



**Karen B. Salmon, Ph.D.**  
State Superintendent of Schools

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TO: Members of the State Board of Education

FROM: Karen B. Salmon, Ph.D., State Superintendent of Schools

DATE: December 4, 2018

SUBJECT: Prince George's County Public Schools Performance Audit Review

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**PURPOSE:**

The purpose of this item is to provide the State Board of Education with an update on the Prince George's County Public Schools (PGCPS) Final Performance Audit Report.

**BACKGROUND:**

Based on allegations of grade manipulation to alter/increase promotion and graduation rates, the Maryland State Department of Education (MSDE) issued an emergency procurement for an independent performance audit of PGCPS' graduation rates. The Request for Proposals was issued on July 10, 2017 and the MSDE awarded Alvarez and Marsal (A&M) with a notice to proceed on August 29, 2017. A performance audit report (2017 Audit) was completed and their findings and recommendations were provided to the MSDE on October 31, 2017.

Based on A&M's Audit Report dated October 31, 2017, the State Board of Education requested a second audit review of the PGCPS. In May of 2018, the independent audit firm of A&M was awarded a notice to proceed with a second independent performance audit (2018 Audit) of PGCPS.

**EXECUTIVE SUMMARY:**

On October 26, 2018, A&M provided MSDE with the 2018 Performance Audit Report regarding PGCPS. The audit consisted of three phases; an Action Plan Assessment, a follow-up Performance Audit, and a consolidation of Best Practices and Lessons learned from the 2017 and 2018 Audits.

As a result of this audit, the Office of Compliance and Monitoring has developed a Graduation Rate Validation Checklist to ensure all LEAs across the State of Maryland are in compliance with applicable State and federal graduation requirements.

**ACTION:**

No action required, for discussion only.

Attachment

# Independent Performance Audit Findings Prince George's County Public Schools Audit Review



MARYLAND STATE BOARD MEETING

December 4, 2018

# Background

- **June 27, 2017** – Prince George’s County Public Schools (PGCPS) Chief Executive Officer Dr. Kevin Maxwell and the majority of the Prince George’s County Board of Education submitted a formal request to State Superintendent of Schools Dr. Karen B. Salmon for an independent performance audit of the PGCPS high school graduation rates.
- **September 1, 2017** - Maryland State Department of Education (MSDE) notified PGCPS about the award of a contract to Alvarez & Marsal (A&M) Public Sector Services to conduct the audit.
- **September 12 thru October 31, 2017** - A&M conducts on-site audit of 27 PGCPS High Schools and provides its finding to MSDE.
- **November 3, 2017** - MSDE released the audit findings and provided a summary of findings and recommendations.
- **January 30, 2018** – PGCPS provides Maryland State Board of Education with response to findings of A&M 2017 Audit Report.
- **May 2018** - MSDE awards a second independent audit review to A&M. This review arose from the previous audit report of October 31, 2017.
- **July 9 thru October 1, 2018** - A&M conducts a secondary review audit focusing on: 1) progress regarding first audit recommendations and 2) recommendations for improvement.
- **October 1, 2018** - A&M provides a draft audit report concerning secondary audit review, progress made and renewed recommendations.
- **October 26, 2018** – A&M provides an updated audit report detailing key findings and observations.
- **November 20, 2018** - A&M’s 2018 PGCPS Final Audit Report sent to Maryland State Board of Education.

# Alvarez & Marsal 2018 Audit Consisted of Three Phases

## **Action Plan Assessment**

An analysis of gaps between Prince George's County Public Schools' (PGCPS) Action Plan published in December 2017 and recommendations included in Alvarez & Marsal's (A&M) 2017 Audit.

## **Performance Audit**

A&M conducted a follow-up performance audit of PGCPS's 27 high schools to collect student cumulative records related to grade changes and graduation certifications.

## **Best Practices & Lessons Learned**

A consolidation of Best Practices and Lessons Learned from the 2017 Audit and the 2018 Audit.

# Action Plan Gap Analysis Summary

Categories Identified in Alvarez & Marsal's 2017 Audit Report	2018 Audit Results			
	Total Recommendations	Recommendations Fully Addressed	Recommendations Partially Addressed	Recommendations Not Addressed
Attendance	5	5	N/A	N/A
Grade Change & Appeals	8	6	2	N/A
Grading	6	6	N/A	N/A
Credit Recovery	4	4	N/A	N/A
Graduation Certification	6	6	N/A	N/A
Record Access & Controls	6	5	1	N/A
General Findings and Observations on Governance of the District	5	1	1	3
<b>TOTAL</b>	<b>40</b>	<b>33</b>	<b>4</b>	<b>3</b>

# Attendance

2017 Audit Recommendation	2018 Audit Results	
	Recommendation Addressed in Prince George's County Public Schools (PGCPS) Action Plan	Recommendation Implemented by PGCPS
Configure SchoolMAX to support monitoring and enforcement of excessive absence procedures for grading or utilizing another automated tool to identify students who have excessive absences and calculate appropriate grading adjustments in accordance with PGCPS procedures.	Yes	No

- Despite incorporating Alvarez & Marsal's recommendation to configure SchoolMAX to support monitoring and enforcement of excessive absence procedures for grading into the Action Plan, PGCPS did not implement this recommendation.<sup>1</sup>

Prince George's County Public Schools utilize SchoolMAX, a comprehensive data management system comprised of student information including attendance records and grades.

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<sup>1</sup> 2018 Audit Report dated October 26, 2018, III,D,1(a)(1), p. 13.

## Areas of Further Enhancement

- Investigate additional features of SchoolMAX that could support school-level attendance accountability. Given the Administrative Procedure (AP) 5113 modifications, Prince George's County Public Schools (PGCPS) should now consider whether SchoolMAX can automatically assign a zero for missed assignments when a student is unlawfully absent.<sup>2</sup>
- Develops a district-level monitoring process including data analysis on the report from SchoolMax, to ensure all schools are following the policies outlined in AP 5113.<sup>3</sup>
- Provide more substantial training for all administrators on how to implement and monitor adherence to AP 5113 at their schools.<sup>4</sup>

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<sup>2</sup> 2018 Audit Report dated October 26, 2018, III,D,1(a)(2), p. 14.

<sup>3</sup> Ibid

<sup>4</sup> Ibid

# Grade Changes & Appeals

## 2018 Audit Results

2017 Audit Recommendation	Recommendation Addressed in Prince George's County Public Schools (PGCPS) Action Plan	Recommendation Implemented by PGCPS
Implement an independent review function for grade changes at the school level.	Partially	Partially
Perform representative random sampling of grade changes to evaluate adherence to policies, procedures, and timelines	Yes	Partially
Report results to PGCPS administration, internal auditor and school board.	Partially	Partially

- Processes and controls for grade changes have significantly improved, and PGCPS has developed an online grade change form that was piloted and will be used starting SY 18-19.<sup>5</sup>
- PGCPS partially implemented these two recommendations – they did conduct random sampling of student records after the Q1 and Q2 grading periods of SY 17-18; however, PGCPS did not produce quarterly grade change reports for individual schools and did not audit Q3 and Q4 grading periods.<sup>6</sup>
- According to Alvarez & Marsal's interviews with the seven members of the Board of Education, they were not aware of the results of the random sample audits completed by PGCPS.<sup>7</sup>

<sup>5</sup> 2018 Audit Report dated October 26, 2018, III,D,2(b), p. 14.

<sup>6</sup> III,D,2(b)(1), p. 14.

<sup>7</sup> Ibid, p. 15.



## Areas of Further Enhancement

- Adds detail to AP 5116 regarding execution and enforcement.<sup>8</sup>
- Add a step in the electronic PS-140 form process that requires the teacher to agree or disagree with a grade change initiated by the principal or Student Intervention Team (SIT) chair, in accordance with the process outlined in AP 5116.<sup>9</sup>
- Outline a clearer process that explains: when to use the online PS-140 form, expected timelines, and record keeping.<sup>10</sup>
- Define procedures for late grade entries.<sup>11</sup>

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<sup>8</sup> 2018 Audit Report dated October 26, 2018, III,D,1,b(2), p. 15.

<sup>9</sup> Ibid

<sup>10</sup> Ibid

<sup>11</sup> Ibid

# Graduation Certification

2017 Audit Recommendation	2018 Audit Results	
	Recommendation Addressed in Prince George's County Public Schools (PGCPS) Action Plan	Recommendation Implemented by PGCPS
Require all schools to utilize Performance Data Summary (PDS) Tally Cards	Yes	Partially
Develop and implement an administrative procedure which specifies tools and processes required to place a student on the graduation list and issue a diploma.	Yes	Partially

- PGCPS high schools have significantly improved their recording procedures for graduation certification since the 2017 Audit.<sup>12</sup>
- Although PGCPS did create many new processes, tools, and trainings to support the graduation certification process, the District did not develop or implement an administrative procedure. Additionally, during the document review process, Alvarez & Marsal found that not every school used the same version of the PDS Tally Card.<sup>13</sup>
- PGCPS did implement new accountability practices, monitoring, and tools. However, as found in this audit, some students who were identified in SchoolMax as eligible to graduate had not met all PGCPS and Maryland State Department of Education requirements to graduate.<sup>14</sup>

<sup>12</sup> 2018 Audit Report dated October 26, 2018, III,D,1,e, p. 17.

<sup>13</sup> III,D1,e(1), p. 17.

<sup>14</sup> Ibid, pp. 17-18.

## Areas of Further Enhancement

- Continues conducting quarterly audits of the Graduation Certification Checklists and Performance Data Summary (PDS) Tally Cards, using a standardized audit process and timeline to help ensure that no student gets overlooked and that all counselors are completing the process in a timely and accurate manner.<sup>15</sup>
- Train principals and assistant principals over seniors on the graduation requirements and certification process so that they are informed when supporting the counselors and signing transcripts or PDS Tally Cards.<sup>16</sup>
- Deliver annual trainings for school registrars focusing on aspects of their role that are impacted by administrative procedures and other policy changes.<sup>17</sup>
- Institute a more formal process for schools to report issues found in student records.<sup>18</sup>
- Increase the level of detail in trainings regarding programming of transfer student data to ensure all schools are entering credits accurately.<sup>19</sup>

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<sup>15</sup> 2018 Audit Report dated October 26, 2018, III,D,e(2), p. 18.

<sup>16</sup> Ibid, p. 18.

<sup>17</sup> Ibid, p. 18.

<sup>18</sup> Ibid, p. 18.

<sup>19</sup> Ibid, p. 18.

# Records Access and Control

2017 Audit Recommendation	2018 Audit Results	
	Recommendation Addressed in Prince George's County Public Schools (PGCPS) Action Plan	Recommendation Implemented by PGCPS
Establish a program of monitoring, reporting, and following up on excessive grade changes, or grades which are clearly outside of compliance with procedures.	Partially	Partially

- Evaluation and analysis of Records Access and Controls can be found throughout the other sections.<sup>20</sup>

<sup>20</sup> 2018 Audit Report dated October 26, 2018, Footnote 4, p. 12.

## General Findings on Governance of the District: Monitoring & Accountability

2017 Audit Recommendation	2018 Audit Results	
	Recommendation Addressed in Prince George's County Public Schools (PGCPS) Action Plan	Recommendation Implemented by PGCPS
To improve school-level accountability, PGCPS leadership should develop performance metrics that can be generated from SchoolMAX and reviewed quarterly to monitor adherence to grading procedures.	No	No
Increase accountability via reviews completed by an independent third party. Either: 1) expand the auditor role to complete performance audits of both academic and non-academic areas of the District or 2) create an accountability officer outside of the auditor function to provide independent oversight of academic policies and procedures and student performance.	Partially	Partially

- PGCPS did not address the 2017 Audit recommendation to improve school-level accountability.<sup>21</sup>
- While PGCPS has taken initial steps to create an accountability function and perform district-level audits, the District has not yet created consistent operating procedures around monitoring, reporting, and enforcement of policies and procedures.<sup>22</sup>
- In late August 2018, PGCPS appointed a new Chief Accountability Officer, who has developed plans to apply rigorous data analytics to Administrative Procedure adherence related to grading, grade changes, attendance, and other areas going forward. This position was filled just before the start of SY 18-19, so these initiatives were not implemented during SY 17-18.<sup>23</sup>

<sup>21</sup> 2018 Audit Report dated October 26, 2018, III,D,1,f(1), p. 18.

<sup>22</sup> III,D,1,f, p. 18.

<sup>23</sup> III,D,1,f(1), p. 19.

## General Findings on Governance of the District: Reporting Complaints / Fraud

2017 Audit Recommendation	2018 Audit Results	
	Recommendation Addressed in Prince George's County Public Schools (PGCPS) Action Plan	Recommendation Implemented by PGCPS
PGCPS leadership should ensure timely investigations and response into complaints to avoid press involvement with internal complaints.	No	Partially
The Board should receive regular briefings into any complaints of fraud impacting student outcomes.	No	Partially

- PGCPS's Internal Audit Department provided regular reports to the Board of Education regarding issues highlighted on the compliance hotline; however, none of the PGCPS Board members interviewed recalled multiple complaints about grading and graduation.<sup>24</sup>
- PGCPS's Internal Audit Department received multiple complaints about grading and graduation, but these complaints were categorized on their complaint summaries as "other" – not calling attention to their relevance to grading and graduation issues.<sup>25</sup>

<sup>24</sup> 2018 Audit Report dated October 26, 2018, III,D,1,f(1), p. 19.

<sup>25</sup> Ibid, p. 19.

# Alvarez & Marsal Audit Sampling

- Alvarez & Marsal selected a sample of **1,085** students from the **7,273** 2018 graduates to understand Prince George's County Public Schools' compliance with graduation polices and procedures.<sup>26</sup>
- **Six** students (**0.6%**) were ineligible to graduate.<sup>27</sup>

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<sup>26</sup> 2018 Audit Report, Executive Summary, Performance Audit, p. 6.

<sup>27</sup> 2018 Audit Report, IV,C,1,Item 2, p. 32.

# Alvarez & Marsal 2018 Key Findings:

1. Prince George's County Public Schools (PGCPS) greatly reduced the degree to which grade changes were used and misused.<sup>28</sup>
2. PGCPS nearly eliminated issues with graduating students who have not met transcript or service learning requirements.<sup>29</sup>
3. PGCPS significantly increased awareness of and compliance with administrative procedure and state requirements.<sup>30</sup>
4. PGCPS did not provide sufficient oversight and support to enforce attendance accountability. Leadership did not communicate the expectation of compliance with attendance related grading requirements and failed to provide tools and processes to ensure adherence or verify data accuracy.<sup>31</sup>
5. Coding errors contributed to the miscoding of five of the students in the sample as eligible to graduate although school certified graduate lists reflected students as non-graduates.<sup>32</sup>

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<sup>28</sup> 2018 Audit Report dated October 26, 2018, IV,D,1, p. 33.

<sup>29</sup> IV,D,2, p. 33.

<sup>30</sup> IV,D,3, p. 34.

<sup>31</sup> IV,D,4, p. 34.

<sup>32</sup> IV,D,5, p. 35.



## 2018 Master Summary Table

Prince George's County Public Schools (PGCPS) Review Summary		2018	
2018 PGCPS graduates			7,273
Students included in sample			1,085
Results from Sample Testing			
Student Category		Students	% of Sample
Grade Changes that Impact Graduation Eligibility			
Students without any grade changes		964	88.8%
Students with grade changes that do not impact graduation eligibility		98	9.0%
Students with grade changes that impact graduation eligibility		23	2.1%
1. With all grade changes fully documented		17	1.5%
2. Any grade change with partial documentation		1	0.1%
3. Any grade change without documentation		5	0.5%
Total Sample Students		1,085	100.0%
Graduates That Do Not Meet Graduation Requirements			
Does not meet graduation requirements		6	0.6%
4. Transcript ineligible		5	0.5%
5. Service Learning ineligible		1	0.1%
Sample Summary			
Unable to determine graduation eligibility due to insufficient change documentation (Cat. 2 + Cat. 3)		6	0.6%
Ineligible to graduate (Cat. 4 + Cat. 5)		6	0.6%
Count of unique students graduated despite one or more Administrative Procedure Violation		12	1.1%
Students without grade changes or transcript policy violations		1,073	98.9%

Reference: 2018 Audit Report, Chapter IV - Performance Audit, Section C - Results, Item 1 – 2018 Graduate Sample Results, Figure 8, p. 31.

# Office of Compliance and Monitoring

## Implementation

- The Maryland State Department of Education (MSDE) has developed a Data Validation and Compliance Monitoring Checklist for local school systems.
- The Office of Compliance and Monitoring will develop an annual inspection calendar to conduct random on-site inspections.
- The Office of Compliance and Monitoring will continue to investigate complaints from stakeholders.



## **Maryland State Department of Education**

2018-2019 Graduation Rate Validation Data and  
Compliance Monitoring

### **On-Site Review**

December 4, 2018

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

# Maryland State Department of Education

## Data Validation and Compliance Monitoring - Graduation Rate

### PURPOSE

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

### BACKGROUND

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

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

## SCOPE AND METHODOLOGY

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

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

## COMPONENTS:

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



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

# Graduation Data Validation and Monitoring

Governance and Leadership					
A: Policies, Procedure and Implementation					
Question	Y	N	N/A	Verification / Required Documents	Reviewer Comments
1. Has the Board established policies and procedures, roles and responsibilities related to graduation data and related areas (i.e.: attendance, dropout, and data quality)					
2. Does the Board provide effective oversight, set risk tolerance, and receive assurances that risk management is done properly? (i.e.: Audit Plans, Audit Reports, Assigns Resources)					
3. Has District leadership developed and implemented an organizational plan establishing roles and responsibilities for implementing and monitoring compliance in accordance with federal and state accountability requirements?					
a) Including graduation rate data collection					
b) Including reporting requirements					
4. Have the Board and District leadership established, implemented and monitored a system for continuous internal data quality monitoring/auditing?					
a) If yes, do they have in place a system for correcting any data issues identified?					
5. Does the District have in place a documented organizational structure/chart that clearly identifies positions that have data management responsibilities?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>B: Communication and Training</b>					
6. Has the District developed, implemented and evaluated a training plan which includes staff involved in data-collection and reporting at all levels in the reporting process?					
7. Do all relevant staff receive training on the data management processes and tools on an ongoing basis?					
<b>C: Supporting Systems and Technology</b>					
8. Has the District established / developed a data warehouse system that meets ESSA accountability requirements? <i>Title II of ESSA requires districts to collect and disseminate additional measures and data, including a variety of non-academic indicators. See ESSA Data Requirements, Page 6.</i>					
<b>D: Monitoring and Accountability (Capacities, Roles and Responsibilities)</b>					
9. Has the District established a documented organizational structure/chart that clearly identifies positions that have data management / data quality responsibilities? (See Attachment – New ESSA Data Requirements)					
10. Are all staff positions dedicated to data management systems filled?					
11. Has the District identified a senior staff member who is responsible for reviewing and certifying the data prior to the submission / release to MSDE?					
12. Has the District designated staff responsible for reviewing the quality of data (i.e., accuracy, completeness, timeliness and confidentiality) received from sub-reporting levels (e.g. schools, departments)?					

## ESSA Data Requirements

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

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

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

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

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

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

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

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>E: Data and Reporting</b>					
13. Has the District provided written guidelines to all reporting entities (e.g., schools, departments) on reporting requirements and deadlines?					
14. Has the District required that all component schools use the same reporting forms and report according to the same reporting timelines?					
15. Has the District identified standard reporting forms/tools to be used by all reporting levels / the forms/tools are consistently used by all levels?					
16. Has the District provided clear instructions on how to complete the data collection and reporting forms/tools?					
17. Does the District and its component schools have in place a data collection system that has sufficient precision to measure the indicator(s) (i.e., relevant data are collected by sex, age, etc. if the indicator specifies disaggregation by these characteristics)?					
18. Does the District have in place a written policy that states for how long source documents and reporting forms need to be retained?					
19. Are all source documents and reporting forms relevant for measuring the indicator(s) available for auditing purposes including dated print-outs in case of computerized system failure?					
<b>F: Data Management Processes and Data Quality Controls</b>					
20. Does the District and its component schools clearly documented data aggregation, analysis and/or manipulation steps performed at each level of the reporting system?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
21. Does the District systematically provide feedback to all sub-reporting levels on the quality of their reporting (i.e., accuracy, completeness and timeliness)?					
22. Does the District have in place quality controls for when data from paper-based forms are entered into a computer (e.g., double entry, post-data entry verification, etc.)?					
23. Does the District have in place a written back-up procedure for when data entry or data processing is computerized?					
a) If yes; the latest date of back-up is appropriate given the frequency of update of the computerized system (e.g., back-ups are weekly or monthly).					
24. Does the District have in place policies and procedures to ensure that relevant personal data are maintained according to national or international confidentiality guidelines?					
25. Does the District have in place a written procedure to address late, incomplete, inaccurate and missing reports; including following-up with sub-reporting levels on data quality issues?					
26. If data discrepancies have been uncovered in reports from sub-reporting levels, does the District maintain documentation regarding how these inconsistencies have been resolved?					
27. Can the District demonstrate that regular supervisory site visits have taken place and that data quality has been reviewed?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>PATHWAYS TO GRADUATION</b>					
<b>A: Policies, Procedures and Implementation</b>					
28. Does the District have in place policies and procedures for graduation requirements that are aligned to Federal and State regulations?					
29. Does the District offer multiple pathways to graduation?					
a) If yes, what are the options?					
30. Has the District developed and implemented evidenced-based processes and procedures for the selection, implementation, monitoring and evaluation for all pathway option programs to ensure that all courses and credit bearing vendor programs have the same expected level of consistency and meet MCCR standards?					
<b>B: Communication and Training</b>					
31. What training does the District provide to LSS employees (users) for submission of cohort data?					
32. Does the District provide ongoing training to staff implementing credit recovery and other pathway alternatives?					
33. Does the District evaluate the effectiveness of its training					
a) If yes, how do you evaluate					
b) What are the results					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>C: Supporting Systems and Technology</b>					
34. Does the District use any commercial or locally developed Credit Recovery Software Programs?					
a) If yes, what are the selection criteria					
35. How does the District ensure rigor and alignment with course requirements?					
36. What training and oversight supervision is provided to ensure implementation with fidelity?					
<b>D: Monitoring and Accountability</b>					
37. Does the District have in place procedures and monitoring practices to ensure that credit recovery and other pathway option courses align with District course requirements for credit and are being implemented with fidelity to ensure appropriate rigor?					
38. Does the District have in place processes and procedures to validate the accuracy of data entry?					
<b>E: Data and Reporting</b>					
39. Are internal controls in place to verify that students enrolled in credit recovery courses are meeting attendance and course assignment / completion requirements?					
a) If yes, describe these internal controls					
40. Does the District (and its component schools) maintain sufficient documentation of student attendance and course assignment/completion requirements in course recovery options?					



## **RECORDING ATTENDANCE**

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

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

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

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

### **Recording Absences**

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

### **Home and Hospital Students**

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

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

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

## **DROPOUT RATE**

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

## **COMPLETER**

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

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>ATTENDANCE AND DROP OUT</b>					
<b>A: Policies, Procedures and Implementation</b>					
41. Does the District have written policies and procedures for calculating and reporting student attendance that align with federal and state requirements?					
42. Does the District have written policies and procedures for calculating and reporting drop-outs that align with federal and state requirements?					
43. Does the District attendance policy and procedures include provisions for grade reduction for students with excused or unexcused absences, suspensions or expulsions that may have bearing on graduation credits?					
44. Does the District have written policies and procedures for a student who completes graduation requirements prior to the end of the school year?					
<b>B: Communication and Training</b>					
45. Have the majority of key data-management staff received the required training in tools and processes and has it been evaluated to determine effectiveness?					
46. Is there a training plan which includes staff involved in data-collection and reporting at all levels in the reporting process?					
47. Has the District provided written guidelines to all reporting entities (e.g., schools, departments, regions) on reporting requirements and deadlines?					
48. Have clear instructions been provided on how to complete the data collection and reporting forms/tools?					

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

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
c) Are source documents kept and made available in accordance with a written policy?					
d) Are all source documents and reporting forms relevant for measuring the indicator(s) available for auditing purposes (including dated print-outs in case of computerized system).					
56. Data Management Processes and Data Quality Controls; Do clear documentation of collection, aggregation and manipulation steps exist?					
a) Does the District have clearly documented data aggregation, analysis and/or manipulation steps performed at each level of the reporting system?					
b) Are data quality challenges identified and are mechanisms in place for addressing them?					
c) Are there clearly defined and followed procedures to identify and reconcile discrepancies in reports?					
d) Are there clearly defined and followed procedures to periodically verify source data?					
<b>GRADING INTEGRITY AND GRADE MODIFICATIONS</b>					
<b>A: Policies, Procedures and Implementation</b>					
57. Does the District have written policies and procedures for grading, including grade modifications that align with federal and state regulations?					
58. Is the District/ School adequately controlling access to their systems for grading, reporting and grade modification?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
a) Are appropriate school personnel appropriately approving and documenting student grade modifications?					
b) Are access controls to the data system adequately designed and operating efficiently?					
c) Does the District have policy guidance that details the processor written documentation requirements for grade changes, retention of supporting documentation requirements and monitoring by District officials?					
d) Does the District have lock out dates?					
e) Has the District developed policy guidance relating to the procedures and requirements for making grade changes in the current year and for prior years?					
f) Does the District conduct periodic review of the grade changes made by the heightened permission users and determine the appropriateness of the grade changes?					
g) Does the System report historical grade change transactions?					
59. Has the District implemented grading policies that govern the manner in which academic grades are to be calculated, maintained, and adjusted?					
60. Are the policies designed to ensure grading consistency, uniformity, and accuracy amongst all schools within the District?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
61. Has the District established accountability measures to ensure the integrity of the grading system, including roles of principal, teacher and reasons for a grade change and timeline, internal monitoring procedures and consequences of failure to abide by the policy?					
62. Does the District have in place a list of roles and responsibilities for accurate grading and reporting data at the District level, school level and teacher level?					
<b>B: Communications and Training</b>					
63. Does the District (and its component schools) have in place an effective system for communicating grading, reporting and grade modification policies and procedures to administrators, teachers and other key stakeholders?					
64. Does the District (and its component schools) provide clear and ongoing training on grading, reporting and grade modification to all stakeholders?					
65. What communication and training regarding grading, reporting and grade modifications does the District (and its component schools) provide?					
a) How often?					
b) How is it communicated?					
c) To what audiences?					
<b>C: Supporting Systems and Technology</b>					
66. Does the District use a data management system for grading and reporting?					
a) If yes, what system?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
67. What are the built-in internal controls of the data management system that support accurate data entry by authorized users?					
68. Is the system using these to ensure the accuracy and integrity of the data?					
69. Are the data management system internal controls adequate to ensure the accuracy and integrity of the data?					
70. Does the system implement ongoing user training?					
71. Does the District (and its component schools) effectively implement a secure data management environment for accurate data?					
72. Does the District (and its component schools) have policy guidance regarding levels of access and timelines for data entry, lock-out, submission and verification?					
<b>D: Monitoring and Accountability</b>					
73. What procedures does the District (and its component schools) have in place for ongoing monitoring and validation of grading data, including grade modifications?					
74. Does the District conduct periodic review of the grade changes made by the heightened permission users and determine the appropriateness of the grade changes?					
75. Does the District have policy guidance that details the levels of permissions for data entry and access for making data changes?					



Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
76. Does the District have in place a process for requiring written certification of the accuracy of the grading/ grade change data that ensures the accuracy of the data in reporting the performance of the student in meeting course requirements as established by the District?					
77. Access Controls to The Data System- User Access; Are there written procedures in place for granting, changing and terminating access rights to the Data System?					
a) Do these procedures establish who has the authority to grant or change access (e.g., supervisory approval)?					
b) Do the procedures limit individual user access rights within the System to only those functions necessary to fulfil individual job responsibilities? <i>(Such controls limit the risk that sensitive or confidential information will be exposed to unauthorized use or modification.)</i>					
c) Do the procedures provide for immediately terminating access when employees leave the District or change roles?					
<b>E: Access Controls To Data System Audit Logs</b>					
78. Does the District's student grade data management system include audit logs or change reports that maintain a record of activity or show changes or deletions made in a computer application?					
79. Does the student grade data management system have mechanisms in place to identify when a grade modification is/was made and by which user?					

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
80. Do District officials review these reports to monitor for unusual activity? <i>(These reports provide a mechanism for individual accountability and for management to reconstruct events.)</i>					
81. Does the District (and its component schools) provide clear, accurate and ongoing communication and training for individual data system users at various access levels?					
82. Does the District conduct timely user-specific electronic audits of grade entry and adjustment data that credentialed users had entered into the system?					

## GRADUATION RATE

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

$$\text{Four-year graduation rate} = \frac{\text{Number of students in the adjusted cohort who earn a regular diploma by August of 2020}}{\text{Number of first time 9th graders in 2015-16, adjusted for transfers in and out}}$$

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

**PROMOTION AND GRADUATION ELIGIBILITY CERTIFICATION**

**A: Policies, Procedures and Implementation**

Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
83. Does the District have in place policies and procedures for Promotion and Graduation that align with federal and state regulations?					
84. Does the District have in place an effective system of internal control to provide reasonable assurance that reported graduation rates are accurate and complete?					
85. Does the District have in place an effective system to ensure: (1) the ACGR data received from the its component schools is accurate and complete, (2) the students identified as graduates in the cohort met State graduation requirements, or (3) its component schools have maintained adequate documentation for the removal of students from the cohort?					
86. Does the District have in place policies and procedures for calculating graduation cohorts, aligned to federal and state requirements under ESSA?					
87. Does the District have in place written procedures and processes to identify inaccurate school level data?					
88. Has the District developed and implemented a process, such as a risk-based monitoring tool, to monitor the local entities' processes to provide assurance that the data they submit to MSDE are accurate and complete?					

Questions	Y	N	N/A	Verification / Required Documents	Review Comments
89. Has the District developed and disseminated guidance to local entities about obtaining and maintaining required documentation supporting student removal from a cohort and regarding the importance of inputting accurate data?					
90. Does the District have in place policy and procedures for calculating its ACGR in accordance with federal requirements?					
91. Has the District implemented a system of internal control over calculating and reporting graduation rates sufficient to provide reasonable assurance that reported graduation rates were accurate and complete?					
<b>B: Communication and Training</b>					
92. Does the District (and its component schools) have in place an effective system for communicating policies and procedures for Graduation eligibility to administrators, teachers and other key stakeholders?					
93. Does the District (and its component schools) provide clear and ongoing training on graduation eligibility requirements to all stakeholders?					
94. What communication and training regarding graduation requirements and data reporting does the District (and its component schools) provide?					
a) How often?					
b) How is it communicated?					
c) To what audiences?					

Questions	Y	N	N/A	Verification / Required Documents	Review Comments
<b>C: Supporting Systems and Technology</b>					
95. Does the District use a data management system for promotion and graduation data?					
a) If yes, what system?					
96. What are the built-in internal controls of the data management system that support accurate data entry by authorized users?					
97. Is the system using these to ensure the accuracy and integrity of the data?					
98. Are the data management system internal controls adequate to ensure the accuracy and integrity of the data?					
99. Does the District implement ongoing user training?					
100. Does the District (and its component schools) effectively implement a secure data management environment for accurate calculating and reporting?					
101. Does the District (and its component schools) have policy guidance levels of access and timelines for data entry, lock-out, submission and verification?					
<b>D: Monitoring and Accountability</b>					
102. Does the District have in place internal controls to ensure the accuracy of the data for calculation of the ACGR?					
103. Does the District have in place policies and procedures for data quality through the use of certifications regarding the accuracy and effectiveness of data to be submitted to MSDE?					

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

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



Questions	Y	N	N/A	Verification / Required Documents	Reviewer Comments
<b>B: Communication and Training</b>					
112. Has the District developed and disseminated guidance to its component schools about obtaining and maintaining required documentation supporting student data and regarding the importance of inputting accurate data?					
<b>C: Monitoring and Accountability</b>					
113. Does the District have in place a data management team (data stewards) who are responsible to ensuring the completeness and accuracy of data submitted to the State?					
114. Does the District have sufficient controls for ensuring adequate supporting documentation of ACGR and related data such as cohort membership, additions, removals, attendance, dropout, course grades and a process for ongoing monitoring for completeness and accuracy?					

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

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