RESPONSE TO INDEPENDENT PERFORMANCE AUDIT

Prince George's County Public Schools Graduation Rates

December 2017

OVERALL KEY FINDINGS

Auditors did not find any direction was given from the school system's leadership to change grades. The auditors found no financial incentives to change grades, and no evidence of systemwide intimidation or fraud related to the allegations of grade manipulation.

Auditor key findings include:

- PGCPS governance structure has performance gaps.

- PGCPS staff does not consistently adhere to policies and procedures related to grading and graduation certification.

- School-level recordkeeping related to grading and graduation certification needs improvement.

- Irregularities in grade changes and graduation certification were identified.

AUDITOR RECOMMENDATIONS

- Clarify policies and procedures and provide regular training to include awareness and understanding and improve adherence to policies and procedures.

- Minimize the potential risk management and discourage fraud through automation of recordkeeping and increased controls.

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

WORK COMPLETED TO DATE

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

- **Grades and Transcripts**
- **Credit Recovery Programs**
- **Staff Training and Support**
- **Technology Upgrades**
- **Communications**

WORK COMPLETED TO DATE
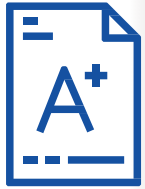
GRADES AND TRANSCRIPTS

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

WORK COMPLETED TO DATE

CREDIT RECOVERY PROGRAMS

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

WORK COMPLETED TO DATE

STAFF TRAINING & SUPPORT

Grade and transcript managers attended mandatory training. Professional School Counselors received additional time to update all student records for graduation certification.

WORK COMPLETED TO DATE

TECHNOLOGY UPGRADES

PGCPS is in the process of upgrading technology (i.e., SchoolMAX) to improve graduation certification.

WORK COMPLETED TO DATE

COMMUNICATIONS

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

TIMELINE FOR IMPLEMENTATION

PGCPS will work with an external third party to review and implement recommendations.

The school system will request a second independent review to ensure progress.

TIMELINE FOR IMPLEMENTATION

Ongoing

- **Increase awareness** of grading policies, graduation certification processes and credit recovery options among stakeholder groups.

- **Leverage opportunities** to emphasize the importance of regular school attendance and educate stakeholder groups about attendance policies and procedures.

- **Work with the Prince George's County Board of Education** to determine how to best report results of random sampling of grade changes to evaluate adherence to policies, procedures and timelines, as well as appropriate inclusion of documentation requirements.

- **Provide training** to Professional School Counselors and Senior Grade-Level Administrators on the process for certifying graduates.

- **Require mandatory training** for any new users of the grading or transcript module.

- **Monitor excessive grade changes** and weekly grade input reports, including the number of grades per week in the gradebook, missing report card grades and excessive absences.

- **Inform staff** about key changes to Administrative Procedures and provide training.

TIMELINE FOR IMPLEMENTATION

August 2017

- Implemented controls to limit the number of school-level grade and transcript managers.

- Discontinued Quarterly Learning Modules (QLMs) for credit recovery.

September 2017

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

October 2017

- Implemented new customer service initiative.

November/December 2017

- Provided all HS principals, Professional School Counselors and registrars with correct grade change form and allocated one week (Nov. 27-Dec. 1, 2017) to complete PDS card tallying process.

- Began alerting parents about timeline to appeal grades.

- Began highlighting compliance hotline in systemwide communications and enhanced website visibility.

- Launched new constituent concern tracking module ("Let's Talk").

TIMELINE FOR IMPLEMENTATION

January 2018

- Issue Request for Proposals from external third-party groups to review and monitor fidelity of implementation of recommended actions.

- Implement Edgenuity Inc. and APEX Learning online programs for credit recovery and original credit. (pending Board of Education approval)

- Produce individual school quarterly grade change reports. Evaluate representative random sampling of grade changes for compliance with policies, procedures and timelines.

- Implement processes to ensure usage of PDS Tally Card in all schools. Establish deadlines to complete all PDS cards for graduation certification before issuing diplomas.

- Establish accountability processes allowing for random audits of senior students' files annually prior to graduation.

- Complete audit of users to ensure demonstrated need for student records access.

TIMELINE FOR IMPLEMENTATION

February 2018

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

March 2018

- Determine criteria for excessive absences and provide all schools with tools to run weekly school-level data reports.
- Begin pilot of electronic grade change form.

TIMELINE FOR IMPLEMENTATION

April 2018

- Align all Administrative Procedures related to academic grades for consistent messaging.
  - Create Administrative Procedures to clearly define and address:
    - How to input grades for credit recovery courses
    - Steps to certify graduates
    - Grading integrity for PGCPS staff
    - Multiple Pathways to Success program-related grade changes

TIMELINE FOR IMPLEMENTATION

- Update Administrative Procedures to clearly define and address:
  - General impact of excessive unlawful absences on a student's quarterly grade, including instances where parents have or have not been contacted
  - Process for makeup work
  - What constitutes makeup work and "good faith effort"
  - Requirements for QLM program that align with existing makeup work guidelines
  - Compliance and monitoring requirements
  - Attendance tracking procedures

TIMELINE FOR IMPLEMENTATION

July 2018

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

Summer 2018

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

Fall 2018

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

- Implement electronic version of the grade change form.

- Hire independent third party to conduct random audit of student grades and graduation requirements at select high schools annually.

- Implement online programs for quarterly grade recovery.

RESPONSE TO AUDIT FINDINGS & RECOMMENDATIONS

General Findings and Observations on Governance of the District

Governance Assessment

AREA: GENERAL AWARENESS OF GRADING POLICIES AND PROCEDURES

The school system will continue to increase awareness of grading policies, graduation certification processes and credit recovery options among stakeholder groups.

AREA: MONITORING & ACCOUNTABILITY

- The school system has initiated steps to improve understanding of the grade appeals process. Beginning November 2017, parents were alerted about the timeline to appeal grades. Notifications will continue at the conclusion of each quarter.

- All grade changes for the previous quarter must be completed two weeks after the grade change appeal window has closed for each quarter. Required training will continue for any new users of the grading or transcript module.

- In January 2018, PGCPS will issue a Request for Proposal from external third-party groups to review and monitor fidelity of implementation of recommended actions.

- PGCPS will hire an independent third party to provide an audit of a random selection of student grades and graduation requirements at several randomly selected high schools annually.

AREA: USE OF INCENTIVES

The school system does not plan to offer student performance-based incentives.

AREA: REPORTING COMPLAINTS OF MISUSE OR FRAUD

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

- This fall, PGCPS implemented a new customer service initiative and increased the Office of the Ombudsman's presence.

- The school system launched a new constituent concern tracking module ("Let's Talk").

Attendance

PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES & PROCEDURES

By April 2018, PGCPS will update Administrative Procedure 5121.3 to clearly define the general impact of excessive unlawful absences on a student's quarterly grade, including instances where parents have or have not been contacted, and the process for makeup work for unexcused absences.

AREA: COMMUNICATIONS & TRAINING

PGCPS will continue to leverage opportunities to emphasize the importance of regular school attendance and educate stakeholder groups about attendance policies and procedures.

AREA: SYSTEMS/TECHNOLOGY

- By March 2018, the Divisions of Teaching and Learning and Information Technology will work collaboratively to determine criteria for excessive absences and ensure that all schools have the ability to run a weekly school-level data report.

- There will be additional exploration with the SchoolMAX vendor to determine the software's capacity to convert excessive unexcused absences to failing grades.

AREA: MONITORING & ACCOUNTABILITY

By April 2018, PGCPS will update Administrative Procedure 5113 to strengthen attendance tracking procedures.

Grading

PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES & PROCEDURES

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

AREA: COMMUNICATIONS & TRAINING

- Each division that revises or creates administrative procedures will ensure that all staff are informed of the changes. Training will be provided for clarity and understanding to reduce risk of misinterpretation.

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

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

AREA: MONITORING & ACCOUNTABILITY

- By April 2018, PGCPS will update Administrative Procedure 5121.3 to clearly define the compliance and monitoring requirements for implementing the procedure.

- In addition, PGCPS will create a new Grade Change Administrative Procedure that addresses grading integrity for all PGCPS staff.

Grade Changes

PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES & PROCEDURES

- All principals, Professional School Counselors and grade managers were provided with the current grade change form.

- By April 2018, PGCPS will create a new Administrative Procedure regarding grade changes to include the process that must be followed for MPTS-related grade changes.

- The Division of Information Technology will develop an electronic version of the grade change form to be piloted in certain schools during the current school year and fully implemented for the 2018-19 school year.

AREA: COMMUNICATIONS & TRAINING

By April 2018, PGCPS will align all procedures related to academic grades for consistent messaging.

AREA: SYSTEMS/TECHNOLOGY

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

AREA: MONITORING & ACCOUNTABILITY

Starting January 2018, PGCPS will produce individual school quarterly grade change reports. A random sampling of grade changes will be evaluated for compliance with policies, procedures and timelines. PGCPS will work with the Board of Education to determine how to best report the information.

Multiple Pathways To Success (MPTS)

PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES & PROCEDURES

Quarterly Learning Modules were discontinued in July 2017 for credit recovery. Starting January 2018, the online programs Edgenuity Inc. and APEX Learning will be used for credit recovery and original credit. Online programs will be used for quarterly grade recovery starting the 2018-19 school year (pending Prince George's County Board of Education approval).

AREA: COMMUNICATIONS & TRAINING

Quarterly Learning Modules were discontinued in July 2017 for credit recovery. There are no grade makeup packets in use throughout PGCPS.

AREA: SYSTEMS/TECHNOLOGY

Quarterly Learning Modules were discontinued in August 2017 for credit recovery.

AREA: MONITORING & ACCOUNTABILITY

By April 2018, the school system will create a new Administrative Procedure regarding grade changes that clearly defines how to input grades for credit recovery courses.

Promotion and Graduation

PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES & PROCEDURES

- By January 2018, processes will be implemented to ensure that the PDS Tally Card is updated and used in all schools.

- All high school principals, Professional School Counselors and grade managers were provided one week (Nov. 27-Dec. 1, 2017) to complete the PDS card tallying process. Deadlines will be established and followed to ensure all PDS cards are completed and signed to certify graduates prior to issuing diplomas.

- By April 2018, a new Administrative Procedure will be created that clearly defines the steps to certify graduates.

AREA: COMMUNICATIONS & TRAINING

PGCPS will continue to provide training to Professional School Counselors and Senior Grade-Level Administrators on the process for certifying graduates.

AREA: SYSTEMS/TECHNOLOGY

By July 2018, the Office of Academics and the Division of Information Technology will identify and maintain graduation standards in SchoolMAX to automate the credit tallying process for the 2018-19 school year.

AREA: MONITORING & ACCOUNTABILITY

Starting January 2018, accountability processes will be established that allow for random audits of senior students' files annually prior to graduation.

Records Access and Controls

PGCPS Policies and Procedures Review

AREA: OVERALL POLICIES & PROCEDURES

- Controls were implemented in August 2017 to limit the number of grade managers and transcript managers at each school.

- In September 2017, the Division of Information Technology mandated training in order to access the approved grading or transcript module.

- By January 2018, the Division of Information Technology will complete an audit of users to ensure demonstrated need for access.

AREA: COMMUNICATIONS & TRAINING

- The grading window is published at the beginning of each school year and announced for all progress reports and report cards.

- All grade changes for the previous quarter must be completed prior to the close of the progress report grading window.

- Required training will continue for any new users of the grading or transcript module.

AREA: SYSTEMS/TECHNOLOGY

Starting August 2017, the Division of Information Technology created a new process requiring user access requests to be approved by central office administrators for greater control and accountability.

AREA: MONITORING & ACCOUNTABILITY

For ongoing monitoring purposes, the Division of Information Technology has created reports that allow school and area office staff to monitor:

- Number of grades per week in the gradebook

- Missing report card grades

- Excessive absences

- Grade changes

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