



PGCPS GRADUATION RATE REVIEW
2017 INVESTIGATION



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

October 31st, 2017

RFP # R00R8400170

CONTAINS SENSITIVE INFORMATION

Submitted To:

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EXECUTIVE SUMMARY

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

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

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

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

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

1. PGCPS’s governance structure has performance gaps.

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

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

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

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

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

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

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

4. Irregularities in grade changes were identified.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

INTRODUCTION

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Between September 12 and October 31, 2017, approximately seven weeks, A&M conducted the performance audit for PGCPS. The performance audit was based on interviews with external PGCPS stakeholders and PGCPS staff, a review of MSDE legislation and regulation and PGCPS policies and procedures, student data collected from SchoolMAX and student record files reviewed during site visits for 28 high schools. In addition, A&M reviewed and logged all complaints from individuals that were received by MSDE, PGCPS board members, PGCPS staff and the hotline and email addresses created during the performance audit to receive new complaints.

This report is broken down into two main sections 1) Governance and 2) On-site school investigations. The Governance section of this report contains key findings and recommendations associated with PGCPS oversight and accountability and a detailed review of State code and regulations and PGCPS policies and procedures. The on-site school investigations contain key findings and recommendations associated the review of student records at all high schools. This section contains summary results from the sample testing of students from the 2016 and 2017 graduating classes. School summaries are contained in Appendix A.

To complete the performance audit, A&M created a multi-disciplined team of fifteen (15) professionals from our Dispute and Investigations Services (DI) and Public Sector Services (PSS) practices with backgrounds in investigations, independent assessments, and experience working on behalf of K-12 education clients.

A&M’s DI team provides specialized investigative and analytical services to help resolve complex accounting and financial issues and disputes. We work closely with law firms, corporate boards, and management of companies and public sector clients involved in multifaceted commercial, financial and accounting disputes and irregularities. Our team conducts rigorous accounting, financial and economic analysis to help resolve a range of disputes – from internal irregularities to litigation – from the boardroom to the courtroom. In addition, DI has deep experience conducting investigations and audits of K-12 public and charter school systems. The team provides an independent perspective and strong investigative skills to quickly discover and validate improprieties and recommend operational improvements.

A&M’s PSS practice focuses on driving transformational change with local, state, and federal clients. We have worked with multiple large, urban districts to resolve critical challenges including identifying solutions to improve financial viability of school districts, creating new school-budgeting approaches, designing new education service delivery models, and addressing Special Education management.

Background on PGCPS

PGCPS is the third largest school district in the Washington D.C. area, serving approximately 130,000 students. PGCPS graduates approximately 7,500 students from 28 high schools each school year. Between 2012 and 2016, PGCPS graduation rates have increased over 8%.

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
PGCPS Graduation Rate	73%	74%	77%	79%	81%

Table 1: PGCPS Historical Graduation Rates

GOVERNANCE ASSESSMENT

Approach

General Governance Assessment

A high-level understanding of governance was critical to the performance audit as it informs A&M's understanding of how PGCPS communicates, executes and strengthens the goals and objectives of the District while discouraging fraud and mismanagement of its resources.

Upon contract award, A&M initiated meetings with Prince George's County elected officials, PGCPs leadership and key PGCPs individuals involved in grading procedures and credit recovery programs. Initial discussions between A&M and stakeholders were focused on gaining a high-level understanding of the governance framework and practices for PGCPs.

Subsequently, A&M conducted a series of detailed interviews with key stakeholders and also performed a review of Maryland statutes and regulations and PGCPs policies and procedures. The policies and procedures review provided a framework for testing processes and our assessment of adherence to policies and procedures.

Interviews with Key Stakeholders

A&M has conducted key interviews with PGCPs leadership and staff in roles related to grading, graduation, and the Multiple Pathways to Success (hereafter "MPTS") programs. Interviews conducted with key stakeholders provided A&M with insight into the stakeholders' understanding of the following areas:

- Complaints under investigation
- Student recordkeeping and grading policies and procedures
- MPTS program and school work packets
- Cultural and behavioral norms of the District

Key Stakeholders	Interviews Conducted
PGCPS Board of Education	Chairman Vice Chairman All other Board Members except one student member
PGCPS Staff	CEO Deputy Superintendent Chief Academic Officer and key academic staff Director of Internal Audit

	Chief Information Officer Area III MPTS team Data Management and Strategy Analyst
Government Officials	State Senator, 1 county council member

The following individuals were contacted, and either declined to participate in interviews or did not respond to our request: County Executive and County Council members.

General Findings and Observations on Governance of the District

Area	Observations	Recommendations
General Awareness of Grading Policies and Procedures	<ul style="list-style-type: none"> Overall, Board members, leadership and employees were aware of the grading policies and procedures, including procedure changes made in August 2016. Board members, leadership and employees were aware of the MPTS Program. <p><i>See Policies and Procedures section below for more detailed review of State code and regulations and PGCPs policies and procedures</i></p>	<ul style="list-style-type: none"> No recommendations at this time.
Monitoring and Accountability	<ul style="list-style-type: none"> PGCPs management does not currently monitor adherence to grading procedures at the individual school level. Leadership generally assume that principals and school based staff will follow the policies and procedures of the District, but does not currently verify that schools are following them. 	<ul style="list-style-type: none"> Improve school-level accountability. PGCPs leadership should develop performance metrics that can be generated from SchoolMAX and reviewed quarterly (at a minimum) to monitor adherence to grading procedures. The metrics will provide leadership insight into timeliness of grade entry, number of grade changes done quarterly, reasons for grade changes and the impact of the grade changes.

	<ul style="list-style-type: none"> The Internal Audit (IA) function is primarily focused on conducting audits of student activity funds and responding to complaints of financial fraud. Until the summer of 2017, IA has not historically performed audits outside of this limited scope. 	<ul style="list-style-type: none"> Increase accountability via reviews completed by an independent third party. Either: 1) expand the IA role to complete performance audits of both academic and non-academic areas of the District or 2) create an accountability officer outside of the IA function to provide independent oversight of academic policies and procedures and student performance.
Use of Incentives	<ul style="list-style-type: none"> Currently, PGCPs does not provide financial incentives for improving student performance of the District. 	<ul style="list-style-type: none"> No recommendations at this time.
Reporting Complaints of Misuse or Fraud	<ul style="list-style-type: none"> School based personnel such as Teachers, Counselors and Grade Managers are largely unaware of reporting hotlines and the role of IA in investigation of complaints of fraud. Per interviews with key external stakeholders, members of the PGCPs community articulated a belief that action will be taken more rapidly by PGCPs leadership if issues are communicated directly to the press than if issues are reported to and dealt with internally by leadership An internal investigation requested by PGCPs leadership into potential grade changes at two schools was conducted by IA during the summer of 2017. The Board was not aware of the investigation or the outcomes. 	<ul style="list-style-type: none"> PGCPs leadership should regularly communicate the hotline information for employees or public stakeholders to report any potential fraud. PGCPs leadership should ensure timely investigation and response into complaints to avoid press involvement with internal complaints. The Board should receive regular briefings into any complaints of fraud impacting student outcomes.

COMPLAINTS AND FOLLOW-UP

The statement of work required A&M to review the complaints and letters received by MSDE, PGCPS board members, and Prince George's County government officials aware of complaints of grade manipulation to alter/increase graduation and promotion rates. In addition, A&M was required to interview any individuals that may provide perspective and information regarding the complaints.

Approach

A&M reviewed all complaints submitted to MSDE, PGCPS employees, and PGCPS board members. In addition, A&M established a confidential hotline and email box to field complaints and comments from individuals. A&M established a log to track complaints, identify commonalities between complaints, and to support follow-up activities as-needed.

Information from these complaints helped to guide the direction of the on-site investigations and helped identify common themes between various sources of complaints related to individual schools and system-wide issues.

Complaint Sources

A&M received and logged complaints from three distinct sources:

1. MSDE - Original complaints made to the MSDE and to the Governor and shared with A&M by MSDE upon the initiation of the project;
2. PGCPS Board Members - Complaints, emails, accuser contact information and other information provided by PGCPS Board Members; and
3. Hotline (Email/Phone) - Complaints submitted directly to A&M through a dedicated PGCPS special review email and phone hotline set up at the outset of the project.

Prioritizing Complaints for Response

A&M prioritized responses to complaints based on relevance and severity. Certain complaints were excluded from the analysis and response for the following reasons:

- K-8 specific complaints which were outside of scope
- Complaints pertaining to issues outside of PGCPS
- Complaints that were not specific to matters related to grading or graduation rate
- Generalized complaints not related to the investigation
- Requests for information on the status of the investigation

Complaints pertaining to policies and processes that could potentially impact the graduation rate, either directly or indirectly, were reviewed carefully, logged, and followed up on. Examples of complaints with potential for indirect impact include:

- Grading procedure changes and interpretation
- Credit recovery programs
- Make-up work
- Excessive absences

Additionally, A&M recorded complaints of instances and threats of retaliation or retribution linked to reporting policy or procedure violations.

Methods of Addressing Complaints

A&M directly addressed complaints that appeared to be relevant to our investigation. A&M reached out by phone, email or in person during school visits (if anonymity could be preserved). All individuals were informed that their anonymity would be protected to avoid potential retribution. Discussions with individuals typically involved two to three A&M employees, with one employee leading the questioning while the others took notes to ensure that key details were captured for later analysis and follow-up.

Findings

As of October 25, 2016, 107 individuals filed complaints that were relevant to the performance audit. Of the 107 individuals filing complaints, 60 individuals contacted A&M directly via the hotline and email address, 34 individuals submitted complaints to the PGCPs Board Members and 13 individuals filed complaints with MSDE. Nearly half of the complaints made related to improper grade changes and graduating ineligible students. A&M was able to contact and follow-up with 84 of the individuals. Information from these complaints helped to guide the on-site school reviews.

The table below outlines the number of individuals submitting complaints, and to whom the complaints were originally submitted.

Individual Role	MSDE Records	Complaints Provided by Board Members	Hotline Email/ Phone	Total
Teacher Complaints	9	11	37	57
Student Complaints	1	0	0	1
Parent Complaints	0	4	6	10
Staff Complaints	0	14	6	20
Other Complaints	3	5	11	19
Total Individuals	13	34	60	107

Table 2: Roles of Individuals Submitting Complaints

Individuals often made multiple complaints, so the total number of complaints is greater than the number of individuals. Below is a breakdown of the complaints by type.

Type of Complaint	Number of Recorded Complaints
Improper Grade Changes	74
Graduating Ineligible Students/Grading Procedure	36
Admin and Faculty Intimidation/Retaliation	29
General Mismanagement	16
Local Credit Recovery/Make-up Work	13
Absence/Truancy related	11
Irrelevant-Request for Information	11
Credit Recovery Programs-District	7
Records Issue	7
Other	18
Total	222

Table 3: Complaints Received by Type

In some instances, individuals provided specific documentation supporting the complaints. These complaints also pertained to schools throughout the PGCPs system. A&M received complaints regarding 20 of the high schools within the district.

Complaint Themes

Throughout the course of complaint review and follow-up, complaints focused on several themes across multiple schools and came from a variety of roles (teachers, parents, staff).

Improper Grade Changes

A&M received 74 total complaints of improper grade changes, which included reports of guidance counselors distributing lists of students requiring interventions, reports of grades being changed without the consent or knowledge of the teacher of a course in question, and reports of the required PS-140 forms not being used appropriately or at all.

Graduating Ineligible Students/Grading Procedure

Many individuals expressed concerns that PGCPs was graduating students who did not truly meet graduation requirements, and may be unprepared for the demands of college or of the real world. Many of these individuals stated that the “good faith effort” element of the grading procedure outlined in AP 5121.3 implemented in 2016 lessened the rigor of work required to pass a class, and others complained that PGCPs was utilizing this and new MPTS programs to push students through to graduation with limited reading, writing, or mathematics skills.

Admin and Faculty Intimidation/Retaliation

Three teachers complained that if they failed too many students, they would be subject to assessments to determine their teaching efficacy. Further complaints were made that certain teachers were reassigned to elective courses if their rates of failure for students were too high in graduation requirement courses.

General Mismanagement

General mismanagement complaints totaled 16 and included a variety of complaints regarding the operations of a school, poor leadership, or mistakes in execution of projects or programs. This category contained some complaints that were ultimately found to be out of scope.

Local Credit Recovery/Make-Up Work

Some complaints held that packets of work would often be requested from teachers to recover students' failing grades at the end of school years. Make-up work was often claimed to be unassociated with lawful student absences, suspension, or make-up work as outlined in PGCPs grading procedure (AP 5121.3.) Some accounts alleged that administrators created and graded make-up work of their own to allow students to pass. Complaints also held that make-up work consisted of photocopied textbook questions and that excessive points were awarded for make-up work when teachers refused to provide additional make-up work or change the student's grade.

Absence/Truancy Related

Many individuals expressed concerns that excessive absences were not impacting student grading or graduation. Many teachers alleged that students were pushed through by administration even if they had missed classes for weeks or months. Absences were said to have no impact on a student's eligibility for retaking tests or retrying assignments, or of participating in credit recovery.

Credit recovery programs-District

Students were complained to be offered credit recovery even when scoring below district specified minimums. Some grade changes due to alternative programs were claimed to be made in excess of grade increase limits spelled out in MPTS regulations. These and other complaints held that credit recovery programs paired with a liberal interpretation of "good faith effort" had lowered the bar for students to be able to pass classes.

Records Issue

Seven complaints referenced a records issue, which could involve direct manipulation, addition to, or destruction of records. If such efforts were carried out they could potentially hamper inquiries into graduation rates at individual schools.

Administrative Burden to Fail a Student

In addition to contributing to complaints in the categories above, teachers at four schools described "soft pressures" from school-level leadership to graduate students in increasing numbers and detailed administrative mechanisms that created a bias toward passing students. Two separate teachers

complained that six pages of justification were required when a student received a failing quarter grade in graduation requirement classes, with no similar process for elective classes.

Three individuals complained that disclaimers were required on every assignment, test, or activity to be exempted from the grading procedures regarding retake. They further complained if a disclaimer was not present, students would have a default option to retry or retake the assignment or test. Individuals also complained a default assumption that students would pass unless teachers notified counselors within tight timeframes.

Irrelevant-Request for Information

11 individuals made comments that were considered requests for information about the audits or updates. This also included at least one journalist that tested to see if the email was functional. These comments were all found to be out of scope.

PGCPS POLICIES AND PROCEDURES REVIEW

Introduction

SOW Task 3.2.1.6 requires A&M to evaluate the protocols, authorities, and practices for certifying students for graduation. A&M has conducted a thorough review of the key policies and procedures related to the attendance, grading, promotion, and graduation procedures, which impact graduation certification. This included a review of legal, regulatory, and procedural requirements, an assessment of the clarity of individual policies and procedures, and an assessment of PGCPS adherence to established requirements. A&M's policy and procedures review serves several key purposes:

1. Establish a baseline of the requirements PGCPS personnel must adhere to, informing investigative activities, and allow A&M personnel to identify potential wrong-doing;
2. Assess PGCPS's current structure of administrative policies and procedures, and evaluate the ability of existing procedures to prevent grade-fixing and graduation rate manipulation;
3. Identify areas for improvement in PGCPS policies and procedures to reduce the risk of grade-fixing and graduation rate manipulation; and
4. Assess PGCPS's implementation of procedures to identify gaps in awareness and adherence, and recommend opportunities to improve communication, controls, and reporting to mitigate any identified risks.

Approach

In accordance with the SOW task, A&M conducted a review of the relevant laws, regulations, policies and procedures which govern PGCPS's attendance, grading, promotion, and graduation certification:

- **State Code:** Section 7 of Education Article, Code of Maryland outlines requirements for the State Board of Education and Local Education Agencies (LEAs), including provisions related to attendance, curriculum, grading, and graduation which have potential impacts on graduation reporting by PGCPS.

- **State Regulations:** Maryland State Law empowers MSDE to establish policies for LEAs through the Code of Maryland Regulations (COMAR). COMAR establishes the practical rules which LEAs are required to follow to maintain compliance with legislation. COMAR adds to the legislative requirements placed on LEAs.
- **PGCPS Policies and Procedures:** To understand the policies and procedures which impact graduation rates within PGCPS, A&M identified each set of requirements which had the potential to impact graduation rates directly or indirectly. After developing an understanding of the four-year adjusted cohort calculation, A&M conducted a focused review of policies and procedures which impact the number of students graduating, or the total number of students considered to be within the cohort. This review included policies and procedures related to Attendance, Grading, Grade Changes, MPTS, Promotion, Certification for Graduation, and Records Access and Controls.

Pertinent legislation, regulations, administrative procedures, and policies are included in Appendix B: Policies and Procedures.

Findings and Observations

The following section outlines key observations and recommendations from A&M’s review of Attendance, Grading, Grade Changes, MPTS, Promotion, Certification for Graduation, and Records Access and Controls.

Attendance

Pursuant to COMAR 13A.08.01.05, PGCPS has established minimum attendance requirements and penalties for not meeting these attendance requirements. AP 5121.3 states that excessive lawful absences without completion of make-up work and excessive unlawful absences will result in a failing grade, and that failing grades due to unlawful absence cannot be corrected based on make-up work.

Area	Observations	Recommendations
Overall Policies and Procedures	<ul style="list-style-type: none"> • AP 5121.3 stipulates that more than five unlawful absences per semester or 10 per full year course will result in the assignment of an E for the course, and requires communication of remediation options to parents. The procedure does not define the impact of failing to communicate remediation options. • The PGCPS grading procedure lacks specificity on the grade to be entered for a student who has an excessive number of lawful absences without make-up work or an excessive number of unlawful 	<ul style="list-style-type: none"> • Update procedure to more-clearly define the grading impacts of excessive unlawful absences in situations where schools have not adequately communicated to parents. • Clarify procedures related to make-up work from lawful absences, require approved exceptions to make-up work to be documented and kept in cumulative folders. • Clarify that a student with unlawful absences (with an ‘E’ grade) earns a 0 or 50 for the course, quarter, or day.

	<p>absences. If the execution of this procedure in the classroom results in an “E” grade between 50 and 59, the student could be considered eligible for QLM work for credit recovery</p>	
<p>Communications and Training</p>	<ul style="list-style-type: none"> Attendance policies and procedures are communicated to students, parents, and the community in Section 5: Student Attendance of the PGCPs Rights and Responsibilities Handbook. This includes defining lawful absences, unlawful absences, and truancy, as well as outlining consequences of unlawful absences and frequent absences. 	<ul style="list-style-type: none"> No recommendations at this time.
<p>Systems / Technology</p>	<ul style="list-style-type: none"> Attendance and Grading Modules are not linked together in SchoolMAX limiting PGCPs ability to monitor grades and grading adjustments for students with excessive unlawful absences. 	<ul style="list-style-type: none"> Configure SchoolMAX to support monitoring and enforcement of excessive absence procedures for grading, or utilizing another automated tool to identify students who have excessive absences, and calculate appropriate grading adjustments in accordance with PGCPs procedures.
<p>Monitoring and Accountability</p>	<ul style="list-style-type: none"> The rewritten version of AP 5113 effective July 1, 2016, which supersedes the July 1, 2007 procedures, reduced accountability measures for student attendance. The following requirements are no longer required under the updated AP 5113: <ul style="list-style-type: none"> Teachers must maintain daily attendance logs for each class. Parents or guardians must notify the school when their 	<ul style="list-style-type: none"> Strengthen attendance tracking procedures to increase the documentation and communication of absences.

	<p>child is absent. School personnel must contact the parent or guardian immediately if the school has not received notification.</p> <ul style="list-style-type: none"> ○ Pupil personnel workers are required to report each month the names of students who have been truant the previous month. ○ Information technology department is required to create an online interactive attendance report, updated daily. 	
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Grading

Grading procedures as interpreted and applied on an individual school level are important to examining graduation rates. Differing interpretation and application of procedures can impact graduation rates.

Area	Observations	Recommendations
Overall Policies and Procedures	<ul style="list-style-type: none"> ● PGCPs’s grading element specifying that a 50% be assigned for any “good faith effort” does not define a “good faith effort” clearly outside of completing half of a given assignment, and does not specify how this element interacts with attendance procedures outlined above. When combining this procedure with the QLM program, there is potential that students could pass with minimal effort. ● In SY15-16 and SY16-17, QLM rules outlined in the MPTS handbook contradicted grading procedures, serving as make-up work often long after the quarter ended. 	<ul style="list-style-type: none"> ● Update the PGCPs grading administrative procedures with more specifics related to make-up work and further specification as to what constitutes a “good faith effort.” ● If the QLM program continues in SY17-18, MPTS requirements should be reconciled with the make-up work requirements of PGCPs grading procedures.

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<p>Communications and Training</p>	<ul style="list-style-type: none"> • When PGCPs changed its grading procedure in 2016 to assign scores of 50% for a “good faith effort,” district leadership sent an email detailing the changes to guidance counselors and principals. The email, dated August 10, 2016, required principals to share this information with teachers when they returned to school the week of August 15, 2016. • Communication of administrative procedures to teachers usually takes place in the form of complete administrative procedures or through inclusion in school-specific staff and faculty handbooks, which provides potential for shift in meaning. For example, the Suitland High School 2017-2018 staff handbook omits a key line regarding the “good faith effort” guideline: “If a student does no work on an assignment or assessment, the teacher shall assign a grade of zero.” 	<ul style="list-style-type: none"> • Support system-wide procedure changes with all-staff communications, trainings, and job aids to reduce risk of misinterpretations. • Create a standard PGCPs Staff and Faculty Handbook to ensure proper understanding and uniform application of procedures across schools.
<p>Monitoring and Accountability</p>	<ul style="list-style-type: none"> • According to AP 5121.3, grading monitoring and accountability is the responsibility of the principal. 	<ul style="list-style-type: none"> • Develop more-detailed guidelines on what and how principals should monitor to ensure adherence to the grading procedures within their school. • Include grading integrity requirements for all teachers, counselors, administrators, and staff in the grading procedure which specify prohibited actions related to unsupported grade changes and

		align procedure violations with repercussions.
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Grade Changes

Adherence to appropriate grade change procedures can greatly reduce the risk of grade entry error or manipulation. Misunderstanding, misapplication, and non-compliance with grade change procedures can increase the risk of inappropriate grade changes impacting graduation rates.

Area	Observations	Recommendations
Overall Policies and Procedures	<ul style="list-style-type: none"> The PS-140 form and the associated grade change process creates a system of control which has the potential to be very effective in reducing risk of error or manipulation. Grade change process relies on school-level adherence to procedures with no district-level accountability measures. The grade change process does not appropriately account for administrator or MPTS driven grade changes. A&M found two versions of the PS-140 form during site visits. The older version (pre-2010) did not require teacher signature and did not clearly require the attachment of make-up work. The current version of the form indicates that the teacher line should include a signature and date and clearly requires make-up work be attached to support grade changes 	<ul style="list-style-type: none"> Establish and communicate the grade change process for MPTS-related grade changes to also use the PS-140 form for any grade changes. Require all schools to use the current version of the PS-140 form. Clearly articulate make-up work requirements for grade changes both in Administrative Procedure and on the PS-140 form.
Communications and Training	<ul style="list-style-type: none"> The grade change procedure is present in PGCPs procedures; 	<ul style="list-style-type: none"> Create consistent messaging and training around grading procedures

	<p>however, A&M has not been able to identify further materials from PGCPs on communication or training related to grade changes within schools.</p>	<p>to reduce the risk of error and manipulation, and encourage consistency in policy and procedure adherence across PGCPs high schools.</p>
Systems / Technology	<ul style="list-style-type: none"> • A designated data entry person is required to input the grade change information into SchoolMAX. 	<ul style="list-style-type: none"> • Emphasize the role of Grade Manager as independent from counselor, transcript manager, MPTS coordinator, and administrator responsible for verifying all documentation requirements before affecting grade changes.
Monitoring and Accountability	<ul style="list-style-type: none"> • PGCPs procedures do not appear to require or encourage any independent monitoring function for grade changes or for cataloging the use of PS-140 forms. This process is controlled at the School level, giving administrators limited visibility and limited tools to hold schools accountable. 	<ul style="list-style-type: none"> • Implement an independent review function for grade changes at the school-level. • Perform representative random sampling of grade changes to evaluate adherence to policies, procedures, and timelines, as well as appropriate inclusion of documentation requirements. • Report results to PGCPs administration, internal auditor, and school board

Multiple Pathways to Success (MPTS)

The MPTS program is used by high schools within PGCPs and has helped many students meet the course requirements for graduation. MPTS programs are associated with many grade changes impacting graduation rates at PGCPs. A&M has reviewed the MPTS handbook to assess their potential impact on grading, promotion, and graduation. This assessment is not intended to evaluate the academic rigor of these programs, only to inform this investigation and assess vulnerabilities for grade and graduation rate manipulation which MPTS may present.

PGCPs’s MPTS program enrollment represents a relatively large student population across nearly all high schools. Preliminary analysis of data provided by PGCPs administrators indicates that thousands of students participate in these programs each year, with the largest number of unique students (2,322) participating in Quarterly Learning Modules in SY16-17.

Credit Recovery	Original Credit	Quarter Online (QOL)	Quarter Learning Modules (QLM)	Summer Credit Recovery
1,617	108	426	2,322	1,179

Table 4: Total Students Participating in MPTS Programs in SY16-17

Policies and Procedures

The MPTS program includes various options for students to take courses outside of the traditional classroom setting, often providing a second chance to students who have failed a course in a traditional setting.

MPTS Background

APEX Learning: This online platform is specifically intended to assist students with taking courses that are original credits to accelerate the schedules of students or offer flexibility for students to take advanced courses that they have not taken before.

Maryland Virtual Learning Online: MVLO gives students another option to take advanced courses or other courses that are not offered within the PGCPs system.

MPTS Blended Learning Online/MPTS Quarter Learning Online: These modules are intended to replace an existing course that the student failed and are blended learning modules consisting of both online work and in-class time. In SY16-17, the online modules were provided by Compass Learning, but this contract was cancelled between school years and the new provider has yet to be identified.

APEX, MVLO, and MPTS online options share several common procedures regarding absence and student progress. Absence procedures include documentation of absences and parent notification. Parents are notified on each of the first two documented absences, and upon the third absence the student is to be removed from the course. Also documented is a student progress requirement which requires a student to submit assignments. If the student does not submit the expected number of assignments, parent conferences occur and ultimately the student is dropped from the course if he/she does not log in and complete work for any ten consecutive days.

Quarter Learning Modules: Quarter Learning Modules offer students the opportunity to recover a failing grade from a given quarter. QLMs differ from other programs in several key ways. There is no apparent online component and the handbook does not specify a requirement for in-class time. Handouts are distributed at schools and graded centrally at the Area III Office. Additional points are applied by schools for passing students based on results shared through a Google spreadsheet.

- The MPTS handbook does not specify whether students receive assistance from teachers, how long they have to complete the work, or how students receive feedback on failed QLMs.
- No specified attendance or any student progress monitoring procedures

Rules associated with QLMs are not as stringent or well-defined as those that apply to other MPTS programs. The handbook only specifies a few rules that must be followed in the administration and scoring of the Quarter Learning Modules. These rules include:

- Only students scoring between 50 and 59 in their original courses can take QLMs.
- QLMs are scored on a “pass-no pass” basis and are worth 10 points.
- Under no circumstance will a QLM be allowed to increase a grade beyond a 65%.

Findings and Observations

Area	Observations	Recommendations
Overall Policies and Procedures	<ul style="list-style-type: none"> • MPTS requirements are not outlined through formal board policy or administrative procedures • MPTS programs, except for QLMs, are well-documented, and have robust accountability for standardized grading and attendance requirements which align with PGCPs and MSDE requirements. QLM requirements, however, lack this level of detail and do not clearly integrate with PGCPs and MSDE policies and procedures. • The MPTS handbook includes no stated requirement for student attendance during the failed quarter to qualify for QLMs. 	<ul style="list-style-type: none"> • Develop stronger procedures and controls to govern QLMs, and prevent the misuse of the program. • Require graded make-up packets be returned to the school as evidence of completion of make-up work, and included in cumulative folders to support audit and review.
Communications and Training	<ul style="list-style-type: none"> • Substantial training documentation for Credit Recovery, Quarterly Recovery, APEX and Compass online learning exists. • PGCPs has not provided A&M any formal documentation of Board Policies and Procedures or Administrative Procedures related to MPTS, providing only annual handbooks. 	<ul style="list-style-type: none"> • See above.
Systems / Technology	<ul style="list-style-type: none"> • Various online learning platforms are used for the Credit Recovery blended learning models as well as for MVLO and APEX Learning. Google Docs is used for keeping attendance for numerous 	<ul style="list-style-type: none"> • No recommendation at this time.

	platforms, and has served as the central repository for grading for QLMs.	
Monitoring and Accountability	<ul style="list-style-type: none"> Web-based programs appear well-monitored through third-party providers. QLM packets are directed to be graded and distributed by the Area III Office, but due to the lack of centralized accountability measures associated with grade changes, there is no control to ensure that QLM grade changes are input at the school level in accordance with the MPTS handbook. 	<ul style="list-style-type: none"> The Area III office (responsible for MPTS) should consider implementing reporting requirements to ensure that grades from recovery programs are input in accordance with the MPTS handbook.

Promotion and Graduation

In the State of Maryland, as students near the end of their academic careers within public schools, the LEA is responsible for certifying each student for graduation. MSDE relies on reporting of student movements from grade-to-grade, in and out of the LEAs, and from 12th grade to graduation as reported by LEAs through SchoolMAX. Due to the four-year adjusted cohort calculation applied by the State of Maryland, timely promotion to grades 10-12 is just as important for graduation rates as graduating from 12th grade. Properly applying district standards for promotion and graduation is key to accuracy and integrity of graduation reporting.

Area	Observations	Recommendations
Overall Policies and Procedures	<ul style="list-style-type: none"> PGCPS promotion and graduation requirements are outlined very clearly within administrative procedures, however, PGCPS was unable to provide a policy or procedure that explained how graduation certification should be performed. The lack of a policy or procedure related to certification for graduation makes oversight of this process challenging. With no formal, district-wide deadlines, requirements, roles and responsibilities, or process for quality control, Schools are at 	<ul style="list-style-type: none"> Require all schools to utilize the PDS Tally Card. Develop and implement an administrative procedure which specifies the appropriate tools and processes required to place students on the graduation list and issue a diploma. Reiterate the importance of completing the PDS Tally Card, and signing each form to certify graduation before issuing a diploma. Summer graduate forms can be completed when they have met graduation requirements, and

	higher risk of error or manipulation.	should not be a reason not to complete forms for those graduating on-time.
Communications and Training	<ul style="list-style-type: none"> PGCPS has shared no formal communications or training documentation related to graduation certification processes. 	<ul style="list-style-type: none"> Develop appropriate communications and training for professional school counselors and administrators involved in the process.
Systems / Technology	<ul style="list-style-type: none"> SchoolMAX enables efficient and consistent processing of graduation certification, however, PGCPS does not currently use the automated process, opting to have individual school counselors complete this process manually. 	<ul style="list-style-type: none"> Consider utilizing SchoolMAX's automated capabilities to support graduation certification. Utilizing automated tools to increase consistency and accuracy, and decrease administrative burden associated with graduation certification.
Monitoring and Accountability	<ul style="list-style-type: none"> PGCPS administrative procedures do not require immediate review of records included for graduation requirements. Procedures leave methods for implementation and accountability to the principal's discretion. PGCPS's central records office performs a limited number of cumulative folder audits annually, and does not receive files of graduating students from schools for several years after graduation. 	<ul style="list-style-type: none"> Develop standardized accountability practices that would detect students being improperly certified for graduation.

Records Access and Controls

Policies and procedures related to attendance, grading, promotion, and graduation rely on appropriate controls over the storage, security, and access to records. Electronic records of grades and graduation are kept primarily in SchoolMAX. Appropriate processes and controls associated with SchoolMAX can reduce the risk of error or manipulation. Documentation supporting grades and graduation requirements, including transcripts, test scores, and make-up work completed for grade changes are required to be kept in cumulative folder.

Policies and Procedures

User access roles defined within SchoolMAX are associated with varying levels of access and control. Roles used by PGCPs include Teacher, Grade Manager, Transcript Manager, as well as a read-only role.

The current procedure for requesting access to roles in SchoolMAX is decentralized: school users complete an access request form, which is often approved by school-level administrative staff. Once this form is completed, the request is forwarded to the system administrator, who assigns the user requested roles within the SchoolMAX system. Based on permissions, users are then able to view, write, and edit across the two modules. User roles are designed to segregate duties and enhance accountability. SchoolMAX logs all user activity and keeps an audit trail of individual grade changes and other actions. Grade changes made after initial teacher grade submission in the grading module can be made by individuals who have been assigned the "Grade Manager" role, while changes to the permanent transcript can only be made by individuals who have been assigned the "Transcript Manager" role.

SchoolMAX as a system includes powerful tools for accountability, but these need to be supported with policies, procedures, and communication to be effective in managing accuracy and integrity of grading. Access request forms do not appear to be readily available for review or audit, which means that the justification for each user's access may be unclear to administrators or auditors. The lack of a centralized approval process district-wide means administrators have limited visibility to abnormal behaviors and are unable to monitor trends in requests district-wide.

Findings and Observations

Area	Observations	Recommendations
Overall Policies and Procedures	<ul style="list-style-type: none">PGCPs has taken steps to improve control over access and modification rights within SchoolMAX in recent months. However, review of user access and modification logs suggest that in previous years, user controls have been distributed more widely than required.	<ul style="list-style-type: none">Improve controls over user roles and access in SchoolMAX and take steps to enhance accountability in the process of granting user access.Perform a complete audit of user access to ensure that each user has a demonstrated need for their user role access which is in line with PGCPs grading policies.

	<ul style="list-style-type: none"> Principals can submit user access requests for anyone in their school to have access and user access requests are approved by IT. User access forms are not maintained in an accessible central location. Some of the risk associated with limited controls over user access is managed through SchoolMAX audit records. 	<ul style="list-style-type: none"> Require user access requests to be approved by a central office administrator who is familiar with the grading procedure and SchoolMAX roles.
Communications and Training	<ul style="list-style-type: none"> Training on SchoolMAX and its use is developed and distributed by the Technology training team. The training focuses on technical guidance on how to use the system. 	<ul style="list-style-type: none"> Develop communications and training related to timelines for grading, requirements for grade changes, user roles and permissions, and other controls over error and fraud.
Systems / Technology	<ul style="list-style-type: none"> User roles are well-defined within SchoolMAX. In recent months, PGCPs has reset user roles and improved control over access 	<ul style="list-style-type: none"> Assess user role alignment with responsibilities and accountability requirements
Monitoring and Accountability	<ul style="list-style-type: none"> Accountability for actions taken in SchoolMAX is handled at the school level unless circumstances necessitate District involvement. There is no clear system of controls over grade and transcript changes. PGCPs does not formally require individual high schools to report on trends or anomalies in SchoolMAX data, nor does the district require establishment of any process for quality assurance over grading and/or grade changes using the system. 	<ul style="list-style-type: none"> Establish a program of monitoring, reporting, and following up on excessive grade changes, or grade changes which are clearly outside of compliance with procedures.

INVESTIGATIONS

Data Collection and Population Analysis

Approach

To develop an understanding of the potential scope and impact of grade changes and graduation rate eligibility, A&M gained an understanding of PGCPs's student data. The approach included: 1) developing an understanding of SchoolMAX, PGCPs's student information system; 2) collecting student data (attendance, grades, transcripts and graduation information) from SchoolMAX; 3) analyzing student data to understand the extent of grade changes; and 4) selecting a sample for on-site investigation. Given the short timeline for the entire investigation, A&M provided summary trends in student data only and has focused on on-site investigations and evaluation of the validity of complaints of grade manipulations to alter or increase graduation rates.

Develop Understanding of Data Systems

Key Interviews

A&M conducted several in-person interviews with key PGCPs technology personnel in order to develop an understanding of PGCPs's data sources, applications, system controls and the tools and processes. A&M conducted a group interview with PGCPs's Chief Information Officer, Student Application Technology Officer, Student Information Systems Technical Lead and Executive Director for Instructional Technology and Support. The initial session focused on developing an understanding of SchoolMAX's modules, their use, and the reporting and audit trail capabilities of the system.

Following this initial conversation, A&M maintained constant contact with the PGCPs Student Applications team, reaching out two to three times a week.

A&M also met with the PGCPs Testing, Research, and Evaluation office regarding assessment scores and alternative graduation validation programs, requesting and collecting Maryland High School Assessment, Alternative Validation Program, SAT, ACT, and PARCC files. This data was used to validate HSA and AVP results and for sampling for the on-site investigation.

Review of SchoolMAX Training Materials

A&M reviewed the SchoolMAX Enterprise Configuration Guide and training documentation provided by PGCPs personnel.

- SchoolMAX Enterprise Configuration Guide – This configuration guide and data dictionary helped A&M develop an understanding of key data elements within the student information system.
- PGCPs internal training guides - The internal guides included screenshots which helped A&M understand the user interface and features that PGCPs teachers, grade managers, and transcript managers used. The guides included information on the following topics relevant to the investigation:
 - Publishing Grades
 - SchoolMAX/GradeMAX Tutorial

- Publishing Grades after Previously Publishing Grades
- SchoolMAX Service Hour Manual

Data Collection

SchoolMAX, PGCPs's student information system, is the primary electronic data source for this investigation. PGCPs uses the third-party software to record attendance, grades, assignments, report cards, discipline incidents and other information about students. Teachers and school personnel input student information into the system and parents can view information in real time.

SchoolMAX has three key modules which support the daily, quarterly, and yearly grade keeping by PGCPs. The following three modules were relevant to the investigation:

1. GradeBook Module (Daily input) - The Gradebook is the lowest level in SchoolMAX that teachers have access to every day. Here they enter grades for assignments, participation, classwork, and tests.
2. Grade Module (Quarterly input) - The Grades Module publishes quarter and progress grades. The final grade is calculated by these grades.
3. Transcript Module (Annual input) - The Transcript Module is mostly used at the end of the year. Final transcripts are sent to parents from here. **This module contains the official student grades and credit completion.**

The focus of this investigation was on the quarterly and final grades in the Grades Module and the final grades presented within the Transcript Module. The data within the Grades Module automatically flows through to the Transcript Module at year-end. However, after year-end, individuals with transcript manager rights have the ability make manual entries to the Transcript module.

A&M collected the following data elements from PGCPs's SchoolMAX system to inform the analysis presented within this report.¹

- Initial Data Table Request (Received September 10, 2017)
 - Grades / Courses
 - Enrollment
 - Transcripts
 - Students
 - Users (Faculty and staff associated with courses, User names and details associated with SchoolMAX entries)
 - Attendance records
- Subsequent Data Requests
 - Transcript changes (from 9/10 – 9/24)
 - Summer School Data
 - Grades
 - Transcripts
 - Enrollment

¹ Unless otherwise noted, A&M's data request was for students from the graduating classes of 2016 and 2017

Data Analysis

A&M performed data analysis to support the on-site investigation and provide insight into the degree to which grade changes in SchoolMAX may have influenced graduation rates. The results of A&M's data analysis findings are presented below.

Students Included in Investigation

A&M identified students who graduated in 2016 and 2017 according to the enrollment table exit codes 60 - Completed requirements for a Maryland High School Diploma, or Exit Code 70 – Early College Admissions Program. Based on this analysis, the population for A&M's investigation is 15,215 graduates and is presented by graduating year in the table below:

Graduating Class	Students
2016	7,568
2017	7,647
Total	15,215

Table 5: Population for Investigation²

Grade Change Analysis

For each graduating class, A&M reviewed SchoolMAX's grade change audit trail to identify: 1) when quarterly grade changes occurred after the grade entry cutoff date for teachers and 2) where manual updates were made directly to final grades and transcripts after system-wide calculation of final grades.

² A&M's analyses presented in this section focus on identifying the unique number of students potentially impacted by grade changes, as such, the total number of students in each table will not tie out to the total number of students in the graduating class. Similarly, where school-by-school analyses are presented, transfer students between schools may contribute to overlap across schools.

Grade Period	Grade Type	Graduating Class	
		2016	2017
1	Quarter	11/2/2015	10/31/2016
2	Quarter	2/3/2016	1/19/2017
3	Quarter	3/25/2016	3/26/2017
3	Quarter ¹	4/5/2016	N/A
4	Quarter ²	5/13/2016	5/12/2017
4	Quarter	6/20/2016	6/12/2017
N/A	Final Grade ³	5/23/2016	5/23/2017
N/A	Final Grade	6/27/2016	6/15/2017

(1) Revised 4th Quarter cutoff date for Central HS

(2) 4th quarter cutoff date for Seniors

(3) Final grade processing for Seniors

Table 6: Grade Entry Cutoff Dates

A&M analyzed the number of unique students with grade entries or changes which occurred after quarterly grade cutoff dates. A&M further refined the analysis to focus on quarterly grade changes where late quarterly grade increased the student's quarterly grade from below 60 points to greater than or equal to 60 points ("fail-to-pass" changes). The table below identifies the number of unique students with grade changes that moved a student's quarterly grade from fail-to-pass. In addition, the table shows the distribution of those grade changes by the number of points added.

Point Change Range	Graduating Class	
	2016	2017
<= 10 Points	273	372
> 10 and <= 20 Points	201	298
> 20 and <= 30 Points	185	222
> 30 Points	516	424
No Grade Entry Before Cutoff Date	4,202	7,541
Total Unique Students	4,587	7,556

Table 7: Distribution of Late Grade Changes (Fail-to-Pass)

A total of 4,587 graduates in 2016 and 7,556 graduates in 2017 experienced at least one quarterly fail-to-pass grade change to at least one class during their senior year. Most students with fail-to-pass grade changes had grade changes which reflect the first entry for the quarter – meaning teachers did not enter grades for these students until after the quarterly grade deadline despite PGCPs Administrative Procedure requiring grades to be entered regularly throughout the quarter. These students are reflected in the above table as “No Grade Entry Before Cutoff Date.”

Of the quarterly grade changes with a previously entered grade, the largest number of students moving from fail-to-pass experienced grade changes in excess of 30 points. The analysis indicates:

- PGCPs staff are not adhering to grade entry deadlines and
- Where quarterly grade changes are made after the cutoff dates, the potential impact of the changes is high.

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

Range	Graduating Class	
	2016	2017
<= 7 Days	190	508
> 7 and <= 30 Days	137	119
> 30 Days	758	596
Total	1,085	1,223

Table 8: Grade Change Dates Relative to Deadlines - Fail-to-Pass

The analysis presented in the above tables demonstrates that many PGCPs students benefit from quarterly grade changes which occurred much later than required by procedures.

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

Final Grade	Graduating Class	
	2016	2017
Grades = 60	251	304
Grade > 60 and <= 65	438	763
Grade > 65 and <= 70	197	361
Grade > 70	423	943
Total	1,086	1,984

Table 9: Grade Changes Final Grade – Fail-to-Pass

The information derived from these analyses demonstrates the degree to which PGCPs staff complied with established grading procedure timelines and was used by A&M to identify grade changes requiring documentation.

Attendance

Based on complaints received and conversations with PGCPs staff, A&M reviewed daily attendance against PGCPs and MSDE requirements. MSDE categorizes 10 or more unlawful absences in a year as truancy. According to PGCPs’s administrative procedures on grading “In secondary schools, five (5) days of unlawful absence per semester course or ten (10) days of unlawful absence per full year course will result in the assignment of an “E” for the course.”³ Administrative procedures also specify that, “A final grade of “E” should be given to a student with excessive unlawful absences who otherwise would have received a passing grade.

The table below summarizes the distribution of student absences for each year’s graduates.

Unlawful Absences	Graduating Class of 2016		Graduating Class of 2017	
	Students	% of Total	Students	% of Total
0 - 10 Days	4,693	62%	4,299	56%
> 10 and <= 20 Days	1,807	24%	1,879	25%
> 20 and <= 50 Days	985	13%	1,311	17%
> 50 Days	83	1%	159	2%
Total	7,568		7,648	

Table 10: Student Absence Distribution

In SY15-16, 37.6% of graduates had unlawful absences in excess of 10 days. In SY16-17, 43.8% of graduates had unlawful absences greater than 10 days. In 2017, 159 students graduated despite incurring more than 50 unlawful absences in SY16-17. This analysis demonstrates the potential risk that a high number of students graduated despite the procedural requirement that students with excessive absences receive an E.

Service Learning

To assess the degree to which PGCPs graduates met the MSDE requirements for Service Learning, A&M analyzed the service learning table in SchoolMAX for all 2016 and 2017 graduates. The review indicated

³ Administrative Procedure 5121.3 – High School – August 2016. AP 5123 also specifies that “the school must document that on at least one occasion in the course of the accrued absences, the school notified the student and the parents/guardians of the following:

- a. Absences have been noted and recorded.
- b. The student stands in the peril of receiving an “E” for the course.
- c. An offer is made to explore and remediate the causes of unlawful absences.

that 19 students did not meet the service learning requirement. Table 11 below identifies the number of graduates by school year based on the review of SchoolMAX data:

Graduating Class		
2016	2017	Total
6	13	19

Table 11: Graduates without Required Service Learning Hours

According to the results of this analysis, 19 students who graduated in 2016 and 2017 did not meet requirements for service learning hours, and should have been ineligible to graduate.

Graduation Cohort Management

Administrators stated that PGCPs has improved cohort tracking management to be in accordance with State law. Prior to 2013, PGCPs did not actively monitor MSDE reporting of the adjusted cohort. PGCPs did not validate if students included in the MSDE report were appropriately coded as withdrawals or transfers. In 2013, PGCPs appointed a Data Management and Strategy Analyst to monitor cohorts and institute processes to track and appropriately document withdrawals and students that transfer to private schools, out of state, and out of country. PGCPs has formed “Student Withdrawal Action Teams” (SWAT) to follow up on reported withdrawals to appropriately document transfers and clean up data before enrollment is certified and submitted to MSDE.

Administrators have indicated that active cohort management has helped increase PGCPs’s graduation rates because more students are now appropriately tracked and documented as transfers rather than withdrawals. Students identified as withdrawals are included in the graduating cohort, however, transfers are excluded from the cohort, helping to increase the graduation rate.

Other Supporting Analysis

A&M intended to evaluate the distribution of privileges across schools and user roles, however, a recent reset in SchoolMAX user roles (July 2017) prevented A&M from performing historical analysis.

On-Site Investigations

Approach

The SOW requires on-site school investigations and the purpose is two-fold: 1) to understand how each school is implementing the policies and procedures related to grading and recordkeeping that are outlined in PGCPs policies and procedures and State of Maryland laws and regulations and 2) to review student records for a sample of 2016 and 2017 graduates so that specific attributes could be tested.

Prior to commencing the on-site investigations, A&M first met with the PGCPs Records Supervisor to obtain an understanding of where the records that were required to test certain attributes were maintained. Based on that interview, A&M confirmed that the archival process for the records of the 2016 and 2017 graduates had not yet commenced for any of the schools so, in all instances, the student cumulative folders would still be in the custody of the individual high schools. Further, all records that A&M was interested in reviewing - grade change forms, service learning verification forms, Annual Secondary School Performance Data Summary Cards (PDS Tally Cards)⁴ and final transcripts - should be located in the students' cumulative folders.

Given that the MPTS quarterly credit recovery programs also gave rise to a number of student grade changes⁵, A&M also spoke with the PGCPs Area III personnel that managed the County's MPTS programs to understand the type of support that A&M should expect to see at the schools to support the grade changes made that impact students who participated in these programs. Based on those interviews, A&M understood that the standard grade change forms are required to be completed to support changes made as a result of MPTS quarterly credit recovery programs.

With the understanding developed through the interviews, A&M scheduled site visits for 28 PGCPs high schools.⁶

⁴ According to the Maryland Student Records System Manual, "The Student Record (SR) Cards...comprise a system for keeping written student records. All of the data elements contained on the cards are required, but the actual formatted cards are not mandatory, except for SR 7." The PDS Card is listed here as SR Card 3, Annual Secondary School Performance – Grades 9-12. Student Record Cards (SR Cards) are defined as "The record system prescribed by the state to assure that accurate and comparable data are maintained for each student prekindergarten to grade 12 in Maryland."

⁵ Quarterly credit recovery results in changes to students' quarterly grades. Full credit recovery does not get updated to the SchoolMAX Grading Module but is entered directly onto the student transcript, therefore, no grade changes would result from this credit recovery option.

⁶ On-site visits were performed at schools with 12th grade classes as these are the schools for which Maryland calculates graduation rates. Forestville High School closed at the end of SY 15-16. The 2016 graduate records are currently in the custody of Suitland High School and were therefore reviewed at Suitland HS.

Sampling Methodology

Sample Selection

A&M relied on complaints made prior to the commencement of the investigation to inform the process used to identify the sample population of students to be reviewed. Many of the complaints focused on grade changes being made without the knowledge of teachers, to fraudulently boost the high school graduation rates. Through data analysis, it was evident that the volume of grade changes for 2016 and 2017 graduates significantly increased at the end of the senior year. Year-end changes impacted grades in Quarters 1, 2, 3 and 4. Data analysis also uncovered a significant number of grade changes occurring after the final date for the submission of final senior grades (i.e. 5/12/2016 for 2016 graduates and 5/13/2017 for 2017 graduates). Many of these changes significantly increased student grades.

To select the sample of students to be tested at each school, A&M started with the population of 2016 and 2017 graduates described in "Table 5: Population for Investigation" of this report. Based on the allegations of misuse of the grade change process to enhance graduation rates, A&M focused on graduates with grade changes made after final grade cutoff for seniors - The final grade cutoff dates for seniors were 5/13/2016 and 5/12/2017 in 2016 and 2017, respectively. After that date, teachers no longer had access in SchoolMAX to modify senior grades. Between final grade cutoff and the date that the PGCPs Applications team runs the script to calculate final grades (5/23 in both 2016 and 2017), only school personnel with grade manager level access are able to make grade changes in SchoolMAX. The grade changes were then stratified into two groups: grade changes between 5/14 and 5/23 and post-5/23 grade changes. Of this population, A&M noted that a total of 5,496 graduates (i.e. 36% of total 2016 and 2017 high school graduates) was impacted by at least one of these late grade changes which increased grades⁷.

Once the sampling population described above was identified, A&M then selected a random sample of students from each high school among the 5,496 graduates with late grade change increases. The sample consisted of 20 percent of the students in the sampling population for each school with a minimum of 30 students selected for each school. In schools where the sample population was less than 30 students, the entire population was included in the sample. There were 1,212 students included in the sample.

Attribute Testing

A&M's goal in testing the sample of students at each high school was to obtain and review support for all grade changes in the sample to understand the nature of those changes. It was also to assess the school's compliance with PGCPs administrative procedures around grade changes and recordkeeping. The attributes of the sample that were tested for compliance include the following:

- Grade Change Forms
 - Were grade change forms fully completed for all grade changes with appropriated sign off? Was supporting documentation attached?
- PDS Tally Cards completed

⁷ These 5,496 students, and the 1,212 in the sample, were affected by late grade changes which were not first grade entries.

- Were PDS Tally Cards completed and signed off prior to graduation?
- Does the PDS Tally Card reflect that the student was eligible for graduation?
- Final transcript
 - Is there a final transcript printed prior to graduation?
 - Does the final transcript appear to be consistent with the PDS Tally Card?
 - Based on transcript, was student eligible to graduate?⁸
- Service Learning Verification Forms
 - Were forms located in student cumulative folders?
 - Did forms reflect the minimum of 24 required hours for graduation certification?

Once the above information was obtained from the school site-visits, A&M performed a detailed review of the documentation obtained.

School Visits

Interviews

During school site visits, A&M also interviewed various personnel involved with grade entry and graduation certification. Individuals interviewed consisted of grade managers, registrars, MPTS Coordinators, guidance counselors and principals among others.

Interviews focused on understanding the processes around grade changes and recordkeeping, the process to certify students for graduation and the timing around it, the culture within the school and PGCPs, the interviewees' observations on the complaints, and the school's understanding of and adherence to PGCPs grading procedures.

Tip Log Follow-Up

A&M also used the complaints received through the tip line and email to inform the interview questions asked at the schools. In instances where there were complaints specifically made against the school, the questioning was focused on those complaints in a manner that would allow A&M to maintain the anonymity of any individuals from whom the complaints were received. More details regarding the types of complaints received are included in the Complaints and Follow-Up Section above. School specific complaints are summarized in site-specific summaries in Appendix A – School Summaries.

Eligibility Testing

A&M reviewed three items to determine whether students were eligible or ineligible to graduate:

- Grade changes and associated documentation
- Student transcripts
- Service learning hours

⁸ Please see Transcript validation section of this report that describes the process employed to analyze the transcripts.

Grade Changes

A&M reviewed late grade changes in the senior year for the graduating classes of 2016 and 2017. Grade changes are considered late if they occurred after the teacher grade deadline of May 13, 2016 or May 12, 2017, the final grade cutoff for seniors. Final grades are calculated and posted to Transcripts on May 23 and any changes to final grades or transcripts done after this date must be made manually. Out of all late grade changes, A&M focused on those that impacted final grades or the transcript, specifically, all grade changes that occurred between May 14 and May 22 and any grade changes on or after May 23 with a manual change to the final grade or transcript.

For these late grade changes that affected the final grade or transcript, A&M located relevant grade change (PS-140) forms or documentation for completion of credit recovery programs.

During document review, A&M evaluated each set of student records to identify each student record which failed to meet the requirements outlined above, and categorized student information to demonstrate the degree of non-compliance in PGCPs record-keeping. Each grade change was categorized as fully-documented, partially-documented, or undocumented.

Once each grade change was categorized, each unique student was placed in a category based on his or her least documented grade change.

Student Transcripts

Through analysis of student transcripts, A&M identified students who did not meet the 16-core credit or the 21 total credit requirements. Once identified, A&M manually reviewed each transcript to identify students who did not meet MSDE and PGCPs course requirements for graduation.

Additionally, A&M received SchoolMAX data on both September 10, 2017 and October 24, 2017. Upon review, A&M was able to determine numerous transcripts had been manually changed between these two dates. Grades were examined before and after the change to determine which of these students had a change which enabled them to graduate when they were ineligible.

Service Learning Hours

A&M also received data for the number of service learning hours each student completed. Through this data, A&M identified students who did not meet the service learning hours requirement.

Transcript Analysis

A&M developed several key analyses based on PGCPs's transcript module data in SchoolMAX. Based on MSDE graduation requirements and PGCPs's Administrative Procedure 6150, A&M established a list of core required courses in English, Mathematics, Science, and Social Studies, and other graduation requirements, including Fine Arts, Physical Education, Health Education, and Technology Education. A&M utilized the PGCPs academic catalog and identified all courses which met these requirements in order to develop queries to search for potentially ineligible transcripts. The resulting query was executed on the sample set of 1,212 students identified for review through the On-Site investigations approach outlined below. The resulting list of potentially ineligible transcripts was then checked carefully to identify graduates for whom transcripts did not substantiate graduation either by completion of the core 16 credits, or by the completer credits outlined in AP6150.

In addition to this transcript analysis, A&M used data from the transcript module to assess the impact of grade changes on graduation eligibility of students.

PGCPS SchoolMAX users assigned the role of “Transcript Manager” have the ability to directly modify student transcripts to reflect grades which may not be present in SchoolMAX. This feature, referred to by PGCPS staff as “pramming” is intended to be used to update transcripts to reflect credits for transfers or dual enrollment. Based on the statements by several PGCPS staff during the on-site investigation, A&M developed further analysis to assess the risk of direct transcript modifications made to student records after graduation. A&M assessed the degree to which manual transcript modifications were used to change transcripts after all district grading deadlines had passed, and throughout the course of the investigation. Due to limitations of historical data, A&M was only able to identify these occurrences related to 2017 graduates which took place during the investigation, between September 10, 2017 and October 24, 2017. Results of this analysis are included below, and as appropriate in site-specific summaries in Appendix A – School Summaries.

Document Review/Categorization of Findings

As A&M reviewed documentation collected from site visits, A&M used the following definitions to categorize document review findings across the sample set of students who graduated in 2016 or 2017.

1. Valid and Fully-Documented Graduation
 - All grade changes are substantiated by appropriate supporting documentation in accordance with PGCPS procedures.
 - Review of transcript and other supporting information indicate that students have met graduation requirements for core credits and completers.
 - Grade change reflects completion of MPTS program (QLM) and MPTS program team has provided A&M with the QLM or other make-up work for review.
2. Grade Change with Limited Documentation
 - Grade change form (PS-140) is present, but not appropriately signed off or completed in accordance with PGCPS procedures.
 - Grade change form indicates that make-up work is the reason for the grade change, but no evidence of make-up work has been provided (excludes where QLMs have been found).
 - Grade Change form has not been provided, however – other documentation for grade change exists which does not meet the requirements of PGCPS procedures (example – email from teacher or principal requesting grade change).
3. Grade Change without Documentation
 - No documentation is provided to support grade change.
 - Excludes any record where QLM review has found the grade change is substantiated by completion of learning module as identified in review.
 - Includes grade changes due to QLM completion which exceed the standard (10 points) offered by the MPTS program.
4. Does Not Meet Graduation Requirements

- Transcripts do not meet requirements for graduation:
 - Missing one or more core classes.
 - Short of required total credits.
- Service learning hour requirement not met.

Other Irregularities

During document review, A&M evaluated each set of student records to identify each student record which failed to meet the requirements outlined above, and categorized student information to demonstrate the degree of non-compliance. The team also noted instances of irregularities which may require further investigation:

- Transcript modifications which were made after student had graduated.
- Grade changes from fail to pass after graduation day.
- Grade changes for early quarter grades which aren't posted until May or June.
- Make-up work accounting for 50% or higher increase.

Academic Validation Projects (AVP) and QLM Validation

During site visits to PGCPHS High Schools, A&M was unable to review several pieces of supporting documentation for graduates in its intended sample. A&M conducted a site visit to the Area III office to verify the completeness and accuracy of the following documentation:

- **Academic Validation Projects:** Projects completed in lieu of achieving a passing score on a subject test for the Maryland High School Assessment. A&M asked to review AVPs to confirm that AVP completion status documented to support graduation reflected the completion of an appropriate number of projects.
- **APEX Documentation:** APEX Online Learning serves as a source of original credit for some PGCPHS student. This externally managed system contributes credits which support some students in meeting graduation requirements. A&M requested to review score reports generated by APEX to verify grades received through the platform were accurately reflected on sample student transcripts.
- **Credit Recovery Documentation:** Compass Learning provided online recovery programs that allowed students to recover credits for failing courses through an online platform, allowing students to record passing grades for previously failed courses that are required for graduation. A&M requested to review score reports generated by Compass to verify grades received through the platform were accurately reflected on sample student transcripts.
- **Quarterly Learning Module Work Packets:** QLM work packets produced by the MPTS program offered students who had scored between 50% and 59% in the original course an opportunity to recover credits for one or more failed quarter. A&M requested to review QLM packets to verify completion, and score reports to verify that grades had been entered properly.

To facilitate efficient review, A&M provided a list of sample students and identified requested evidence for each students three days in advance of this review. A&M sought to validate each of the following:

- 309 AVPs
- 14 APEX grade reports
- 24 online recovery grade reports
- 78 QLM packets

On October 19, 2017, A&M conducted an on-site review of documentation at the John Eager Howard Administrative Annex in Capitol Heights, Maryland. During this visit, A&M reviewed evidence to verify the documentation of each program. A&M did not assess the quality, academic rigor, or alignment with curriculum standards for any of these programs.

Upon arrival, Area III staff provided A&M with the requested records. Each record was reviewed for existence, completeness, and grading by a four-member team from A&M. Documentation which was initially identified as missing was noted for follow-up by the Area III staff supporting the site visit, and provided within 48 hours and reviewed upon receipt.

AVP

A&M physically examined AVP bundles for 309 students to check for the presence of AVP packets for each student in our provided student sample. The subjects for which each student had completed AVPs were recorded and checked against reported requirements. A&M checked for the presence of the required number of projects and two independently graded score rubric sheets for each project.

Upon the initial receipt of AVPs, packets for seven students could not be located. A list of these students was provided to Area III staff. Staff quickly located these records and produced them for review upon A&M's second visit to the facility. PGCPs produces all requested student AVPs, and A&M noted that AVP packets were substantially complete and contained the necessary documents to verify that they had been scored. A&M evaluated the completion, grading, and document retention practices associated with AVPs to be satisfactory.

APEX:

A&M reviewed physical copies of grade reports produced by APEX, and verified that each student's score, as reflected in APEX was appropriately entered in grading systems. PGCPs provided documentation for all requested APEX students, and A&M verified that all APEX grades were reflected appropriately on transcripts.

Credit Recovery:

A&M reviewed electronic copies of gradebooks for Quarterly Online Learning provided by Edgenuity (owner of Compass) to verify that grade changes impacted by credit recovery programs were reflected in SchoolMAX appropriately. According to PGCPs staff and an Edgenuity point of contact, due in-part to the recent end to the Compass contract, and the purchase of Compass by Edgenuity – not all records could be verified using Compass's systems. Of the 24 online recovery courses with the potential to affect grades for students in the sample, 22 were verified as fully-documented using Compass grade reports. For the remaining two students, PGCPs provided internal grade reports; A&M considered these grade changes to be partially-documented.

QLM:

A&M assessed the presence of completed QLM packets and verified that each had been graded. The QLM student sample consisted of 58 students that completed a total of 78 QLMs in SY15-16 and SY16-17.

To identify whether appropriate grading adjustments had been made, A&M recorded each subject for which a student had completed a QLM and checked whether scores had been awarded for each packet and recorded those results. Upon initial review, A&M identified students with missing QLMs and requested additional documentation from Area III staff.

Area III staff provided the appropriate QLMs for 26 students, but could not produce physical packets for the remaining students. For 22 of the remaining students, Area III staff provided QLM contracts which reflected the grade earned, but were unable to provide the work packet provided by the student. For the remaining 10 students in the sample, no documentation was provided. For grade change evaluation within the sample, A&M considered sample grade changes supported by QLMs to be fully documented, grade change supported by QLM contacts to be partially documented, and grade changes without documentation to be undocumented.

Integrating Results into Sample Analysis

The results of the QLM and QOL findings on fully-documented, partially-documented, and fully documented grade changes were integrated into the sample analysis where appropriate to improve the identified level of documentation for a given grade change. Where PS-140 forms or other documentation supported the same grade change, the best-documented status was reported.

Findings and Observations

Transcript Analysis Findings

Based on the automated transcript analysis, and subsequent review of individual transcripts, A&M identified 56 total transcripts out of the testing sample of 1,212 students (4.6%) which either lacked core required courses or completer credits as outlined in AP 6150. Included within this calculation are 16 individual transcripts which did not meet graduation requirements when the students were certified to graduate, but were modified between September 10, 2017 and October 24, 2017 utilizing the pramming feature with grade changes which made the transcripts appear eligible for graduation.

Manual Transcript Review	2016	2017	Total
# Transcripts Manually Reviewed	160	141	301
# Transcripts found ineligible to graduate (unique)	20	36	56
Core Classes	15	23	38
Elective Classes	1	1	2
Manipulation after 9/10/17	4	12	16

Table 12: Ineligible Transcripts by Year

This assessment of transcript eligibility was limited to the 1,212 transcripts which were pulled in support of the on-site investigation. The transcripts found as ineligible to graduate as presented in the table above reflect their eligibility at the time they were certified for graduation. Individual schools where transcript modifications were apparent have been identified in Appendix A: School Summaries.

Document Review Findings

During the site visits, A&M attempted to obtain supporting documentation for the 2,640 post-final grade cut-off quarterly grade changes that affected the 1,212 students in the sample. A&M noted that a substantial number of the grade changes that occurred after May 23 were made by teachers, not grade managers and supporting documentation for these changes was not located during the site visits. Per follow up with the Applications team, A&M determined that for any changes occurring after May 23 to impact final grades, the final grades would have to be manually updated. The school would then have to manually update the transcripts or submit a request to the Applications team for the database administrator to post the schools updated final grades to transcript. A&M reviewed all manual changes to student grades and transcripts post May 23 and determined that only 724 quarterly grade changes ultimately impacted final student grades and/or transcripts. These changes impacted 592 courses for 395 students. The quarterly grade changes analyzed are summarized in the table below.

	2016	2017	Total
Total requested # Student records	582	630	1,212
Total # Grade Changes on or after 5/14	1,232	1,408	2,640
Grade Changes Included (that Impacted on Final Grade or Transcript)			
	2016	2017	Total
# Students with Grade Changes that impact final grade or transcript	200	195	395
# Courses with Grade Changes that impact final grade or transcript	281	311	592
# grade changes that impact final grade or transcript	336	388	724
# GC between 5/14-5/22	250	284	534
# additional GC after 5/23 with FG or transcript update	86	104	190

Table 13: Sample and Grade Change Summary⁹

Of 1,212 students in the sample tested, 395 had quarterly grade changes that impacted a student's final grade or transcript.

Table 14 summarizes A&M's findings based on a review of the Grade Change Forms, PDS Tally Cards and Transcripts obtained during the site visits. Overall, documentation supporting quarterly grade changes was limited, PDS Tally Cards, if completed, were done after graduation and the vast majority of transcripts obtained were completed after graduation.

⁹ Grade changes for 2016 and 2017 graduated classes were compared to their respective grade change timelines

Grade Changes (that Impacted Final Grade or Transcript) by Category	2016	2017	Total
# GC fully documented	64	83	147
including students with QLM - fully documented	7	1	8
including students with QOL - fully documented	5	0	5
# GC partially documented	84	126	210
including students with QLM - partially documented	4	3	7
including students with QOL - partially documented	2	0	2
# GC undocumented	188	179	367
Total	336	388	724

Unique Students with Grade Changes (that Impacted Final Grade or Transcript) by Category	2016	2017	Total
# Unique Students with all GC fully documented	31	33	64
# Unique Students with one or more GC partially documented and none undocumented	42	59	101
# Unique Students with any GC undocumented	127	103	230
Total	200	195	395

Table 14: Document Review - Consolidated Findings

A&M’s review revealed that a substantial number of grade changes for which supporting documentation should be available were completely undocumented.

Other Control Findings

A&M obtained an understanding of the documentation required by PGCPs to certify students for graduation through an interview with the PGCPs Records Supervisor as well as through a review of the Administrative Procedures. In addition to reviewing grade changes, A&M also tested controls around process of certifying students for graduation by reviewing the PDS Tally Cards and final transcripts from schools for the sample tested. Findings are noted in **Table 15** below.

PDS Tally Cards	2016	2017	Total
# not completed (or not found)	259	304	563
# completed	323	326	649
# not signed (of those completed)	1	50	51
# not dated (of those completed)	1	23	24
# completed after graduation (of those completed)	169	151	320
Total	582	630	1,212

Transcripts (received for all students)	2016	2017	Total
# dated before or on graduation	14	80	94
# dated after graduation	568	550	1,118
# dated October 2017 (during site visits)	284	284	568
Total	582	630	1,212
# mismatched tally card	28	15	43

Table 15: Other Control Findings

A&M's review revealed that a large number of PDS Tally Cards were not completed for the graduating classes of 2016 and 2017 tested and of the PDS Tally Cards that were actually completed, approximately half were completed after graduation.

The majority of transcripts were dated after graduation, and of those approximately half were printed during the A&M site visit.

Key Observations

A&M's site visits yielded observations that can be classified into the following three categories:

1. The District does not adhere to policies and procedures related to grading and graduation certification.
2. School level recordkeeping related to grading and graduation certification is poor
3. Irregularities Resulting in Graduation Rate Increases

The observations are explained in greater detail in the section below.

District Does Not Adhere to Policies and Procedures

Grading Procedures

50% minimum grade with good faith effort improperly applied/interpreted by teachers and schools. Some schools are providing minimum grades of 50% regardless of whether a "good faith effort" has been demonstrated.

Attendance

In the majority of high schools, it was evident that the PGCPs grading policies regarding truancy and excessive unlawful absences were not being adhered to. Based on interviews at schools, many students with unlawful absences were actively followed up with, but the numbers of days absent was not a factor in grading. Schools actively tried to re-engage truant students, offering opportunities to make-up the work that they had missed.

As noted in the data analysis section of this report, a substantial number of students in the graduating classes of 2016 and 2017 had unlawful absences over 10 days in their senior years but all still graduated.

MPTS Handbook

Rules outlined in the MPTS handbook are not consistently followed by the schools. Though the MPTS handbook notes that grade change forms are required for quarter grade changes made as a result of a student obtaining a passing grade in the Quarterly Online Learning (QOL) and QLMs recovery programs, most high schools do not follow this rule. In addition, both the QOL and the QLMs have minimum grade requirements of 40% and 50%, respectively, that must be met before a student can be considered eligible to participate in the program. A&M has noted various instances where students that were ineligible because their grades did not meet these minimum requirements, yet the students were still allowed to participate in the QOL and QLM credit recovery programs.

According to the MPTS handbook, The QOL and QLM programs only enable a student to recover to a maximum grade of 65%. A&M has noted instances where students completed QLMs with grades higher than 65% and the students' grades were changed to the grade actually earned rather than assigning the maximum of 65% as outlined in the handbook.

Grading Timeline

Based on data analysis and confirmed during the on-site investigations, it is evident that that grading timelines are not adhered to at most PGCPs high schools. In all instances, the volume of grade changes made after the final senior grade cut-off is significant. Further, in many instances, these changes result students receiving grades that change their final grade in a class from failing to passing. These late quarterly grade changes impact not only Q4, but all quarters.

Make-up Work

Schools are submitting grade changes for "completion of make-up work" towards the end of the senior year. The submitted grade changes are impacting all quarters and are not in line with the PGCPs procedures which have a narrow timeline in which make-up work can be submitted.

Poor Recordkeeping

Grade Change Forms

Some schools were unaware that formal grade change forms were required and converted the process to an online one where changes were requested electronically through the use of a google spreadsheet. In other instances, there was an awareness of the procedure but it was not being consistently followed (i.e. some grade changes were supported and others were not). Many schools were unaware that grade change forms and supporting documentation were required to be maintained in student cumulative folders. In those instances, the grade manager often maintained binders with grade change forms in his/her office.

In at least one school, grade change forms were actively completed after the fact. Staff at the school anonymously indicated that this was done in preparation for on-site investigation.

In most instances grade change forms did not have any supporting documentation attached and it was therefore difficult to validate that make-up work was, in fact, completed or that there was an error in data entry, for example.

Graduation Certification

Each school has their own process in place to certify students for graduation. In most instances, students' credits are checked at the commencement of the senior year, senior contracts are signed indicating the courses, credits and service learning hours required for students to meet graduation requirements. Many schools utilize the graduating cohort google spreadsheet distributed by MSDE to track students' progress. In no instances did A&M note where schools utilized the PDS Tally Cards to keep track of student graduation requirements. In all instances, PDS Tally Cards were completed after student were already certified for graduation and are treated more like an administrative task required only to support the archival/microfilming process.

A&M also noted instances where schools made changes to student transcripts after final senior grades posted and in some instances, after students already graduated.

Service Learning Verification

In addition to the data analysis, A&M performed a high-level review of service learning verification forms are not consistently maintained in student cumulative folders so A&M was not able verify their existence

for all students in the sample. In addition, A&M noted numerous service learning forms where students were given credit for donating money, coats, and other items as opposed to providing services to approved entities.

A&M performed an analysis of the service learning hours for the student in the sample and noted that 3 of the students in the sample (1 in 2016 and 2 in 2017) did not meet the required minimum 24 service learning hours required for graduation.

Irregularities Resulting in Graduation Rate Increases

Goal Seeking

During a review of student records, A&M has noted handwritten marking on transcripts where schools are performing math to determine the grade change required for a student to pass a class. Additionally, a disproportionate number of grade changes result in students achieving the minimum passing grade of 240 points.

Post-Graduation Grade and Transcript Manipulation

A&M has noted multiple instances where student transcripts were updated after students had already graduated. In some instances, transcripts were modified after the commencement of this investigation.

Excessive Extra Credit Opportunities for Failing Seniors

In most high schools, principals encouraged teachers to offer failing seniors make-up work. Often the principals explained that teachers were asked to provide seniors who were only within a few points of passing a class the option to complete extra credit work so that they could obtain a passing grade and meet graduation requirements. Principals noted that although these requests were made of teachers, the ultimate decision on whether the student was offered the extra credit opportunity was at the individual teacher's discretion and they were adamant that no teachers were forced or coerced to do so. Many of these extra credit changes were made to earlier quarters.

Unofficial Credit Recovery Programs

Some schools were found by A&M to have unofficial, school-based credit recovery programs to complement the PGCPs centrally administered credit recovery. In some instances, the schools utilized the QLM packets but graded them in-house rather than submitting them through the centralized grading process established by PGCPs. At some schools, the packets were not graded at all, but rather, once a student completed the packets they were given credit for doing so regardless of the quality of their responses. The grade changes resulting from these unofficial programs were often substantial and resulted in failing seniors ultimately passing classes.

Some schools noted that this option was offered to students whose grades were too low to qualify for the official QLM program which required students to have a quarterly grade between 50 and 59 to be eligible. This unofficial credit recovery was therefore being administered to students with lower scores and giving them the opportunity to earn more than the 10-point maximum offered under the QLM program. In all instances noted, these recovery packets were provided towards the end of the senior year when students had failed their specific courses. In some instances, these unofficial programs were administered by guidance counselors or administration and there was no indication that teachers were made aware of the resulting grade changes.

Summary of Significant On-Site Findings By School

PGCPS High School	Key Findings by School											
	District Does Not Adhere to Policies and Procedures					Poor Recordkeeping		Irregularities Resulting in Graduation Rate Increases				
	Grading Policy (50% Good Faith Effort)	MPTS Handbook	Grading Timeline	Attendance	Make-up Work	Grade Change Forms	Graduation Certification	Ineligible Graduate(s)	Goal Seeking	Post-Grad Grade and Transcript Manipulation	Excessive Extra Credit Opportunities for Failing Seniors	Unofficial Credit Recovery Programs
ACADEMY OF HEALTH SCIENCES AT PGCC	N/A	N/A	N/A	N/A	N/A	N/A	X					
BLADENSBURG HIGH	X		X	X	X	X	X	X			X	
BOWIE HIGH	X	X	X	X	X	X	X	X				
CENTRAL HIGH			X	X	X	X	X	X		X	X	X
CHARLES HERBERT FLOWERS HIGH			X	X	X	X	X	X			X	
COMMUNITY-BASED CLASSROOM			X	X	X	X	X	X			X	
CROOM HIGH		X	X	X	X	X	X	X		X	X	
CROSSLAND EVENING/SAT HIGH			X	X		X	X				X	
CROSSLAND HIGH			X	X	X	X	X				X	
DR HENRY A WISE, JR. HIGH			X	X	X	X	X	X				
DUVAL HIGH	X	X	X	X	X	X	X	X			X	X
ELEANOR ROOSEVELT HIGH	X		X	X		X	X	X				
FAIRMONT HEIGHTS HIGH		X	X	X	X	X	X					X
FORESTVILLE HIGH			X	X		X	X					
FREDERICK DOUGLASS HIGH			X	X		X	X	X				
FRIENDLY HIGH			X	X		X	X					X
GWYNN PARK HIGH		X	X	X		X	X	X				X
HIGH POINT HIGH		X	X	X		X	X	X				
LARGO HIGH			X	X	X	X	X					
LAUREL HIGH	X	X	X	X	X	X	X	X				
NORTHWESTERN EVENING/SAT HIGH			X	X		X	X				X	
NORTHWESTERN HIGH			X	X	X	X	X	X	X		X	
OXON HILL HIGH			X	X			X					
PARKDALE HIGH			X	X	X	X	X	X	X		X	
POTOMAC HIGH			X	X		X	X	X				
SUITLAND HIGH	X		X	X		X	X	X				
SURRATTSVILLE HIGH	X		X	X	X	X	X	X		X	X	
TALL OAKS HIGH			X	X	X	X	X	X		X		X
Total School Count	7	7	27	27	16	26	28	19	2	4	12	6

Table 16: Summary of Significant On-Site Findings By School

Use, duplication, or disclosure is subject to restrictions stated in RFP # R00R8400170 with Alvarez & Marsal.

Based on A&M’s site visits for 28 schools, we identified twelve types of findings, falling into three broad categories. The above table summarizes the findings located at each school. More detail is provided in the Appendix A – School Summaries.

Observations and Recommendations

		Observations	Recommendations
District Does Not Adhere to Policies and Procedures	<i>Grading Procedures</i>	50% minimum grade with good faith effort improperly applied/interpreted by teachers and schools. Some schools providing minimum grades of 50% regardless of whether a "good faith effort" has been demonstrated.	District should provide clarity and training around the grading procedures and ensure consistent application across schools.
	<i>Attendance</i>	A significant number of 2016 and 2017 graduates had unlawful absences in excess of 10 days during their senior year. The high number of absences highlights that policies regarding unlawful absences and grading are not being followed by the schools. High absences from classroom instruction increase the risk that students are passing classes for which they have not learned the materials.	Per the grading policy, a final grade of "E" should be given to a student with excessive unlawful absences who otherwise would have received a passing grade; however, there is some ambiguity in the current policies regarding the interventions and opportunities to be provided to truant students and schools. The policy should be clarified to remove ambiguities and the district should hold students accountable to those standards.
	<i>MPTS Handbook</i>	MPTS policies not consistently followed by the schools. Though the MPTS handbook notes that grade change forms are required for quarter grade changes, most schools do not follow this policy. Minimum grade requirements of 40% and 50% for eligibility to participate in QOLs and QLMs, respectively, are not followed by some schools. Also, some schools awarded recovered grades in excess of the maximum grade of 65% outlined in the MPTS handbook.	The District should provide more oversight regarding the use of MPTS programs. Grade changes for all MPTS programs should be completed by the schools and evidence of those grade changes (completed grade change forms and supporting documentation) should be submitted to the District as validation that grades were change and completed in accordance with MPTS policy.
	<i>Grading Timeline</i>	Quarterly grading timelines are not adhered to at most schools. In all instances, the volume of grade changes made after the final senior grade cut-offs are significant. Further, in many instances, these changes result in students receiving grades that change their final grade in a class from failing to passing. These late quarterly grade changes impact not only Q4 but all quarters.	The District should monitor the post-cut off changes at schools to follow-up and ensure that these types of changes are limited to credit recovery and approved make-up work.
	<i>Makeup Work</i>	Schools are submitting grade changes for "completion of makeup work" towards the end of the senior year. These changes are impacting all quarters and are not in line with the PGCPs policies which have a narrow timeline during which makeup work can be submitted.	The District should ensure that policies on makeup work are being consistently applied across schools. Further, there are no policies outlining when and how additional work or extra credit should be applied, if at all.

		Observations	Recommendations
Poor Recordkeeping	<i>Grade Change Forms</i>	Grade change forms (PS-140s) not consistently used resulting in instances where teachers may not be aware of changes made to grades that they issued and not providing them the opportunity to agree/disagree with those changes. When used, many schools are unaware that the forms are required to be filed in student cumulative folders.	The District should reinforce the procedures around recordkeeping and utilize the internal audit function to monitor adherence to recordkeeping requirements.
	<i>Graduation Certification</i>	Schools are completing PDS tally cards after students have been certified for graduation and could result in instances where schools erroneously graduate students who have not met PGCPs graduation requirements. Schools are making changes to student transcripts after final senior grades have been posted and, in some instances, after students have already graduated.	Graduation certification should be automated in SchoolMAX through use of the Graduation Module. However, until the process can be automated, schools should ensure that PDS tally cards are utilized to assist in tracking a student's path to graduation rather than as an administrative task completed after students have already matriculated. Transcripts should be reviewed to ensure accuracy and finalized prior to graduation.

		Observations	Recommendations
Irregularities Resulting in Graduation Rate Increases	<i>Ineligible Graduates</i>	Per a review of the transcripts of the sample, A&M noted 59 instances (4% of the sample tested) where the information on the students transcripts were insufficient to meet graduation requirements.	Graduation certification should be automated in SchoolMAX through use of the Graduation Module. However, until the process can be automated, schools should ensure that PDS tally cards are utilized to assist in tracking a student's path to graduation rather than as an administrative task completed after students have already matriculated. Transcripts should be reviewed to ensure accuracy and
	<i>Goal Seeking</i>	A&M has noted where marking on transcripts where schools are performing math to determine the grade change required for a student to pass a class. Additionally, a disproportionate number of grade changed result in students achieving the minimum passing grade of 240 points.	This may require further investigation/monitoring by the District.
	<i>Post-Grad Grade and Transcript Manipulation</i>	The team has noted multiple instances where student transcripts were updated after students had already graduated. In some instances, transcripts were actually modified after the commencement of this investigation.	The District should place controls around when transcripts of graduated students can be accessed. There should be a cut-off point prior to graduation at which schools no longer have access to modify transcripts. For all modifications after graduation, schools should first be required to submit a request to the Applications team.
	<i>Excessive Extra Credit Opportunities for Failing Seniors</i>	Teachers are encouraged by school administration to provide seniors who are within a few points of passing a class the option to complete extra credit work so that they can obtain a passing grade and meet graduation requirements.	District policies are silent regarding the provision of additional credit. No policies exist that outline when and how additional work or extra credit, can be applied, if at all.
	<i>Unofficial Credit Recovery Programs</i>	Some schools are utilizing QLM packets but grading them in-house rather than submitting them through the centralized grading process established by PGCPs. At some schools, the packets were not graded at all but rather, once a student completed the packets they were given credit for doing so regardless of the quality of the student responses.	District should discontinue use of QLMs until a formal oversight function is place to ensure that schools are not administering in-house credit recovery to students (note: per our interview with District staff, the QLM program has been discontinued).

Table 17: Observations and Recommendations

Conclusion and Impact Analysis

During on-site school reviews, A&M reviewed grade change forms, PDS Tally Cards, final transcripts and service learning verification forms for the student sample tested. The student files reviewed during the on-site investigation yielded the following results:

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

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

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

** This table reflects counts of unique students in each category*

Table 18: Consolidated Summary

Of the 1,212 students with grade changes, 796 did not have grade changes that impacted final grades. Of the 416 students with grade changes that impacted final grades, 58 (13.9%) students had grade changes that were fully-documented, 85 (20.4%) students had grade changes with limited documentation, and 212 (51.0%) students had grade changes with no documentation.

The sample of 1,212 students tested was from a population of 5,496 students identified as having late grade change increases after final grade entry cutoff dates for seniors. Because this sample is selected

randomly from the late grade change population of 5,496 students, these findings cannot be assumed to hold true to the larger population of 15,215 students in the graduating classes of 2016 and 2017.

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

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

- 1. Clarify policies and procedures and provide regular training to increase awareness and understanding and improve adherence to policies and procedures.**
- 2. Minimize the potential risk of mismanagement and discourage fraud through automation of recordkeeping and increased controls.**
- 3. Increase monitoring and accountability to ensure adherence to grading policies, grade changes and graduation certification policies and procedures.**

APPENDIX A: SCHOOL SUMMARIES

The following school summaries present notes from school visits, combined with school specific findings developed throughout the course of this performance audit. A&M recommends these school summaries be used to support follow-up on school-specific issues to understand and remediate challenges related to grading and graduation certification.

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ACADEMY OF HEALTH SCIENCES AT PGCC

A&M conducted the on-site investigation on October 17, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCCS Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	-	-	-	≥ 95%	≥ 95%

Record Review Findings

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

Academy of Health Sciences at PGCC School Review Summary	Graduating Class		Total			
	2016	2017				
Students	88	102	190			
Students included in Sample	16	20	36			
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	16	100.0%	20	100.0%	36	100.0%
Without grade changes affecting final grades	0	0.0%	0	0.0%	0	0.0%
With all grade changes fully documented	16	100.0%	20	100.0%	36	100.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
3. Any grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
4. Does not meet graduation requirements	0	0.0%	0	0.0%	0	0.0%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	16		20		36	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	0	0.0%	0	0.0%	0	0.0%
Ineligible to graduate (category 4)	0	0.0%	0	0.0%	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 36 students reviewed, none were found ineligible to graduate. Of the 36 students with grade changes, all 36 had grade changes that impacted final grades, however, this is due to the grade manager entering in the grades once they are received from Prince George's Community College (PGCC), which

runs on a different system and timeline. Of the 36 students with grade changes that impacted final grades, all 36 (100.0%) students had grade changes that were fully-documented, no students had grade changes with limited documentation, and no students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Extremely clean recordkeeping with essentially all policies adhered to.
- All PDS Tally Cards and transcripts were present and accounted for when requested.

Grading Procedures: Are grading procedure requirements understood and adhered to?

- Many courses AHS students participate in are taken at PGCC are on a semester basis and professors are not required to enter grades twice a week in SchoolMAX, progress and quarter grades are coded as incomplete while in progress at PGCC, and then a grade change is made to translate student grades into scores for their transcript at Academy of Health Sciences.
- The standard PGCCPS good faith effort grading procedure is not strictly deployed at Academy of Health Sciences as that is not a PGCC policy. Because so many of the courses in the curriculum are PGCC courses, expectations are that the students abide by those policies.
- **Staff stated standard PGCCPS policies are written too vaguely and with not enough attention to upholding standards to be successfully deployed at the Academy of Health Sciences.**

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- All of the PDS Tally Cards are signed and dated just prior to graduation. They are completely filled out for each year with classes and grades provided.
- Two transcripts were modified after graduation to reflect completion of PGCC courses, indicating that transcripts did not include graduation requirement courses at the time of certification for graduation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- This school does not deploy MPTS programs, with the exception of APEX in certain specific cases. APEX use and applicability seems understood.
- QLMs are not offered or used at AHS.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Students typically had a greater number of service learning hours than required.
- There were some student service learning verification forms that were duplicates across multiple student folders. A&M determined that these were filled out for events that the students jointly attended by the guidance counselor, though the intent did not seem nefarious.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCCPS administration while speaking with the A&M site visit team or via the tip line?

- Staff uniformly believed that there was not any grade manipulation happening on their campus.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- No irregularities documented with the exception of the copied service learning forms described in a previous section.
- Two 2017 graduates’ transcripts had courses prammed to their transcripts in September 2017, likely due to a lack of cohesion between the grading systems at AHS and PGCC and not because the two students did not successfully complete the classes in question.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- The only recent change was the revocation of grade manager rights for the registrar. They attributed this to county policy.

School-Specific Complaint Log Summary

A&M received no specific complaints related to Academy of Health Sciences.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	-	-
> 10 and ≤ 20 Points	-	-
> 20 and ≤ 30 Points	-	-
> 30 Points	88	23
No Grade Entry Before Cutoff Date	87	101
Total Unique Students	88	101

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	88	102
> 10 and ≤ 20 Days	-	-
> 20 and ≤ 50 Days	-	-
> 50 Days	-	-
Total Unique Students	88	102

School-Specific Recommendations

Opportunities for Improvement

- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- AHS should endeavor to develop better cohesion between the grading systems at AHS and PGCC so that clerical errors do not occur and so that AHS can remain in compliance with PGCC standards for verifying graduation.

Additional Analysis and Investigation

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

BLADENSBURG

A&M conducted the on-site investigation on October 5, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	69%	70%	73%	74%	74%

Record Review Findings

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

Bladensburg High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	324		364		688	
Students included in Sample	20		22		42	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	8	40.0%	12	54.5%	20	47.6%
Without grade changes affecting final grades	7	35.0%	11	50.0%	18	42.9%
With all grade changes fully documented	1	5.0%	1	4.5%	2	4.8%
2. Any grade changes with limited documentation and no grade changes without documentation	2	10.0%	0	0.0%	2	4.8%
3. Any grade changes without documentation	9	45.0%	10	45.5%	19	45.2%
4. Does not meet graduation requirements	1	5.0%	0	0.0%	1	2.4%
Transcript Ineligible	1	5.0%	0	0.0%	1	2.4%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	20		22		42	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	11	55.0%	10	45.5%	21	50.0%
Ineligible to graduate (category 4)	1	5.0%	0	0.0%	1	2.4%

* This table reflects counts of unique students in each category

Of the 42 students reviewed, 1 (2.4%) was found ineligible to graduate. Of the 42 students with grade changes, 18 did not have grade changes that impacted final grades. Of the 24 students with grade changes that impacted final grades, 2 (8.3%) students had grade changes that were fully-documented, 2 (8.3%) students had grade changes with limited documentation, and 19 (79.2%) students had grade changes with

no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- All cumulative folders were provided. Transcripts were printed during the site visit.
- Very few PS-140 forms were found, but even fewer grade change forms had the proper supporting documentation. The Grade Manager also provided a two-foot stack of grade change forms that had not yet been filed in cumulative folders.
- Approximately 50% of the students’ service learning forms were found in the cumulative folders.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Generally, it seems that the grading procedures are adhered to. The principal was adamant that she requires all grade change forms to be accompanied by appropriate supporting documentation prior to authorizing any changes. Attendance policies are not enforced.
- The new grading procedures posted on Bladensburg’s website omits sections of AP 5121.3, presenting the grade change process as principal or SIT driven, rather than teacher driven.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not utilized to certify students for graduation. The registrar prepares a Google Spreadsheet that the counselors review based on their Senior Agreements and electronic transcripts. The PDS Tally Cards are completed subsequent to graduation by the Registrar. The SY15-16 and SY16-17 PDS Tally Cards were not completed at the time of our visit, as the Registrar had been on medical leave for a significant period of time. The registrar communicated that there was a plan in place to ensure the PDS Tally Cards would be up to date by the end of the current school year.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- It appears that the staff understands the MPTS policies and endeavors to make options available to students who need them.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- The service learning verification forms that were provided appeared to be completed properly and generally in accordance with the requirements in terms of hours and types of activities.

However, not every student had these forms in their files, nor did every form we reviewed have the requisite number of hours. The transcripts reviewed for our sample selection indicated that service learning hour requirements were met for all students.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team?

- No specific complaints were made and none of the people we spoke to believed anything nefarious was taking place at their school.

Evidence of Irregularities: During your review, have you identified irregularities? (example – manipulated or falsified records, contradictory transcripts, etc.)

- For one of the students in our sample selection, 1st, 2nd, and 3rd quarter grades were approved and changed on May 19, 2017 for “Completion of make-up work” (French 2).
- For a second student in our sample selection, both a normal grade change form and an MPTS (APEX Learning) form authorized multiple quarter grade changes for the same class (French 2).

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- Bladensburg updated their Grading Procedures on September 11, 2017. However, it is unclear whether this was in response to the complaints or investigation.

School-Specific Complaint Log Summary

A&M received no specific complaints related to Bladensburg High School.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	17	43
> 10 and ≤ 20 Points	9	26
> 20 and ≤ 30 Points	8	16
> 30 Points	29	26
No Grade Entry Before Cutoff Date	243	362
Total Unique Students	253	363

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	105	108
> 10 and ≤ 20 Days	98	101
> 20 and ≤ 50 Days	105	126
> 50 Days	16	29
Total Unique Students	324	364

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.

- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.

Additional Analysis and Investigation

- Further investigate grade changes for multiple quarters that are approved and changed at the end of the year.

BOWIE

A&M conducted the on-site investigation on October 3, 2017. During the site visit, A&M conducted interviews and reviewed student files at each school site. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	86%	89 %	90%	85%	90%

Record Review Findings

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

Bowie High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	591	538	1,129			
Students included in Sample	44	49	93			
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	38	86.4%	41	83.7%	79	84.9%
Without grade changes affecting final grades	38	86.4%	41	83.7%	79	84.9%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	5	11.4%	2	4.1%	7	7.5%
3. Any grade changes without documentation	1	2.3%	3	6.1%	4	4.3%
4. Does not meet graduation requirements	0	0.0%	3	6.1%	3	3.2%
Transcript Ineligible	0	0.0%	3	6.1%	3	3.2%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	44		49		93	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	6	13.6%	5	10.2%	11	11.8%
Ineligible to graduate (category 4)	0	0.0%	3	6.1%	3	3.2%

** This table reflects counts of unique students in each category*

Of the 93 students reviewed, 3 (3.2%) were found ineligible to graduate. Of the 93 students with grade changes, 79 did not have grade changes that impacted final grades. Of the 14 students with grade changes

that impacted final grades, no students had grade changes that were fully-documented, 7 (50.0%) students had grade changes with limited documentation, and 4 (28.6%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Student record files are generally organized. Transcript and/or and PDS Tally Cards were missing for four students in the graduating class of 2016 and two students in the graduating class of 2017, however the staff found these later and provided them for pickup.
- Staff reported that PS-140 forms are only used when teachers request grade changes or when principals request grade changes due to teacher absence.
- Of the PS-140 forms found, the majority noted the reason for the grade change as “Completion of make-up work.” If documentation was attached, it came in the form of a gradebook printout with the grade that was changed. In addition, staff reported that some teachers may wait until the end of the year to complete their PS-140 forms.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Attendance-related grading procedures are not enforced strictly because of cases of parent pushback. However, the principal claims the school differentiates between 11 absences and 50 absences, believing that students with excessive unlawful absences should not be given the chance to complete MPTS programs. Additionally, staff reported that Bowie High School does not notify parents and students of excessive absences as required by policy prior to giving a student a failing grade.
- Administrators report resistance amongst staff toward the new grading procedures, particularly for assigning 50% for “good faith effort.”
- Administrators report some teachers may provide make-up work for unlawful absences.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- Only two students in the graduating class of 2017 had PDS Tally Cards that were completed before graduation. Seven students in the graduating class of 2016 and nine students in the graduating class of 2017 had PDS Tally Cards completed on the day of graduation. PDS Tally Cards for the remaining students were completed after the date of graduation. While generally completed appropriately, several PDS Tally Cards were found in which credits were misplaced in the tally sheet or totals were added up incorrectly.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- Administrators reported resistance amongst staff towards MPTS programs, particularly QLMs. In addition, staff claimed that only about half of the students pass QLMs and a teacher support session was not well attended. Thus, QLM participation is low at Bowie.
- Administrators report resistance amongst teachers towards the new grading procedures, such as when grades are changed due to MPTS programs. However, administrators claim that teachers should know about these grade changes because teachers know student grades before credit recovery is completed and that students should get grade increases from doing credit recovery. However, teachers are not formally notified when students complete credit recovery and receive grade changes as a result.
- PS-140 forms are not used for grade changes related to MPTS programs. Rather, the grade manager makes these changes based on lists of students who pass credit recovery. The principal claims the district has not provided direction on how to handle these grade changes.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- While service learning verification forms were not stored in cumulative folders for all students, the forms found appeared to be completed properly and generally in accordance with the requirements in terms of hours and types of activities.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No specific complaints were made.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- One of the transcripts that needed to be picked up at a later date was signed in October 2017.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No recent changes to policies, procedures, or roles have been made.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by A&M by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	-
Admin and Faculty Intimidation/Retaliation	1
Credit Recovery Programs-District	-
General Mismanagement	1
Graduating Ineligible Students	1
Improper Grade Change	1
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	41	9
> 10 and ≤ 20 Points	6	11
> 20 and ≤ 30 Points	3	7
> 30 Points	15	11
No Grade Entry Before Cutoff Date	210	537
Total Unique Students	242	537

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	451	398
> 10 and ≤ 20 Days	109	93
> 20 and ≤ 50 Days	28	47
> 50 Days	3	-
Total Unique Students	591	538

School-Specific Recommendations

Opportunities for Improvement

- Ensure separation of duties and independent oversight of roles including grade manager, transcript manager, MPTS coordinator, and counselor.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation.
- Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations.
- Retain service learning verification forms in the student cumulative folders.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.
- Ensure students enrolled in MPTS programs meet eligibility requirements outlined in the MPTS Handbook. Verify grades are appropriately entered upon MPTS completion.

Additional Analysis and Investigation

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

CENTRAL

A&M conducted the on-site investigation on October 13, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	64%	63%	72%	75%	74%

Record Review Findings

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

Central High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	203		192		395	
Students included in Sample	14		19		33	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	6	42.9%	5	26.3%	11	33.3%
Without grade changes affecting final grades	6	42.9%	5	26.3%	11	33.3%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	3	15.8%	3	9.1%
3. Any grade changes without documentation	3	21.4%	7	36.8%	10	30.3%
4. Does not meet graduation requirements	5	35.7%	4	21.1%	9	27.3%
Transcript Ineligible	5	35.7%	3	15.8%	8	24.2%
Service Learning Ineligible	0	0.0%	1	5.3%	1	3.0%
Total sample	14		19		33	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	3	21.4%	10	52.6%	13	39.4%
Ineligible to graduate (category 4)	5	35.7%	4	21.1%	9	27.3%
* This table reflects counts of unique students in each category						

Of the 33 students reviewed, 9 (27.3%) were found ineligible to graduate. Of the 33 students with grade changes, 11 did not have grade changes that impacted final grades. Of the 22 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 3 (13.6%)

students had grade changes with limited documentation, and 10 (45.5%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Recordkeeping practices do not seem to be well understood. Grade change forms are often included within the file, but they are typically initiated and signed off by the counselor.
- Many of these grade changes consist of final grade changes rather than quarter grade changes, with the explanation given that the counselor was not aware that changes to quarter grades could be made after grade cut-off.
- Make-up work is not included along with the grade change form. It was stated at the school that make-up work was retained in a box in the counselor’s office, but was not organized by student, making it difficult to tie specific work completed to grade change forms.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- 50% minimum grade for “good faith effort” seems accepted and followed based on interviews with school personnel.
- School encourages teachers to provide extra credit opportunities to failing seniors when within a few points of earning a passing grade at end of school year. This work is described by the school as “make-up work” but is not consistent with make-up work as defined in PGCPs Administrative Procedure 5121.3.
- No support was provided for the grade changes that were made and typically teacher signatures were not included on the forms.
- The school does not strictly consider attendance in determining student grades, instead giving multiple opportunities to recover grades regardless of attendance.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not filled out until after graduation and are not actively used in the process of graduation certification. These forms were often filled out during off months. Interviewees felt that the requirement to fill out these cards was time consuming and, given that the counselors were on a 10-month schedule, it was difficult for them to complete the forms prior to the end of the school year.
- Transcripts provided were printed on 10/12/2017, but signed and dated on June 1st. Transcript data reveals that transcripts in sample population were updated after graduation. In some

instances, updates were made to 2016 and 2017 student transcripts subsequent to the commencement of this investigation.

- Student Intervention Team (SIT) process plays a significant role in the certification process. During SIT meetings, focus is placed on failing seniors and teachers are encouraged to offer students extra credit.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policies do seem well understood in general, as the counselor was able to correctly identify the correct score eligibility ranges for the QLMs as well as Compass Learning options. However, many of the policies around grade change that are associated with the MPTS process seem less well understood and abided by.
- The school uses Spring and Summer MPTS packets as extra credit work that provide students with opportunities for grade increases and grades these packets in-house.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Most service learning verification forms were in place and generally looked complete.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- None of the interviewees leveled any accusations against others or against the PGCPs administration while A&M was onsite. The general sense that most had about the accusations is that they were unfounded. Some that stated that they had not paid attention and simply done their jobs.
- One individual interviewed did indicate that they noted the significance of some of the grade changes that were being made but did not specifically level an accusation against administration based on that observation.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Significant irregularities were identified on the visit to Central HS. The cumulative folders of the sample set contained some older versions of transcripts which A&M compared to recently printed transcripts. These older transcripts revealed class changes that had been made to transcripts to meet graduation requirements. Several transcripts in the sample of graduated seniors were shown to be missing graduation requirement classes.
- The school assumed that the grade manager could not change quarter grades, so final grade changes were being made instead.

- One specific irregularity was of a 2016 graduate who had not met the graduation requirement for Health course requirement upon graduation. The older transcript that was discovered showed a class called “Life Sports” for which the student received a B while in the new transcript that class had been replaced with graduation requirement class called “Health Issues.” In interviews, it was stated that this change had been made during the school year, but in later data analysis it was discovered that this student’s transcript was altered on 10/12/17, the day before the A&M site visit.
- A&M returned to the school to collect some transcripts that had been requested but not previously provided. One of the transcripts had a note appended that stated English 12 had been omitted from the previous transcript and that it had just been added that morning. The indicated that the change resulted from a Compass Learning credit recovery course that had never been recorded. However, A&M noted that there was no previous English 12 course on the student’s transcript. Failure of an original course is a precondition for enrolling in a full credit recovery.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- The registrar was required to substitute for the grade manager in the previous school year because the previous grade manager was out on leave for a significant time. However, an Assistant Principal has now taken over that role.
- In 2016 one of the current guidance counselors also served as the MPTS coordinator. This was also her first year as a 12th grade counselor. The MPTS role has now been transferred to another individual.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by A&M by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	-
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	-
Improper Grade Change	1
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	15	21
> 10 and ≤ 20 Points	4	18
> 20 and ≤ 30 Points	6	14
> 30 Points	15	18
No Grade Entry Before Cutoff Date	185	192
Total Unique Students	189	192

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	57	95
> 10 and ≤ 20 Days	61	60
> 20 and ≤ 50 Days	78	33
> 50 Days	7	4
Total Unique Students	203	192

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Ensure separation of duties and independent oversight of roles including grade manager, transcript manager, MPTS coordinator, and counselor.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.
- Ensure extra credit opportunities provided to students align with PGCPs grading procedures.
- Eliminate school-based credit recovery programs.

Additional Analysis and Investigation

- Further investigate the high number of students with ineligible transcripts who have been certified to graduate.

CHARLES HERBERT FLOWERS

A&M conducted the on-site investigation on October 6, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	83%	87%	86%	86%	91%

Record Review Findings

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

Charles Herbert Flowers High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	452		498		950	
Students included in Sample	25		28		53	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	8	32.0%	21	75.0%	29	54.7%
Without grade changes affecting final grades	7	28.0%	20	71.4%	27	50.9%
With all grade changes fully documented	1	4.0%	1	3.6%	2	3.8%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	2	7.1%	2	3.8%
3. Any grade changes without documentation	16	64.0%	5	17.9%	21	39.6%
4. Does not meet graduation requirements	1	4.0%	0	0.0%	1	1.9%
Transcript Ineligible	1	4.0%	0	0.0%	1	1.9%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	25		28		53	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	16	64.0%	7	25.0%	23	43.4%
Ineligible to graduate (category 4)	1	4.0%	0	0.0%	1	1.9%
<i>* This table reflects counts of unique students in each category</i>						

Of the 53 students reviewed, 1 (1.9%) was found ineligible to graduate. Of the 53 students with grade changes, 27 did not have grade changes that impacted final grades. Of the 26 students with grade changes that impacted final grades, 2 (7.7%) students had grade changes that were fully-documented, 2 (7.7%)

students had grade changes with limited documentation, and 21 (80.8%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- No PDS Tally Cards were on site because the registrar indicated that they were behind on completing PDS Tally Cards. They had not completed PDS Tally Cards for either year under examination.
- The records room appeared to be in good order, however transcripts and PDS Tally Cards were not kept in files. The 2016 cumulative records were held in the records room while the 2017 records were maintained in the registrar’s office.
- Not many of the projected PS-140 grade change forms were present, indicating that these forms not being filled or there is a lapse in recordkeeping practice.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The grading procedures seems to be very well understood at an administrative level. The Principal was one of the architects of the “good faith effort” grading procedure within the district and serves as a mentor principal.
- The principal noted that many teachers have accepted the new grading procedure regarding the award of 50 points for “good faith effort;” however, he has noted that some teachers have been resistant to the new policy.
- The school has implement a grade appeal process which was designed to complement the implementation of the new grading procedures, as it was anticipated that the policy could result in disagreements between teachers and students on grades awarded. The principal noted that, In the past school year there were approximately 80 appeals, of which half were successful.
- Flowers High School had some specific instances of makeup work being identified as the reason for a grade change where the work was not attached, or where the changes in points due to completion of makeup work were large.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- No PDS Tally Cards were present for 2017.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- Based on discussion with the MPTS Coordinator, MPTS policies seemed well understood. She was very passionate and dedicated to the Blended learning program and stated that students saw a high level of success with these classes and enjoyed them.
- The MPTS coordinator noted that the QLMs were not heavily used within their school and that students saw more success with blended learning options.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Service learning verification forms were noted in a majority of the student’s samples and were properly documented.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- The administrative team at Charles H. Flowers High School all believed that the accusations were unfounded and that these activities were not taking place at Flowers High School.
- Based on tip line complaints, this school received one of the highest numbers of complaints of any high school within the PGCPs system. Most complaints alleged that teachers were being intimidated by school administration to change grades and that grade increases would occur if teachers taught graduation requirement classes.
- Complaints also alleged that senior recovery packets were given to students for completion at the end of the year. Though there was indication of this in earlier years, there was no indication of this practice during the two years under review.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- No irregularities were documented in the site visit.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No recent changes to policies, procedures, or roles have been made.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by A&M by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	1
Admin and Faculty Intimidation/Retaliation	8
Credit Recovery Programs-District	1
General Mismanagement	-
Graduating Ineligible Students	2
Improper Grade Change	9
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	2
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	15	13
> 10 and ≤ 20 Points	8	11
> 20 and ≤ 30 Points	11	17
> 30 Points	29	19
No Grade Entry Before Cutoff Date	452	497
Total Unique Students	452	498

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	328	327
> 10 and ≤ 20 Days	93	107
> 20 and ≤ 50 Days	31	59
> 50 Days	-	5
Total Unique Students	452	498

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.
- Ensure extra credit opportunities provided to students align with PGCPs grading procedures.
- Ensure students enrolled in MPTS programs meet eligibility requirements outlined in the MPTS Handbook. Verify grades are appropriately entered upon MPTS completion.

Additional Analysis and Investigation

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

COMMUNITY-BASED CLASSROOM

A&M conducted the on-site investigation on October 16, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	33%	70%	53%	89%	76%

Record Review Findings

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

Community-Based Classroom Review Summary	Graduating Class				Total	
	2016		2017			
Students	111		94		205	
Students included in Sample	18		12		30	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	0	0.0%	0	0.0%	0	0.0%
Without grade changes affecting final grades	0	0.0%	0	0.0%	0	0.0%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
3. Any grade changes without documentation	17	94.4%	12	100.0%	29	96.7%
4. Does not meet graduation requirements	1	5.6%	0	0.0%	1	3.3%
Transcript Ineligible	1	5.6%	0	0.0%	1	3.3%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	18		12		30	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	17	94.4%	12	100.0%	29	96.7%
Ineligible to graduate (category 4)	1	5.6%	0	0.0%	1	3.3%
* This table reflects counts of unique students in each category						

Of the 30 students reviewed, 1 (3.3%) was found ineligible to graduate. Of the 30 students with grade changes, all 30 had grade changes that impacted final grades. Of these students, no students had grade changes that were fully-documented, no students had grade changes with limited documentation, and 29

(96.7%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Only one PDS card and no transcripts were missing from our sample. One PDS was not fully filled in when pulled from the folders but was completed as the visit was in progress and produced. Recordkeeping procedures regarding the tally cards and transcripts were exemplary.
- Recordkeeping related to grade change forms was not performed in line with district policy. Specifically, PS-140 grade change forms were not in place or even used in the grade change process. Instead, emails were identified as the primary means for teachers to communicate and authorize grade changes.
- Only two such grade change emails were able to be produced, and an explanation was given that many of these grade changes were authorized verbally within classrooms.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The “good faith effort” procedure was understood to be applied at the assignment level and seems to be central to grading at the school.
- The administration seemed to embrace the policy in general and was supportive of the concept of giving students second chances.
- Attendance policies as they relate to grades are generally not followed by the school.
- Some interviews revealed a level of resistance to the “good faith effort” procedure as simply making it too easy for students to pass.
- Based on our interviews, the general understanding is that the district's grading procedure is in line with the school's mission to be a secondary option for students that have been unsuccessful at other schools and need a different learning environment.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS cards were not completed in time for graduation, but they were more complete than at many other schools in the district.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policies seem to be well understood. Notably the school does not use the Quarter Learning Modules nor does it use Apex learning. Only the Blended Learning Credit Recovery is used with regularity.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Some service learning documents are in place, and are generally filled out appropriately.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No accusations were leveled against Community Based Classrooms specifically.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- No significant irregularities identified.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No recent changes to policies, procedures, or roles have been made.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	-
Admin and Faculty Intimidation/Retaliation	1
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	1
Improper Grade Change	-
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	-
Records Issue	1

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	5	-
> 10 and ≤ 20 Points	7	4
> 20 and ≤ 30 Points	4	4
> 30 Points	10	5
No Grade Entry Before Cutoff Date	23	86
Total Unique Students	39	86

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	84	51
> 10 and ≤ 20 Days	21	33
> 20 and ≤ 50 Days	6	10
> 50 Days	-	-
Total Unique Students	111	94

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Ensure separation of duties and independent oversight of roles including grade manager, transcript manager, MPTS coordinator, and counselor.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.

- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.
- Ensure extra credit opportunities provided to students align with PGCPs grading procedures.

Additional Analysis and Investigation

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

CROOM HIGH SCHOOL

A&M conducted the on-site investigation on October 17, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	72%	82%	76%	69%	62%

Record Review Findings

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

Croom High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	76		80		156	
Students included in Sample	14		14		28	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	8	57.1%	1	7.1%	9	32.1%
Without grade changes affecting final grades	7	50.0%	1	7.1%	8	28.6%
With all grade changes fully documented	1	7.1%	0	0.0%	1	3.6%
2. Any grade changes with limited documentation and no grade changes without documentation	4	28.6%	9	64.3%	13	46.4%
3. Any grade changes without documentation	1	7.1%	3	21.4%	4	14.3%
4. Does not meet graduation requirements	1	7.1%	1	7.1%	2	7.1%
Transcript Ineligible	1	7.1%	1	7.1%	2	7.1%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	14		14		28	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	5	35.7%	12	85.7%	17	60.7%
Ineligible to graduate (category 4)	1	7.1%	1	7.1%	2	7.1%

** This table reflects counts of unique students in each category*

Of the 28 students reviewed, 2 (7.1%) were found ineligible to graduate. Of the 28 students with grade changes, 8 did not have grade changes that impacted final grades. Of the 20 students with grade changes that impacted final grades, 1 (5.0%) student had grade changes that were fully-documented, 13 (65.0%) students had grade changes with limited documentation, and 4 (20.0%) students had grade changes with

no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Please identify any themes observed within the site visit and provide supporting evidence which is unique to the school. Speak to the extent of the issues and provide specific examples, including support in the site data.

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Records are generally well-organized and easy to access.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Although grading procedures seem to be understood by staff, Croom’s Principal, Counselor, Grade Manager, and one teacher interviewed acknowledged that Croom offers “recovery packets” which are not sanctioned by the MPTS handbook.
- Based on interviews, these packets are offered at the end of the year based on student-by-student circumstances, and often exceed the time limits for make-up work stipulated by the PGCPs grading procedures.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- Croom has not used PDS Tally Cards for the last several years – forms with student names are included in cumulative folders, but the tallies are not completed.
- Student cumulative folders did not include any similar check sheet which reflected MSDE-required data elements.
- Croom’s principal uses a hand-written check sheet to verify that students have met graduation requirements. This worksheet does not include any certification of graduation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- Croom staff do not adhere strictly to MPTS handbook. Croom makes many grade changes based on a school-managed “recovery packet” process which allows students to receive grade changes much later than stipulated by policy.
- Recovery packets were not available for review, but several teachers acknowledged having provided them.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Yes. Croom has managed and documented service learning well in accordance with procedures

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team?

- No accusations related to deliberate grade or graduation rate manipulation have been reported.

Evidence of Irregularities: During your review, have you identified irregularities? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Several students within Croom’s sample set of data were confirmed to have graduated on June 1st, however multiple grade change forms with only the principal and grade manager’s signature were processed on June 15th for these students. Upon review – the changes to the grades appear to have impacted individual student graduation eligibility. No make-up work was provided to substantiate these changes. After questioning individual records in discussions with the principal, A&M was provided with emails from October 2017 between the principal and teachers documenting the reasons for grade changes, however, no make-up work was provided.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- Beginning in August 2017, grade manager roles have been restricted to only individuals who have attended training and the grade manager, counselors, and principals have re-familiarized themselves with grading and record-keeping procedures.
- According to Croom’s principal, the new process for grade changes will be in accordance with the PGCPs grading procedures and all grade changes will go through the student.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	-
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	1
Improper Grade Change	-
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	8	5
> 10 and ≤ 20 Points	3	10
> 20 and ≤ 30 Points	8	4
> 30 Points	5	1
No Grade Entry Before Cutoff Date	6	79
Total Unique Students	22	79

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
> 10 and ≤ 20 Days	22	24
> 20 and ≤ 50 Days	26	25
> 50 Days	5	13
Total Unique Students	53	62

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Ensure adherence to attendance-related grading procedures.
- Eliminate school-based credit recovery programs.

Additional Analysis and Investigation

- Additional analysis may be warranted to fully understand the scope and effect of late grade changes on graduation across the population of recent Croom graduates.
- Further investigate Croom's school-based credit recovery may be necessary to ensure that these programs have been eliminated or brought into compliance with MPTS requirements.

CROSSLAND EVENING SCHOOL

A&M conducted the on-site investigation on October 11, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	8%	5%	16%	16%	18%

Record Review Findings

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

Crossland Evening/Sat High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	36		66		102	
Students included in Sample	3		1		4	
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	0	0.0%	0	0.0%	0	0.0%
Without grade changes affecting final grades	0	0.0%	0	0.0%	0	0.0%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	1	33.3%	0	0.0%	1	25.0%
3. Any grade changes without documentation	2	66.7%	1	100.0%	3	75.0%
4. Does not meet graduation requirements	0	0.0%	0	0.0%	0	0.0%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	3		1		4	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	3	100.0%	1	100.0%	4	100.0%
Ineligible to graduate (category 4)	0	0.0%	0	0.0%	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 4 students reviewed, none were found ineligible to graduate. Of the 4 students with grade changes, all 4 had grade changes that impacted final grades. Of these students, no students had grade changes that were fully-documented, 1 (25.0%) student had grade changes with limited documentation, and 3 (75.0%)

students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations:

Please identify any themes observed within the site visit and provide supporting evidence which is unique to the school. Speak to the extent of the issues and provide specific examples, including support in the site data.

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- No grade change forms were available. Per discussions with school, grade changes were submitted via a google spreadsheet to the grade manager.
- Email support for grade changes were provided by the school counselor.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Staff interviewed appeared to comprehend the 50% minimum grade for “good faith effort” and noted that the policy is applied as stated.
- Attendance policies that affect grading are not adhered to. Principal noted that the population of students that attend this school have unique circumstances that may impact attendance.
- Principal noted that teachers are encouraged to provide extra credit opportunities to failing seniors.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS tally cards and transcripts were fully completed and provided to the team. PDS tally cards were completed subsequent to graduation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- School staff interviewed appeared to have a good understanding of the MPTS requirements around Compass credit recovery programs. QLMS are not utilized by the school.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Unable to verify whether documentation is maintained. Met with counselor at Northwestern Evening School location and she brought copies of grade change support, PDS tally cards and transcripts for requested students (i.e. full cumulative folders were not reviewed).

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team?

- Persons interviewed were confident that complaints were not applicable to this school.
- No accusations noted.

Evidence of Irregularities: During your review, have you identified irregularities? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Counselor indicated that teachers are requested to complete a senior failure notice during the school year to identify seniors in their classes that are failing their classes. If student ultimately fails a class but was not included on the failure notice, the teacher is required to give the student a passing grade.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

School-Specific Complaint Log Summary

A&M received no specific complaints related to Crossland Evening High School.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	5	6
> 10 and ≤ 20 Points	2	-
> 20 and ≤ 30 Points	1	1
> 30 Points	2	1
No Grade Entry Before Cutoff Date	9	59
Total Unique Students	12	60

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	11	46
> 10 and ≤ 20 Days	16	16
> 20 and ≤ 50 Days	8	4
> 50 Days	1	-
Total Unique Students	36	66

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.

Additional Analysis and Investigation

- Further investigate the impact of senior failure notices on passing students who fail.

CROSSLAND

A&M conducted the on-site investigation on October 2, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	77%	76%	78%	81%	82%

Record Review Findings

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

Crossland High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	232		212		444	
Students included in Sample	13		17		30	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	5	38.5%	12	70.6%	17	56.7%
Without grade changes affecting final grades	5	38.5%	12	70.6%	17	56.7%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	1	7.7%	1	5.9%	2	6.7%
3. Any grade changes without documentation	7	53.8%	4	23.5%	11	36.7%
4. Does not meet graduation requirements	0	0.0%	0	0.0%	0	0.0%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	13		17		30	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	8	61.5%	5	29.4%	13	43.3%
Ineligible to graduate (category 4)	0	0.0%	0	0.0%	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 30 students reviewed, none were found ineligible to graduate. Of the 30 students with grade changes, 17 did not have grade changes that impacted final grades. Of the 13 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 2 (15.4%) students had grade changes with limited documentation, and 11 (84.6%) students had grade changes with

no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Recordkeeping policies do not seem well adhered to. PDS cards were not found for any of the students, nor were transcripts present within the students’ cumulative folders. The transcripts were printed during A&M’s visit.
- Though no cumulative folders were missing for any of the sample students. PS-140 forms were not usually found within cumulative folders, though the team was able to locate numerous PS-140 forms outside of the sample to get a sense for grade change practice at the school.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Many of the senior administration officials were supportive of the policy because it offered students an opportunity to earn a score close to passing in order to avoid feeling demoralized.
- Other individuals interviewed thought the policy enabled students to avoid doing work.
- Grading procedure related to absences was not well understood, with one guidance counselor indicating that there was no difference in how a student with 60 absences would be treated when compared to a student with 10 absences in terms of grading.
- There was wide application of make-up work in situations that don’t seem to have involved excused absences, suspensions, or home and hospital teaching.
- It was stated in complaint follow-up interview that some grade change forms had employed the “error in data entry” box to compensate for lack of grade change documentation.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not used to certify graduation. No PDS tally cards were completed for 2016 or 2017 graduates.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policy requirements seemed to be understood by the MPTS coordinator. It was expressed that the Quarter Learning Modules had not been successful at the school and that many students had failed them.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Student service learning forms were not produced during the A&M records audit.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Some of the senior administration expressed that they did not believe the accusations.
- Numerous anonymous onsite interviews with staff members and teachers revealed a belief that the accusations had merit. Staff shared that the principal would regularly make changes to grades and play favorites among teachers that would be asked to change those grades. Staff further shared that the principal was not receptive to feedback and would scandalize the name of anyone that came to her with feedback that she found to be unpalatable. The principal was not present for A&M's visit.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Excessive make-up work was a common driver of grade changes, and the make-up work appeared to fall outside of PGCPs policy detailing make-up work policies for absences, suspensions, and home and hospital situations. In one instance, a word search completed near year-end was used to justify an early quarter grade increase.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No recent policy or role changes were rereported as a result of the complaints.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	-
Admin and Faculty Intimidation/Retaliation	2
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	-
Improper Grade Change	5
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	1
Other	1
Records Issue	1

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	1	6
> 10 and ≤ 20 Points	5	10
> 20 and ≤ 30 Points	12	10
> 30 Points	25	23
No Grade Entry Before Cutoff Date	134	210
Total Unique Students	146	210

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	96	60
> 10 and ≤ 20 Days	80	63
> 20 and ≤ 50 Days	50	79
> 50 Days	6	10
Total Unique Students	232	212

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.
- Ensure extra credit opportunities provided to students align with PGCPs grading procedures.

Additional Analysis and Investigation

- Further investigate excessive make-up work that falls outside of PGCPs policy and procedures.

DR. HENRY A. WISE, JR.

A&M conducted the on-site investigation on October 9, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	77%	79%	84%	87%	89%

Record Review Findings

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

Dr Henry A Wise, Jr. High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	458	485	943			
Students included in Sample	35	34	69			
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	28	80.0%	27	79.4%	55	79.7%
Without grade changes affecting final grades	27	77.1%	23	67.6%	50	72.5%
With all grade changes fully documented	1	2.9%	4	11.8%	5	7.2%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	3	8.8%	3	4.3%
3. Any grade changes without documentation	7	20.0%	3	8.8%	10	14.5%
4. Does not meet graduation requirements	0	0.0%	1	2.9%	1	1.4%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	1	2.9%	1	1.4%
Total sample	35		34		69	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	7	20.0%	6	17.6%	13	18.8%
Ineligible to graduate (category 4)	0	0.0%	1	2.9%	1	1.4%
<i>* This table reflects counts of unique students in each category</i>						

Of the 69 students reviewed, 1 (1.4%) was found ineligible to graduate. Of the 69 students with grade changes, 50 did not have grade changes that impacted final grades. Of the 19 students with grade changes that impacted final grades, 5 (26.3%) students had grade changes that were fully-documented, 3 (15.8%) students had grade changes with limited documentation, and 10 (52.6%) students had grade changes with

no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Student record files are generally organized. All student cumulative folders were located. Transcripts for all students were printed during the site visit.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The grading procedure generally appears to be followed except with regard to grade change form use.
- Staff reported that all grade changes should be accompanied by a PS-140 form. No PS-140 forms were found for 2016 students, but use of PS-140 forms increased in for 2017 graduates.
- Many grade changes marked the reason for grade change as “Completion of make-up work,” yet only one had documentation of the make-up work done.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not used to verify eligibility for graduation. However, staff reported using senior contracts and graduation notification agreements, to track student credits.
- While staff understand that PDS Tally Cards need to be completed before the end of the year, staff report that the school lacks the time and resources to do so in advance of graduation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- No clear violations of MPTS policies were reported or observed during the site visit.
- Staff reported that at Dr. Henry A. Wise Jr. High School, QLM packets are completed in the classroom, during supplemental after school and Saturday sessions held during which teachers provide more hands-on support and teach the material.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Service learning verification forms were kept together in binders separate from student cumulative folders. Forms were found for most students sampled at Wise.
- Several students recorded service hours for activities which may not meet PGCPs or MSDE requirements, including working at the school, returning a library book, none of which meet MSDE’s service learning guidelines.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No accusations have been leveled towards specific individuals, groups, or PGCPs administration

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- No irregularities were identified.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- SchoolMAX user roles were restricted, requiring additional training for grade manager and transcript manager roles.
- No other significant changes were apparent

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	-
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	1
Improper Grade Change	3
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	1
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	21	31
> 10 and ≤ 20 Points	2	15
> 20 and ≤ 30 Points	5	17
> 30 Points	11	18
No Grade Entry Before Cutoff Date	163	459
Total Unique Students	183	463

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	289	302
> 10 and ≤ 20 Days	113	131
> 20 and ≤ 50 Days	54	48
> 50 Days	2	4
Total Unique Students	458	485

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Ensure adherence to attendance-related grading procedures.

Additional Analysis and Investigation

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

DuVAL

A&M conducted the on-site investigation on October 10, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	82%	82%	85%	92%	92%

Record Review Findings

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

Duval High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	336		312		648	
Students included in Sample	30		25		55	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	20	66.7%	20	80.0%	40	72.7%
Without grade changes affecting final grades	18	60.0%	20	80.0%	38	69.1%
With all grade changes fully documented	2	6.7%	0	0.0%	2	3.6%
2. Any grade changes with limited documentation and no grade changes without documentation	4	13.3%	0	0.0%	4	7.3%
3. Any grade changes without documentation	4	13.3%	4	16.0%	8	14.5%
4. Does not meet graduation requirements	2	6.7%	1	4.0%	3	5.5%
Transcript Ineligible	2	6.7%	1	4.0%	3	5.5%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	30		25		55	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	8	26.7%	4	16.0%	12	21.8%
Ineligible to graduate (category 4)	2	6.7%	1	4.0%	3	5.5%
<i>* This table reflects counts of unique students in each category</i>						

Of the 55 students reviewed, 3 (5.5%) were found ineligible to graduate. Of the 55 students with grade changes, 38 did not have grade changes that impacted final grades. Of the 17 students with grade changes that impacted final grades, 2 (11.8%) students had grade changes that were fully-documented, 4 (23.5%) students had grade changes with limited documentation, and 8 (47.1%) students had grade changes with

no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Student record files are generally organized. All student cumulative folders were easily located
- Transcripts were provided for every student. All transcripts for 2017 students were dated June 21, 2017, nearly a month after students graduated. Printed transcripts for 2016 students could not be located and were printed during the site visit.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Grading procedures are now well-understood by staff in the wake of previous internal investigations, but records indicate procedures were not appropriately followed in previous years.
- Most grade changes were not supported by PS-140s or any other supporting documentation. Some staff maintained other records of grade changes, but there was little evidence of adherence with administrative procedures related to PS-140s.
- Where PS-140s were present, several were not signed by the teacher and some were for grade changes for quarters 1 or 2 completed just before graduation.
- In some instances, grade changes for multiple quarter grades were requested on the same form for an error in data entry.
- One of the professional school counselors acted as grade manager, and had affected grade changes where he was listed as both the requester and the data entry person.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not used to verify eligibility for graduation.
- Professional School Counselors have their own approaches to verifying graduation eligibility, typically relying on senior contracts in lieu of the PDS Tally Cards

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS handbook requirements are now well-understood and adhered to after the conclusion of previous internal investigations
- Staff have indicated the DuVal High School ran large, unofficial credit recovery programs which utilized MPTS content to provide additional points not in compliance with the MPTS handbook
- Staff have also indicated that previous credit recovery programs were not always graded, and that students were rewarded points for attempting

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Service learning verification forms were found in the cumulative folders for most students.
- Those found were all met the 24 hour total requirement and were generally completed properly.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Staff shared information that reflected the findings of the previous internal audit of DuVal high school
- Staff acknowledged that individuals at DuVal had deliberately violated grading procedures to offer students additional chances to graduate

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Two of the PS-140 forms provided were designated with the reason as “Other – Module / Project Graduation Requirement” with a signature only from the person requesting the change. Neither were dated.
- Records review indicated several grade changes were generated from school-based credit recovery programs which did not comply with MPTS handbook requirements.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- According to DuVal staff, after the previous investigation at DuVal High School, the principal and registrar were placed on administrative leave
- DuVal high school is now led by an acting principal
- Transcript manager and grade manager roles were reported to have been restricted

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	-
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	1
Improper Grade Change	1
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	1
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	5	15
> 10 and ≤ 20 Points	15	28
> 20 and ≤ 30 Points	23	17
> 30 Points	46	30
No Grade Entry Before Cutoff Date	164	312
Total Unique Students	203	312

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	199	138
> 10 and ≤ 20 Days	83	85
> 20 and ≤ 50 Days	47	79
> 50 Days	7	10
Total Unique Students	336	312

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Ensure separation of duties and independent oversight of roles including grade manager, transcript manager, MPTS coordinator, and counselor.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Ensure adherence to attendance-related grading procedures.
- Ensure students enrolled in MPTS programs meet eligibility requirements outlined in the MPTS Handbook. Verify grades are appropriately entered upon MPTS completion.
- Eliminate school-based credit recovery programs.

Additional Analysis and Investigation

- No additional analysis and investigation at this time. Previous internal investigations have addressed major concerns.
- PGCPs should continue to monitor progress in remediating findings from the previous internal investigation.

ELEANOR ROOSEVELT

A&M conducted the on-site investigation on October 4, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	89%	87%	88%	90%	91%

Record Review Findings

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

Eleanor Roosevelt High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	602		569		1,171	
Students included in Sample	46		41		87	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	35	76.1%	31	75.6%	66	75.9%
Without grade changes affecting final grades	35	76.1%	31	75.6%	66	75.9%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
3. Any grade changes without documentation	10	21.7%	9	22.0%	19	21.8%
4. Does not meet graduation requirements	1	2.2%	1	2.4%	2	2.3%
Transcript Ineligible	1	2.2%	1	2.4%	2	2.3%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	46		41		87	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	10	21.7%	9	22.0%	19	21.8%
Ineligible to graduate (category 4)	1	2.2%	1	2.4%	2	2.3%
<i>* This table reflects counts of unique students in each category</i>						

Of the 87 students reviewed, 2 (2.3%) were found ineligible to graduate. Of the 87 students with grade changes, 66 did not have grade changes that impacted final grades. Of the 21 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, no students had grade changes with limited documentation, and 19 (90.5%) students had grade changes with no

documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Student cumulative folders and transcript/PDS Tally Card packets are well kept and organized. All cumulative folders were found, however several transcripts were missing and printed out from SchoolMAX upon request

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Form PS-140 is not used at all for grade changes, in fact, most were observed as communicated via email.
- The attendance policy is upheld in terms of keeping documentation for absences. Enforcement of the attendance related grading procedure is left up to individual teachers and largely unenforced, based on the fact that many students with excessive (10+) unlawful absences have been provided make-up work and recovery options.
- According to interviews, teacher interpretations of the updated grading procedures (50% for “good faith effort”) have varied greatly. Some staff continue to resist the procedures, while others give 50% as minimum quarterly grades.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- Graduation certification is generally completed within a month after graduation each year.
- Since the county asks for the list of graduating seniors before fourth quarter grades come out, counselors are left to make assumptions of which seniors will or will not make the list. After these grades come out, counselors must email the registrar the names of any seniors who do not meet graduation requirements so that they are taken off the graduation list.
- Because the default is that seniors are on the graduation list, there is room for error when meeting graduation requirements are dependent on the last quarter grades and make-up work being completed up to the deadline.
- Students are added to the graduation list after it is drawn up, without requiring evidence or documentation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- Generally, MPTS policies and procedures are understood and adhered to.
- Students receive significant on-site support during the QLM process.

- Administrators have noted the program has become much more effective with on-site coaching and dedicated classroom time for QLMS.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- The school keeps a binder of submitted service learning verification forms, however, documentation was incomplete for many students in the sample.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Staff have alleged that the Instructional Director and Principal verbally communicate with staff to encourage them to increase grades without proper documentation.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- During the site visit, A&M team members came across PDS cards dated in 2017 which included notes requesting pramming of courses onto transcripts, or changing of grades to meet graduation requirements. No supporting information or documentation was included.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- None noted.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	2
Admin and Faculty Intimidation/Retaliation	1
Credit Recovery Programs-District	1
General Mismanagement	-
Graduating Ineligible Students	3
Improper Grade Change	6
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	1
Other	1
Records Issue	1

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	11	25
> 10 and ≤ 20 Points	23	22
> 20 and ≤ 30 Points	13	10
> 30 Points	26	47
No Grade Entry Before Cutoff Date	192	560
Total Unique Students	231	561

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	535	475
> 10 and ≤ 20 Days	54	57
> 20 and ≤ 50 Days	11	33
> 50 Days	2	4
Total Unique Students	602	569

School-Specific Recommendations

Opportunities for Improvement

- Require grade change forms (PS140) for every grade change, and support all grade changes for make-up work with appropriate documentation.
- Retain PS140s in the student cumulative folders.
- Complete Performance Data Summary (PDS) cards annually, and utilize the tally sheet on each PDS card to certify each student prior to graduation.
- Retain PDS cards in the student cumulative folders.
- Certify transcripts as official by having the principal or a designee sign the transcripts prior to graduation.
- Retain the official transcript in the student cumulative folders.
- Retain service learning verification forms in the student cumulative folders.

Additional Analysis and Investigation

- Conduct further review of post-graduation and grade and transcript modification.

FAIRMONT HEIGHTS

A&M conducted the on-site investigation on October 16, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	75%	76%	73%	87%	85%

Record Review Findings

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

Fairmont Heights High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	161		184		345	
Students included in Sample	12		18		30	
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	10	83.3%	16	88.9%	26	86.7%
Without grade changes affecting final grades	10	83.3%	11	61.1%	21	70.0%
With all grade changes fully documented	0	0.0%	5	27.8%	5	16.7%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	2	11.1%	2	6.7%
3. Any grade changes without documentation	2	16.7%	0	0.0%	2	6.7%
4. Does not meet graduation requirements	0	0.0%	0	0.0%	0	0.0%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	12		18		30	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	2	16.7%	2	11.1%	4	13.3%
Ineligible to graduate (category 4)	0	0.0%	0	0.0%	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 30 students reviewed, none were found ineligible to graduate. Of the 30 students with grade changes, 21 did not have grade changes that impacted final grades. Of the 9 students with grade changes that impacted final grades, 5 (55.6%) students had grade changes that were fully-documented, 2 (22.2%) students had grade changes with limited documentation, and 2 (22.2%) students had grade changes with

no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- All cumulative folders and transcripts for the sample students were provided. A very small percentage of PS-140 forms were found in the cumulative folders. Performance data summary cards for 2017 still have not been completed. Based on this, although the policies may be understood, they are not being fully adhered to.
- Tally cards for graduation are not being used. The registrar said that the 2017 cards were not complete because he hasn’t had time to do them. The principal was also aware that they were not complete.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The school is not following the guidelines with regards to make up work and grade changes.
- We observed two instances in which QLM packets were given to students for make-up work. In one instance, the QLM accounted for a grade change from 60 to 86, which the MPTS coordinator agreed was not appropriate. The principal signed grade changes presented to her without a thorough review. Of the PS-140 forms the team reviewed, there were several instances of Q1, Q2, and Q3 grades all being changed in May.
- The A&M team discovered an email from the Spanish teacher to administration identifying four seniors that failed the course and presented four options for those students to do make-up work to pass.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- The counselor indicated that the PDS Tally Cards are all dated 6/1/20XX regardless of when they are completed. 2017 cards have not been tallied or properly filled out, yet most of them were dated and many others were signed.
- The counselor stated that PDS cards are completed in the summertime. In some cases, the staff relies on the senior contracts to verify that the student has met the graduation requirements instead of the PDS Tally Cards.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- The MPTS coordinator, Ms. McCoy-Hill understood the policies and was very well-versed in the requirements surrounding the QLMs.

- Fairmont Heights did not follow MPTS policies. QLM packets were used for make-up work. In one case, more than the QLM limit of 10 points was awarded to the student's grade.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- For the service learning verification forms that were provided, most were completed properly and generally in accordance with the requirements in terms of hours and types of activities.
- Some forms indicated that students were being granted service learning hours for ineligible activities, including after-school jobs.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- One staff member indicated that grades may have been changed to maintain the eligibility of athletes. However, no other interviewees believed any intentional manipulation was taking place at their school.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- The A&M team did not view any records that appeared to be manipulated or falsified. However, a lack of proper documentation surrounding the graduation process was observed. The principal approved grade changes brought to her by a teacher, with or without supporting documentation, and regardless of which quarter the grade change pertained to. When confronted with one particularly questionable grade change, the principal was not familiar with the situation despite having signed the form.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- We were not informed of any specific policy changes that have been made. The principal attributed some of the issues to her being new as a principal despite this being her 5th year as principal.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	-
Admin and Faculty Intimidation/Retaliation	1
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	-
Improper Grade Change	1
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	-	9
> 10 and ≤ 20 Points	3	6
> 20 and ≤ 30 Points	3	2
> 30 Points	10	13
No Grade Entry Before Cutoff Date	81	184
Total Unique Students	84	184

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	75	59
> 10 and ≤ 20 Days	41	65
> 20 and ≤ 50 Days	40	51
> 50 Days	5	9
Total Unique Students	161	184

School-Specific Recommendations

Opportunities for Improvement

- Require grade change forms (PS140) for every grade change, and support all grade changes for make-up work with appropriate documentation.
- Retain PS-140s in the student cumulative folders.
- Complete Performance Data Summary (PDS) cards annually, and utilize the tally sheet on each PDS card to certify each student prior to graduation.
- Retain PDS cards in the student cumulative folders.
- Certify transcripts as official by having the principal or a designee sign the transcripts prior to graduation.
- Retain the official transcript in the student cumulative folders.
- Retain service learning verification forms in the student cumulative folders.

Additional Analysis and Investigation

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

FORESTVILLE

A&M conducted the on-site investigation on October 20, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Class of 2016 for this school. Because Forestville High School was closed at the end of the 2016 school year only the first year of files was available. These files are now housed at Suitland High School. This summary presents record review findings, site visit observations, and key statistics from the PGCPS Special Review hotline and data analytics.

Record Review Findings

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

Forestville High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	184	-	184			
Students included in Sample	15	-	15			
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	12	80.0%	0	N/A	12	80.0%
Without grade changes affecting final grades	12	80.0%	0	N/A	12	80.0%
With all grade changes fully documented	0	0.0%	0	N/A	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	N/A	0	0.0%
3. Any grade changes without documentation	3	20.0%	0	N/A	3	20.0%
4. Does not meet graduation requirements	0	0.0%	0	N/A	0	0.0%
Transcript Ineligible	0	0.0%	0	N/A	0	0.0%
Service Learning Ineligible	0	0.0%	0	N/A	0	0.0%
Total sample	15		0		15	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	3	20.0%	0	N/A	3	20.0%
Ineligible to graduate (category 4)	0	0.0%	0	N/A	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 15 students reviewed, none were found ineligible to graduate. Of the 15 students with grade changes, 12 did not have grade changes that impacted final grades. Of the 3 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, no students had grade changes with limited documentation, and 3 (100.0%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Most recordkeeping requirements and practices are not adhered to. No PDS cards or transcripts are present within cumulative folders.
- Grade change forms are not kept within folders. It is not certain whether these forms were filled out or where they could be found.
- Transcripts were produced for our visit but were not signed or retained within cumulative folders.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The school did not appear to misapply the grading procedure, though the new procedure was not fully rolled out when Forestville High School closed.
- The school did not retain PS-140 grade change forms as required by the school.
- Absences did not factor heavily within the grading system.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- No PDS Tally Cards were produced.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policies seem to have been understood in past years.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Despite data system indicating completion, few forms were present and complete

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No accusations were made.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No Applicable – School Closed

School-Specific Complaint Log Summary

No specific complaints were received for Forestville.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	13	-
> 10 and ≤ 20 Points	13	-
> 20 and ≤ 30 Points	13	-
> 30 Points	17	-
No Grade Entry Before Cutoff Date	145	-
Total Unique Students	149	-

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
> 10 and ≤ 20 Days	52	96
> 20 and ≤ 50 Days	27	65
> 50 Days	-	9
Total Unique Students	79	

School-Specific Recommendations

Opportunities for Improvement

- Not Applicable – School Closed

Additional Analysis and Investigation

- No Applicable – School Closed

FREDERICK DOUGLASS

A&M conducted the on-site investigation on October 12, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	87%	84%	86%	90%	92%

Record Review Findings

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

Frederick Douglass High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	239		212		451	
Students included in Sample	20		20		40	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	18	90.0%	15	75.0%	33	82.5%
Without grade changes affecting final grades	18	90.0%	15	75.0%	33	82.5%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	1	5.0%	1	5.0%	2	5.0%
3. Any grade changes without documentation	1	5.0%	2	10.0%	3	7.5%
4. Does not meet graduation requirements	0	0.0%	2	10.0%	2	5.0%
Transcript Ineligible	0	0.0%	2	10.0%	2	5.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	20		20		40	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	2	10.0%	3	15.0%	5	12.5%
Ineligible to graduate (category 4)	0	0.0%	2	10.0%	2	5.0%
* This table reflects counts of unique students in each category						

Of the 40 students reviewed, 2 (5.0%) were found ineligible to graduate. Of the 40 students with grade changes, 33 did not have grade changes that impacted final grades. Of the 7 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 2 (28.6%)

students had grade changes with limited documentation, and 3 (42.9%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Records were generally in order. The cumulative folders for 2017 graduates typically contained service learning verification forms and grade change forms. The cumulative folders for 2016 did not include service learning verification forms, and while some were provided separately, we did not receive several service learning verification forms. Based on our sample, the staff were not using grade change forms for every grade change.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The administration understood the good faith grading procedure and they seem to be following the policy. However, grade change forms are not being used for all grade changes.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- 2016 PDS Tally Cards were dated June 1, 2016 and graduation was held May 27, 2016. 2017 PDS Tally Cards were dated June 1, 2017 and graduation was held May 23, 2017. Therefore, the tally cards were completed after graduation.
- The PDS Tally Cards were not utilized to certify students for graduation. The process begins at the beginning of senior year. Counselors look at each 4th year student and identify courses and community service hours needed to graduate. In January, another review is conducted to see if the student is on track to graduate. Jeopardy notices are provided to students who are at risk of not graduating. 4th quarter meeting is held with student to inform him/her of the grades needed to graduate. In May, a DE list and potential failure list is run in APEX. Promotes/non-promotes are determined based on report cards, DE list and potential failure list.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- The administration and staff seemed to fully understand the requirements of the various MPTS programs.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- We did not receive service learning verification forms for all students in our sample. However, of the forms we did receive, the majority of the students met the requirements and the documentation was properly completed.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No specific complaints were made and none of the people we spoke to believed anything nefarious was taking place at their school.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- No irregularities were identified.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- The administration and staff did not communicate that they had changed any policies, procedures, or roles. The staff did mention that the county had limited grade change privileges in the SchoolMAX system to only a limited number of individuals.

School-Specific Complaint Log Summary

A&M received no specific complaints related to Frederick Douglass High School.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	15	7
> 10 and ≤ 20 Points	6	5
> 20 and ≤ 30 Points	4	3
> 30 Points	7	6
No Grade Entry Before Cutoff Date	133	211
Total Unique Students	139	211

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	181	136
> 10 and ≤ 20 Days	49	58
> 20 and ≤ 50 Days	9	17
> 50 Days	-	1
Total Unique Students	239	212

School-Specific Recommendations

Opportunities for Improvement

- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.

Additional Analysis and Investigation

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

FRIENDLY

A&M conducted the on-site investigation on October 3, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	84%	78%	80%	76%	81%

Record Review Findings

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

Friendly High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	180		218		398	
Students included in Sample	12		20		32	
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	11	91.7%	17	85.0%	28	87.5%
Without grade changes affecting final grades	11	91.7%	17	85.0%	28	87.5%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	2	10.0%	2	6.3%
3. Any grade changes without documentation	1	8.3%	1	5.0%	2	6.3%
4. Does not meet graduation requirements	0	0.0%	0	0.0%	0	0.0%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	12		20		32	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	1	8.3%	3	15.0%	4	12.5%
Ineligible to graduate (category 4)	0	0.0%	0	0.0%	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 32 students reviewed, none were found ineligible to graduate. Of the 32 students with grade changes, 28 did not have grade changes that impacted final grades. Of the 4 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 2 (50.0%) students had grade changes with limited documentation, and 2 (50.0%) students had grade changes with

no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Records were generally in order. Some cumulative folders did not include service learning forms, and there was one instance of a student without a tally card. Of our sample, grade change forms were not being used in all cases where required. The grade manager retained separate documentation to corroborate grade changes, such as emails, but the grade manager should have completed a grade change form for each of these grade changes. For grade changes initiated due to the completion of make-up work, the grade manager had been returning the attached supporting documentation to teachers, instead of retaining copies of the grade change form and supporting documentation in the cumulative folder.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The attendance portion of the grading procedure is understood but has not been adhered to in previous school years. The acting principal noted that she communicated to teachers at the beginning of the school year to enforce the attendance policy and that the administration will be monitoring the success of this new initiative over the course of this year.
- Grade change forms are not being used to initiate all grade changes.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- The counselors are not completing PDS Tally Cards until after graduation. The PDS Tally Cards were signed June 1, 2016 and June 1, 2017, which fell on the same day as graduation in 2016 and 2017.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- The individuals we interviewed generally understood the MPTS policies. We did not identify any instances where MPTS policies were not being adhered to.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- For the service learning forms provided, they were appropriately signed and filled out. Students had met the requisite number of hours.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No accusations were leveled

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Friendly’s administration was aware of one instance where a student passed English 12 after completing additional work, but the administration was no longer able to change the grades in the system. Therefore, while the student graduated, it would not appear that they should have graduated per the system or per the student’s transcript. The school’s administration has escalated the issue to county and state officials to resolve the matter.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	-
Admin and Faculty Intimidation/Retaliation	1
Credit Recovery Programs-District	-
General Mismanagement	1
Graduating Ineligible Students	2
Improper Grade Change	2
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	2
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	15	13
> 10 and ≤ 20 Points	6	4
> 20 and ≤ 30 Points	5	2
> 30 Points	13	4
No Grade Entry Before Cutoff Date	40	214
Total Unique Students	62	214

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	95	129
> 10 and ≤ 20 Days	73	64
> 20 and ≤ 50 Days	12	24
> 50 Days	-	1
Total Unique Students	180	218

School-Specific Recommendations

Opportunities for Improvement

- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.

Additional Analysis and Investigation

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

GWYNN PARK

A&M conducted the on-site investigation on October 9, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	83%	86%	87%	87%	95%

Record Review Findings

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

Gwynn Park High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	257	235	492			
Students included in Sample	22	16	38			
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	14	63.6%	13	81.3%	27	71.1%
Without grade changes affecting final grades	14	63.6%	13	81.3%	27	71.1%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
3. Any grade changes without documentation	6	27.3%	3	18.8%	9	23.7%
4. Does not meet graduation requirements	2	9.1%	0	0.0%	2	5.3%
Transcript Ineligible	2	9.1%	0	0.0%	2	5.3%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	22		16		38	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	6	27.3%	3	18.8%	9	23.7%
Ineligible to graduate (category 4)	2	9.1%	0	0.0%	2	5.3%
<i>* This table reflects counts of unique students in each category</i>						

Of the 38 students reviewed, 2 (5.3%) were found ineligible to graduate. Of the 38 students with grade changes, 27 did not have grade changes that impacted final grades. Of the 11 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, no students had

grade changes with limited documentation, and 9 (81.8%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- The school’s recordkeeping requirements and policies are not adhered to by the administration and staff. For example, the grade change forms are not being retained in the students’ cumulative folders, tally cards have not been filled out for 2016 or 2017 graduates, and service learning forms were incomplete or missing from the cumulative folders of some of the students in the sample. According to the school staff, the school has not had a registrar since December 2016 and there has been turnover with the guidance secretary position.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Based on discussions with school staff and administration, attendance does not factor into grading, as students are given opportunities to recover failing grades due to absences.
- The principal and staff understood the new grading procedure and explained that students can and do receive below 50 percent on assignments if there is not a “good faith effort” shown by the student.
- PS-140s are not maintained in student cumulative folders and none of the grade changes for the sample students were located.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- Guidance had not completed the PDS Tally Cards for 2016 or 2017 graduates.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policies appeared to be generally understood and adhered to by the school’s administration and staff. The A&M team noted an instance where a teacher had attached a QLM as make-up work to a grade change form. Since the county does not return the QLM packets to the schools, it appears that the teacher had graded the QLM and considered it make-up work.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- The service learning forms were in most of the students’ cumulative folders. However, some students did not receive the full 24 hours required. The A&M team noted instances where

students received service learning hours for activities that did not require the student to perform any service. For example, students received 1 hour of service learning when their parent attended back-to-school night and other students earned 25 service hours for donating 5 coats.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- The principal noted that the previous registrar resigned due to complaints that she had deliberately changed grades on transcripts. The principal noted that she did not know how widespread the alleged grade manipulation was, but noted that the registrar had changed her own child’s grades. The principal also indicated that she had informed the county of these grade manipulations, but the county has not investigated the issue.
- The principal contacted Labor Relations to determine the course of action to terminate the registrar. She noted that Labor Relations indicated that the grade manipulation was grounds for termination, but the registrar resigned that day, December 9, 2016, before being terminated.
- There were a several complaints received regarding improper grade changes.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- One student in the sample did not pass World History per his transcript yet still graduated. The A&M team followed up with the guidance counselor who was unable to find any documentation that the student had attended summer school or a credit recovery program. Based on the information obtained and reviewed, it appears that this student graduated improperly.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- None noted.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	1
Admin and Faculty Intimidation/Retaliation	5
Credit Recovery Programs-District	1
General Mismanagement	3

Graduating Ineligible Students	3
Improper Grade Change	6
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	2
Other	1
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	14	4
> 10 and ≤ 20 Points	13	2
> 20 and ≤ 30 Points	11	4
> 30 Points	18	6
No Grade Entry Before Cutoff Date	33	234
Total Unique Students	65	234

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	189	169
> 10 and ≤ 20 Days	47	43
> 20 and ≤ 50 Days	21	21
> 50 Days	-	2
Total Unique Students	257	235

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.
- Eliminate school-based credit recovery programs.

Additional Analysis and Investigation

- Given the complaints against the registrar that resigned in December 2016, review of all grade and transcript changes made by the registrar to determine the extent of alleged manipulation.

HIGH POINT

A&M conducted the on-site investigation on October 12, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	58%	62%	64%	59%	62%

Record Review Findings

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

High Point High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	407		479		886	
Students included in Sample	35		42		77	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	34	97.1%	36	85.7%	70	90.9%
Without grade changes affecting final grades	34	97.1%	35	83.3%	69	89.6%
With all grade changes fully documented	0	0.0%	1	2.4%	1	1.3%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
3. Any grade changes without documentation	1	2.9%	4	9.5%	5	6.5%
4. Does not meet graduation requirements	0	0.0%	2	4.8%	2	2.6%
Transcript Ineligible	0	0.0%	2	4.8%	2	2.6%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	35		42		77	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	1	2.9%	4	9.5%	5	6.5%
Ineligible to graduate (category 4)	0	0.0%	2	4.8%	2	2.6%
<i>* This table reflects counts of unique students in each category</i>						

Of the 77 students reviewed, 2 (2.6%) were found ineligible to graduate. Of the 77 students with grade changes, 69 did not have grade changes that impacted final grades. Of the 8 students with grade changes that impacted final grades, 1 (12.5%) student had grade changes that were fully-documented, no students

had grade changes with limited documentation, and 5 (62.5%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Filing procedures were very organized and all cumulative folders requested were provided.
- Support for one of the grade changes was not located.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Generally, it seems that the grading procedures are adhered to. The principal was adamant that she requires all grade change forms to be accompanied by appropriate supporting documentation prior to authorizing any changes.
- Attendance policies are not enforced.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not utilized to certify students for graduation. The registrar prepares a Google Spreadsheet that the counselors review based on their Senior Agreements and electronic transcripts.
- The PDS Tally Cards are completed subsequent to graduation by the Registrar. The PDS Tally Cards for SY15-16 and SY 16-17 were completed and attached to copies of transcripts and HSA testing scores.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- It did not appear that MPTS policy requirements are completely understood. Interviews revealed that some students are enrolled in a MPTS program despite not meeting all eligibility requirements, as a result of inadequate monitoring of the enrollment/sign-up process. Once the student has started the program, they are not withdrawn.
- Grading procedures related to MPTS are not adhered to. A&M observed a small number of instances where students were awarded points exceeding those permitted by policy.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- For the service learning verification forms that were provided, they appeared to be completed properly and generally in accordance with the requirements in terms of hours and types of

activities. However, not every student had these forms in their files, nor did every form reviewed reflect the requisite number of hours. The transcripts reviewed for our sample selection indicated that service hour requirements were met for all students.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No specific complaints were made during the site visit and none of the people interviewed believed anything intentional manipulation was taking place at the school.
- There were a few complaints received and noted in the complaint summary below.

Evidence of Irregularities: During your review, have you identified irregularities? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Principal noted that prior to her arrival at the school, teachers were required to give seniors that failed their classes passing grades if those teachers did not include that student on the senior failure notice provided to counselors during the school year. The principal noted that she ended this practice once she was made aware of it.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No changes identified.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	-
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	-
General Mismanagement	1
Graduating Ineligible Students	1
Improper Grade Change	1
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	1
Other	2
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	1	17
> 10 and ≤ 20 Points	9	19
> 20 and ≤ 30 Points	5	8
> 30 Points	9	13
No Grade Entry Before Cutoff Date	241	476
Total Unique Students	251	477

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	281	312
> 10 and ≤ 20 Days	87	91
> 20 and ≤ 50 Days	39	76
> 50 Days	-	-
Total Unique Students	407	479

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.
- Ensure students enrolled in MPTS programs meet eligibility requirements outlined in the MPTS Handbook. Verify grades are appropriately entered upon MPTS completion.

Additional Analysis and Investigation

- Analyze grade changes associated with previous principal's alleged practice of passing seniors when not included on teacher failure notices.

LARGO

A&M conducted the on-site investigation on October 2, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPS Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	80%	78%	82%	82%	84%

Record Review Findings

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

Largo High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	230	220	450			
Students included in Sample	15	15	30			
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	13	86.7%	12	80.0%	25	83.3%
Without grade changes affecting final grades	9	60.0%	11	73.3%	20	66.7%
With all grade changes fully documented	4	26.7%	1	6.7%	5	16.7%
2. Any grade changes with limited documentation and no grade changes without documentation	1	6.7%	3	20.0%	4	13.3%
3. Any grade changes without documentation	1	6.7%	0	0.0%	1	3.3%
4. Does not meet graduation requirements	0	0.0%	0	0.0%	0	0.0%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	15		15		30	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	2	13.3%	3	20.0%	5	16.7%
Ineligible to graduate (category 4)	0	0.0%	0	0.0%	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 30 students reviewed, none were found ineligible to graduate. Of the 30 students with grade changes, 20 did not have grade changes that impacted final grades. Of the 10 students with grade changes

that impacted final grades, 5 (50.0%) students had grade changes that were fully-documented, 4 (40.0%) students had grade changes with limited documentation, and 1 (10.0%) student had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Student record files were generally disorganized. However, all cumulative folders were available for review.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The administration understood the grading procedures and claimed that the policies are being followed. However, grade change forms are not being used for all grade changes (specifically relating to MPTS related changes) and no grade change forms were accompanied with appropriate make-up work.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not utilized to certify students for graduation. The counselors rely on credit evaluations, graduation notification agreements, etc. to certify students for graduation. The tally sheets are completed during the summer after graduation and provided to the registrar in August or September.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- The principal and staff seemed to fully understand the requirements of the various MPTS programs.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Service learning forms were generally present, however, A&M found evidence that Largo was offering service learning credit for activities which may not adhere to PGCPs or MSDE requirements.
- For example, during the site visit, A&M noted that Largo was offering service learning hours in exchange for financial donations to a charitable organization called “Bread of Life” – Flyers were found in the guidance office with the offering “For every dollar you donate, receive 1 service learning hour!!”

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No, specific complaints were not made, and Largo staff did not express awareness of any wrongdoing. The Principal firmly believed that any increase in graduation rates at county level is due to improved cohort management.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Service learning hours are being awarded to students who donate money to non-profits, instead of meeting PGCPs and MSDE requirements for service learning contributes to students who have not met the graduation requirements associated with service learning being awarded a diploma.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- The administration and staff did not communicate that they had changed any policies, procedures, or roles based on complaints.

School-Specific Complaint Log Summary

A&M received no specific complaints related to Largo High School.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	5	8
> 10 and ≤ 20 Points	21	5
> 20 and ≤ 30 Points	4	5
> 30 Points	3	4
No Grade Entry Before Cutoff Date	219	220
Total Unique Students	219	220

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	119	94
> 10 and ≤ 20 Days	83	67
> 20 and ≤ 50 Days	28	51
> 50 Days	-	8
Total Unique Students	230	220

School-Specific Recommendations

Opportunities for Improvement

- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.

Additional Analysis and Investigation

- Investigate the awarding of service learning hours in exchange for donations to non-profit organizations.

LAUREL

A&M conducted the on-site investigation on October 11, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	73%	76%	81%	83%	85%

Record Review Findings

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

Laurel High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	433	407	840			
Students included in Sample	34	33	67			
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	28	82.4%	26	78.8%	54	80.6%
Without grade changes affecting final grades	28	82.4%	26	78.8%	54	80.6%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	1	2.9%	4	12.1%	5	7.5%
3. Any grade changes without documentation	4	11.8%	3	9.1%	7	10.4%
4. Does not meet graduation requirements	1	2.9%	0	0.0%	1	1.5%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	1	2.9%	0	0.0%	1	1.5%
Total sample	34		33		67	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	5	14.7%	7	21.2%	12	17.9%
Ineligible to graduate (category 4)	1	2.9%	0	0.0%	1	1.5%
<i>* This table reflects counts of unique students in each category</i>						

Of the 67 students reviewed, 1 (1.5%) was found ineligible to graduate. Of the 67 students with grade changes, 54 did not have grade changes that impacted final grades. Of the 13 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 5 (38.5%)

students had grade changes with limited documentation, and 7 (53.8%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- There were several cumulative folders that were missing and others found in boxes in a separate location from other folders in the appropriate filing location. Laurel recordkeeping and organization was lacking. Student record cards were kept separate from student cumulative folders.
- PDS Tally Cards and/or student cumulative folders were not found for seven students in the graduating class of 2016 and nine students in the graduating class of 2017. Staff later found several of these records. However, after the second site visit to Laurel, PDS Tally Cards were still not found for two students in the graduating class of 2017.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Laurel administration’s view with regards to the “good faith effort” policy is that any effort by the students should be rewarded. This was evidenced by students receiving an “I” on QLM packets by the district and still being awarded points by the administrative team. Students were given up to 5 points, with a max quarter grade of 60. Example: student grade was increased from 56 to 60 despite receiving an “I” on QLM packet.
- Administration noted that teachers often make deals with students regarding extra credit or make up work to allow them to pass. Teachers may not always provide make-up work when it is required by policy, for example in the case of in-school suspensions.
- When teachers do not submit grades or submit grade late, the grade manager will fill in progress and quarterly reports with a grade of 70, so as not to punish students. It is up to the teacher, parent, or student to reconcile these grades with those in SchoolMAX, but there is no emphasis on making sure they all get reconciled.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- Of the PDS Tally Cards provided, all were completed on June 1 of the respective graduation year. For the graduating class of 2016, these forms were completed before graduation on June 2, 2016. However, the graduating class of 2017 graduated on May 30, 2017, so the forms were completed after graduation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- Based upon discussions with staff members, the staff understands the MPTS policies and endeavors to make options available to students who need them. The policies regarding QLMs are not being adhered to, due to the grading changes as noted above.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- The service learning verification forms that were provided were completed properly and generally in accordance with the requirements in terms of hours and types of activities. However, not every student had these forms in their files nor did every form we reviewed have the requisite number of hours. There were several students whose hours were earned for activities at Laurel High School.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Based on interviews, the administration seemed to have a contentious relationship with the teachers with regards to the implementation of the MPTS and policy changes. Administrators stated that teachers were resistant to offering make-up work when required and using grade change forms. An administrator we spoke with believed any accusations may be coming from the teachers but offered no specifics.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- No irregularities were identified.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- QLMs are not currently being offered.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	1
Admin and Faculty Intimidation/Retaliation	2
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	1
Improper Grade Change	3
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	-
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	28	35
> 10 and ≤ 20 Points	6	13
> 20 and ≤ 30 Points	12	9
> 30 Points	33	11
No Grade Entry Before Cutoff Date	170	404
Total Unique Students	210	405

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
> 10 and ≤ 20 Days	91	85
> 20 and ≤ 50 Days	35	68
> 50 Days	3	6
Total Unique Students	129	159

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Ensure separation of duties and independent oversight of roles including grade manager, transcript manager, MPTS coordinator, and counselor.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.
- Ensure extra credit opportunities provided to students align with PGCPs grading procedures.
- Ensure students enrolled in MPTS programs meet eligibility requirements outlined in the MPTS Handbook. Verify grades are appropriately entered upon MPTS completion.

Additional Analysis and Investigation

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

NORTHWESTERN (EVENING/SATURDAY)

A&M conducted the on-site investigation on October 11, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	8	≤ 5.00	9	28	22

Record Review Findings

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

Northwestern Evening/Sat High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	34		33		67	
Students included in Sample	4		-		4	
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	0	0.0%	0	N/A	0	0.0%
Without grade changes affecting final grades	0	0.0%	0	N/A	0	0.0%
With all grade changes fully documented	0	0.0%	0	N/A	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	N/A	0	0.0%
3. Any grade changes without documentation	4	100.0%	0	N/A	4	100.0%
4. Does not meet graduation requirements	0	0.0%	0	N/A	0	0.0%
Transcript Ineligible	0	0.0%	0	N/A	0	0.0%
Service Learning Ineligible	0	0.0%	0	N/A	0	0.0%
Total sample	4		0		4	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	4	100.0%	0	N/A	4	100.0%
Ineligible to graduate (category 4)	0	0.0%	0	N/A	0	0.0%
* This table reflects counts of unique students in each category						

Of the 4 students reviewed, none were found ineligible to graduate. Of the 4 students with grade changes, all 4 had grade changes that impacted final grades. Of these students, no students had grade changes that were fully-documented, no students had grade changes with limited documentation, and 4 (100.0%)

students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- No grade change forms were available. Per discussions with school, grade changes were submitted via a google spreadsheet to the grade manager.
- Email support for grade changes were provided by the school counselor

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Staff interviewed appeared to comprehend the 50% minimum grade for “good faith effort” and noted that the policy is applied as stated.
- Attendance policies that affect grading are not adhered to. Principal noted that the population of students that attend this school have unique circumstances that may impact attendance.
- Principal noted that teachers are encouraged to provide extra credit opportunities to failing seniors.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS tally cards and transcripts were fully completed and provided to the team. PDS tally cards were completed subsequent to graduation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- School staff interviewed appeared to have a good understanding of the MPTS requirements around Compass credit recovery programs. QLMS are not utilized by the school.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- School maintains evidence of service learning hours. No issues noted.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team?

- Persons interviewed were confident that complaints were not applicable to this school.
- No accusations noted.

Evidence of Irregularities: During your review, have you identified irregularities? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Counselor indicated that teachers are requested to complete a senior failure notice during the school year to identify seniors in their classes that are failing their classes. If student ultimately fails a class but was not included on the failure notice, the teacher is required to give the student a passing grade.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- None noted.

School-Specific Complaint Log Summary

No school-specific complaints were received for Northwester Evening / Saturday School.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	2	4
> 10 and ≤ 20 Points	2	-
> 20 and ≤ 30 Points	2	1
> 30 Points	5	2
No Grade Entry Before Cutoff Date	-	31
Total Unique Students	9	31

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	12	10
> 10 and ≤ 20 Days	9	10
> 20 and ≤ 50 Days	10	12
> 50 Days	3	1
Total Unique Students	34	33

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.

Additional Analysis and Investigation

- Further investigate the impact of senior failure notices on passing students who fail.

NORTHWESTERN

A&M conducted the on-site investigation on October 11, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	68%	66%	69%	67%	69%

Record Review Findings

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

Northwestern High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	382	396	778			
Students included in Sample	25	33	58			
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	20	80.0%	25	75.8%	45	77.6%
Without grade changes affecting final grades	20	80.0%	25	75.8%	45	77.6%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	3	12.0%	2	6.1%	5	8.6%
3. Any grade changes without documentation	2	8.0%	5	15.2%	7	12.1%
4. Does not meet graduation requirements	0	0.0%	1	3.0%	1	1.7%
Transcript Ineligible	0	0.0%	1	3.0%	1	1.7%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	25		33		58	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	5	20.0%	7	21.2%	12	20.7%
Ineligible to graduate (category 4)	0	0.0%	1	3.0%	1	1.7%

** This table reflects counts of unique students in each category*

Of the 58 students reviewed, 1 (1.7%) was found ineligible to graduate. Of the 58 students with grade changes, 45 did not have grade changes that impacted final grades. Of the 13 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 5 (38.5%)

students had grade changes with limited documentation, and 7 (53.8%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- PDS cards were not filled out for 2016 and 2017, and the school seems behind in producing these documents in general. There are also no transcripts held within the cumulative folders.
- PS-140 grade change forms are not always kept, but at least some of the requested forms were present with support for the grade change attached.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The “good faith effort” grading procedure seems understood and much of the administration was in favor of these policies.
- Certain key members of the administration voiced unhappiness with the policy because they believe that it is compromising student motivation to work hard and to attend class.
- Grading procedures are implemented similarly compared with many other schools in the district.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are not complete for either examined year.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policies seem understood at the school. A&M was able to view a number of PS-140s associated with MPTS and it appears that the current coordinator is attaching supporting documentation to most of these forms.
- Interviews revealed that the level of communication with teachers regarding QLM related grade changes was lacking and might be improved.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Some service learning forms were in student folders, but many did not contain this documentation. When found the forms were generally filled out correctly and contained the proper number of hours.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Most administrators indicated their disagreement with the complaints.
- There was at least one interview that revealed some belief that the complaints were real and seen at Northwestern.
- An interviewee contended that teachers had been asked for grade changes inappropriately and had been angry at the requested changes.
- It was stated that the administration had been entirely driven by data and the desire to get the graduation rate up, and that this was behind the profusion of last minute grade changes.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Goal seeking - One example included a transcript and PS-140 form with a calculation for the points necessary to earn a 240 on the transcript and an accompanying PS-140 form that awarded a grade change necessary to reach that threshold to pass.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- The principal has communicated policies about grade changes in briefings given to teachers at the beginning of every school year. The continuous communication of these grade change policies brings questions to the situations that required this continuous communication.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	1
Admin and Faculty Intimidation/Retaliation	2
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	4
Improper Grade Change	2
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	-
Records Issue	1

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	8	13
> 10 and ≤ 20 Points	5	17
> 20 and ≤ 30 Points	8	10
> 30 Points	25	23
No Grade Entry Before Cutoff Date	269	390
Total Unique Students	284	391

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	157	184
> 10 and ≤ 20 Days	135	109
> 20 and ≤ 50 Days	85	96
> 50 Days	5	7
Total Unique Students	382	396

School-Specific Recommendations

Opportunities for Improvement

- Require use of current PS-140 forms (PS-140) for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Require compliance with grading timeline.

Additional Analysis and Investigation

- Conduct further examination of the “goal seeking” identified on PS-140 forms.

OXON HILL

A&M conducted the on-site investigation on October 6, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	72%	73%	76%	84%	85%

Record Review Findings

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

Oxon Hill High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	288		332		620	
Students included in Sample	11		23		34	
Results from Sample Testing: *						
<i>Student Category</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>	<i>Count</i>	<i>% of Sample</i>
1. Valid and fully-documented graduates	11	100.0%	23	100.0%	34	100.0%
Without grade changes affecting final grades	11	100.0%	23	100.0%	34	100.0%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
3. Any grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
4. Does not meet graduation requirements	0	0.0%	0	0.0%	0	0.0%
Transcript Ineligible	0	0.0%	0	0.0%	0	0.0%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	11		23		34	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	0	0.0%	0	0.0%	0	0.0%
Ineligible to graduate (category 4)	0	0.0%	0	0.0%	0	0.0%
<i>* This table reflects counts of unique students in each category</i>						

Of the 34 students reviewed, none were found ineligible to graduate. Of the 34 students with PS-140 forms, all 34 did not have PS-140 forms that impacted final grades. For additional information on how the sample was selected, please refer to the "Sampling Methodology" section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- The registrar, PCS, principal, and assistant principal we spoke with all seem to understand the recordkeeping practices. A previous registrar was let go after the 2016 school year. We were told this was due to poor performance and not having anything to do with the complaints in this matter. All parties interviewed admit that recordkeeping was not up to par in the past partially due to the previous registrar. Despite the current staff's stated commitment to better recordkeeping practices, we did not view evidence of that in the student files.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The registrar, PCS, principal, and assistant principal we spoke with all had knowledge of the requirements and policies as related to grade change forms, QLMS and credit recovery.
- The required documentation to support these grading initiatives was not present in student files.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- Dr. Cadet (Principal) described the year-long process they undertake in identifying seniors and their needs to graduate. They have a mid-year check-in January called student inauguration. A&M was not provided with enough evidence of grade changes to determine whether they were done properly or to verify dates.
- A&M was informed after our site visit that Oxon Hill was tipped off by other PGCPs employees that A&M would be requesting and reviewing PDS cards. It was stated that on October 5, 2017, the day before A&M site visit, the entire guidance office was closed down and staff stayed until 11 PM to complete the PDS cards from the previous two years.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- Based upon the interviews with Oxon Hill personnel, the staff understands the MPTS policies and endeavors to make all options available to students who need them.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- For the service learning verification forms that were provided, they were completed properly and in accordance with the requirements in terms of hours and types of activities. However, not every student had these forms in their files.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Each staff member interviewed strongly asserted that no wrongdoing had taken place at Oxon Hill. Based upon the interviews with staff, they take their responsibilities as educators seriously. One administrator stated they were glad A&M was there so that her school could be exonerated from any complaints.
- The principal attributed Oxon Hill’s increases in graduation rates to better tracking of students, including W-50s and better instruction.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- PDS cards for sample students were reported to have been completed the night before A&M site visit. The tally cards that were provided were not dated.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No recent changes were noted

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	-
Admin and Faculty Intimidation/Retaliation	1
Credit Recovery Programs-District	1
General Mismanagement	1
Graduating Ineligible Students	1
Improper Grade Change	5
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	2
Other	-
Records Issue	1

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	-	14
> 10 and ≤ 20 Points	1	19
> 20 and ≤ 30 Points	4	11
> 30 Points	7	21
No Grade Entry Before Cutoff Date	247	325
Total Unique Students	250	327

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	209	162
> 10 and ≤ 20 Days	52	96
> 20 and ≤ 50 Days	27	65
> 50 Days	-	9
Total Unique Students	288	332

School-Specific Recommendations

Opportunities for Improvement

- Require use of current PS-140 forms every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Retain all PS-140s in the student cumulative folders.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation.
- Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.

- Retain service learning verification forms in the student cumulative folders.

Additional Analysis and Investigation

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

PARKDALE

A&M conducted the on-site investigation on October 10, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	67%	71%	76%	77%	75%

Record Review Findings

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

Parkdale High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	392		426		818	
Students included in Sample	23		42		65	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	6	26.1%	36	85.7%	42	64.6%
Without grade changes affecting final grades	6	26.1%	36	85.7%	42	64.6%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	7	30.4%	1	2.4%	8	12.3%
3. Any grade changes without documentation	10	43.5%	4	9.5%	14	21.5%
4. Does not meet graduation requirements	0	0.0%	1	2.4%	1	1.5%
Transcript Ineligible	0	0.0%	1	2.4%	1	1.5%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	23		42		65	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	17	73.9%	5	11.9%	22	33.8%
Ineligible to graduate (category 4)	0	0.0%	1	2.4%	1	1.5%

* This table reflects counts of unique students in each category

Of the 65 students reviewed, 1 (1.5%) was found ineligible to graduate. Of the 65 students with grade changes, 42 did not have grade changes that impacted final grades. Of the 23 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 8 (34.8%)

students had grade changes with limited documentation, and 14 (60.9%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Recordkeeping practices seem well understood in general.
- No cumulative records, PDS cards, or transcripts were missing from our sample of students.
- Transcripts and PDS cards were produced separately from the cumulative folder and were all dated within a few weeks of each student’s graduation. Only three PDS cards from the sample were found to be unsigned.
- There were some errors found in transcription of the transcript information onto the PDS Tally Card.
- PS-140 forms were not as well documented and retained as the other documents, with slightly less than half of these forms present from our sample of students. Not all of the forms had proper signatures or support attached.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- The school seems to adhere to the “good faith effort” policy as written, but the interviews revealed a polarized opinion of the policy among key members of the administration. Some were in favor of the policy as offering students a chance to achieve even if they had not done well in a class. However, roughly half of those individuals interviewed felt that the policy was too lenient and that it “gave too much” to students that did not do work or come to class.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards were present and dated roughly 1-2 weeks after the students’ graduation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policies seem reasonably well adhered to, as there were not indications of students being offered MPTS programs outside of specified score ranges or of students being awarded a greater number of points than they should have been for completion of these programs.
- Interviews revealed some dissatisfaction with the Quarter Learning Modules. Interviewees stated that the QLMs had not been successful, with only 25 students turning in finished QLMs out of 200 students that were asked to complete them.

- Make-up work seems to occupy much of the space that certain MPTS programs are intended to in terms of credit recovery.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

Service learning forms were present within some folders, but many of these folders lacked the required documentation.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Most interviewees expressed that they were surprised by the complaints and did not believe that these complaints took place at Parkdale.
- One interviewee implicated a previous principal in encouraging grade changes

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Notations were found on PS-140 forms that suggested calculations were being made to determine what scale of quarter grade change would allow a student to receive 240 points for passing. This “goal seeking” indicates grade changes may have been made to graduate ineligible students.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No major changes in procedures, roles, or personnel have taken place in response to the complaints.
- The previous principal passed away in 2016, and a new principal has been in place since that time.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Truancy Related	1
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	-
Improper Grade Change	2
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	1
Other	1
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	19	21
> 10 and ≤ 20 Points	16	6
> 20 and ≤ 30 Points	12	6
> 30 Points	25	20
No Grade Entry Before Cutoff Date	297	423
Total Unique Students	309	424

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	237	203
> 10 and ≤ 20 Days	95	122
> 20 and ≤ 50 Days	58	86
> 50 Days	2	15
Total Unique Students	392	426

School-Specific Recommendations

Opportunities for Improvement

- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.

Additional Analysis and Investigation

- Investigate potential grade manipulation through “goal seeking.”

POTOMAC

A&M conducted the on-site investigation on October 5, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	63%	62%	58%	71%	76%

Record Review Findings

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

Potomac High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	234	247	481			
Students included in Sample	18	21	39			
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	17	94.4%	14	66.7%	31	79.5%
Without grade changes affecting final grades	17	94.4%	14	66.7%	31	79.5%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	1	4.8%	1	2.6%
3. Any grade changes without documentation	1	5.6%	5	23.8%	6	15.4%
4. Does not meet graduation requirements	0	0.0%	1	4.8%	1	2.6%
Transcript Ineligible	0	0.0%	1	4.8%	1	2.6%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	18		21		39	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	1	5.6%	6	28.6%	7	17.9%
Ineligible to graduate (category 4)	0	0.0%	1	4.8%	1	2.6%
<i>* This table reflects counts of unique students in each category</i>						

Of the 39 students reviewed, 1 (2.6%) was found ineligible to graduate. Of the 39 students with grade changes, 31 did not have grade changes that impacted final grades. Of the 8 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 1 (12.5%)

students had grade changes with limited documentation, and 6 (75.0%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Records were generally in order. The cumulative folders typically contained service learning verification forms but did not include PS-140 forms in every instance.
- Based on sample, the staff were not using PS-140 forms for every grade change. Grade change forms were maintained by the grade manager in binders in her office.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Based on interviews, the administration understood “good faith effort” and seems to be following that portion of the grading procedure. The administration indicated that it is not strictly following the attendance policy given the unique circumstances of the student population and the need to provide leeway for those students who have extenuating circumstances. Grade change forms are not being used to initiate all grade changes.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- The 2017 PDS Tally Cards were not completed as of the date of the A&M’s site visit. The 2016 forms were marked complete by 5/23/2016.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- The individual responsible for coordinating the MPTS program at the school was knowledgeable of the different requirements and nuances of each program. According to the staff interviewed, the school had the most success with the Compass Learning quarterly and blended online learning programs. The QLM’s were not as successful as students would often not complete them.
- Potomac HS was one of the few PGCPs high schools that utilized the Compass Learning credit recovery programs prior to it being rolled out as a county initiative under the MPTS program.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- A&M located service learning verification forms for only a portion of the students in the sample. For the forms received, A&M noted that the forms were completed and reflected that the students met graduation requirements.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Staff accused athletic coaches of pressuring teachers to increase grades for athletes

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- In reviewing PS-140 forms, the A&M team noticed that all students were receiving an 80% grade in certain classes and the reason was marked as “Error in data entry.” Administration explained that these classes did not have teachers or long-term substitutes, and therefore the administration gave every student an 80% in these classes to avoid penalizing the students for limited instruction.
- Administration changed quarterly grades for these students, and in some cases changed multiple quarterly grades. Of the grade changes we reviewed, none of the students were in 12th grade, however, due to the potential impact on promotion, these grade changes could artificially increase graduation.
- The classes affected by the grade changes included Spanish 1, Spanish 2, Constitutional Law, Local, State, and National Government, Aerospace Science, Foundations of Technology, and a Special Education Science course. The passing grades allowed students to advance to courses despite not meeting requirements.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No recent changes were noted.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	1
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	1
General Mismanagement	-
Graduating Ineligible Students	2
Improper Grade Change	3
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	1
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	2	18
> 10 and ≤ 20 Points	6	15
> 20 and ≤ 30 Points	-	13
> 30 Points	3	22
No Grade Entry Before Cutoff Date	96	247
Total Unique Students	101	247

Distribution of Student Unlawful Absences		
	Class of 2016	Class of 2017
0-10 Days	114	83
> 10 and ≤ 20 Days	71	90
> 20 and ≤ 50 Days	44	65
> 50 Days	5	9
Total Unique Students	234	247

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Ensure adherence to attendance-related grading procedures.

Additional Analysis and Investigation

- Investigate complaints of grade manipulations favoring athletes.
- Investigate the impact of the practice of passing students where teachers leave or absences impacts instruction.

SUTLAND

A&M conducted the on-site investigation on October 4, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	71%	66%	65%	72%	79%

Record Review Findings

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

Suitland High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	404	441	845			
Students included in Sample	28	34	62			
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	23	82.1%	14	41.2%	37	59.7%
Without grade changes affecting final grades	23	82.1%	14	41.2%	37	59.7%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	10	29.4%	10	16.1%
3. Any grade changes without documentation	5	17.9%	5	14.7%	10	16.1%
4. Does not meet graduation requirements	0	0.0%	5	14.7%	5	8.1%
Transcript Ineligible	0	0.0%	5	14.7%	5	8.1%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	28		34		62	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	5	17.9%	15	44.1%	20	32.3%
Ineligible to graduate (category 4)	0	0.0%	5	14.7%	5	8.1%
<i>* This table reflects counts of unique students in each category</i>						

Of the 62 students reviewed, 5 (8.1%) were found ineligible to graduate. Of the 62 students with grade changes, 37 did not have grade changes that impacted final grades. Of the 25 students with grade changes that impacted final grades, no students had grade changes that were fully-documented, 10 (40.0%)

students had grade changes with limited documentation, and 10 (40.0%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Recordkeeping requirements and practices are not always adhered to.
- Transcripts were produced separately from the cumulative folder.
- Grade change forms are not always kept within the cumulative folders. The grade manager did hold a reasonably comprehensive set of copies of PS-140 forms as required.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Grading procedures at this school seem to differ widely from understood norms within the county. Though the “good faith effort” policy is already interpreted different by specific teachers, at Suitland the policy is applied on the class level as opposed to the assignment level.
- Many PS-140 forms produced were found to show increases in student grades to a score of 50 with the reason shown as “county policy” or “administrative procedure.” It was later discovered that the school administration had used the “good faith effort” grading procedure as a means of boosting student scores to 50 if the teacher could look back and consider that the student had made a “good faith effort” in the class as a whole, even if he/she had a much lower overall score prior to grade change.
- The school held a large meeting where teachers and administrators went over student grades line by line to substantiate changes to 50. It was mentioned by one administration member that this was partially done to enable credit recovery options.
- This action seems to be a broad misunderstanding of the application of the grading procedure to individual assignments as opposed to final grades.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- No PDS cards were produced. It was noted that the counselors did most of their certification and tracking by google sheets.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- MPTS policies seem to have been understood. Similar to other schools, Suitland did not see success with the Quarter Learning Modules. Many students did not do well on the QLMs and quite a few students did not turn them in.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Nearly nonexistent documentation of service learning requirements.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- No specific accusations were made

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- No specific irregularities were identified, however many quarter grades had been increased to 50. This may indicate misinterpretation/misapplication of the PGCPs’s “good faith effort” policy.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- One notable recent staff change is the reassignment of the previous principal to a middle school this school year. However, this change could not be directly tied to the complaints.

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	-
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	1
General Mismanagement	-
Graduating Ineligible Students	2
Improper Grade Change	1
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	1
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by A&M.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	2	24
> 10 and ≤ 20 Points	3	27
> 20 and ≤ 30 Points	6	26
> 30 Points	20	42
No Grade Entry Before Cutoff Date	251	439
Total Unique Students	263	439

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	207	242
> 10 and ≤ 20 Days	112	116
> 20 and ≤ 50 Days	74	78
> 50 Days	11	5
Total Unique Students	404	441

School-Specific Recommendations

Opportunities for Improvement

- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.

Additional Analysis and Investigation

- No further investigation or analysis required at this time.

SURRATTSVILLE

A&M conducted the on-site investigation on October 12, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the graduating classes of 2016 and 2017 for this school. This summary presents the record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	71%	80%	76%	80%	91%

Record Review Findings

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

Surrattsville High School Review Summary	Graduating Class		Total			
	2016	2017				
Students	163	167	330			
Students included in Sample	15	15	30			
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	15	100.0%	11	73.3%	26	86.7%
Without grade changes affecting final grades	15	100.0%	11	73.3%	26	86.7%
With all grade changes fully documented	0	0.0%	0	0.0%	0	0.0%
2. Any grade changes with limited documentation and no grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
3. Any grade changes without documentation	0	0.0%	0	0.0%	0	0.0%
4. Does not meet graduation requirements	0	0.0%	4	26.7%	4	13.3%
Transcript Ineligible	0	0.0%	4	26.7%	4	13.3%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	15		15		30	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	0	0.0%	0	0.0%	0	0.0%
Ineligible to graduate (category 4)	0	0.0%	4	26.7%	4	13.3%

** This table reflects counts of unique students in each category*

Of the 30 students reviewed, 4 (13.3%) were found ineligible to graduate. Of the 30 students with grade changes, 26 did not have grade changes that impacted final grades. Of the 4 students with grade changes that impacted final grades, 0 (0.0%) students had grade changes that were fully-documented, 0 (0.0%)

students had grade changes with limited documentation, and 0 (0.0%) students had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- Student record files are generally organized. All student files for 2017 were located. Cumulative folders for 2016 were somewhat out of order. Transcript and PDS tally cards were missing for two 2016 students, however the staff found these later and provided them for pickup.
- Administrators interviewed were aware that every grade change should have signed PS-140s and documentation, this was not the case. Most grade changes were not supported by PS-140s or any other supporting documentation. Where PS-140s were present, many were not signed by the grade manager and several were not approved or signed by the teacher.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Surrattsville’s principal claimed that the “good faith effort” grading procedure is used to increase quarter grades to 50, indicating that the policy may be misunderstood, and might have had the effect of inflating grades.
- Attendance-related grading procedures are enforced inconsistently based on teacher preferences. Several staff suggested that despite having many students with dozens of absences, no students have been failed due to unlawful absences.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- PDS Tally Cards are generally not used to verify eligibility for graduation, but are completed the following fall.
- Counselors monitor senior progress throughout the year, completing senior contracts in the fall, a mid-year check, and an end-of-year check. During the senior contract period, the counselor will check credits attained throughout high school and credits still needed to graduate.
- At the two checkpoints, the counselor will check progress against the list of credits still needed and do a spot check of overall credit evaluation.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- The requirements of the MPTS handbook seem to be well-understood and adhered to, however in several instances, staff acknowledged that students are provided make-up work opportunities for past quarters.

- Based on records review, some students have been allowed to complete make-up work after course completion where credit recovery may have been a more appropriate option.
- In some instances, students who are not able to afford credit recovery courses are given a grade increase with “family cannot afford to pay for credit recovery” as the reason. In these instances, local “recovery packets” have been used.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- Service learning verification forms that were provided appeared to be completed properly and in accordance with the requirements in terms of hours and types of activities.
- In limited instances, the service learning documentation did not meet the hour total of 24.
- Several student’s hours were earned for extracurricular activities which did not clearly meet MSDE’s service learning guidelines

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- Several staff accused the senior professional school counselor of intentionally manipulating grades and manually adding (pramming) courses onto student transcripts. These claims are supported by many grade changes after student graduation on May 23rd, 2017, which were supported by little or no documentation or make-up work.
- Staff expressed a concern that the senior professional school counselor was pushing through students to graduation who were habitually truant.
- Students named by staff in in-person interviews and identified through the tip line had many late grade changes with limited documentation.
- Several students in A&M’s sample set contained transcripts from June of 2017 that had been replaced with newer transcripts, printed just before the A&M site visit in October.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- Over 10 PS-140s for two students in the class of 2017 were signed on 10/6/17 or 10/7/17, a week before the site visit. Several of these grade changes were found in the data to have been made in May or June. These records appear to have been created in October to provide documentation for previous changes.
- The principal explained that these new forms were simply documenting decisions made by the SIT team in advance of graduation, however, A&M found SIT meeting minutes which indicate several of the students in question were still being discussed at SIT teams after graduation, in June and September.

- The counselor named in staff accusations has assumed some of the roles of the registrar and/or transcript manager at times, including pramming courses onto student transcripts. When staff were questioned about after-graduation changes to student transcripts, staff indicated that the senior counselor had been manipulating transcripts in advance of the A&M visit.
- The senior professional school counselor completed 9 grade changes for one student, and 7 grade changes for another student within the course of 20 minutes on May 16th, 2017. Documentation supporting these changes was not completed until October 2017. The make-up work submitted for these students was not approved by or graded by the course teacher, who refused to provide make-up work so long after quarter ends for these students based on PGCPs procedures for make-up work.
- In October of 2017, the senior guidance counselor also made manual changes to the transcripts of four students who had graduated on May 23rd, 2017. Before these changes, each student failed to meet core graduation criteria. Each change added credits which resulted in student transcripts showing as having met graduation requirements.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- No recent changes to policies, procedures or roles were apparent

School-Specific Complaint Log Summary

The following table summarizes the complaints and complaints received by the A&M team by category.

Complaint Category	Number of Complaints
Absence/Tuancy Related	-
Admin and Faculty Intimidation/Retaliation	-
Credit Recovery Programs-District	-
General Mismanagement	-
Graduating Ineligible Students	-
Improper Grade Change	3
Irrelevant-Request for Information	-
Local Credit Recovery/Make-up Work	-
Other	1
Records Issue	-

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	2	5
> 10 and ≤ 20 Points	1	2
> 20 and ≤ 30 Points	-	-
> 30 Points	6	6
No Grade Entry Before Cutoff Date	93	165
Total Unique Students	98	165

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	76	61
> 10 and ≤ 20 Days	56	62
> 20 and ≤ 50 Days	31	39
> 50 Days	-	5
Total Unique Students	163	167

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Ensure separation of duties and independent oversight of roles including grade manager, transcript manager, MPTS coordinator, and counselor.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.

- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation. Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations. Retain service learning verification forms in the student cumulative folders.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.
- Ensure extra credit opportunities provided to students align with PGCPs grading procedures.
- Ensure students enrolled in MPTS programs meet eligibility requirements outlined in the MPTS Handbook. Verify grades are appropriately entered upon MPTS completion.
- Eliminate school-based credit recovery programs.

Additional Analysis and Investigation

- Allegations of the senior counselor manipulating student records both before and after graduation, paired with evidence of grade and transcript changes warrants additional analysis and investigation.

TALL OAKS

A&M conducted the on-site investigation on October 13, 2017. During the site visit, A&M conducted interviews and reviewed student files. Student files reviewed included a sample of students from the Classes of 2016 and 2017 for this school. This summary presents record review findings, site visit observations, and key statistics from the PGCPs Special Review hotline and data analytics.

Historical Graduation Rates

	Class of 2012	Class of 2013	Class of 2014	Class of 2015	Class of 2016
4 Year Graduation Rate	62%	73%	62%	69%	87%

Record Review Findings

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

Tall Oaks High School Review Summary	Graduating Class				Total	
	2016		2017			
Students	70		71		141	
Students included in Sample	15		16		31	
Results from Sample Testing: *						
Student Category	Count	% of Sample	Count	% of Sample	Count	% of Sample
1. Valid and fully-documented graduates	1	6.7%	3	18.8%	4	12.9%
Without grade changes affecting final grades	0	0.0%	3	18.8%	3	9.7%
With all grade changes fully documented	1	6.7%	0	0.0%	1	3.2%
2. Any grade changes with limited documentation and no grade changes without documentation	7	46.7%	2	12.5%	9	29.0%
3. Any grade changes without documentation	1	6.7%	0	0.0%	1	3.2%
4. Does not meet graduation requirements	6	40.0%	11	68.8%	17	54.8%
Transcript Ineligible	6	40.0%	11	68.8%	17	54.8%
Service Learning Ineligible	0	0.0%	0	0.0%	0	0.0%
Total sample	15		16		31	
Unable to determine graduation eligibility due to insufficient documentation (categories 2 and 3)	8	53.3%	2	12.5%	10	32.3%
Ineligible to graduate (category 4)	6	40.0%	11	68.8%	17	54.8%
<i>* This table reflects counts of unique students in each category</i>						

Of the 31 students reviewed, 17 (54.8%) were found ineligible to graduate. Of the 31 students with grade changes, 3 did not have grade changes that impacted final grades. Of the 28 students with grade changes that impacted final grades, 1 (3.6%) student had grade changes that were fully-documented, 9 (32.1%)

students had grade changes with limited documentation, and 1 (3.6%) student had grade changes with no documentation. For additional information on how the sample was selected, please refer to the “Sampling Methodology” section of the report.

Site Visit Observations

Recordkeeping Practices: Are recordkeeping requirements and policies understood and adhered to? Have sample records been identified as missing?

- All the cumulative folders requested were provided. We observed many PS-140 forms but not every grade change had a form or the proper supporting documentation. The principal indicated that they have been more stringent in requiring teachers to submit proof if the grade change is due to make up work being performed.
- Student transcripts were not readily available and were printed for A&M the day of the site visit.
- Tall Oaks does not utilize the tally cards for validating graduation. The registrar said that they are not used because all the kids at Tall Oaks come there from other schools. Tall Oaks is an alternative/vocational school in which all kids are at least 16 and come there because they have failed out/been kicked out of other schools in the district or deal with some other issue. The grade manager said it would take too long to do it manually and that every other district she knows (DC, Anne Arundel, Montgomery) all have an automated process.

Grading Procedure Requirements: Are grading procedure requirements understood and adhered to?

- Based upon the interviews, it appears the grading procedures are understood and generally adhered to. Because most, if not all, the students at Tall Oaks are behind in credits when they arrive, teachers and administration seem to be very willing to allow make up work to be performed.
 - This is evidenced by the PS-140 forms that A&M reviewed. Nearly all grade changes were due to the completion of make-up work.
- According to interviews with staff, many of the students work to support themselves or families, have children of their own, etc. so the policies regarding attendance are not adhered to.
- Principal stated QLMs were only used here in SY15-16 with very few students taking advantage of them.

Graduation Certification: Are graduation certifications (PDS Tally Cards) completed with sufficient time to validate graduation? Do certification dates tend to align with grade change evidence?

- Tall Oaks does not have a formal system with regards to verifying graduation. At the beginning of the year, the principal and counselor/grade manager determine what each student needs to graduate. They check those items at the end of the year but there is not sufficient evidence for A&M to verify. The registrar is responsible for checking the student service hours.

- Based upon the record review findings, there are students graduating without meeting all of the graduation requirements.

MPTS Policies: Are MPTS policy requirements understood and adhered to?

- Based upon interviews, the staff understands the MPTS policies and endeavors to make options available to students who need them. Most of the students at Tall Oaks need to utilize the MPTS options to graduate. As noted, the QLM program was not widely used, even when it was offered.

Service Learning Verification: Are service learning requirements met in accordance with requirements and documented properly?

- For the service learning verification forms that were provided, they were completed and generally in accordance with the requirements in terms of hours and types of activities. However, not every student had these forms in their files nor did every form we reviewed have the requisite number of hours.

Accusations: Have staff or administrators leveled accusations of deliberate grade or graduation rate manipulation towards specific individuals, groups, or the PGCPs administration while speaking with the A&M site visit team or via the tip line?

- There were not specific complaints made and none of the staff members we spoke with believed anything nefarious was taking place at their school. Because of the nature of this school, in which students will often take more than 4 years to graduate and the students do not attend Tall Oaks for the duration of the high school careers, staff indicated that there is less pressure on cohort graduation rates, and that the cohort graduation rates will fluctuate.

Evidence of Irregularities: During the review, have irregularities been identified? (example – manipulated or falsified records, contradictory transcripts, etc.)

- We did not view any records that appeared to be manipulated or falsified. The principal stated he generally approved any grade change brought to him by a teacher, with or without supporting documentation.
- A second set of transcripts was printed for A&M after grade manager realized that proper grade changes previously made in the system did not make their way onto the transcripts.
- Further review of post-graduation transcript changes indicated that pramming had been used after-the-fact to make student records appear eligible to graduate.

Recent Changes or Other Response to Allegations and Investigations: Has the school made any recent changes to policies, procedures, or roles based on complaints?

- QLMs are not currently being offered and were not offered in the 2016-2017 school year.

School-Specific Complaint Log Summary

A&M received no specific complaints related to Tall Oaks High School.

School-Specific Data Analytics Findings

The following tables summarize data analytics of the entire population of 2016 and 2017 graduates analyzed by the A&M team.

Distribution of Students with Quarterly Grade Changes by Point Range		
	Class of 2016	Class of 2017
≤ 10 Points	3	4
> 10 and ≤ 20 Points	6	1
> 20 and ≤ 30 Points	2	5
> 30 Points	14	7
No Grade Entry Before Cutoff Date	19	69
Total Unique Students	34	70

Distribution of Students with Unlawful Days Absent by Day Range		
	Class of 2016	Class of 2017
0 - 10 Days	33	29
> 10 and ≤ 20 Days	23	22
> 20 and ≤ 50 Days	14	18
> 50 Days	-	2
Total Unique Students	70	71

School-Specific Recommendations

Opportunities for Improvement

- Require compliance with grading timeline.
- Ensure separation of duties and independent oversight of roles including grade manager, transcript manager, MPTS coordinator, and counselor.
- Require use of current PS-140 forms for every grade change, support all grade changes with appropriate documentation, and ensure appropriate sign-off by all required parties.

- Retain PS-140s in the student cumulative folders.
- Complete PDS Tally Cards annually, and utilize the tally sheet on each PDS Tally Card to certify each student in advance of graduation.
- Retain PDS Tally Cards and the transcript used to certify the student for graduation in the student cumulative folders.
- Require the principal to certify transcripts and PDS Tally Cards as official by signing and dating prior to graduation.
- Require students to complete service learning hours with MSDE-approved organizations.
- Retain service learning verification forms in the student cumulative folders.
- Strictly enforce procedures related to make-up work completion relative to period end dates. Ensure compliance with all requirements for make-up work as outlined in grading procedures.
- Ensure adherence to attendance-related grading procedures.
- Ensure extra credit opportunities provided to students align with PGCPs grading procedures.
- Ensure students enrolled in MPTS programs meet eligibility requirements outlined in the MPTS Handbook. Verify grades are appropriately entered upon MPTS completion.

Additional Analysis and Investigation

- Further investigate pramming of grade changes to transcripts.

APPENDIX B: RELEVANT AUTHORITIES, POLICIES, AND PROCEDURES

This appendix includes relevant sections of legislation, regulation, policies, and procedures which have contributed to A&M's independent performance audit of PGCPs. This appendix is not intended to a comprehensive listing, but is meant to serve as a reference for the relevant documents surrounding grading and graduation within PGCPs.

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LEGISLATION¹

Attendance

Education Article §7-103, Code of Maryland

- “(a) Each public school under the jurisdiction of a county board:*
- (1) (i) Shall be open for pupil attendance for at least 180 actual school days and a minimum of 1,080 school hours during a 10-month period in each school year; or*
 - (ii) If normal school attendance is prevented because of conditions described in subsection (b) of this section, shall be open for at least 1,080 hours during a 10-month period;*
 - (2) Shall be open for pupil attendance a minimum of 3 hours during each school day; and*
 - (3) May not be open on Saturdays, Sundays, or holidays in order to meet the 180-day or 1,080-hour requirement of this subsection.”*

Education Article §7-301, Code of Maryland

- “(a) This section does not apply to a child under the age of 18 years who: (see section §7-301(a) for exceptions.*
- (a-1) (1) Except as otherwise provided in this section, each child who resides in this State and is 5 years old or older and under 18 shall attend a public school regularly during the entire school year.”*
- “(e) (2) Any person who has legal custody or care and control of a child who is 5 years or older and under 18 who fails to see that the child attends school or receives instructions under this section is guilty of a misdemeanor” (see Code of Maryland for further detail)*

The compulsory age for education increased from 16 to 17 years old effective July 1, 2015, and then to 18 years old effective July 1, 2017.

Grading

Maryland State Law includes no specific provisions which specify grading policies and procedures, or directly impact the grading policies of LEAs such as PGCPs. The state’s policies on grading are outlined within regulation.

¹ PDF of Education Article, Code of Maryland: http://mgaleg.maryland.gov/2018RS/Statute_Web/ged/ged.pdf;
Online Search Page: <http://mgaleg.maryland.gov/webmga/fmStatutes.aspx?pid=statpage&tab=subject5>

Promotion and Graduation

Education Article §7-203.2, Code of Maryland

- “(a) (1) In this section the following words have the meanings indicated.*
- (2) (i) “Four–year adjusted cohort” means a group of students who are entering the ninth grade for the first time from a cohort that is subsequently adjusted by adding any students who transfer into the cohort later during the ninth grade and the next three years and subtracting any students who transfer out, emigrate to another country, or die during that same period.*
- (ii) “Four–year adjusted cohort” also includes students retained in grade and only counted once as members of their original cohort.*
- (3) “Graduation rate” means the percentage obtained from applying the graduation rate formula.*
- (4) (i) “Graduation rate formula” means the number of students who graduate on time with a Maryland high school diploma divided by the number of students in the four–year adjusted cohort.*
- (ii) “Graduation rate formula” does not include students who graduate on time with a GED or other certificate not aligned with State standards.*
- (5) (i) “On time” means on or before the conclusion of a four–year adjusted cohort’s fourth year of high school.*
- (ii) “On time” includes a senior summer session in a jurisdiction that offers senior summer sessions.*
- (6) (i) “Transfer out” means a student who the county board confirms, via written documentation, has enrolled in another high school or other educational program from which that student is expected to receive a Maryland high school diploma.*
- (ii) “Transfer out” does not include a student enrolled in:*
- 1. A GED program; or*
 - 2. An alternative education program that does not issue or provide credits toward a Maryland high school diploma.*
- (b) The purpose of this section is to:*
- (1) Initiate a process by which the State may achieve the goal of collecting, maintaining, analyzing, and publicly reporting data relating to the graduation rates of students in public high schools as an essential step in addressing gaps in educational achievement among a diverse student population; and*
- (2) Explicitly delineate the duties and responsibilities of the Department and the county boards in this regard.*

- (c) (1) *Beginning on or before September 1, 2011, and each year thereafter, a county board shall:*
- (i) *Collect, maintain, and analyze graduation rates for public schools, local school systems, and the State; and*
 - (ii) *Report the information required under item (i) of this paragraph to the public and the Department in the aggregate and disaggregated by:" (see Code for demographic categories)*
- “(2) *Beginning on or before October 1, 2011, and each year thereafter, the Department shall:*
- (i) *Compile the information received under paragraph (1) of this subsection and calculate a graduation rate for the State; and*
 - (ii) *Post the information obtained under this subsection for each county on its Web site in the aggregate and disaggregated by:" (see Code for demographic categories)*
- “(d) (1) *The county boards and the Department may develop and implement additional indicators to collect, maintain, analyze, and publicly report data regarding alternative high school completions.*
- (2) *The Department shall ensure that the information collected under paragraph (1) of this subsection is comparable for public schools and local school systems in the State.*
- (e) *The Department shall:*
- (1) *Implement training for administrators and other personnel responsible for collecting, maintaining, analyzing, and publicly reporting data regarding four-year adjusted cohorts and graduation rates;*
 - (2) *Implement a standard process for verifying the accuracy of data including:*
 - (i) *Statistical checks and analyses; and*
 - (ii) *On-site audits of record-keeping procedures;*
 - (3) *Implement a public awareness campaign including outreach to civic associations, community-based groups, and parent organizations and the solicitation of suggestions and community support regarding the need for collecting, maintaining, analyzing, and publicly reporting accurate data regarding four-year adjusted cohorts and graduation rates;*
 - (4) *Provide technical support to the county boards with collecting, maintaining, analyzing, and publicly reporting graduation rate data; and*
 - (5) *Serve as a central repository for this data."*

Education Article §7-205, Code of Maryland

- “(a) *The promotion of students in a public school and graduation from a public school shall be in accordance with:*
- (1) *Policies established by the county board; and*
 - (2) *The rules and regulations of the State Board.*

- (b) (1) *Each student who graduates from a public high school shall receive the same type of diploma or certificate, regardless of the high school attended or the course taken.*
- (2) *The diploma or certificate shall state that the student has completed a program of studies satisfactorily in accordance with the requirements of the State Board.”*

Education Article §7-205.1, Code of Maryland

“(a) The State Board shall establish high school curriculum and graduation requirements for all public schools in accordance with this section.

- (b) (1) *Beginning with the 2015–2016 school year, all students shall be assessed using acceptable college placement cut scores no later than 11th grade to determine whether the student is ready for college–level credit–bearing course work in English Language Arts, Literacy, and Mathematics.*
- (2) (i) *Subject to subparagraph (ii) of this paragraph, the Department, in collaboration with local school systems and public community colleges, shall develop and implement, by the 2016–2017 school year, transition courses or other instructional opportunities to be delivered in the 12th grade to students who have not achieved college and career readiness by the end of the 11th grade.*
- (ii) *The implementation of transition courses or other instructional opportunities required under subparagraph (i) of this paragraph:*
 - 1. *Shall include an assessment or reassessment of the student after completion of the course; and*
 - 2. *May not preclude or replace enrollment in a course otherwise required for graduation from high school.”*

REGULATIONS²

Attendance

COMAR 13A.08.01.03 Lawful Absence

“Students presently enrolled in public schools are considered lawfully absent from school, including absence for any portion of the day, only under the following conditions:

- A. Death in the immediate family. The local school system shall determine what relationships constitute the immediate family.*
- B. Illness of the student. The principal or a pupil personnel worker shall require a physician's certificate from the parent or guardians of a student reported continuously absent for illness.*
- C. Court summons.*
- D. Hazardous weather conditions. Hazardous weather conditions shall be interpreted to mean weather conditions which would endanger the health or safety of the student when in transit to and from school.*
- E. Work approved or sponsored by the school, the local school system, or the State Department of Education, accepted by the local superintendent of schools or the school principal, or their designees as reason for excusing the students.*
- F. Observance of a religious holiday.*
- G. State emergency.*
- H. Suspension.*
- I. Lack of authorized transportation. This does not include students denied authorized transportation for disciplinary reasons.*
- J. Other emergency or set of circumstances which, in the judgment of the superintendent or designee, constitutes a good and sufficient cause for absence from school.”*

COMAR 13A.08.01.04 Unlawful Absence

“A. An absence, including absence for any portion of the day, for any reason other than those cited as lawful are presumed to be unlawful and may constitute truancy. Local school systems may add specified criteria for unlawful absences to local board-approved attendance policies.

B. Truancy. A truant is a student who is absent without lawful cause as defined in Regulation .03, of this chapter, from the attendance for a school day or portion of it.

² Code of Maryland Regulations (COMAR) Online Search page:
<http://www.dsd.state.md.us/COMAR/ComarHome.html>

C. *Habitual Truant. A student is an habitual truant if the student is unlawfully absent from school for a number of days or portion of days in excess of 20 percent of the school days within any marking period, semester, or year. A local school system has the prerogative of defining habitual truancy in a more but not less stringent manner (for example, unlawful absences in excess of 15 percent of the school days)."*

COMAR 13A.08.01.05 Student Attendance Policy

"Each local school system shall develop a student policy which includes:

A. *A general statement dealing with the local school system's purpose and rationale for promoting regular school attendance.*

B. *Rules, Definitions, and Procedures for Policy Implementation*

(1) *Reasons for lawful and unlawful absences and tardiness include lawful/unlawful absence as defined in Regulations .03 and .04, of this chapter. Clarification of special situations for unlawful absence may also be identified.*

(2) *Standards for regular attendance include minimal requirements for student attendance in order to foster continuity of the instructional program. The standards for school attendance may identify a specific number of excessive or unlawful absences allowed within a marking period, semester, or school year.*

(3) *Procedure to verify absences/tardiness includes responsible persons, time limits, and methods of absent/tardy verification.*

(4) *Penalties for not meeting standards for regular attendance requirements include actions taken by school system staff when a student is unlawfully absent or accumulates an equivalent number of excessive or unlawful absences which exceeds the standard for regular school attendance. The penalties should be identified, and should reflect a continuum of excessive or unlawful absences.*

(5) *Make-up work requirements include classroom teacher and student responsibility, time limits, and grading policy for make-up work. Make-up work requirements may also involve a procedure for completing class work in advance of an absence wherever possible.*

(6) *Attendance-monitoring procedure includes:*

(a) *Record-keeping format to comply with State attendance reporting requirements;*

(b) *Intervention strategies and procedures for dealing with absenteeism at the beginning stages of the problem as well as chronic absenteeism; and*

(c) *A referral process to pupil services or other central office professionals for case management of chronic attendance cases.*

(7) *Reward process includes an identified motivational program to reward regular school attendance.*

(8) *Information dissemination includes methods for informing school staff, students, parents, and community members of attendance policy requirements.*

(9) Appeals process includes specific due process procedures for appealing attendance violation decisions at the school and central office level.

(10) Legal foundation includes citations of legal authority for attendance policy development and implementation.”

Grading

COMAR 13A.03.02.08 Students’ Rights

“A. Each local school system shall develop a written policy on grading and reporting that complies with the student record requirements as set forth in COMAR 13.A.08.02.

B. On October 1 of each school year, each local school system shall file its policies on grading and reporting with State Superintendent of Schools.”

Alternative Programs

COMAR 13A.03.02.04 Other Provisions for Earning Credit

“A. In addition to earning credits during the regular school day and year, credits may be earned, at the discretion of the local school system, through the means specified in §§B–I of this regulation.”

B. Summer School.

“(2) Credit instruction shall meet the aggregate time requirements specified by the local school system.”

“C. Evening School. A local school system may provide evening school programs for credit as an extension of the regular school day as determined by the needs of students.”

D. Online Courses.

“(1) Consistent with local school system policy and procedure, credit may be given for Department-approved online courses.

(2) If credit is to be applied toward minimum graduation requirements, the Department-approved online course shall be provided by the local school system.”

E. Tutoring.

F. Work Study Programs, Job Entry Training Programs, or Experience Outside the School.

G. College Courses.

H. Independent Study/Internship.

I. Credit through Examination.

COMAR 13A.03.02.11 Alternatives for Structuring Programs

“A. Each local school system shall be permitted to develop alternative ways for individual or groups of students to fulfill graduation requirements.

B. *An alternative plan may include a waiver of the fourth year enrollment requirement if all credit, assessments, and student service requirements are met and if the local superintendent of schools or designee determines that the waiver is in the best interest of the student.*

C. *Procedures for implementing these alternative programs leading to high school diplomas are as follows:*

(1) *Development and approval of a curricular plan which assures that the content of the specified credits is included and the standards for graduation are met pursuant to the requirements of this chapter with the plan containing a program description, performance requirements, and evaluation procedures; and*

(2) *The local superintendent of schools is responsible for approving any plan and shall notify the State Superintendent of Schools once approval has been given.”*

Promotion and Graduation

COMAR 13A.03.02.09 Diplomas and Certificates

“A. The types of diplomas and certificates specified in §§B—D of this regulation shall be awarded to any student who meets the requirements for award.

B. Maryland High School Diploma. Except as provided in Regulation .12 of this chapter, and in §C of this regulation, to be awarded a Maryland high school diploma, a student shall:

(1) *Complete the enrollment, credit, and service requirements as specified in this chapter;*

(2) *Complete local school system requirements; and*

(3) *Meet the graduation assessment requirements in the following ways:*

(a) *Achieve a passing score on the Maryland High School Assessments for Algebra I and English 10, in the following way:*

(i) *For school year 2016—2017, a score of 725”*

“(v) Assessment in English 10 and/or Algebra I, the passing score on the retest shall be the passing score in the year in which the student first took the assessment.

(b) *Achieve a passing score as established by the Department on the Maryland High School Assessments for biology and government;*

(c) Achieve a combined score(s) as established by the Department on the Maryland High School Assessments;

(d) If a student has not achieved a passing score on the Maryland High School Assessment in English 10 and/or Algebra I, achieve a score as established by the Department on Department-approved assessments for algebra, and/or English, aligned with the Maryland High School Assessments such as Advanced Placement examinations, SAT, ACT, and International Baccalaureate examinations; or

(e) Except for students described in Regulation .06G of this chapter, if a student is unable to meet the requirements in §B(3)(a)—(d) of this regulation, then satisfactorily complete the requirements of the Bridge Plan for Academic Validation as set forth in Regulation .06E of this chapter.”

“F. Local Endorsements. Consistent with procedures established by the Department, each local school system may add endorsements to the diploma as incentives for students to meet locally established requirements and outcomes in instruction beyond the minimums specified by the State.

G. At least yearly, through the end of the implementation, the State Board will review and assess updated information on the graduation assessment requirements and scores.”

COMAR 13A.03.02.05 Student Service

“To graduate, students shall complete one of the following:

A. 75 hours of student service that includes preparation, action, and reflection components and that, at the discretion of the local school system, may begin during the middle grades; or

B. A locally designed program in student service that has been approved by the State Superintendent of Schools.”

Records, Access, and Controls

COMAR 13A.08.02.06 Retention, Disposition, and Destruction of Student Records

“A. Guidelines and standards for the retention and disposition of student records maintained under this title shall be those adopted in the Maryland Student Records System Manual.

B. Individual student records not required or specifically regulated by other State or local regulations shall be destroyed when they no longer serve legitimate education purposes, subject to the following exceptions:

(1) The local school system or educational institution may not destroy any student record if there is an outstanding request to inspect and review them under Regulation .13 of this chapter;

(2) Explanations placed in the education record under Regulation .15 of this chapter shall be maintained as provided in Regulation .15D of this chapter; and

(3) *The record of access required under Regulation .20 of this chapter shall be maintained for as long as the education record to which it pertains is maintained.*

COMAR 13A.08.02.07 Review and Updating

“A. To ensure that student records maintained under this title are relevant and accurate, a local school system and educational institution regulated by the State Board of Education shall provide for review and updating of student records.

B. Changes in identifying information, results of individual and group standardized tests, and health data shall be made within a reasonable time after these changes occur during the school year.

C. Review of student records shall occur at least under the following conditions:

(1) When a student transfers to the next higher organizational unit, such as from elementary to middle school level;

(2) When a student graduates from high school; and

(3) When a student withdraws for any other reason.

D. Each principal of an educational institution shall certify annually in writing to the local superintendent the accuracy of student data maintained in the student records at the educational institution.”

COMAR 13A.08.02.08 Students’ Rights Establishes students’ and parents’ rights for access to records. [Link](#)

COMAR 13A.08.02.09 Content of Records Establishes the minimum content for records. [Link](#)

COMAR 13A.08.02.10 Annual Notification of Rights

“A. Each local school system or educational institution shall give parents or guardians of students in attendance or eligible students in attendance at the local school system or educational institution annual notice by such means as are reasonably likely to inform them of their right to:

(1) Inspect and review the student's records;

(2) Seek amendment of the student's records that the parent, guardian, or eligible student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights;

(3) Consent to disclosures of personally identifiable information contained in the student records, except to the extent that the Act and Regulation .19 of this chapter authorize disclosure without consent; and

(4) File complaints with the United States Department of Education concerning alleged failures by the local school system or educational institution to comply with the requirements of the Act.”

COMAR 13A.01.04.04 Data-Based Areas establishes annual reporting requirements for performance metrics, including Maryland State Assessments, Average Daily Attendance rates, and Yearly High School Graduation rates. [Link](#)

PGCPS POLICIES AND ADMINISTRATIVE PROCEDURES³

Attendance

PGCPS Administrative Procedure 5113: Student Attendance, Absence, and Truancy

III. Definitions

"C. Truant Student: A child enrolled in school that is unlawfully absent from school for:

- 1. Eight days in a quarter;*
- 2. Fifteen days in any semester; or*
- 3. Twenty days in a school year.*

D. Habitual Truant: Any student who is unlawfully absent from school more than 20 percent of any grading period of the school year."

"F. Unlawful Absence: Student absent from school for any reason other than those defined as a lawful excuse. Students who are removed from school by their parent(s)/guardian(s) for more than 10 consecutive days for extended travel and not enrolled in another school or educational program may be withdrawn; then, re-enrolled upon their return.

G. Tardiness: Anytime a student is not in the classroom when the class period begins."

IV. Procedures

"A. Recording Absences – Recognizing the responsibility of administrators and teachers for developing and maintaining a system of recording and reporting student absences (lawful and unlawful), the following procedures are to be considered as minimum for each school level (elementary, middle, and high).

- 1. The classroom teacher is responsible for recording student attendance and tardiness on the online system.*
- 2. If the student has missed 3 or more consecutive school days, the parent(s)/guardian(s) should be called by the teacher.*
- 3. If no change, the teacher of record will submit the student's name to the professional school counselor/and or administrator to schedule a conference with the student and parent(s)/guardian(s).*
- 4. Students with excessive absences, both lawful and unlawful, will be referred to the School Instructional Team (SIT).*
- 5. Students who demonstrate a pattern of excessive absences will be referred to the school team, which will include the pupil personnel worker, for intensive interventions designed to increase regular attendance.*

³ PGCPS Administrative Procedures: <http://www.pgcps.org/administrativeprocedures/>

B. *Confirming Absences – Upon returning to school from an absence, the student is required to present a written note from his/her parent/guardian stating the dates and reason for the absence. Documentation may be requested for absences of three or more consecutive days.”*

V. Preventing Truancy

“A. Identify At-Risk Students: *Students often exhibit behaviors which, without intervention, can lead to truancy. To prevent unlawful absences, it is crucial to initiate positive and supportive interventions as soon as a student begins to exhibit such indicators.”* (See AP 5113 for some student warning symptoms.)

“C. Addressing At-Risk Students: *During the first month of the school year, the pupil personnel worker and the professional school counselor will meet with returning students who were identified as truants the previous year to:”* (See AP 5113 for list)

PGCPS Administrative Procedure 5121.3: Grading and Reporting for High School Grade 9 through Grade 12

“Teachers must assess a variety of student performances such as written assignments, homework, projects, classroom participation/class work, quizzes, tests, and end of quarter/course examinations.”

Thus, attendance plays an indirect role in graduation through participation and class work.

Grading – Lawful Absences

“1. *Students who are considered lawfully absent from a class (See Administrative Procedure 5113) will have the opportunity to make up missed assignments.*

2. *Teachers are required to provide make-up work (within 48 hours) when requested for students who are lawfully absent, including suspensions, and who have not qualified for home teaching.*

3. *For all suspensions, teachers are required to provide make-up work and assignments to all students, unless other educational alternatives are provided. It is the responsibility of the parent(s)/guardian(s) to contact the school and make arrangements.*

4. *Students who are lawfully absent may not be penalized for work requested but not provided by the school for periods of such lawful absence.*

5. *The number of days allowed to make up missed work will be equivalent to the number of days of lawful absences. This timeline will begin when the teacher provides the student with the assignments within 48 hours of the request. Students who fail to complete missed assignments within the allotted time will receive 0 (zero) for each assignment.*

6. *If lawfully absent students return to school near the close of the first, second, or third marking period and do not have sufficient time as described above to make up the missed work, an “I” grade will be assigned.*

a. *The student’s average for the previous marking period (the marking period in which the “I” grade was assigned) will be recalculated and changed on the report card by the next marking period.*

- b. *The Grade Change Authorization Form PS-140 must be used to authorize and document this change.*
 - c. *If a student fails to meet established deadlines for completion of assignments (see above), all missing grades will be converted to 0 (zero) per assignment for non-credit and credit courses.*
7. *In the fourth marking period, if an "I" grade would otherwise have been assigned, teachers will use all existing grades to determine the student's fourth marking period grade. A request for an exception may be made to the principal.*
8. *In secondary schools, five (5) days of lawful absence per semester course, or ten (10) days of lawful absence per full year course will result in the assignment of an "E" for the course if a student did not complete makeup work for missed time or receive home teaching. However, the school must document that on at least one occasion during the course of the accrued absences, the school notified the student and parents or guardians of the following:*
- a. *Absences have been noted and recorded.*
 - b. *The student stands in peril of receiving an "E" for the course.*
 - c. *Work missed was not made up.*
9. *An "E" should be assigned to a student with excessive lawful absences who has not completed make-up work within the prescribed time period and who otherwise would have received a passing grade. Teachers must notify the student and parents that an "E" was assigned for that course and do an override to change the grade."*

Grading – Unlawful Absences

1. *In secondary schools, a student with unlawful absences will receive a "failing" grade for any day(s) of such absence(s). The failing grades will be averaged with other daily grades. A score of 0 (zero) will be given to students who do not attempt to complete or fail to submit an assignment. Failing grades for credit courses is zero percent.*
2. *In secondary schools, five (5) days of unlawful absence per semester course or ten (10) days of unlawful absence per full year course will result in the assignment of an "E" for the course. However, the school must document that on at least one occasion in the course of the accrued absences, the school notified the student and the parents/guardians of the following:*
- a. *Absences have been noted and recorded.*
 - b. *The student stands in the peril of receiving an "E" for the course.*
 - c. *An offer is made to explore and remediate the causes of unlawful absences."*
3. *The school is not required to provide make-up work for unlawful absences.*
4. *A final grade of "E" should be given to a student with excessive unlawful absences who otherwise would have received a passing grade."*

Grading

Board of Education Policy 5121: Grading and Reporting for Elementary and Secondary Students

“Further, this policy affirms the Board of Education’s belief that grades will be reflective of student mastery of and demonstration of actual achievement relative to, the rigorous academic standards that under gird the Maryland Voluntary State Curriculum and are reflected in the state assessments.

In accordance with COMAR 13A.03.02.12 and to guide administrators and teachers, the Board of Education directs the Superintendent of Schools to provide Administrative Procedures on grading and reporting that shall include but not be limited to the following:

- 1. Establishment of instructional objectives and standards of performance for each course;*
- 2. Factors to be used in determining grades;*
- 3. Reporting contacts between parent (guardian) and teacher that maximize the school-home partnership in support of student achievement;*
- 4. Procedures for appeal of grades and course withdrawal;*
- 5. Grading provisions for children with Individual Educational Plans; and*
- 6. Compliance with the student record requirements as set forth in COMAR 13A.08.02.”*

PGCPS Administrative Procedure 5121.3: Grading and Reporting for High School Grade 9 through Grade 12

Preface to Administrative Procedure 5121.3

“Principals or their designees are responsible for ensuring that grading and reporting policies are applied consistently within their school and responsible for reviewing procedures with staff.”

Rationale

- “1. Grading and promotion within the Prince George’s County Public School System will be based upon the degree of success an individual student has achieved in completing the educational program designed to meet his/ her unique needs*
- 2. Every student will have the opportunity to earn grades that reflect his/her ability to demonstrate learning outcomes and be graded only in accordance with their achievement on material or information based on specified learning outcomes and approved curricula.*
- 3. The bell curve will not be used as a basis for determining student grades.*
- 4. Grades will be based on summative assessments and the completion of formative and practice assignments.”*

Grading Elements

- “1. Grades will be used on report cards for all courses taken for credit. The grades will be reported in a numeric scale from 0 to 100.*
- 2. Final numeric grades will be converted to alpha grades. The grades eligible for use on report cards are A, B, C, D, E, I, P, and W, with no plus or minus signs. Interpretation of letter grades is as follows:

A = Excellent progress toward meeting course objectives and learning outcomes (90-100%).
B = Above average progress toward meeting course objectives and learning outcomes (80-89%).
C = Average progress toward meeting course objectives and learning outcomes (70-79%).
D = Below Average progress toward meeting course objectives and learning outcomes (60-69%).
E = Failure toward meeting course objectives and learning outcomes (0-59%)

I = Incomplete. The “I” grade may be used temporarily for secondary students who have been lawfully absent from school and have not had an opportunity to make up missed work in a timely manner.

P = Pass (credit bearing).

W = Withdrawn. The School Instructional Team agrees to allow a student to drop a course after twenty (20) school days from the start of the course or ten (10) days in a semester course.*
- 3. Factors used to determine student grades must include the following items (See Attachment):

a. Class Work
b. Homework
c. Assessment*
- 4. Teachers shall assign a minimum grade of 50% to assignments or assessments for which the student made a good faith effort, as defined by completing at least 50% of the assignment, to meet the basic requirements. If a student does no work on an assignment or assessment, the teacher shall assign a grade of zero.”*

Reporting and Recording Grades

- 1. Reporting

“b. Students and/or parents may request one additional opportunity to improve a score on a qualifying assessment, activity, or assignment that demonstrates knowledge of course content, skills, and standards. An assessment, activity or assignment is considered qualifying if the following criteria are met:

1. The student completed and submitted the original assessment, activity, or assignment by the due date.

2. The student participated in the teacher-facilitated re-teaching (before, during, or after school) within five school days following the return of the original graded work.*

3. *Within ten school days of receiving the returned original graded work, the student completed and resubmitted the new assessment, activity, or assignment.*
4. *The higher grade shall be the grade of record.*
5. *If the work is not eligible for reassessment, that must be identified in writing on the rubric at the time of original assignment. Final research reports and projects that culminate a unit of study, or final semester or marking period exams may not be reassessed.*
6. *Make up work can not be submitted 5 school days prior to the end of the quarter to ensure teachers have time to grade all outstanding work."*

2. Recording

"Teachers will maintain a record of each student's work, progress, and attendance on a daily basis in SchoolMAX.

a. Teachers and schools will maintain records of student progress. It is expected that teachers will enter graded student work into their electronic grade book and return that work to students within ten business days of the due date. However, it is recognized that to provide meaningful feedback to students, teachers may not be able to read/review and post the grade within ten business days, and, on those assignments, teachers may provide written notice on the rubric or assignment with a projected date that grades will be returned to students."

"c. Teachers must record a minimum of two numeric grades per week in SchoolMAX; more than two is highly recommended. If a week is shortened by two days, a minimum of one grade will be required. If a class meets only once per week, only one grade will be recorded."

Grade Change

PGCPS Administrative Procedure 5121.3: Grading and Reporting for High School Grade 9 through Grade 12

Procedures for Appeal

"Within five (5) days upon receipt of a report card by the parent/guardian, report card grades may be appealed in writing on the official appeals form. The steps of the appeal are as follows:

1. *The parent/guardian will confer with the teacher and provide the reason(s) for appealing the grade. If the parent/guardian is dissatisfied with the resolution they may appeal the teacher's decision to the principal or designee.*
2. *The principal or designee will confer with the parent/guardian and teacher, make a decision and provide a written response. This decision will be included in the cumulative folder.*
3. *If the principal deems that a quarter grade submitted for a student should be different than what is reflected on the report card, the principal is required to submit a Grade Change Authorization Form (Form PS-140) to the School Instructional Team (SIT) with evidence and rationale for changing the grade. The decision of the SIT must be conveyed to the teacher that submitted the grade within 48 hours.*

4. *If the parent/guardian wishes to appeal the principal's decision, he/she will request a conference with the Area Associate Superintendent. A further appeal may be made to the Office of Appeals.*
5. *Appeals of grades will be considered if they are based on one or more of the following reasons:*
 - a. *There is an allegation of an error in averaging or in data entry.*
 - b. *There is an allegation that factors other than those established at the beginning of the school year were used to determine the grade.*
 - c. *There is an allegation of personal teacher bias.*
6. *At each level of appeal, the written decision must be provided to the parent, student, and teacher. The request and written decision also must be included in the cumulative folder.*
7. *At any level of the appeal, if a grade change is authorized, a Grade Change Authorization Form (Form PS-140) must be completed."*

Authorization of Grade Change

"The principal is responsible for following the standard procedure for the authorization and recording of all grade changes.

1. *A Grade Change Authorization Form (PS-140) will be used to authorize and record the specific reasons for requesting each grade change.*
2. *Form PS-140 must be signed by the teacher of the course for which the grade change is requested and by the school principal.*
3. *Upon effecting the grade change in the appropriate database, the authorized data entry person must sign the PS-140. Appropriate staff must refer to the transcript guide when changing grades.*
4. *If a grade change involves a final grade, the original grade as recorded on the electronic report and the final report card will be reprinted. The new grade, recorded by the registrar, will be recorded on the documents, initialed, and dated by the principal.*
5. *Form PS-140 must be filed in the student's cumulative record folder, with copies distributed as indicated on the form.*
6. *School staff will re-calculate the student's quarter Grade Point Average and cumulative Grade Point Average if a grade change is authorized.*

If the principal deems that a quarter grade submitted for a student should be different than what is reflected on the report card, the principal is required to submit a Grade Change Authorization Form (Form PS-140) to the School Instructional Team (SIT) with evidence and rationale for changing the grade. The decision of the SIT must be conveyed to the teacher that submitted the grade within 48 hours."

Promotion and Graduation

PGCPS Administrative Procedure 6150: Education Requirements and Options in Secondary Schools

In accordance with Maryland Department of Education requirements and COMAR 13A.03.02.09, outlines this administrative procedure outlines the requirements for successful completion of high school, including course credits, assessments, and service learning hours. It outlines PGCPS program requirements for English, Mathematics, Science, Social Studies, Health, and elective courses. The program-specific descriptions outline the course progression required for each subject matter. Assessment requirements include test scores needed based on class year.

AP 6150 was updated on August 17th, 2017, to include references to the Multiple Pathways to Success Program, not included in the last updated version from September 6th, 2016. The new procedure now specifies that “A student failing a grade level course may make it up in summer school, Evening High School, or Multiple Pathways to Success (MPTS) credit recovery” in the sections for English, Math, and Science. This administrative procedure does not reference an AP for administration or grading of the MPTS program, but leaves this open-ended option to support promotion based on MPTS completion.

PGCPS Administrative Procedure 5123.2: General Procedures Pertaining to Promotion, Retention and Acceleration of Students

The 2017 update of these requirements superseded the 2014 update, and lessened the requirements for math credits by one for each year for promotion for grade 9-11.

III. Procedures

A. Promotion and Retention Considerations

3. High School

“b. Promotion for entering freshmen for the period through Fall 2013:

(1) From Grade 9 to 10, a student must have a total of five units of credit, including one credit of English. Progress toward fulfilling the graduation requirement with regards to the Maryland High School Assessment should be included.

(2) From Grade 10 to 11, a student must have a total of 10 units of credit, including two credits of English, one credit of mathematics, one credit of science, and one credit of social studies. Progress toward fulfilling the graduation requirement with regards to the Maryland High School Assessment should be included.

(3) From Grade 11 to 12, a student must have a total of fourteen units of credits, including three credits of English, two credits of mathematics, one credit of science, one credit of social studies, and be able to fulfill all requirements not to exceed nine credits per year, for a Maryland High School diploma in June. In addition, the student must have taken all three high school assessments. An exception will be made for students entering a high school their senior year from another LEA or from out of state. Students must sit for the

appropriate high school assessment at the end of the course before being promoted to 12th grade.

(4) Students must meet the assessment requirements or alternative option per entry year in high school in order to graduate with a Maryland High School Diploma (see Administrative Procedure 6150). Failure to achieve either option will result in a student not being able to graduate, regardless of credits and grades earned.

(5) Students must meet the service-learning requirements per entry year in high school in order to graduate with a Maryland High School Diploma (see Administrative Procedure 6151). Failure to achieve either option will result in a student not being able to graduate, regardless of credits and grades earned.”

“g. Notification of Seniors of Graduation Status

(1) A Graduation Notification/Agreement, PS-13 will be completed in triplicate with each senior in a conference with his/her counselor during the first eight weeks of the senior year. The original copy will be retained for the school file; a copy will be sent by U.S. mail to the parent or guardian prior to the end of the first grading period; and the student will retain the third copy.

NOTE: Senior students entering after issuance of the first report card will, at the time of registration, complete a Graduation Notification/Agreement. If an official transcript from the previous school is not available, a note on the Graduation Notification/Agreement will indicate “pending receipt of official previous school records.”

When official records are received, a Graduation Notification/Agreement will be completed. One copy will be sent by U.S. mail to the parent or guardian; one copy will be retained for the school file; and one copy will be given to the student.

(2) Additional notification of students’ progress on the assessment requirements, credits earned, and grades is provided in the form of progress reports and report cards issued every nine weeks. Ongoing communication will be provided to parents of seniors in danger of not graduating.

(3) Students not meeting graduation requirements will be notified immediately following final examinations by a personal conference with appropriate staff, a telephone call to parents or guardians, and a certified letter sent to parents or guardians.”

IV. Retention Guidelines

AP 5123.2 outlines a detailed timeline related to retention, highlighting required progress checks for D/E students, as well as required intervention points for at risk students. Notably, this timeline specifies to *“Flag students for retention using School Exclusion feature by the end of May.”*

V. SchoolMAX FLAGS:

“A fair warning flag can be set to let parents know that a child is in danger of failing. It can print for any course where the child has a grade of “E” on the progress report or the report card.”