January 11, 2019

Karen B. Salmon, Ph.D.
State Superintendent of Schools
Office of the State Superintendent
Nancy S. Grasmick State Education Building
200 West Baltimore Street
Baltimore, MD 21201-2595

Dear Dr. Salmon:

This letter serves as an official response to your letter dated November 20, 2018, regarding the Alvarez & Marsal Public Sector Services, LLC, Independent Performance Audit of Prince George's County Public Schools Graduation Rates dated October 26, 2018.

Responses to the specific questions/comments are noted below:

AREAS OF FURTHER ENHANCEMENT (PAGE 14)

1. Investigate additional features of SchoolMAX that could support school-level attendance accountability. Given the AP 5113 modifications, PGCPS should now consider whether SchoolMAX can automatically assign a "zero" for missed assignments when a student is unlawfully absent.

   Response: Review with vendor the possibility of assigning a "zero" on date of unlawful absence(s). Design plan to implement AP 5113. Status/Implementation Date: 3/31/19.

2. Develop a district-level monitoring process including data analysis on the reports from SchoolMAX to ensure all schools are following the policies outlined in AP 5113.

   Response: The monitoring component of the School Performance Plan (SPP) process has been developed to include attendance as one of its areas of focus. Reports to monitor compliance with AP 5113, Student Attendance, exist within APEX, and these reports will be used as part of the SPP monitoring process. Schools currently receive a monthly report that identifies specific students who have missed 10% of the school days, whether lawful or unlawful absences including suspensions, for at least four days in a quarter; nine days in a semester; or 18 days in a school year. The monthly reports are used to assist School Instructional Teams in identifying appropriate strategies to improve individual student attendance. Status/Implementation Date: Completed 10/22/18.

PRINCE GEORGE'S COUNTY PUBLIC SCHOOLS

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3. Provide a substantial training for all administrators on how to implement and monitor adherence to AP 5113 at their schools.

Response: Student Services provided professional development to high school principals on the tenets of effective SIT and SST processes and connectivity for attendance monitoring (11/1/18). An Attendance Monitoring Checklist to assist schools in reducing student absences was created, and all school personnel will be trained on how to use the document by the end of January 2019. Quarterly professional development will be provided to all administrators to assist staff with understanding, implementing and monitoring adherence to AP 5113. Status/Implementation Date: Ongoing.

AREAS OF ENHANCEMENT (PAGE 15)

4. Add detail to AP 5116 regarding execution and enforcement.

Response: The Grade Change cross-functional team will make recommendations for steps for execution and enforcement of duties to be included in AP 5116, and request review by related offices. The recommendations will be added to AP 5116, posted for SY20 and staff trained during the summer. Status/Implementation Date: 7/1/19.

5. 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 SIT chair, in accordance with the process outlined in AP 5116.

Response: This function is already in the PS-140 system. We may need to add it to reports, if it is not already included. Status/Implementation Date: Completed.

6. Outline a clearer process that explains: when to use the online PS-140 Form, expected timelines, and record keeping.

Response: The Grade Change cross-functional team will create clear steps that outline when the online PS-140 Form should be used, expected timelines for completion, and how electronic records will be stored centrally for internal and external review. Status/Implementation Date: 7/1/19.

7. Define procedures for late grade entries.

Response: Explicit directions will be provided in AP 5116 on how to handle late grade entries. The revised AP 5116 will be posted by 7/1/19. Status/Implementation Date: 7/1/19.

8. Establish clear repercussions for grading and reporting procedure violations.

Response: The Monitoring & Accountability Office will work with Academics staff to develop Certify error reports to identify violations of grading and reporting procedure violations. These reports will be emailed to Certify users at the specific school in accordance with SOPs. All new and revised Administrative Procedures will include language that establishes clear repercussions for procedure violations. Status/ Implementation Date: 7/1/19.

9. Provide additional training for both principals and assistant principals on how to implement AP 5121.3 in their schools and continue to share training materials that school administrators can use with their staff.

   Response: The Division of Academics will collaborate with the Division of School Leadership and Support to provide additional training and materials to share with their staff on the continuous implementation of AP 5121.3. Status/ Implementation/Date: 4/1/19.

AREAS OF ENHANCEMENT (PAGE 17)

10. Clarify procedures around repeated courses. For example, when can a student repeat a course for a higher grade? And how many times can a course be repeated?

    Response: The Division of Academics will collaborate with other departments and offices for additional language on how often a course can be repeated for a higher grade and update AP 5121. Specific information will be included in updated Administrative Procedure. Status/ Implementation Date: 7/1/19.

11. Add monitoring and compliance guidelines to the roles and responsibilities of EOP teachers, school coordinators, principals and the EOP Office.

    Response: Proposed revisions to Administrative Procedure 5182, Educational Online Program, provide a new section (X.) titled Monitoring and Compliance. The updated procedure will be posted by 7/1/19. Staff will be trained on the revised procedure. Status/Implementation Date: 7/1/19.

12. Add a process to AP 5182 that outlines how student progress is tracked and specify clear checkpoints for course completion.

    Response: Proposed revisions to Administrative Procedure 5182, Educational Online Program, provide a new section (VII.) titled Student Court Progress. The updated procedure will be posted by 7/1/19. Staff will be trained on the revised procedure. Status/Implementation Date: 7/1/19.

AREAS OF ENHANCEMENT (PAGE 18)

13. Continue conducting quarterly audits of the Graduation Certification Checklists and PDS Tally Cards, using a standardized audit process and timeline to help ensure that no student gets overlooked and that all counselors are completing the process in a timely and accurate manner. (This is also a 2017 Audit recommendation that has not been fully implemented.)

    Response: Student Services will continue to conduct on-site observations of the graduation certification process. They will provide an audit team to review a sample of transcripts against Graduation Notification Agreement and senior student list (google doc) to review for accuracy. Principals will conduct quarterly reviews in each building to ensure staff listed on the graduation certification checklist are completing recommended tasks. Status/Implementation Date: Ongoing.

14. 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.

    Response: Professional development will be required for each high school with the instructional director, principal, assistant principal and Professional School Counselor on reviewing the certification process. We will continue this training annually for "Senior" Teams. A webinar for principals will be provided as an additional layer of professional development around graduation certification. Status/Implementation Date: 4/1/19.

15. Deliver annual trainings for school registrars focusing on aspects of their role that are impacted by administrative procedures and other policies.

    Response: Conduct systemic trainings (September, January and April) for high school registrars, guidance secretaries and records secretaries. Status/Implementation Date: September 2018; January 2019; April 2019.

16. Institute a more formal process for schools to report issues found in student records.

    Response: An online form will be developed and sent to the appropriate departments (designed to be sent directly to department email address or designee). We will monitor submissions to identify excessive issues at schools or with specific record content. Status/Implementation Date: July 2019.

17. Increase the level of detail in trainings regarding pramming of transfer student data to ensure all schools are entering credits accurately.

    Response: The Office of School Counseling will complete procedures, develop webinars and provide additional training on pramming of student transfer data. Staff will audit 10% student sample of transcripts of seniors who have been prammed (reviewed and recorded). Status/Implementation Date: 6/1/19.

AREAS OF ENHANCEMENT (PAGE 19)

18. Provide support and resources for the newly empowered Chief Accountability Officer organization to continue to make progress in closing the accountability gaps identified in the 2017 audit.

    Response: The Division of Accountability, specifically the Monitoring & Accountability Office, has as one of its core services the responsibility for supporting the work of the system in addressing gaps identified in the 2017 audit. The Monitoring & Accountability Office will keep clients and administrators fully aware of efforts and results. Status/Implementation Date: Ongoing.

AUDIT SAMPLE RESULTS (PAGE 33)

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

    Response: Checking default absence reason code assignment was added to Student Apps NYE/YEP Project Plan as rollover task to be performed before the first day of school annually. Perform configuration audit of the SchoolMAX attendance module to verify the quality and validity of the attendance data. Status/Implementation: 3/29/19.

KEY FINDINGS (PAGE 33 – 36)

20. Continue to improve the timeliness of grade submissions to further improve grade entry timeline compliance.

    Response: Staff will create reports to help monitor grade entry compliance. We will continue to recommend improvements to expand the capacity of SchoolMAX to ensure a true interpretation of data. Status/Implementation Date: Monthly Reviews.

21. Work to improve the consistent use of grade change forms across high schools and standardize the late grade entry process district-wide.

    Response: The Grade Change cross-functional team will review a grade change report for indicators related to consistent use and standardizing the late grade entry process (Failure to Post). Mandatory annual training of PS-140 and procedures for associate superintendents, instructional directors and principals will be held. Status/ Implementation Date: 8/1/19.

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

    Response: Staff will continue to review PDS cards with internal audit annually. Staff will also create a google survey form which school counselors can use to identify issues that require troubleshooting with grad standards. Responses will be provided to assist with troubleshooting school issues. Registrars will be provided exemplar SR3 examples. Status/Implementation Date: 4/1/19.

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

    Response: Systemic meetings for administrators, teachers and central office staff will be used to communicate future changes and training to sustain a culture of compliance. In addition, executive staff will continue to monitor the implementation of administrative procedures and issue consequences for noncompliance where appropriate. Status/Implementation Date: Ongoing.

24. Establish a standardized attendance recording process supported by administrative procedures and provide comprehensive training, monitoring, and reporting on attendance entry and updates. The administrative procedure should include requirements for timely entry and should clearly communicate the expectation that every absence should be appropriately recorded as lawful or unlawful.

Response: Student Applications will update the SchoolMAX Training Manual on how to record attendance and the functionality of the electronic module. Teachers will be trained on attendance entry through webinar, video and trainer of trainer's model. Attendance Monitoring Checklist will be created to provide guidance on how to monitor daily recording of attendance by pulling the missing attendance report as described in AP 5113. Status/Implementation Dare: 3/29/19.

25. Proactively identify and address system configuration issues, improve data quality and improve school-level understanding and use of data.

Response: The Monitoring & Accountability Office will work with Information Technology to identify, design and develop appropriate reports to improve data quality. The Monitoring & Accountability Office will work with the Division of School Support and Leadership to support the development of trainings for users in the understanding and appropriate uses of data. Status/Implementation Date: Ongoing.

   a. Perform an initial audit of SchoolMAX to verify the quality and validity of its attendance data.

      Response: We will perform a configuration audit of the SchoolMAX attendance module to verify. Status/Implementation Date: 3/1/19.

   b. Perform regular audits of SchoolMAX to illuminate potential system configuration problems, including a focus on whether automatic processes function as expected.

      Response: Internal Audit and IT will review the details of the audit and define a plan to provide oversight of what process can be automated in SchoolMAX. Status/Implementation Date: 3/1/19.

   c. Designate personnel within the Accountability function to continuously monitor SchoolMAX for anomalies, irregularities, and potential data quality issues, and facilitate coordination between the Accountability and Student Applications teams to ensure alignment.

      Response: This is a core service of the Monitoring & Accountability Office. Staff will be assigned to assist and facilitate reporting as well as monitor data quality. Status/Implementation Date: 2/1/19.

   d. Produce tailored data outputs and/or develop training to allow schools to interpret and act appropriately upon anomalies within their own SchoolMAX data with validation and follow-up from the Accountability function where necessary.

> Response: APEX reports focusing on attendance have been created and are part of the School Performance Plan monitoring. The Monitoring & Accountability Office will monitor these reports and work with related stakeholders in addressing issues that may arise. Stakeholders include both schoolhouse and district-level staff. Training on the SPP including attendance and other accountability related metrics began with principals in October 2018. Status/Implementation Date: Ongoing.

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

    Response: We will create reports that compare the "non-grads" to check on the exit code. This process should be completed before graduation. Status/Implementation Date: 5/1/19.

AREAS OF FURTHER REVIEW (PAGE 37)

27. Conduct a complete system configuration audit to verify the quality and validity of attendance data.

    Response: Checking default absence reason code assignment was added to Student Apps NYE/YEP Project Plan as rollover task to be performed before first day of school annually. Perform configuration audit of the SchoolMAX attendance module to verify the quality and validity of the attendance data. Status/Implementation Date: 3/29/19.

28. Investigate whether SchoolMAX can enforce the SY18-19 version of AP 5121.3.

    Response: We will define the detailed requirements with academics and student services to enforce AP 5121.3. Status/Implementation Date: 3/29/19.

29. Develop tools and processes to compare attendance and grading appropriately to enforce compliance with AP 5121.3.

    Response: We will define the detailed requirement with academic and student services to enforce AP 5121.3. Status/Implementation Date: 3/29/19.

30. Continue to improve staff training and standardization around the graduation certification process and perform independent reviews to ensure the appropriate completion of PDS Tally Cards for all graduates.

    Response: Student Services will continue to conduct on-site observations of the graduation certification process. They will provide an audit team to review a sample of transcripts against Graduation Notification Agreement and senior student list (google doc) to review for accuracy. Principals will conduct quarterly reviews in each building to ensure staff listed on the graduation certification checklist are completing recommended tasks. Status/Implementation Date: Ongoing.

TRANSCRIPT REVIEW (PAGE 39 & 42)

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

    Response: The Graduation Standards cross-functional team will provide training of the graduation standards application to Professional School Counselors semiannually. The Division of Academics will collaborate with Division of Special Education and Student Services continuously on the audit processes. Division of Academics staff will seek guidance from MSDE in advance of graduation for unique student circumstances. Reports will be generated quarterly to ensure students are scheduled appropriately to meet state and local graduation requirements. Status/Implementation Date: Ongoing.

32. Continue its effort to control the use of grade changes and maintaining focus on grade entry timeline adherence.

    Response: Proactive efforts were taken to address timely submission of grades. Principals were expected to advise teachers in writing of their professional responsibility with respect to the timely submission of grades. Letters of counsel were issued to principals who did not meet this expectation during Quarter 1. A reminder memorandum was sent to principals to outline submission dates for Quarter 2 grades. This practice will be used at the beginning of each quarter moving forward. Status/Implementation Date: Quarterly Reviews.

ATTENDANCE DATA QUALITY (PAGE 45)

33. Address systems configuration issues, improve data quality and improve school-level understanding and use of data through several steps.

    Response: The Monitoring & Accountability Office will work with Information Technology to identify, design and develop appropriate reports to improve data quality. The Monitoring & Accountability Office will work with the Division of School Support and Leadership to support the development of trainings for users in the understanding and appropriate uses of data. Status/Implementation Date: Ongoing.

    a. Perform an initial audit of SchoolMAX to verify the quality and validity of its attendance data.

       Response: Status/Implementation Date: 3/1/19.

    b. Perform regular audits of SchoolMAX to illuminate potential system configuration problems, including a focus on whether automatic processes function as expected.

Response: Internal Audit and IT will review the details of the audit and define a plan to provide oversight of what process can be automated in SchoolMAX. Status/Implementation Date: 3/1/19.

c. Designate personnel within the Accountability function to continuously monitor SchoolMAX for anomalies, irregularities, and potential data quality issues, and facilitate coordination between the Accountability and Student Applications teams to ensure alignment.

Response: This is a core service of the Monitoring & Accountability Office. Staff will be assigned to assist and facilitate reporting as well as monitor data quality. Status/Implementation Date: 2/1/19.

d. Produce tailored data outputs and/or develop training to allow schools to interpret and act appropriately upon anomalies within their own SchoolMAX data with validation and follow-up from the Accountability function where necessary.

Response: APEX reports focusing on attendance have been created and are part of the School Performance Plan (SPP) monitoring. The Monitoring & Accountability Office will monitor these reports and work with related stakeholders in addressing issues that may arise. Stakeholders include both schoolhouse and district-level staff. Training on the SPP including attendance and other accountability related metrics began with principals in October 2018. Status/Implementation Date: Ongoing.

COURSE LEVEL ATTENDANCE (PAGE 47)

34. Proactively communicate expectations around attendance policies and procedures.

Response: Pupil Personnel Workers presented to school staff on AP 5113. Attendance procedures were updated in the Student Rights and Responsibilities Handbook which was presented to students (page 10 of AP 10101); robocalls will be utilized to communicate procedural reminders to parents; methods for schools to communicate procedures to parents, students, and staff is addressed in AP 5113 (page 12) in the Monitoring and Accountability section. Prior to the Winter Break, a letter was sent to all parents stressing the importance of daily school attendance. Status/Implementation Date: Implemented 9/1/18.

35. Train school leaders to utilize data analysis to improve visibility and ensure compliance with attendance policies and procedures.

Response: Created and implemented Attendance Actions Tracking Tool. (Tool consists of school-based data with expanded prompt for documentation.) Training staff began in November and will continue throughout the school year to assist in closely monitoring student attendance. Status/Implementation Date: Ongoing.

36. Regularly review attendance data to identify data irregularities and ensure school compliance with attendance policies and procedures.

    Response: Data monitoring and quality is part of the core services of the newly established Monitoring & Accountability Office (MAO). Staff will be assigned within the MAO to work collaboratively with the other divisional stakeholders to ensure accurate compliance with both attendance policies and procedures. Status/ Implementation Date: 2/1/19.

37. Support high schools to implement programs to address truancy and chronic absenteeism at schools that are mostly impacted by this analysis.

    Response: Review resources with Pupil Personnel Workers at monthly professional development to build their capacity to support schools and students with chronic absenteeism. Status/Implementation Date: Monthly Reviews.

SERVICE-LEARNING ANALYSIS (PAGE 49)

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

    Response: Service-Learning review/verification/documentation strategies are included in the Graduation Checklist (pages 13, 15, 16 & 18). During the September 2018 High School Principals' Meeting, Graduation Standards were reviewed that included guidance specific to student service-learning hours. Status/Implementation Date: Completed.

I look forward to further discussing these responses with you and the Maryland State Board of Education at the January 22, 2019 meeting. Please do not hesitate to contact my office if additional information is required.

Sincerely,
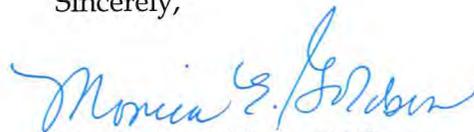
Monica E. Goldson, Ed.D.
Interim Chief Executive Officer

c: Governor Larry J. Hogan, Jr.
      Maryland State Board of Education
      Alvin Thornton, Ph.D., Chair, Prince George's County Board of Education
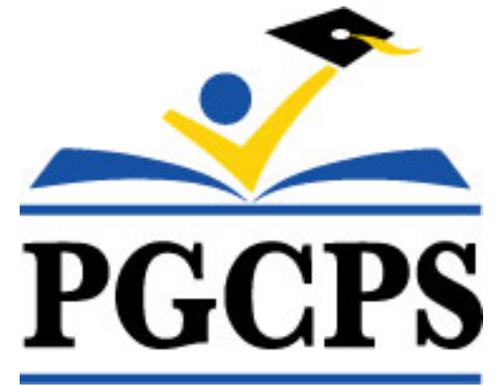
RESPONSE TO INDEPENDENT PERFORMANCE AUDIT

Prince George's County Public Schools Graduation Rates

January 2019

Key Findings

KEY FINDINGS

- **Reduced grade change use and misuse:** PGCPS greatly reduced the degree to which grade changes were used and misused.

- **Nearly eliminated ineligible graduations:** PGCPS nearly eliminated issues with graduating students who have not met the transcript or service learning requirements.

- **Increased compliance with requirements:** PGCPS significantly increased awareness of and compliance with administrative procedure and state requirements.

KEY FINDINGS

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

- **Graduation coding errors:** Coding errors contributed to inappropriate identification of five of the students in the sample as eligible to graduate although school-certified graduate lists reflected students as non-graduates.

Best Practices

BEST PRACTICES

PGCPS developed and/or implemented:

- **An online grade change form** that mirrors the existing PS-140 Form fields. The online grade change tool includes workflow functionality which integrates with PGCPS's login credentials and automatically routes the form to appropriate points of individuals for approval, and users are required to attach evidence that supports each grade change.
- **A district-wide counseling "shut-down"** for professional school counselors to review PDS Tally Cards for errors and **a checklist verification process** helps counselors stay current with PDS Tally Cards to identify potential issues early and address issues before it is too late in the school year.
- **SchoolMAX access controls** by separating transcript manager and grade manager duties so than no one person at each school could hold both levels of access.
- **A Student Instructional Team (SIT)** process to enforce administrative procedures and other requirements and to provide limited and well-documented exceptions based on extreme circumstances.
- **A clear and detailed "Good Faith Effort" policy** in an Administrative Procedure that can support the intended purpose without compromising the quality of work / effort from students.
- **An Administrative Procedure for Grade Changes and Grade Appeals** to ensure grade changes are warranted and have proper supporting documentation. The appeals process allows parents and students to raise any grade related concerns formally.

Timeline for Implementation

WORK COMPLETED TO DATE

- **Developed** district-level monitoring process, including data analysis, on the reports from SchoolMAX to ensure all schools are following the policies outlined in AP 5113.

- **Added** step in the electronic PS-140 Form process that requires the teacher to agree or disagree with a grade change initiated by the principal or SIT chair, in accordance with the process outlined in AP 5116.

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

- **Proactively communicated** expectations around attendance policies and procedures.

ONGOING

- **Provide substantial training** for all administrators on how to implement and monitor adherence to AP 5113 at their schools.

- **Conduct quarterly audits** of the Graduation Certification Checklists and PDS Tally Cards, using a standardized audit process and timeline.

- **Deliver annual trainings** for school registrars focusing on aspects of their role impacted by administrative procedures and other policies.

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

- **Improve the timeliness** of grade submissions to further improve grade entry timeline compliance.

ONGOING

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

- **Proactively identify and address** system configuration issues, improve data quality and improve school-level understanding and use of data.

- **Improve staff training** and standardization around the graduation certification process and perform independent reviews to ensure the appropriate completion of PDS Tally Cards for all graduates.

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

ONGOING

- **Control the use of grade changes** and maintaining focus on grade entry timeline adherence.

- **Address systems configuration issues**, improve data quality and improve school-level understanding and use of data through several steps.

- **Produce tailored data outputs** and/or develop training to allow schools to interpret and act on SchoolMAX data anomalies with validation and follow-up from the Accountability function.

- **Train school leaders** to utilize data analysis to improve visibility and ensure compliance with attendance policies and procedures.

- **Support high schools** to implement programs to address truancy and chronic absenteeism at schools mostly impacted by this analysis.

TIMELINE FOR IMPLEMENTATION

February 2019

- Regularly review attendance data to identify data irregularities and ensure school compliance with attendance policies and procedures.
- Designate personnel within the Accountability function to continuously monitor SchoolMAX for anomalies, irregularities, and potential data quality issues, and facilitate coordination between the Accountability and Student Applications teams to ensure alignment.

March 2019

- Perform an initial audit of SchoolMAX to verify the quality and validity of its attendance data.
- Perform regular audits of SchoolMAX to illuminate potential system configuration problems, including a focus on whether automatic processes function as expected.
- Establish a standardized attendance recording process supported by administrative procedures and provide comprehensive training, monitoring, and reporting on attendance entry and updates. The administrative procedure should include requirements for timely entry and should clearly communicate the expectation that every absence should be appropriately recorded as lawful or unlawful.

TIMELINE FOR IMPLEMENTATION

March 2019 (continued)

- Conduct a complete system configuration audit to verify the quality and validity of attendance data.
- Investigate whether SchoolMAX can enforce the SY18-19 version of AP 5121.3.
- Develop tools and processes to compare attendance and grading appropriately to enforce compliance with AP 5121.3.
- Investigate additional features of SchoolMAX that could support school-level attendance accountability. Given the AP 5113 modifications, PGCPS should now consider whether SchoolMAX can automatically assign a "zero" for missed assignments when a student is unlawfully absent.

April 2019

- 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.
- Provide additional training for both principals and assistant principals on how to implement AP 5121.3 in their schools and continue to share training materials that school administrators can use with their staff.
- Continue to ensure PDS Tally Cards are kept up to date annually and list correct graduation standards to assist the tallying process.

TIMELINE FOR IMPLEMENTATION

May 2019
- At the District level, verify that no students listed as "non-grads" on the school certified graduate lists are incorrectly recorded with as exit code C-60 in SchoolMAX and that any errors identified are quickly resolved.

June 2019
- Increase the level of detail in trainings regarding pramming of transfer student data to ensure all schools are entering credits accurately.

July 2019
- Add detail to AP 5116 regarding execution and enforcement.
- Outline a clearer process that explains: when to use the online PS-140 Form, expected timelines, and record keeping.
- Define procedures for late grade entries.
- Establish clear repercussions for grading and reporting procedure violations.
- Clarify procedures around repeated courses. For example, when can a student repeat a course for a higher grade? And how many times can a course be repeated?

August 2019
- Work to improve the consistent use of grade change forms across high schools and standardize the late grade entry process district-wide.