

Campus Systems Audit: Attendance & Truancy Dr. Josefina Villamil Tinajero PK-8

Audit Plan Code: 24.01-02.A



Assurance | Insight | Objectivity

Final Report
January 29, 2024

Student attendance was recorded accurately for the 10 absences tested. However, instances were identified where student attendance procedures were not followed as expected. Two 45-Day Attendance Improvement Plans were not developed and one was incomplete.



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Abbreviations

| | |
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| DAEP | Disciplinary Alternative Education Program |
| DTP | DAEP Present absence reason code |
| EPISD | El Paso Independent School District |
| FSP | Foundation School Program |
| ISS | In-School Suspension |
| OSS | Out-Of-School Suspension |
| PEIMS | Public Education Information Management System |
| SAAH | Student Attendance Accounting Handbook |
| TEA | Texas Education Agency |
| TEC | Texas Education Code |



Audit Report

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Objective and Scope

The objectives of the audit were to determine if school staff:

1. Followed the Texas Education Agency's (TEA) Student Attendance Accounting Handbook and the District's Attendance Procedures Manual as it pertains to:
 - a. Attendance is taken and recorded accurately.
 - b. Self-audits are performed.
2. Notified parents when students had three or more unexcused absences within a four-week period and developed a 45-day attendance plan for the students who received a notice of absence.

The scope of the audit was the 2023-2024 school year (through November 3, 2023).

The audit objectives align with the EPISD Strategic Blueprint Lever I Whole Child Development and Lever IV Culture of Accountability. Refer to the Background section of the report for further details.

We want to thank the staff from Dr. Josefina Villamil Tinajero PK-8 School, Student and Parent Services, Student Retention and Truancy Prevention Department, Information Technology Department, and Professional Learning Department, who participated in this audit for their time.

Summary of Results

Based on the tests performed during the campus visit and the information gathered for the samples tested, ten (10) findings and six (6) observations were identified. The audit results are summarized below.

1. The campus had a total of 1,350 unverified (UNV) absences and 699 no-note/no-call (NN) absences as of November 1, 2023, which translates into approximately \$118,801.02 in state funding. See Finding 1.1 for details.
2. The ten (10) absences tested were recorded accurately; however, there were instances of non-compliance with the District's Attendance Procedures Manual relating to the bell schedule, the six weeks self-audits, daily procedures, supporting documentation, and misfiling. See Findings 1.2 through 1.8 and Observations 1.1 through 1.5 for details.
3. For two of the three students tested, the 45-Day Attendance Improvement Plan was not developed. For the other student, the form was not signed by the student and parent. In addition, monitoring responsibilities are not outlined in the Student Retention and Truancy Prevention Manual, and there is no policy in place to track when the NOA letters are mailed out. See Findings 2.1 and 2.2 and Observation 2.1 for details.

Included with each finding and observation are (i) the Principal's response or Management's response (when applicable) and (ii) recommendation(s) to address the finding or observation identified.

Principal's Corrective Action Plan

The Principal at Dr. Josefina Villamil Tinajero, Management, and Leadership agreed with the audit findings. The Principal submitted a Corrective Action Plan (CAP) outlining seven (7) activities to be implemented to address the ten (10) findings and six (6) observations. Activities include obtaining training and developing internal campus procedures (e.g., reminders, checklists, and monitoring).

The due dates for the activities are March 25, 2024 (one activity), March 26, 2024 (two activities), and April 1, 2024 (four activities).

The CAP appears to be sufficient to address the findings and observations outlined in this report. Internal Audit will conduct follow-up reviews to validate that CAP activities have been implemented.

Findings, Recommendations, and Principal's/Management's Response

1. Attendance

Finding 1.1

The campus had 1,350 unverified (UNV) absences as of November 1, 2023

As of November 1, 2023, the campus also had 699 absences coded as no-note/no-call (NN). Combined, the 2,049 absences translate into approximately \$118,801.02 in state funding based on the 2022-2023 Summary of Finances as of November 20, 2023 (\$57.98 per absence). This amount represents the total funds the District would not receive due to the UNV and NN absences. When absences are not verified and corrected per the supporting documentation on file, the District loses an opportunity to generate more funding if any of the absences are considered present for Foundation School Program (FSP) purposes.

The TEA's Student Attendance Accounting Handbook (SAAH) under Section 3.6.3 Requirements for a Student to Be Considered Present for FSP (Funding) Purposes states, "Students present at the official attendance-taking time are counted present for funding purposes... students who are absent at the official attendance-taking are counted absent for funding purposes."

The EPISD Attendance Procedures Manual under The Role of the Attendance Clerk states, "The senior attendance clerk, attendance clerk, and PEIMS Clerk elementary are assigned the responsibility of verifying the submission of attendance each period or the attendance accounting period as required by the District. Attendance is taken during the accounting period as well as each individual period at the secondary level (middle and high). Accuracy of attendance is critical for... funding."

Recommendations

The Principal should determine:

- 1.1.1 The reason behind the volume of unverified absences.
- 1.1.2 The best course of action to address the unverified absences and update attendance records for the school year 2023-2024 in Frontline.

Principal's Response

"Tinajero's student enrollment is over 1,200 students. The Attendance clerk was not able to maintain the high volume of daily entering, posting and calling to clear unverified absences (sic). Access (sic) to Frontline system was given to an experienced campus clerk to assist with calls, entering, posting and clearing attendance data. Our attendance clerk has been relieved of all additional duties to prioritize the clearing of unverified absences. Attendance clerk will be provided with a daily checklist which will include scheduled times specifically for clearing (sic) unverified absences."

Finding 1.2

The PEIMS clerk did not attend attendance training, and s/he serves in the backup attendance role

The PEIMS clerk did not attend the beginning of the year attendance training, and s/he has access to enter, post, and delete attendance data in Frontline. According to the EPISD Attendance Procedures Manual, clerks serving as back-ups must attend attendance training. If the PEIMS clerk is not trained in the attendance-recording policies, s/he can perform attendance procedures incorrectly, leading to inaccuracies in attendance records.

The EPISD Attendance Procedures Manual under Security Access and Training states, "Clerks serving in the back up attendance role must attend available staff development session on attendance."

The Student Parent Services ARG under Staff development states, "Attendance Clerks shall attend Beginning of the Year Attendance staff development, each school year, and any subsequent webinars or sessions conducted. Failure to attend or participate shall be reported to the campus principal and/or the assistant superintendent."

Recommendations

- 1.2.1 The Principal should contact the Student and Parent Services Department to inquire if attendance clerk training is available. If there is, the Principal should ensure the PEIMS clerk attends the training.
- 1.2.2 The Principal or the designated Campus Administrator should ensure all personnel who have access to enter, post, and delete attendance records in Frontline attend the beginning of the year staff development for attendance offered by Student and Parent Services.

Principal's Response

"PEIMS clerk was not aware of trainings for attendance. Principal will get in contact with SPS for attendance trainings for backup clerks. Attendance clerk will be required to notify the administrator of any trainings, so that the attendance administrator can notify the backup attendance personnel."

Finding 1.3

The accounting period start and end times for the middle school do not agree with the times in Frontline

The middle school's 3rd period (the accounting period), per the school's bell schedule, is from 9:26 am to 10:11 am, while in Frontline, it is from 9:30 am to 10:17 am. The Attendance Clerk did not verify the campus bell schedule and accounting period in the student system prior to the first day of school.

The EPISD Attendance Procedures Manual under Beginning of the School Year Attendance Procedures states that the Attendance Clerk is responsible for verifying "...campus bell schedule and accounting period in the student system prior to the first day of school."

Recommendations

- 1.3.1 The Principal, in collaboration with School Leadership, should determine if the 2023-2024 Frontline bell schedule should align with the school's bell schedule and make corrections as needed.
- 1.3.2 The Attendance Clerk should revisit the Beginning of the School Year Attendance Procedures guidelines per the EPISD Attendance Procedures Manual.

Principal's Response

"There was a breakdown in communication between our campus bell schedule and Frontline. Our attendance clerk was unaware of this task. Attendance clerk will be directed to the EPISD Attendance Procedures Manual. Attendance clerk will create a 'Year at a Glance' calendar based on EPISD Procedure manual. Principal will request access in Frontline to update bell schedules."

Finding 1.4

The "Attendance not Taken" report was not on file for five of six dates tested

The campus did not identify if any teachers had not taken attendance on August 15, 2023, September 13, 2023, September 20, 2023, September 22, 2023, and October 25, 2023. In addition, on August 14, 2023, the "Attendance not Taken" report was not generated before noon; it was run once after 3:00 p.m. and stored in the Attendance Clerk's computer instead of the daily attendance folder. If attendance is not taken, there is a risk (i) a student(s) who was not on campus (during the attendance accounting period) may be inaccurately considered in attendance for FSP purposes and (ii) the campus does not have an accurate record of the student's whereabouts in case of an emergency (for safety purposes).

The EPISD Attendance Procedures Manual under –

- Daily Attendance Procedures states, "Generate the attendance not taken report to determine who has not taken attendance by no later than noon for morning classes and no later than three o'clock p.m."
- The Role of the Attendance Clerk states, "The senior attendance clerk, attendance clerk and PEIMS clerk elementary are assigned the responsibility of verifying the submission of attendance each period or the attendance accounting period as required by the District."
- Six week Procedures states, "Attendance must be maintained for each day within a six week period and placed in a daily manila file folder. The following items must be included... Attendance Not Taken Report."

Recommendations

The Principal should:

- 1.4.1 Direct, in writing, the attendance clerk to generate the "Attendance Not Taken" report as outlined in the EPISD Attendance Procedures Manual and store it in the daily attendance folders.
- 1.4.2 Monitor whether the "Attendance Not Taken" reports are generated timely. This can be done as part of the six weeks' self-audits, which are documented in the "Principal's (or Designee's) Daily Attendance File Audit Form."

Principal's Response

"Attendance clerk was unaware of this task, therefore did not identify teachers who did not take attendance before noon. Attendance Clerk will be directed in writing to generate the attendance not taken reports on a daily basis before noon in order to identify those teachers who have not taken attendance. Attendance clerk will be directed to the EPISD Attendance Procedures Manual. Attendance clerk will create a 'Year at a Glance' calendar based on EPISD Procedure manual."

Finding 1.5 The Attendance Clerk did not provide written notice to the Principal of teachers not taking attendance on the three dates selected

The Clerk did not provide written notice to the Principal of the teachers who did not take attendance on August 15, 2023, September 20, 2023, and September 22, 2023. There is no documentation of the effort to follow up with teachers who are not taking attendance consistently. Inaccurate attendance may impact funding for the District.

The EPISD Attendance Procedures Manual under –

- Daily Attendance Procedures states, "Generate the attendance not taken report to determine who has not taken attendance by no later than noon for morning classes and no later than three o'clock p.m. Remind the teacher(s) in writing. Run the report again at the end of the day. If this occurs on a consecutive basis and/or three times, notify your campus administrator in writing."
- General Information for Teachers states, "Teacher entry of attendance information is very important to the District. It is extremely important that attendance is taken as accurately as possible. Failure to take attendance correctly causes the District to lose funding and subjects the District to both internal and external audits."

The 2023-2024 SAAH Section 3 General Attendance Requirements 3.1 Responsibility states, "The teacher who initially records an absence is responsible for the accuracy of the report and attests to the validity of the data with his or her signature—or, in the case of a paperless attendance accounting system, with his or her entry of those data using the teacher's logon with a distinct secret password."

Recommendation

- 1.5.1 The Principal should (i) require the attendance clerk to submit, in writing, the names of the teachers who do not take attendance consecutively on a periodic basis and (ii) follow up with those teachers. By doing this, the Principal can identify and address the reasons why teachers are not taking attendance daily (e.g., access issues, system issues, absenteeism, or non-compliance with attendance taking).

Principal's Response

"... Attendance clerk will be provided with a daily checklist which will include times. Clerk will submit in writing the names of those teachers who have not taken attendance and administration will follow up with teachers."

Finding 1.6 The Assistant Superintendent is not aware of

The Principal does not inform the Assistant Superintendent on a six-week basis when teachers do not take attendance. The Assistant Superintendent is not aware of the number of teachers who do not take attendance per campus. If attendance is not taken, it can lead to inaccuracies in attendance records, which affect funding. Accountability is not documented throughout the entire chain of command. There is no oversight at every level.

teachers who do not take attendance

The EPISD Attendance Procedures Manual under The Role of Special Program Designee states, "The Principal should... Provide a report on a six weeks basis to the Assistant Superintendent/Associate Superintendent about teachers who do not take attendance."

Recommendation

1.6.1 The Principal should revisit the EPISD Attendance Procedures Manual and comply with informing the Assistant Superintendent of teachers who do not take attendance on a six-week basis.

Principal's Response

"Principal did not notify Assistant Superintendent of teachers who did not take daily attendance within each six week period. Principal will review the 'Attendance not taken report', meet with teachers on the list and keep a log of teachers who do not comply with taking daily attendance. Log will be submitted to Assistant Superintendent."

Finding 1.7
The "Daily Attendance by Student" or "Student Attendance Detail" reports were not on file

For three (3) of the five (5) daily attendance folders tested, the reports were not on file. Absences were not reviewed using the Daily Attendance by Student reports to verify that the absence reason codes recorded (i.e., postings) are correct, which impacts FSP Funding.

The EPISD Attendance Procedures Manual under –

- Daily Attendance Procedures states, "Running the daily attendance report each morning for the previous day. Verify all postings are correct. You can either run the daily attendance by student (recommended) or the student attendance detail." AND "Post corrections and absence reasons in the student system. All posting must occur within five days of receiving the absence documentation."
- Six Week Procedures states, "Attendance must be maintained for each day within a six week period and placed in a daily manila file folder. The following items must be included...Daily Attendance Report (all day and Accounting period)*...*Daily reports must be maintained in a file folder for each day."

Recommendations

1.7.1 The Attendance Clerk should perform the procedures stipulated in the EPISD Attendance Procedures Manual.

1.7.2 The Principal should determine why the Attendance Clerk is not up to date with the attendance duties and determine the proper course of action to address the cause.

Principal's Response

"... Attendance clerk will be directed in writing to run daily attendance reports from the previous day and post corrections and absence reasons in Frontline, along with the help of the Clerk and PEIMS. Attendance clerk will be directed to the EPISD Attendance Procedures Manual. Attendance clerk will be provided with a daily checklist which will include times."

Finding 1.8

The Campus Administrators did not monitor the 1st six weeks' attendance accuracy by spot-checking student attendance records. The Principal and Assistant Principal overseeing attendance were unaware of the requirement to

The attendance self-audit review for the 1st six weeks was not performed

perform a self-audit and complete the "Principal's (or Designee's) Daily Attendance File Audit Form."

The "Daily Attendance File Audit Form" provided by the Student Parent Services Department states, "Once every six weeks, the principal or his/her designee will perform an audit of six Daily Attendance Files (randomly selected). Using the Daily Attendance summary report from the selected Daily Attendance File, choose six students to audit...."

Recommendations

The Principal should:

- 1.8.1 Request assistance or training, if needed, from the Student and Parent Services Department to perform the self-audit and complete the "Principal's (or Designee's) Daily Attendance File Audit Form" for him/her and the assistant principal overseeing attendance.
- 1.8.2 Complete the "Principal's (or Designee's) Daily Attendance File Audit Form" for the 1st six weeks and continue completing the form for the following six weeks. Consequently, submit the completed form to their Assistant Superintendent and Student and Parent Services.

Principal's Response

"Administration did not perform campus audit. Principal will request training from Student and Parent Services Department. Administration will perform self-audit for campus attendance and complete the Principal Daily File Audit form every six weeks and submit the completed forms (sic) to Assistant Superintendent and Student and Parent Services."

2. Truancy

Finding 2.1
Two 45-Day Attendance Improvement Plans were not developed

Of the three (3) students selected for our sample who received a Notice of Absence (NOA) letter, the 45-Day Attendance Improvement Plan was not developed for two (2) students.

By not developing the 45-Day Attendance Improvement Plan, there is no follow-up to increase the student's attendance so s/he can receive instruction, truancy behaviors might increase, and the campus is not complying with the Texas Education Code 25.0915. By following up on truancy behaviors, the campus partakes in assisting the child to thrive and decreasing student absenteeism.

The Student Retention and Truancy Prevention Manual does not outline monitoring responsibilities to ensure the 45-Day Attendance Improvement Plans are developed.

The EPISD Student Retention and Truancy Prevention Manual under –

- Enforcement of School Attendance Laws states, "Schools and parents will be required to develop a 45-day Intervention Plan for any student with three unexcused absences."
- Anti Truancy Intervention Team and 45 Day Attendance Improvement Plan states, "By Texas law, a 45 Day Attendance Improvement Plan must be developed, in conjunction with parental input, for each student who has been identified as demonstrating truancy behaviors. These plans are authored and

completed by the Anti-Truancy Intervention Team which may consist primarily of campus personnel including, but not limited to: principals, assistant principals, social workers, graduation coaches and other degreed and certified individuals." AND "45 Day Attendance Improvement Plans will be developed for students and parents to reduce truancy behaviors."

Texas Education Code 25.0915(a) states, "Truancy Prevention Measures, (a) A school district shall adopt truancy prevention measures...(1) impose...(A) a behavior improvement plan on the student that must be signed by an employee of the school, that the school district has made a good faith effort to have signed by the student and the student's parent or guardian, and that includes:

- (i) a specific description of the behavior that is required or prohibited for the student;
- (ii) the period for which the plan will be effective, not to exceed 45 school days after the date the contract becomes effective; or
- (iii) the penalties for additional absences, including additional disciplinary action or the referral of the student to a truancy court..."

Recommendation

2.1.1 The Principal, in collaboration with his/her Campus Administration and the Student Retention and Truancy Prevention department, should determine a plan of action on how the Principal can monitor whether the "45-Day Attendance Improvement plans" are developed for students who receive a Notice of Absence (NOA) letter.

2.1.2 The Student Retention and Truancy Prevention Department should collaborate with School Leadership to establish monitoring responsibilities (at the District and campus levels) to ensure the 45-Day Attendance Improvement Plans are being developed to comply with the TEC requirement.

Principal's/ Management's Response

According to the Principal, "Administration failed to complete 45 day attendance plans for these students. Principal will request training from Alpha team. Principal will collaborate with ALPHA team on ways to monitor 45-Day plan developments. Administration will develop 45-day attendance plans with the help of attendance clerk and backup attendance clerk."

According to the Executive Director of Administrative Services:

- There is a "possible lack of training.
- A request has been submitted to Strategic Planning, Analytics, and Accountability to build a Tableau report that would monitor Truancy Prevention steps against the number of unexcused absences to assist School Leadership in the monitoring of Truancy Requirements.
- Coding was updated in the Truancy model (sic) to indicate the date the Notice of Absences are generated by the Alpha Team and mailed out by the campus.
- A review session will be setup with the campus principal, attendance administrator and attendance clerk and Alpha Team member to review the findings and review Truancy Requirements. "

Finding 2.2 One 45-Day Attendance Improvement Plan

Of the three (3) students selected for our sample, who received a Notice of Absence (NOA) letter, the 45-Day Attendance Improvement Plan on file for one student was not signed by the student and the parent. The campus has tried reaching out to the parent via phone call and email without success.

The EPISD Student Retention and Truancy Prevention Manual under –

tested did not include the parent's and student's signature

- Enforcement of School Attendance Laws states, "Schools and parents will be required to develop a 45-day Intervention Plan for any student with three unexcused absences."
- Anti Truancy Intervention Team and 45 Day Attendance Improvement Plan states, "By Texas law, a 45 Day Attendance Improvement Plan must be developed, in conjunction with parental input, for each student who has been identified as demonstrating truancy behaviors. These plans are authored and completed by the Anti-Truancy Intervention Team which may consist primarily of campus personnel including, but not limited to: principals, assistant principals, social workers, graduation coaches and other degreed and certified individuals." AND "45 Day Attendance Improvement Plans will be developed for students and parents to reduce truancy behaviors."

Texas Education Code 25.0915(a) states, "Truancy Prevention Measures, (a) A school district shall adopt truancy prevention...(A) a behavior improvement plan on the student that must be signed by an employee of the school, that the school district has made a good faith effort to have signed by the student and the student's parent or guardian."

Recommendations

- 2.2.1 The 45-Day Attendance Improvement plan for the student identified must be developed in conjunction with parental input.
- 2.2.2 The Principal, in collaboration with the Student Outreach Specialist (SOS) at Tinajero PK-8th School, should develop a plan of action to retrain the campus personnel assigned to the Anti-Truancy Intervention Team (e.g., assistant principals, social workers, etc.) on their responsibilities and requirements when establishing the 45-Day Attendance Improvement Plans.
- 2.2.3 The Assistant Principals should revisit the EPISD Student Retention and Truancy Prevention Manual.

Principal's Response

The "45-day plan was not signed by parent due to failure to make contact with parent. Principal will request training from the ALPHA team. Administration will work with counselors, social worker, and ALPHA Team in order to make contact with parent and work with parent to improve student attendance."

Observations, Recommendations, and Principal's/Management's Response

While conducting this audit, we made observations that were not included as findings in the Audit Report as they were instances of low-risk issues. However, we felt the observations were worthy of informing you as the data owner/expert to determine how they should be addressed.

1. Attendance

Observation 1.1

The Principal and two Assistant Principals did not attend the beginning of the school year attendance training.

Recommendation

- 1.1.1 The Principal should consider attending attendance training and getting familiar with the EPISD Attendance Procedures Manual since responsibilities are outlined for his/her position in the manual.

Principal's Response

"Administration was not aware, or was scheduled to attend other meetings/trainings. Attendance administrator will ensure that all administrators are informed and attend the attendance trainings. All administrators will become familiar with the EPISD Attendance Procedures Manual."

Observation 1.2

The supporting documentation on file for three (3) of the five (5) absences tested was not date-stamped. Without date stamps, it is difficult to determine if documentation was posted within five days as required. See the table below.

Table 1: Supporting documentation not date-stamped

| Absence Date | Description of Supporting Documentation Found | Date of Stamp |
|--------------|-----------------------------------------------|---------------|
| 8/14/2023 | Physician's Note | None |
| 8/30/2023 | Physician's Note | None |
| 9/29/2023 | Physician's Note | None |

The EPISD Attendance Procedures Manual, under –

- Daily Attendance Procedures states, "All documents must be date stamped." AND "Post corrections and absence reasons in the student system. All posting must occur within five days of receiving the absence documentation."
- The Role of Special Program Designees states, the principals should "Ensure attendance clerks are posting documentation within five days of receiving documentation."

Recommendation

- 1.2.1 The attendance clerk should date stamp all attendance documentation as outlined in the EPISD Attendance Procedures Manual. The Principal can then monitor if the documentation is being posted within five days of receipt.

Principal's Response

"... Clerks will be notified in writing that every attendance documentation will be time stamped at the time of acceptance. Principal will ensure that a functioning time stamp is available for use."

Observation 1.3

One instance of a misfiled attendance document was identified during the campus visit. The supporting documentation for an absence that occurred on September 29, 2023, was misfiled in the daily file folder for October 16, 2023.

The EPISD Attendance Procedures Manual under Daily Attendance Procedures states, "Retain all sign-in/sign-out sheets, absence notes, physician notes, and substitute class rosters. File in the appropriate daily folder... Example: On Monday, you receive a note for last Thursday. File the note in the Thursday folder."

Recommendation

- 1.3.1 The Principal should direct the attendance clerk to file the attendance document identified in the correct daily folder if not done already.

Principal's Response

"... Clerks will have daily folders and be required to file documentation before the end of day to ensure documentation is not misfiled. Attendance clerk will be directed to the EPISD Attendance Procedures Manual. Attendance clerk will be provided with a daily checklist which will include daily filing of folders."

Observation 1.4

The supporting documentation to justify the absence reason code NN dated September 13, 2023, for one student, was not filed in the daily attendance file folder. Also, the copy of the blackboard log was not stored in the daily file folder of September 13, 2023. The Attendance Clerk indicated that s/he was unaware of how to retrieve the blackboard log, and that s/he had to store it in the daily attendance file folder.

The EPISD Attendance Procedures Manual under –

- Daily Attendance Procedures states, "Retain all sign-in/sign-out sheets, absence notes, physician notes, and substitute class rosters. File in the appropriate daily folder... Example: On Monday, you receive a note for last Thursday. File the note in the Thursday folder."
- Six Week Procedures states, "Attendance must be maintained for each day within a six week period and placed in a daily manila file folder. The following items must be included...Blackboard Log."

Recommendations

- 1.4.1 The Principal should direct the attendance clerk to file the attendance documents for the NN absence in the appropriate daily attendance folder if not done already.
- 1.4.2 The Attendance clerk should revisit the EPISD Attendance Procedures manual regarding the items that need to be included in the daily attendance file folders (i.e., the blackboard log).

Principal's Response

"... Attendance clerk was unaware as to how to log into blackboard. Attendance clerk and backup will be trained on blackboard log. Clerks will be required to file daily attendance documents in the daily folder before end of day to ensure correct filing. Attendance clerk will be directed to the EPISD Attendance Procedures Manual. Attendance clerk will be provided with a daily checklist which will include daily filing of folders."

Observation 1.5

The supporting documentation for one absence tested classified as DTP (DAEP Present) was not filed in the September 20, 2023, daily attendance file folder. The DAEP attendance rosters are stored in a separate folder in the Attendance Clerk's office.

The EPISD Attendance Procedures Manual under –

- Strategies for Validating Attendance states, "Maintain all documentation necessary for attendance audits on a daily basis. This includes parent notes,

notes from medical personnel, field trip lists, absentee slips if used, documentation from teachers requiring a change to absence information, the daily sign-in/sign-out sheets, discipline OSS, DAEP, and ISS notification forms.”

- DAEP Facilitator Method states, “The alternative teacher will submit the class roster for each period...The signed class roster will be placed in the daily attendance file.”

Recommendation

- 1.5.1 The Attendance Clerk should revisit the EPISD Attendance Procedures manual regarding the items that need to be included in the daily attendance file folders (i.e., discipline OSS, DAEP, and ISS notification forms).

Principal's Response

“... Clerks will be required to file daily attendance documents (i.e., discipline OSS, DAEP, and ISS forms) in the daily folder before end of day to ensure correct filing. Attendance clerk will be directed to the EPISD Attendance Procedures Manual. Attendance clerk will be provided with a daily checklist which will include daily filing of folders.”

2. Truancy

Observation 2.1

There is no current practice nor policy in place to track when the NOA letters are mailed to the parents/responsible person or adult student.

The EPISD Student Retention and Truancy Prevention Manual under Notice to Home of Unexcused states, "Campus personnel will send the Notice of Unexcused Absence to Parent by mail when a student is identified as having three unexcused absences."

Texas Education Code 25.085(g) states, "After the third unexcused absence of a person described by Subsection (e), a school district shall issue a warning letter to the person that states the person's enrollment may be revoked for the remainder of the school year if the person has more than five unexcused absences in a semester."

For the sample of three (3) students with three or more accumulated unexcused absences tested, we confirmed the NOA letters were generated. However, the campus does not maintain documentation that the letters were sent to parents/responsible person or adult student.

Recommendation

- 2.1.1 The EPISD Student Retention and Truancy Prevention management should develop a process that outlines how campuses document and track the distribution of the NOA letters to parents.

Management's Response

According to the Executive Director of Administrative Services, “Specific truancy training was not held at the beginning of the year although a memo was distributed through the Principal’s Communication toolbox reminding principals about truancy coding. Campuses are not reviewing the ARG for the Student Truancy and Prevention Department. The Administrative Reference Guide is being updated to include specific information on how notices shall be

sent to parents; the timelines for mailing out the notices and the campus personnel responsible at each step of the truancy process. Additionally, a course is being developed for EPISD University for all campus administrators to review and clerks. Alpha Specialists have been provided access to the Truancy Prevention Module to monitor coding and work with campuses to ensure proper follow-up on students.”



Audit Report

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Background

The Campus Systems Audit was approved by the Board of Trustees as part of the 2023-2024 Internal Audit Plan. The audit supports Levers I and IV of the District's Strategic Blueprint.



The Campus Systems Audit provides an independent and objective risk-based assessment of Dr. Josefina Villamil Tinajero PK-8 School's compliance with procedures for (i) student attendance and (ii) student truancy. The specific audit objectives are included in the [Objective and Scope](#) section of this report.

Student Attendance

Attendance reporting and validation occur daily at each EPISD campus. Elementary teachers must take attendance at 10:00 a.m. at the official accounting period. Middle and high school teachers take attendance within the first ten minutes of a class period each day. The campus Attendance Clerk (i) confirms that daily attendance entries are complete and correct each day and (ii) verifies the submission of attendance for each period or the attendance accounting period as required by the District. The campus principal must review and attest to the accuracy and completeness of attendance data for the campus.

The accuracy of attendance data is critical for identifying students who have excessive absences and for funding purposes.

- According to the US Department of Education's Report on Chronic Absenteeism, "Education can only fulfill its promise as the great equalizer - a force that can overcome differences in privilege and background - when we work to ensure that students are in school every day and receive the supports they need to learn and thrive...Students who are chronically absent—meaning they miss at least 15 days of school in a year—are at serious risk of falling behind in school."
- The Texas Education Agency (TEA) uses student attendance data to allocate Foundation School Program (FSP) funds to Texas Public schools. The TEA's 2023-2024 Student Attendance Accounting Handbook Section 1 Overview states, "Under state law, every Texas school district is required to adopt an

attendance accounting system...that includes procedures that ensure the accurate taking, recording, and reporting of attendance accounting data."

Truancy

The District notifies parents when students have three or more unexcused absences within a four-week period through the Notice of Absence (NOA) letter. A student who receives an NOA should also have a 45-Day Attendance Improvement plan. According to the EPISD Student Prevention and Truancy Manual, "By Texas law, a 45 Day Attendance Improvement Plan must be developed, in conjunction with parental input, for each student who has been identified as demonstrating truancy behaviors. These plans are authored and completed by the Anti-Truancy Intervention Team which may consist primarily of campus personnel including, but not limited to, principals, assistant principals, social workers, graduation coaches and other degreed and certified individuals."

Methodology

To achieve our audit objective(s), we:

1. Researched relevant federal/state laws and regulations, Board policies, and the departments' manual/guidelines.
2. Interviewed key personnel, attended training provided by Student and Parent Services and performed walkthroughs to understand attendance and truancy management functions, processes, and controls in place.
3. Obtained attendance change logs and frontline access logs from the Information Technology Department.
4. Performed a risk assessment based on our understanding of the processes and controls in place for attendance and truancy.
5. Performed a risk-based analysis to select the campuses to audit. Findings and observations from prior audits were taken into consideration.
6. Conducted a campus visit, inquired about the attendance and truancy management processes, and performed audit procedures related to the audit objectives.

Because of the inherent limitations in a system of internal controls, there is a risk that errors or irregularities occurred and were not detected. Due professional care requires the internal auditor to conduct examinations and verifications to a reasonable extent. Accordingly, an auditor is able to obtain reasonable, but not absolute, assurance that procedures and internal controls are followed and adhered to in accordance with federal, state, local policies, and guidelines.



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