34. Does the District use any commercial or locally developed Credit Recovery Software Programs?	X			Use recovery credit service through BlackBoard	BlackBoard provides a credit recovery protocol feature within its software package.
a) If yes, what are the selection criteria				Based on Principal's and software	
35. How does the District ensure rigor and alignment with course requirements?	X			Instructional Coordinators create credit recovery modules	
36. What training and oversight supervision is provided to ensure implementation with fidelity?	X			Through discussions with principals regarding credit recovery expectations	Occurs on a monthly basis
<b>D: Monitoring and Accountability</b>					
37. Does the District have in place procedures and monitoring practices to ensure that credit recovery and other pathway option courses align with District course requirements for credit and are being implemented with fidelity to ensure appropriate rigor?	X			Meetings with Principals	
38. Does the District have in place processes and procedures to validate the accuracy of data entry?	X			Built within PowerSchool features	Also Historical records
<b>E: Data and Reporting</b>					
39. Are internal controls in place to verify that students enrolled in credit recovery courses are meeting attendance and course assignment / completion requirements?	X				
a) If yes, describe these internal controls				Features built within PowerSchool	
40. Does the District (and its component schools) maintain sufficient documentation of student attendance and course assignment/completion requirements in course recovery options?	X			Documentation retained throughout electronic means within PowerSchool	Can also be accessed through BlackBoard

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>ATTENDANCE AND DROP OUT</b>					
<b>A: Policies, Procedures and Implementation</b>					
41. Does the District have written policies and procedures for calculating and reporting student attendance that align with federal and state requirements?	X			Procedures JED and JED-RA	Currently these procedures are under review and will realign with new COMAR for SY 2019-2020.
42. Does the District have written policies and procedures for calculating and reporting drop-outs that align with federal and state requirements?			X	District policy parallels established COMAR	MSDE function
43. Does the District attendance policy and procedures include provisions for grade reduction for students with excused or unexcused absences, suspensions or expulsions that may have bearing on graduation credits?	X			Contained within the Grading and Attendance and Punctuality Policy: JED-RA	Additional review conducted on a "case-by-case" basis
44. Does the District have written policies and procedures for a student who completes graduation requirements prior to the end of the school year?	X			Procedure IKFA	Early College follows Dual Enrollment guidelines
<b>B: Communication and Training</b>					
45. Have the majority of key data-management staff received the required training in tools and processes and has it been evaluated to determine effectiveness?	X			Staff has attended/participated in MSDE training Staff has trained school based personnel Evaluations are ongoing	
46. Is there a training plan which includes staff involved in data-collection and reporting at all levels in the reporting process?	X			Entry level training for staff End of year processing training Quarterly required meeting training	
47. Has the District provided written guidelines to all reporting entities (e.g., schools, departments, regions) on reporting requirements and deadlines?	X			End of year process. Reporting spells out all deadlines for staff and administrators.	
48. Have clear instructions provided on how to complete the data collection and reporting forms/tools?	X			Electronic communications process Principals receive "end-of-year" bulletin	

Questions	Y	N	N/A	Verification / Required Documents	Review Comments
<b>C: Monitoring and Accountability</b>					
49. Does the District (and its component schools) accurately report attendance, leaver codes, including dropouts, in accordance with state requirements?	X				
50. Does the District (and its component schools) report drop-out data in accordance with federal and state requirements?	X			Procedures are developed and follow set COMAR standards	
<b>D: Data and Reporting</b>					
51. Data Roles and Responsibilities; Are key monitoring and evaluation (M&E) and data-management staff identified with clearly assigned responsibilities?	X			Data Access Matrix	
52. Data Reporting Requirements; Has the District clearly documented (in writing) what is reported to who, and how and when reporting is required?	X			This process is conducted electronically	
53. Is there a written policy that states how long source documents and reporting forms need to be retained?	X			CCPS follows state guidelines as outlined in MD Student Records System Manual	Current year plus 5
54. Definitions; Are there operational indicator definitions meeting relevant standards that are systematically followed by all users?	X				
55. Data Collection and Reporting Processes; Are there standard data-collection and reporting forms that are systematically used?	X			Are data is collected and reporting is done electronically	
a) Are data recorded with sufficient precision/detail to measure relevant indicators?	X				
b) Are data maintained in accordance with international or national confidentiality guidelines?	X				

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
c) Are source documents kept and made available in accordance with a written policy?	X			Student Records Cards are maintained in accordance with COMAR	
d) Are all source documents and reporting forms relevant for measuring the indicator(s) available for auditing purposes (including dated print-outs in case of computerized system).	X			Graduation files and SRC cards are scanned and kept in Cold Storage (function of PowerSchool)	This is also web extender searchable
56. Data Management Processes and Data Quality Controls; Do clear documentation of collection, aggregation and manipulation steps exist?	X				Role of MSDE
a) Does the District have clearly documented data aggregation, analysis and/or manipulation steps performed at each level of the reporting system?	X				
b) Are data quality challenges identified and are mechanisms in place for addressing them?	X				Error Rate filter Monitoring of data and filter within MSDE
c) Are there clearly defined and followed procedures to identify and reconcile discrepancies in reports?	X				
d) Are there clearly defined and followed procedures to periodically verify source data?	X				On a continuous basis
<b>GRADING INTEGRITY AND GRADE MODIFICATIONS</b>					
<b>A: Policies, Procedures and Implementation</b>					
57. Does the District have written policies and procedures for grading, including grade modifications that align with federal and state regulations?	X			Procedures IKAE, IKAE-RA, IKAG, IKAG-RD	Follows requirements established within COMAR
58. Is the District/ School adequately controlling access to their systems for grading, reporting and grade modification?	X			PowerSchool Data Matrix environment	

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
a) Are appropriate school personnel appropriately approving and documenting student grade modifications?	X				
b) Are access controls to the data system adequately designed and operating efficiently?	X				
c) Does the District have policy guidance that details the processor written documentation requirements for grade changes, retention of supporting documentation requirements and monitoring by District officials?		X			Referred to current guidance contained with document 3.3 Currently in the process of developing
d) Does the District have lock out dates?	X				
e) Has the District developed policy guidance relating to the procedures and requirements for making grade changes in the current year and for prior years?	X				
f) Does the District conduct periodic review of the grade changes made by the heightened permission users and determine the appropriateness of the grade changes?	X				Reviewed electronic Google drive form for Grade changes
g) Does the System report historical grade change transactions?	X				Grade Change Log Review team
59. Has the District implemented grading policies that govern the manner in which academic grades are to be calculated, maintained, and adjusted?	X			Procedures IKAG, IKAG-RA, IKAG-RD	
60. Are the policies designed to ensure grading consistency, uniformity, and accuracy amongst all schools within the District?	X			During training and administrative training and meetings	Also available through intranet

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
61. Has the District established accountability measures to ensure the integrity of the grading system, including roles of principal, teacher and reasons for a grade change and timeline, internal monitoring procedures and consequences of failure to abide by the policy?	X			Audit logs Personnel Practices Teachers Union contract	
62. Does the District have in place a list of roles and responsibilities for accurate grading and reporting data at the District level, school level and teacher level?	X				
<b>B: Communications and Training</b>					
63. Does the District (and its component schools) have in place an effective system for communicating grading, reporting and grade modification policies and procedures to administrators, teachers and other key stakeholders?	X			Yearly Every marking period	
64. Does the District (and its component schools) provide clear and ongoing training on grading, reporting and grade modification to all stakeholders?	X			Grading and Reporting - Yearly	Teachers Union also provides training and guidance regarding CCPS grading and reporting requirements
65. What communication and training regarding grading, reporting and grade modifications does the District (and its component schools) provide?	X				
a) How often?				Yearly / Annually	
b) How is it communicated?				New Teacher and Staff orientations	
c) To what audiences?				All staff	
<b>C: Supporting Systems and Technology</b>					
66. Does the District use a data management system for grading and reporting?	X				
a) If yes, what system?				PowerSchool	Also Vendor's data service center

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
67. What are the built-in internal controls of the data management system that supports accurate data entry by authorized users?	X			Data user's access matrix ensures trained people / staff are entering data Authorities levels	Annually trained
68. Is the system using these to ensure the accuracy and integrity of the data?	X				
69. Are the data management system internal controls adequate to ensure the accuracy and integrity of the data?	X				
70. Does the system implement ongoing user training?	X			Conducted annually	New teachers bootcamp
71. Does the District (and its component schools) effectively implement a secure data management environment for accurate data?	X			ELDAP	Prior to grade change Principals authority to open New function in PowerSchool for SY 19-20
72. Does the District (and its component schools) have policy guidance regarding levels of access and timelines for data entry, lock-out, submission and verification?	X			All contained within Data Management protocols	
<b>D: Monitoring and Accountability</b>					
73. What procedures does the District (and its component schools) have in place for ongoing monitoring and validation of grading data, including grade modifications?	X			SCGT Report (Student / Course / Grade / Teacher) 2x's per year	Conducted at Mid-Year and Final Grade period to avoid multi class errors.
74. Does the District conduct periodic review of the grade changes made by the heightened permission users and determine the appropriateness of the grade changes?	X				
75. Does the District have policy guidance that details the levels of permissions for data entry and access for making data changes?	X			Contained within Data Matrix and IT procedures	



Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
76. Does the District have in place a process for requiring written certification of the accuracy of the grading/ grade change data that ensures the accuracy of the data in reporting the performance of the student in meeting course requirements as established by the District?	X			Student Reports	
77. Access Controls To The Data System- User Access; Are there written procedures in place for granting, changing and terminating access rights to the Data System?		X		Human resources notification	Recommend CAP to establish a written procedure
a) Do these procedures establish who has the authority to grant or change access (e.g., supervisory approval)?		X			
b) Do the procedures limit individual user access rights within the System to only those functions necessary to fulfil individual job responsibilities? <i>(Such controls limit the risk that sensitive or confidential information will be exposed to unauthorized use or modification.)</i>		X			
c) Do the procedures provide for immediately terminating access when employees leave the District or change roles?	X			Procedures are in place for the access control of staff terminations.	CAP should include this procedure
<b>E: Access Controls To Data System Audit Logs</b>					
78. Does the District's student grade data management system include audit logs or change reports that maintain a record of activity or show changes or deletions made in a computer application?	X			Changes In grade - YES Deletions - NO Historical Grades - YES	CAP Recommended: Determine if PowerSchool can be enhanced to provide a Deletion log
79. Does the student grade data management system have mechanisms in place to identify when a grade modification is/was made and by which user?	X			Historical Grades - YES	Assignment Grades are recorded at the teacher's level and can be changed before final submission.

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
80. Do District officials review these reports to monitor for unusual activity? <i>(These reports provide a mechanism for individual accountability and for management to reconstruct events.)</i>		X		No	CAP Recommended: Determine if PowerSchool can be enhanced to identify reporting / grading abnormalities
81. Does the District (and its component schools) provide clear, accurate and ongoing communication and training for individual data system users at various access levels?	X				
82. Does the District conduct timely user-specific electronic audits of grade entry and adjustment data that credentialed users had entered into the system?	X				

## PROMOTION AND GRADUATION ELIGIBILITY CERTIFICATION

### A: Policies, Procedures and Implementation

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
83. Does the District have in place policies and procedures for Promotion and Graduation that align with federal and state regulations?	X			Procedure IKF	
84. Does the District have in place an effective system of internal controls to provide reasonable assurance that reported graduation rates are accurate and complete?	X			Grading is reviewed throughout the school year. Teachers / Principals are required to review graduation data is accurate	Additionally, Data Manager Ortiz is responsible for the scrubbing of all data before submission to MSDE
85. Does the District have in place an effective system to ensure: (1) the ACGR data received from its component schools is accurate and complete, (2) the students identified as graduates in the cohort met State graduation requirements, or (3) its component schools have maintained adequate documentation for the removal of students from the cohort?	X				
86. Does the District have in place policies and procedures for calculating graduation cohorts, aligned to federal and state requirements under ESSA?	X			CCPS follows established COMAR requirements	
87. Does the District have in place written procedures and processes to identify inaccurate school level data?	X			Counselors conduct credit checks to ensure accuracy	This is conducted annually
88. Has the District developed and implemented a process, such as a risk-based monitoring tool, to monitor the local entities' processes to provide assurance that the data they submit to MSDE are accurate and complete?	X			Data Manager conducts scrub before providing to MSDE	

Questions	Y	N	N/A	Verification / Required Documents	Review Comments
89. Has the District developed and disseminated guidance to local entities about obtaining and maintaining required documentation supporting student removal from a cohort and regarding the importance of inputting accurate data?	X			During the following meetings; Guidance Secretary / School Counselor / Testing Coordinators	
90. Does the District have in place policies and procedures for calculating its ACGR in accordance with federal requirements?	X			CCPS follows MSDE calculations	
91. Has the District implemented a system of internal control over calculating and reporting graduation rates sufficient to provide reasonable assurance that reported graduation rates were accurate and complete?			X		MSDE responsibility
<b>B: Communication and Training</b>					
92. Does the District (and its component schools) have in place an effective system for communicating policies and procedures for Graduation eligibility to administrators, teachers and other key stakeholders?	X			Contained within Education Planning Guide	Also available on the web as a PDF
93. Does the District (and its component schools) provide clear and ongoing training on graduation eligibility requirements to all stakeholders?	X				
94. What communication and training regarding graduation requirements and data reporting does the District (and its component schools) provide?	X			The Education Planning Guide is updated annually School Counselors and administrators are updated Planning Guide is available online	A hard copy is provided to each high school student
a) How often?				Counselors - 3x's per year	
b) How is it communicated?				Electronically	
c) To what audiences?				All staff and administrators	

Questions	Y	N	N/A	Verification / Required Documents	Review Comments
<b>C: Supporting Systems and Technology</b>					
95. Does the District use a data management system for promotion and graduation data?	X				
a) If yes, what system?				PowerSchool	
96. What are the built-in internal controls of the data management system that supports accurate data entry by authorized users?	X			Grading Policies Report (25% threshold for error) Electronic gradebook error reports	
97. Is the system using these to ensure the accuracy and integrity of the data?	X				Overview by Data Manager
98. Are the data management system internal controls adequate to ensure the accuracy and integrity of the data?	X			PowerSchool	
99. Does the District implement ongoing user training?	X			New User training and as changes are made	
100. Does the District (and its component schools) effectively implement a secure data management environment for accurate calculating and reporting?	X				
101. Does the District (and its component schools) have policy guidance levels of access and timelines for data entry, lock-out, submission and verification?	X			Procedures follow established COMAR	
<b>D: Monitoring and Accountability</b>					
102. Does the District have in place internal controls to ensure the accuracy of the data for the calculation of the ACGR?	X			Internal processes ensure accurate data through verification	
103. Does the District have in place policies and procedures for data quality through the use of certifications regarding the accuracy and effectiveness of data to be submitted to MSDE?	X			No real certifications Data is scrubbed by Data Management team before it is sent to MSDE	

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>E: Data and Reporting</b>					
104. Does the District have in place reliable oversight procedures and processes to monitor and validate school and student level data reliability?	X				
<b>RECORDS ACCESS AND CONTROL</b>					
<b>A: Policies, Procedures and Implementation</b>					
105. Does the District have in place data standards and policies and procedures for data management and reporting that ensures accuracy?	X			CCPS procedures follow established COMAR	
106. Does the District have in place an effective system of controls specific to ACGR data reliability or monitor its component schools for data reliability?	X			Data is reviewed and scrubbed before submission to MSDE	Data Manager Ortiz
107. User Access - Are there written procedures in place for granting, changing and terminating access rights to data systems?		X			CAP Recommended CCPS should establish a written policy which provides access control and view authority within PowerSchool
a) Does the District have in place an effective system for certifying user levels of access?	X				
b) Do these procedures establish who has the authority to grant or change access (e.g., supervisory approval)?	X				
c) Does the District have in place appropriate types of control activities, including dividing or segregating key data entry and certification duties and responsibilities among different people to reduce the risk of error, misuse, or fraud?	X			Following protocol 3.3	

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
d) Do the procedures limit individual user access rights within the system to only those functions necessary to fulfil individual job responsibilities? <i>(Such controls limit the risk that sensitive or confidential information will be exposed to unauthorized use or modification.)</i>	X				
e) Do the procedures provide for immediately terminating access when employees leave the District or change roles?	X				
108. Identity Account Access - Do District officials have in place and implement a system of strict control in the ability to grant or modify user rights in the System?	X				
109. Does the District have in place and implement procedures to prevent individual users from having the capability to assign themselves additional user rights beyond those rights they have already been authorized?	X				
110. Audit Logs - Does the District's student data management system include audit logs or change reports that maintain a record of activity or show changes or deletions made in a computer application?	X			Deletion function will be reviewed with contractor	CAP Recommended Determine if PowerSchool has or can be enhanced to identify all deletions made within the system.
111. Does the student data management system have mechanisms in place to identify when changes are made and by which user?	X				

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>B: Communication and Training</b>					
112. Has the District developed and disseminated guidance to its component schools about obtaining and maintaining required documentation supporting student data and regarding the importance of inputting accurate data?	X			Conducted on a continuous basis	Counselor meeting 3x's per year Monthly principal meeting agenda item
<b>C: Monitoring and Accountability</b>					
113. Does the District have in place a data management team (data stewards) who are responsible for ensuring the completeness and accuracy of data submitted to the State?	X			Application Service Department	
114. Does the District have sufficient controls for ensuring adequate supporting documentation of ACGR and related data such as cohort membership, additions, removals, attendance, dropout, course grades and a process for ongoing monitoring for completeness and accuracy?	X			Applicant Service Reviewed by the Executive Director of Secondary Education Reviewed by the Superintendent	

Maryland State Department of Education, Dr. Karen B. Salmon, Ph.D., State Superintendent of Schools

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**School District:**

**Program Area:**

CPA Number:

**Notice of Finding and Recommendation (VFR) Number(s)** - *Multiple VFRs may be combined under one action plan when applicable.*

**Corrective Action:**

*Provide a detailed narrative outlining actions the district will take to correct unresolved findings. Narrative must fully explain measures implemented to ensure consistent compliance.*

**Oversight Responsibility:**

*Provide the specific position title of the employee(s) responsible for oversight of each corrective action.*

Estimated Date of Completion for each Corrective Action:



## **Maryland State Department of Education**

Nonpublic Student Textbook Program

**On-Site Inspection Questionnaire**

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**D - FACILITY INFORMATION**

**E - FACILITY ENVIROMENT**

**F - ADDITIONAL FINDINGS AND OBSERVATIONS**

<b>Name and Address of Facility:</b>	
<b>Date of On-Site Inspection:</b>	
<b>Facility Participants:</b>	
<b>Compliance &amp; Monitoring Specialist:</b>	

# Maryland State Department of Education

## Nonpublic Textbook and Technology Program

### **PURPOSE**

The purpose of the program is to provide funding for the purchase of textbooks, computer hardware and computer software for loan to students in eligible nonpublic schools. Schools shall receive a distribution of \$65 per eligible student, except that at schools where 20% to 40% of the students are eligible for free or reduced price meals the distribution is \$95 per student, and at schools where more than 40% of the students are eligible for free or reduced price meals the distribution is \$155 per student.

### **BACKGROUND**

The program is governed by the Budget Bill language in the Fiscal 2018 appropriations for the Maryland State Department of Education (MSDE), R00A03.04. The Fiscal 2018 Budget Bill language specifies how the program must operate. To participate in the program, a nonpublic school must meet the eligibility requirements set forth in the Budget Bill language. Interested applicants also must follow the directions in this guidance document.

The Nonpublic Textbook and Technology Program provides textbooks and technology instructional materials for loan to nonpublic schools. For a school to participate, its student tuition must be equal to or less than the statewide average per pupil expenditure by Local Education Agencies from the second prior fiscal year.

The budgeted amount for the Fiscal 2018 Nonpublic Textbook Program is \$6.04 million. Schools where more than 40% of the students are eligible for the free or reduced-price meal program (FARMS) receive allocations of \$155 per student, schools where 20% to 40% of the students are eligible for FARMS receive allocations of \$95 per student, and schools where less than 20% of the students are eligible for FARMS receive allocations of \$65 per student. FARMS eligibility is self-reported by the schools and is based on the results of surveys conducted by the schools.

The materials ordered by the nonpublic schools must be secular in character, acceptable for use in any public elementary or secondary school in Maryland, and must be used in classrooms.

Since its inception, the Nonpublic Textbook program has been authorized annually by State Budget Bill language. Since Fiscal 2016, the Budget Bill language has required that schools adhere to certain non-discrimination requirements.

School orders are submitted to MSDE electronically via an online portal. MSDE program staff review the schools' requisitions. If they are approved, then they are converted to MSDE contracts with vendors. Materials are drop-shipped by vendors directly to the schools, and the schools affix MSDE property labels to the materials. MSDE makes payments directly to the vendors.

## **SCOPE AND METHODOLOGY**

Special Fund Appropriation, provided that this appropriation shall be for the purchase of textbooks or computer hardware and software and other electronically delivered learning materials as permitted under Title II D. Section 2416(b)(4), (6), and (7) of the No Child Left Behind Act for loan to students in eligible non-public schools with a maximum distribution of \$65 per eligible non-public school student for participating schools, except that at schools where from 20% to 40% of the students are eligible for the free or reduced price lunch program there shall be a distribution of \$95 per student, and at schools where more than 40% of the students are eligible for the free or reduced-price lunch program there shall be a distribution of \$155 per student. To be eligible to participate, a non-public school shall:

1. Hold a certificate of approval from or be registered with the State Board of Education;
2. Not charge more tuition to a participating student than the statewide average per pupil expenditure by the local education agencies, as calculated by the department, with appropriate exceptions for special education students as determined by the department; and
3. Comply with Title VI of the Civil Rights Act of 1964, as amended.

The department shall establish a process to ensure that the local education agencies are effectively and promptly working with the nonpublic schools to assure that the nonpublic schools have appropriate access to federal funds for which they are eligible. Further provided that the Maryland State Department of Education shall:

1. Assure that the process for textbook, computer hardware, and computer software acquisition uses a list of qualified textbook, computer hardware, and computer software vendors and of qualified textbooks, computer hardware, and computer software; uses textbooks, computer hardware, and computer software that are secular in character and acceptable for use in any public elementary or secondary school in Maryland; and
2. Receive requisitions for textbooks, computer hardware, and computer software to be purchased from the eligible and participating schools, and forward the approved requisitions and payments to the qualified textbook, computer hardware, and computer software vendor who will send the textbooks, computer hardware, and computer software directly to the eligible school which will:
  - (i) Report shipment receipt to the department;
  - (ii) Provide assurance that the savings on the cost of the textbooks, computer hardware, or computer software will be dedicated to reducing the cost of textbooks, computer hardware, or computer software for students; and
  - (iii) Since the textbooks, computer hardware, or computer software shall remain property of the State, maintain appropriate shipment receipt records for audit purposes.

Further provided that a nonpublic school participating in the Aid to Non-Public Schools Program R00A03.04 shall certify compliance with Title 20, Subtitle 6 of the State Government Article. A nonpublic school participating in the program may not discriminate in student admissions on the basis of race, color, national origin, or sexual orientation. Nothing herein shall require any school or institution to adopt any rule, regulation, or policy that conflicts with its religious or moral teachings. However, all participating schools must agree that they will not discriminate in student admissions on the basis of race, color, national origin, or sexual orientation. The sole legal remedy for violation of these provisions is ineligibility for participating in the Aid to Non-Public Schools Program.

# Nonpublic Student Textbook Program

FACILITY			
A: PROGRAM ELIGIBILITY			
VERIFICATIONS	Y	N	REVIEWER COMMENTS
<p>1. Does the participating facility meet the eligibility requirements to participate in the Nonpublic Student Textbook Program (NSTP)?</p> <p><i>An eligible nonpublic school must "hold a certificate of approval from or be registered with the State Board of Education." Code of Maryland Regulations (COMAR) 13A.09.09.03 provides for the issuance of a certificate of approval by the State Board for the following educational programs: (1) nursery school; (2) kindergarten; (3) elementary school; (4) secondary school; and (5) Montessori school.</i></p>			
<p>2. Does the facility comply with Title VI of the Civil Rights Act of 1964?</p> <p><i>Prevents discrimination on the basis of race, color, and national origin in any programs or activity that receive federal funds or other Federal financial assistance.</i></p>			
<p>3. Does the facility comply with Title 20, Subtitle 6 of the State Government Article?</p> <p><i>A participating nonpublic school may not discriminate in student admission on the basis of race, color, national origin, or sexual orientation.</i></p>			



VERIFICATIONS	Y	N	REVIEWER COMMENTS
4. Is the facility receiving full funding from the federal and State government for their special education programs?			
a. If yes, is the facility considered a Type I Special Education Program?			
<p>5. Is this facility eligible as a Type II and/or Type III Educational Program?</p> <p><i>Due to the nature of these programs, and to the fact that schools and facilities operating these programs do not charge tuition to parents, these programs do not qualify for participation in the nonpublic student textbook program.</i></p>			If <b>YES</b> – Facility is not eligible for funding under the NSTP and does not qualify for participation.
<p>6. Is the facilities annual tuition rate / policy in compliance with the Budget Bill definition for qualifying facilities?</p> <p><i>The nonpublic school shall “not charge more tuition to a participating student than the statewide average per pupil expenditure by the local education agencies, as calculated by the department.”</i></p>			
7. Does the facility, its administrator, operator, owner, or designee understand the Assurance Statement to participate in the NSTP and has provided the Maryland State Department of Education (MSDE) with a dated and signed copy of this assurance?			

VERIFICATIONS	Y	N	REVIEWER COMMENTS
8. Does the facility have documentation which verifies that eligible student's cost of textbooks was reduced by the requisite amount?			
<b>B: FACILITY POLICY AND PROCEDURES</b>			
9. Does the facility have family survey forms, tuition scholarship program, Temporary Assistance for Needy Families (TANF) and/or free and reduced price meals (FARM) information to support the FARMS count submitted in their NSTP application?			
10. Does the facility have letters, memos, meeting agendas, announcements and bulletins that communicate to parents the cost savings have been passed onto the student?			
11. Does the facility have written policies or procedures for maintaining and updating the inventory of books, hardware, software, and other electronic materials purchased under NSTP?			
<b>C: ACCOUNTABILITY</b>			
12. Can the facility verify all provided textbooks, hardware, software, and other electronic devices are correctly identified with a MSDE label?			
13. Verify the facility maintains a current and accurate inventory list which contains the location of books, hardware, software, and other electronic material.			

VERIFICATIONS	Y	N	REVIEWER COMMENTS
14. Can the facility provide information pertaining to any book(s) that have not been received, short orders, or damaged books, hardware, software, or other electronic material?			
15. Does the facility have documentation indicating it received prior approval from MSDE's Division of Business Services regarding the disposition of outdated or worn textbooks, hardware, software, or other electronic material?			
16. Does the facility maintain records for three years pertaining to all material received through participation in the NSTP?			
D. FACILITY INFORMATION			
17. Verify the name and contact information of the individual who is responsible for overseeing the facilities participation in the NSTP.			
18. Verify the facility is in <b>good standing</b> with the State of Maryland and has a current business license posted.			<i>Recorded Business License Number</i>
19. Verify the facility has building safety plan posted.			<i>Record Date of Most Recent Plan</i>
20. Are all students, parents, guardians, and staff provided a copy of the building safety plan?			
21. Does the facility initiate annual safety drills and building evacuations in case of emergencies?			<i>Date of Most Recent Drill</i>

VERIFICATIONS	Y	N	REVIEWER COMMENTS
<b>E: FACILITY ENVIRONMENT</b>			
22. Describe general condition of the facility.			(Example: <i>Facility appears to be clean and well maintained.</i> )
<b>F: ADDITIONAL FINDINGS AND OBSERVATIONS</b>			
23. If applicable, describe additional areas or items of concern.			

Maryland State Department of Education, Dr. Karen B. Salmon, Ph.D., State Superintendent of Schools

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## **Maryland State Department of Education**

Nonpublic Student Textbook Program

**On-Site Inspection Questionnaire**

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**D - FACILITY INFORMATION**

**E - FACILITY ENVIROMENT**

**F - ADDITIONAL FINDINGS AND OBSERVATIONS**

<b>Name and Address of Facility:</b>	<b>Excellent Start Learning Center 8401 Carlson Lane Windsor Mill, MD 21244</b>
<b>Date of On-Site Inspection:</b>	<b>4/25/19</b>
<b>Facility Participants:</b>	<b>Deborah Harris – Owner/CEO</b>
<b>Compliance &amp; Monitoring Specialist:</b>	<b>Dr. Robin Lopez</b>

# **Maryland State Department of Education**

## **Nonpublic Textbook and Technology Program**

### **PURPOSE**

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### **BACKGROUND**

The program is governed by the Budget Bill language in the Fiscal 2018 appropriations for the Maryland State Department of Education (MSDE), R00A03.04. The Fiscal 2018 Budget Bill language specifies how the program must operate. To participate in the program, a nonpublic school must meet the eligibility requirements set forth in the Budget Bill language. Interested applicants also must follow the directions in this guidance document.

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The materials ordered by the nonpublic schools must be secular in character, acceptable for use in any public elementary or secondary school in Maryland, and must be used in classrooms.



Since its inception, the Nonpublic Textbook program has been authorized annually by State Budget Bill language. Since Fiscal 2016, the Budget Bill language has required that schools adhere to certain non-discrimination requirements.

School orders are submitted to MSDE electronically via an online portal. MSDE program staff review the schools' requisitions. If they are approved, then they are converted to MSDE contracts with vendors. Materials are drop-shipped by vendors directly to the schools, and the schools affix MSDE property labels to the materials. MSDE makes payments directly to the vendors.

## **SCOPE AND METHODOLOGY**

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1. Hold a certificate of approval from or be registered with the State Board of Education;
2. Not charge more tuition to a participating student than the statewide average per pupil expenditure by the local education agencies, as calculated by the department, with appropriate exceptions for special education students as determined by the department; and
3. Comply with Title VI of the Civil Rights Act of 1964, as amended.

The department shall establish a process to ensure that the local education agencies are effectively and promptly working with the nonpublic schools to assure that the nonpublic schools have appropriate access to federal funds for which they are eligible. Further provided that the Maryland State Department of Education shall:

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2. Receive requisitions for textbooks, computer hardware, and computer software to be purchased from the eligible and participating schools, and forward the approved requisitions and payments to the qualified textbook, computer hardware, and computer software vendor who will send the textbooks, computer hardware, and computer software directly to the eligible school which will:
  - (i) Report shipment receipt to the department;
  - (ii) Provide assurance that the savings on the cost of the textbooks, computer hardware, or computer software will be dedicated to reducing the cost of textbooks, computer hardware, or computer software for students; and
  - (iii) Since the textbooks, computer hardware, or computer software shall remain property of the State, maintain appropriate shipment receipt records for audit purposes.

Further provided that a nonpublic school participating in the Aid to Non-Public Schools Program R00A03.04 shall certify compliance with Title 20, Subtitle 6 of the State Government Article. A nonpublic school participating in the program may not discriminate in student admissions on the basis of race, color, national origin, or sexual orientation. Nothing herein shall require any school or institution to adopt any rule, regulation, or policy that conflicts with its religious or moral teachings. However, all participating schools must agree that they will not discriminate in student admissions on the basis of race, color, national origin, or sexual orientation. The sole legal remedy for violation of these provisions is ineligibility for participating in the Aid to Non-Public Schools Program.

# Nonpublic Student Textbook Program

FACILITY			
A: PROGRAM ELIGIBILITY			
VERIFICATIONS	Y	N	REVIEWER COMMENTS
<p>1. Does the participating facility meet the eligibility requirements to participate in the Nonpublic Student Textbook Program (NSTP)?</p> <p><i>An eligible nonpublic school must "hold a certificate of approval from or be registered with the State Board of Education." Code of Maryland Regulations (COMAR) 13A.09.09.03 provides for the issuance of a certificate of approval by the State Board for the following educational programs: (1) nursery school; (2) kindergarten; (3) elementary school; (4) secondary school; and (5) Montessori school.</i></p>	√		<p>MSDE License #09-03-0051 Approved 5/28/14</p>
<p>2. Does the facility comply with Title VI of the Civil Rights Act of 1964?</p> <p><i>Prevents discrimination on the basis of race, color, and national origin in any programs or activity that receive federal funds or other Federal financial assistance.</i></p>	√		<p>Found in:</p> <ul style="list-style-type: none"> <li>• Equal Opportunity Posters – Posted throughout building</li> <li>• Student-parent Handbook (Given after admission)</li> <li>• Application</li> </ul>
<p>3. Does the facility comply with Title 20, Subtitle 6 of the State Government Article?</p> <p><i>A participating nonpublic school may not discriminate in student admission on the basis of race, color, national origin, or sexual orientation.</i></p>	√		<p>Found in application</p>

VERIFICATIONS	Y	N	REVIEWER COMMENTS
4. Is the facility receiving full funding from the federal and State government for their special education programs?		√	
a. If yes, is the facility considered a Type I Special Education Program?			
5. Is this facility eligible as a Type II and/or Type III Educational Program?  <i>Due to the nature of these programs, and to the fact that schools and facilities operating these programs do not charge tuition to parents, these programs do not qualify for participation in the nonpublic student textbook program.</i>		√	If <b>YES</b> – Facility is not eligible for funding under the NSTP and does not qualify for participation.
6. Is the facilities annual tuition rate / policy in compliance with the Budget Bill definition for qualifying facilities?  <i>The nonpublic school shall “not charge more tuition to a participating student than the statewide average per pupil expenditure by the local education agencies, as calculated by the department.”</i>	√		Fee schedule per grade level - \$13,520 and under
7. Does the facility, its administrator, operator, owner, or designee understand the Assurance Statement to participate in the NSTP and has provided the Maryland State Department of Education (MSDE) with a dated and signed copy of this assurance?		√	Could not locate copy of assurance  *Jamie – How can she find a copy?

VERIFICATIONS	Y	N	REVIEWER COMMENTS
8. Does the facility have documentation which verifies that eligible student's cost of textbooks was reduced by the requisite amount?		√	One of the lowest fees in the county
<b>B: FACILITY POLICY AND PROCEDURES</b>			
9. Does the facility have family survey forms, tuition scholarship program, Temporary Assistance for Needy Families (TANF) and/or free and reduced price meals (FARM) information to support the FARMS count submitted in their NSTP application?	√		MSDE Nutrition Program – Meal Benefit Application
10. Does the facility have letters, memos, meeting agendas, announcements and bulletins that communicate to parents the cost savings have been passed onto the student?		√	Not aware of this requirement Language will be added to application and handbook
11. Does the facility have written policies or procedures for maintaining and updating the inventory of books, hardware, software, and other electronic materials purchased under NSTP?		√	A system for tracking will be created.
<b>C: ACCOUNTABILITY</b>			
12. Can the facility verify all provided textbooks, hardware, software, and other electronic devices are correctly identified with a MSDE label?		√	Provided 2 rolls of labels. Labels will be affixed
13. Verify the facility maintains a current and accurate inventory list which contains the location of books, hardware, software, and other electronic material.		√	Owner has a folder of orders – no tracking conducted

VERIFICATIONS	Y	N	REVIEWER COMMENTS
14. Can the facility provide information pertaining to any book(s) that have not been received, short orders, or damaged books, hardware, software, or other electronic material?			N/A – No issues with orders
15. Does the facility have documentation indicating it received prior approval from MSDE's Division of Business Services regarding the disposition of outdated or worn textbooks, hardware, software, or other electronic material?			N/A – No items have been discarded
16. Does the facility maintain records for three years pertaining to all material received through participation in the NSTP?			Program has only been in place for 3 years
D. FACILITY INFORMATION			
17. Verify the name and contact information of the individual who is responsible for overseeing the facilities participation in the NSTP.			Deborah Harris – Owner/CEO
18. Verify the facility is in <b>good standing</b> with the State of Maryland and has a current business license posted.			<i>Recorded Business License Number</i> SDOT Printout – In Good Standing
19. Verify the facility has building safety plan posted.			<i>Record Date of Most Recent Plan</i> January, 2010 – No changes to structure
20. Are all students, parents, guardians, and staff provided a copy of the building safety plan?	√		Via Handbook
21. Does the facility initiate annual safety drills and building evacuations in case of emergencies?	√		<i>Date of Most Recent Drill</i> 4/17/19

VERIFICATIONS	Y	N	REVIEWER COMMENTS
<b>E: FACILITY ENVIRONMENT</b>			
22. Describe general condition of the facility.			<i>Facility appears to be clean and well maintained.</i>
<b>F: ADDITIONAL FINDINGS AND OBSERVATIONS</b>			
23. If applicable, describe additional areas or items of concern.			<ul style="list-style-type: none"> <li>• Follow-up on location of: <ul style="list-style-type: none"> <li>▪ Amazon Kindles- only located 12 out of 20. 2 not working</li> <li>▪ HP Spectre Laptop - 1</li> <li>▪ Dell Desktop (only located 8 out of 10. 2 not working</li> <li>▪ Ipad</li> <li>▪ MX1 Document Camera – 2</li> <li>▪ Cannon Power Shot Camera – only located 1 out of 3</li> </ul> </li> </ul>

**Maryland State Department of Education, Dr. Karen B. Salmon, Ph.D., State Superintendent of Schools**

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# Maryland State Department of Education

2019 Principal Evaluation System

Compliance Checklist

**On-Site Review**

<b>Local School System (LSS):</b>	
<b>Date of On-Site Inspection:</b>	
<b>LSS Participants:</b>	
<b>Compliance &amp; Monitoring Specialist:</b>	

# Office of Leadership Development and School Improvement

Principal Evaluation System					
A: Training					
Question	Y	N	N/A	Verification / Required Documents	Reviewer Comments
1. Does the local school system require principals to complete initial and refresher training on evaluating teachers, providing actionable feedback, collecting evidence to support evaluation ratings, and calibrating evaluation ratings?					
2. Does the local school system require principal supervisors to complete initial and refresher training on evaluating principals, providing actionable feedback, collecting evidence to support evaluation ratings, and calibrating evaluation ratings?					
3. Does the local school system provide principals with yearly orientation and training on the evaluation process that includes an overview of the evaluation cycle, evidence required to meet established effectiveness levels, process to appeal an evaluation rating, and support to improve professional practice?					
4. Does the local school system provide training for people who observe and provide feedback on instruction?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>B: Monitoring and Review</b>					
5. Has the local school system designated staff and a process for reviewing the quality, validity, and reliability of the principal evaluation system (i.e. quality of evaluation reports, validity of student growth measures, and timeliness of feedback)?					
<b>C: Policy</b>					
6. Does the local school system have policies that describe the appeal process for an evaluation rating and support provided to principals rated as developing or ineffective?					

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