Campus Systems Audit: Attendance, Truancy, and Activity Funds Austin High School

Assurance | Insight | Objectivity

Student attendance was recorded accurately in 8 of the 10 absences tested. The Notice of Absence letter was generated for the three students tested. However, one of the three 45-day Attendance Improvement Plans tested had not been developed. Instances where student attendance and truancy procedures were not followed as expected were identified. The were no findings or observations regarding activity funds.

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Abbreviations

EPISD	El Paso Independent School District
EXC	Ex-Other (absence reason code)
FSP	Foundation School Program
IL	Illness (absence reason code)
NN	No Note/Call (absence reason code)
NOA	Notice of Absence
PEIMS	Public Education Information Management System
SAAH	Student Attendance Accounting Handbook
TEA	Texas Education Agency
TSI	Texas Success Initiative Assessment
TST	Testing (absence reason code)
UNV	Unverified absence

Audit Report

ASSURANCE • INSIGHT • OBJECTIVITY

Objective and Scope

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing. 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.

3. Followed the District's Campus Accounting Manual as it pertains to:
   a. Collections in the vault are receipted and secured.
   b. Deposits are supported.
   c. Disbursements and transfers between agency funds are approved, supported, and allowable.

The scope of the audit was the 2023-2024 school year (through February 21, 2024).

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.

Summary of Results

Based on the tests performed during the campus visit and the information gathered for the samples tested, nine (9) findings and six (6) observations were identified. There were no instances of non-compliance with activity funds; thus, there were no findings or observations regarding activity funds. The audit results are summarized below.

1. The campus had a total of 5,587 unverified (UNV) and 4,107 no-note/no-call (NN) absences as of February 19, 2024, which translates into approximately $562,252 in state funding. See Finding 1.1 for details.

2. Eight (8) of the ten (10) absences tested were recorded accurately. However, there were some instances of non-compliance with the District's Attendance Procedures Manual relating to training, absence reason codes, the six weeks self-audits, daily procedures, and supporting documentation. See Findings 1.2 through 1.8 and Observations 1.1 through 1.5 for details.

3. The Notice of Absence letter was generated for the three students tested. One of the three students tested did not have a 45-Day Attendance Improvement Plan developed. The plan was developed after the Internal Auditor's visit. Also, one plan was developed nine weeks after the NOA was issued. Procedures do not specify the timeline for developing the 45-Day Attendance Improvement plans. See Finding 2.1 and Observation 2.1.

We want to thank the staff from Austin High School, Student and Parent Services, Student Retention and Truancy Prevention Department, Campus Accounting Department, Information Technology Department, and Professional Learning Department, who participated in this audit for their time.

Findings, Recommendations, and Principal's Response

1. Attendance

Finding 1.1
The campus had 5,587 unverified (UNV) absences as of February 19, 2024

As of February 19, 2024, the campus also had 4,107 absences coded as no-note/no-call (NN). Combined, the 9,694 absences translate into approximately $562,252 in state funding based on the 2022-2023 Summary of Finances as of April 17, 2024 ($58 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. This amount represents the total funds the District would not receive due to the UNV and NN absences.

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 and no note/no call 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

"The previous Assistant Superintendent for Student Parent Services [REDACTED] instructed the attendance clerks to change all UNVS to NNS. New Attendance Director has given clarification to process for UNVS and cleared up any confusion so that policy will followed by the campus."

Finding 1.2
Three handwritten student sign-in sheets were used as student rosters for taking attendance

Handwritten sign-in sheets are not considered acceptable supporting documentation for audit (external) purposes; thus, not sufficient to count the student as present for Foundation School Program (FSP) purposes.

A typed roster containing the student's ID, class location, and name of the teacher was not produced by the teacher or attendance clerks to indicate if the students were absent or not.

The TEA's Student Attendance Accounting Handbook (SAAH) under Section 3.6 General Attendance Taking Rules states,

- "Using a student sign-in sheet to record attendance is not an acceptable method of taking roll and will result in the attendance being disallowed", "All other methods by which a student takes his or her own attendance, such as sign-in sheets, are not allowed under any circumstances."

- "Students who are on campus at the time attendance is taken but who are not in their assigned classroom are considered in attendance for FSP purposes provided they were with a campus official (nurse, counselor, principal, etc.). Class admit slips or other documentation supporting that a student was with a campus official must be retained for audit purposes."

Recommendation

1.2.1   The Principal should inform campus administrators and staff in writing of the SAAH attendance-taking rules related to student sign-in sheets and adhere to them.

Principal's Response

"Attendance clerks were not aware that they could not accept sign-in sheets. Attendance clerks will not accept sign-in sheets and will only accept class rosters to adhere to district policy."

Finding 1.3
The PEIMS Clerk did not attend attendance training, and s/he serves in the backup attendance role

The PEIMS Clerk 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 Administrative Reference Guide (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

1.3.1   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.

1.3.2 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

"I was not aware that the PEIMS clerk did not have the required attendance training as she came from another campus. In addition, I was not aware that she was assigned as the backup and that falls on me. Ensure that the PEIMS Clerk receives yearly attendance training with appropriate personnel at the beginning of the year."

Finding 1.4
Student absence is excused for 3rd period, yet it is classified as UNV

One student participated in state testing that took place on November 15, 2023, during the 2nd through 3rd period. An absence justification note was provided and stored on file. However, the attendance record for the 3rd period is inaccurately coded as unverified in Frontline.

The EPISD Attendance Procedures Manual under the Role of the Attendance Clerk states, "Accuracy of attendance data is critical for both funding purposes and the awarding of promotional status/credits to students."

The EPISD Attendance Absence Codes (under the Documentation Requirements column) outlines that absence reason code "TST" (Testing) should be used when a student participates in testing activities on campus. The absence is excused and not state-reported. Whereas UNV absences are state-reported if left as UNV.

Recommendation

1.4.1 The Principal should instruct the attendance clerks to modify students' absence to TST for the 3rd period in Frontline if not done already.

Principal's Response

"Human error on the side of the attendance clerk. Attendance clerks will be more careful and follow all policies to ensure that all absences are coded correctly in TEAMS."

Finding 1.5
Two (2) of the 10 student absences were either miscoded or missing supporting documentation

One (1) of the 10 absences tested did not have complete supporting documentation in the daily file folders to justify the absence reason code. See Table 1 below for additional information. According to the TEA's Student Attendance Accounting Handbook (SAAH) under Section 2 Audit Requirements, "Incomplete or inaccurate data will result in attendance not being allowed."

In addition, one (1) absence remained miscoded after the campus had reached out to parents and confirmed the absence reason. The absence reason code was updated on June 17, 2024, after the campus received the Draft Audit Report. See Table 1 below for additional information.

Table 1: Absence with incomplete supporting documentation or miscoding

Student Absence Date	Absence code used	Supporting documentation on file	Required Documentation / Other
8/9/2023	EXC	Nothing	Documentation or note in Frontline stating the Principal designed the absence as excused.

12/6/2023	NN	Daily Attendance by Student Report*	<u>Other</u>: Absence should have been modified to IL.

*The copy of the Daily Attendance by Student report dated 12/6/2023 with the staff notes was found yet not filed in the appropriate daily attendance file folder.

The EPISD Attendance Absence Codes table (under the Documentation Requirements column) outlines the following:

• Absence reason code "EXC" (Ex-Other) should be used "for all absences not covered on the absence code list and the principal has designated the absence as excused." The absence reason code is considered excused, and is state-reported.

• Absence reason code "IL" (Illness) should be used "for the student's illness only." The absence reason is considered excused and is state-reported.

• Absence reason code "NN" (No Note/Call) should be used when "the parent does not call and the clerk tries to contact the parent." The absence reason code is not considered excused, and is state-reported.

Recommendation

1.5.1 The attendance clerks should revisit the supporting documentation requirements in the "EPISD Attendance Absence Codes" table for EXC and NN absence reason codes.

Principal's Response

"The correction for the above student has been corrected and documentation has been sent to [REDACTED] EPISD Internal Audit Department."

Finding 1.6
The attendance self-audit review for the 1st, 2nd, and 3rd six weeks was not performed

The Campus Administrators did not monitor the 1st, 2nd and 3rd six weeks' attendance accuracy by spot-checking student attendance records. According to the Principal, it was shared during the 1st nine weeks Principals meeting, that an attendance self-audit review needed to be performed. However, per the Principal, training was not provided, and they are unsure how to retrieve the "Daily Attendance File Audit Form." In addition, the Assistant Principal overseeing attendance, who joined the campus in January 2024, was not fully aware of the requirement to perform a self-audit and complete the "Principal's (or Designee's) Daily Attendance File Audit Form." During the campus visit, the instructions and "Daily Attendance File Audit Form" were shown to the Assistant Principal overseeing attendance and the Principal.

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:

1.6.1 Request assistance or training, if needed, from the Student and Parent Services Department on the self-audit procedures.

1.6.2 Complete the "Principal's (or Designee's) Daily Attendance File Audit Form" for the 1st, 2nd , and 3rd six weeks and continue completing the form for the following six weeks. Consequently, the completed form should be submitted to the respective Assistant Superintendent.

Principal's Response

"Did not have the required training and failed to follow up to receive the required training. Ensure the principal andt (*sic*) the assistant principal over attendance receives required training in July and complete the principal audit once every six weeks."

Finding 1.7
The "Attendance not Taken" report was not on file for two of the three dates tested

The "Attendance not Taken" report was not generated on November 15, 2023, and February 5, 2024, to determine if any teachers had not taken attendance on these days. The "Attendance not Taken" report should still be generated even if the campus in undergoing state testing since attendance was taken in the 1st period. 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:

1.7.1 Provide a written directive to the attendance clerks to generate the "Attendance Not Taken" report as outlined in the EPISD Attendance Procedures Manual and store it in the daily attendance folders.

1.7.2 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

"November 15th was TSI Testing and the campus was frozen for 2nd and 3rd periods for the day, this was noted on the daily report. February 5th was not completed by the attendance clerks. Attendance clerks will make sure all attendance not taken reports are done daily."

Finding 1.8
The Assistant Superintendent is not aware of teachers who do not take attendance

The Principal does not inform the Assistant Superintendent on a six-week basis when teachers do not take attendance. If attendance is not taken, it can lead to inaccuracies in attendance records, which affect funding.

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

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

Principal's Response

"Did not compile the list of teachers who had not taken attendance during a six week basis so that the list could be sent to Mr. Paz [Assistant Superintendent]. Email Mr. Paz the list once every six weeks along with documentation of meeting with the teachers."

2. Truancy

Finding 2.1
One 45-Day Attendance Improvement Plan was not developed

The NOA letter for one of the three students tested was issued on August 14, 2023; however, as of Internal Audit's visit on February 21 and 22, 2024, the 45-Day Attendance Improvement Plan had not been developed. The plan was developed after our visit on February 27, 2024.

By not developing the 45-Day Attendance Improvement Plan timely, 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 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.

Principal's Response

"Change of administrators who over see (sic) attendance and the attendance contracts. Have the administrator provide the principal a list of those students who have received an NOA letter and documentation of the 45 day intervention plan in place."

Observations, Recommendations, and Principal'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 four of the five Assistant Principals did not attend the beginning of the school year attendance training. One of the four Assistant Principals retired in December 2023. The Assistant Principal who did attend the training, concluded their last day at the campus on February 25, 2024.

Recommendation

1.1.1   The Principal should consider 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

"Made the assumption that the training was for new administrators only or attendance adminiistrotor (sic). Ensure all administrators on campus attend the BOY attendance training."

Observation 1.2

The supporting documentation on file was not date-stamped for 1 of the 5 absences tested. Without date stamps, it is difficult to determine if documentation was provided within five days as required and if approval from the Principal was needed. The absence occurred on December 6, 2023; a doctor's note, which was not date-stamped, was the supporting documentation on file.

During the campus visit, the Senior Attendance Clerk and Attendance Clerk stated that if a doctor's note is received within five days of the absence, they are to modify the absence without the Campus Administrator's approval.

Per the EPISD Attendance Procedures Manual:

- 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."

- Parent Contact states, "Parents/responsible persons or adult students may send a written note or call the campus to excuse an absence. Documentation must be provided within five days of the absence to the attendance clerk. After five days, the administrator must review the documentation and approve or deny." In addition, per the Student and Parent Services Executive Director, this criteria applies to any note or phone call. Any attendance documentation presented after five days must have the administrator's signature.

Recommendations

1.2.1 The attendance clerks 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.

1.2.2 The attendance clerks should perform the procedures stipulated in the EPISD Attendance Procedures Manual in reference to the "Parent Contact" section.

1.2.3 The Principal and Assistant Principal overseeing attendance should be familiar with the Parent Contact section of the EPISD Attendance Procedures Manual.

Principal's Response

"Human error on the part of the attendance clerks who do their best to stamp the date on all notes and documents received by them. Attendance clerks will ensure that all documents received by them are stamped with the date."

Observation 1.3

The "daily attendance by student report" dated December 6, 2023, was not filed in the December 6, 2023 the daily attendance file folder. Instead it was found on the Senior Attendance Clerk's desk.

The EPISD Attendance Procedures Manual under Six Weeks Procedures states, "The Attendance must be maintained for each day within a six week period and placed in daily manila file folder. The following items must be

included in the following order: Daily Attendance Report (all day and Accounting Period)...."

Recommendation

1.3.1   The attendance clerks should perform the procedures stipulated in the EPISD Attendance Procedures Manual in reference to the Six Weeks Procedures.

Principal's Response

"The senior attendanccce (*sic*) clerk was working on that file calling parents trying to contact the parents. Clerk will not keep files on her desk so that nothing is misplaced."

Observation 1.4

The Principal has not designated when an absence reason code EXC is to be utilized. There was uncertainty among the campus attendance clerks since they were unaware that the Principal had to designate the absence as excused before it could be changed.

The EPISD Attendance codes table (under the Documentation Requirements column) outlines that absence reason code "EXC" (Ex-Other) should be used for all absences that are not covered on the absence code list, and the principal has designated the absence as excused. Absences with reason code EXC are not considered in attendance (i.e., state-reported) for Foundation School Program (FSP) purposes.

Recommendations

1.4.1   The Principal should designate when an absence is to be classified as "EXC."

1.4.2   The avoid reoccurrences, the attendance clerks should revisit the "EPISD Attendance Absence Codes" table for EXC absences.

Principal's Response

"I was not aware that I had the right to determine an absence be coded as EXC. Attend the required training and receive guidance on how to code an absence as EXC from the principal."

Observation 1.5

The copy of the blackboard log was not stored in any of the 10 daily attendance folders tested, see Table 2. The Senior 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 blackboard log serves as the supporting documentation that the campus reached out to the parents in regards to the student's absence and/or as a justification when an absence was modified from UNV to NN.

Table 2: Missing Archived Blackboard Logs

Daily Attendance File Folder date	Blackboard log on file (Y/N)
8/9/2023	N
9/27/2023	N
11/15/2023	N
12/06/2023	N
1/17/2024	N
1/22/2024	N
1/23/2024	N

1/24/2024	N
1/25/2024	N
1/26/2024	N

The EPISD Attendance Procedures Manual under 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."

Recommendation

1.5.1 The attendance clerks 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

"The attendance clerks were not aware that they had to file this report. Ensure that the attendance clerks file all required reports daily."

2. Truancy

Observation 2.1

There were delays in the development of two of the 45-Day Attendance Improvement Plans. See the table below:

Table 3: 45-Day Attendance Improvement Plan Timelines

Student ID	NOA date	Date 45 Day Attendance Improvement Plan was developed
564682	8/14/2023	11/6/2023
594247	8/14/2023	2/27/2024

In addition, during the campus visit, the campus administrators indicated that the "45-Day Attendance Improvement plans are developed after a student accumulates 10 UNVs." However, according to the EPISD Student Retention and Truancy Prevention Manual under Enforcement of School Attendance Law, "Schools and parents will be required to develop a 45-day Intervention Plan for any student with three unexcused absences."

Recommendations

2.1.1 The Principal, in collaboration with the Student Outreach Specialist (SOS) at Austin High School, should retrain the campus personnel assigned to the Anti-Truancy Intervention team (e.g., assistant principals, social workers, etc.) on the requirements when establishing the 45-Day Attendance Improvement Plans.

2.1.2 The Assistant Principals should revisit the EPISD Student Retention and Truancy Prevention Manual.

Principal's Response

" Lack of communication and planning on the part of the assistance principal with the Alpha and setting up the plan and parent meeting. Have the administrator submit a list to principal with all NOA dates and the dates of the 45 plan and parent meeting."
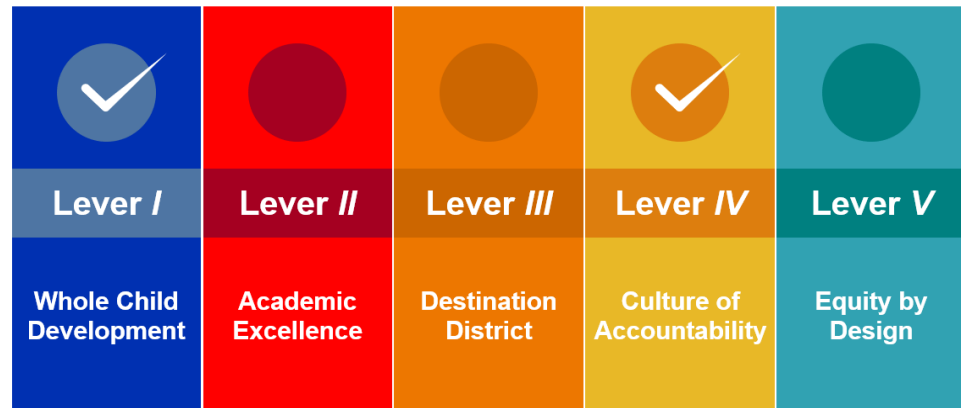
Background

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.

Lever *I*	Lever *II*	Lever *III*	Lever *IV*	Lever *V*
Whole Child Development	Academic Excellence	Destination District	Culture of Accountability	Equity by Design

The Campus Systems Audit provides an independent and objective risk-based assessment of Austin High School's compliance with procedures for (i) student attendance, (ii) student truancy, and (iii) activity funds. 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."

Activity Funds

Activity funds are established to direct and account for monies used to support co-curricular and extra-curricular student activities. Cocurricular activities are school-sponsored activities that directly add value to classroom instruction and curriculum. Extracurricular activities include a variety of other district-directed activities, like athletic and other nonacademic competitions. [1] According to the TEA's Financial Accountability System Resource Guide Appendix H, "These funds are to be used to promote the general welfare of the school district and the educational development and morale of all students."

At EPISD, there are student and campus activity funds. Student activity funds belong to students and are used to support the activities of student-led organizations and clubs and for purposes authorized by the student club or organization. The sponsor for the student organization/club and the principal manage and approve all disbursements. Campus activity funds belong to EPISD and can be expended for the benefit of the District or its students and shall be related to the District's educational purpose. [2] The financial clerk and principal are responsible for managing campus activity funds. The principal is responsible for approving disbursements from campus activity funds.

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 Campus Accounting, and performed walkthroughs to understand attendance, truancy, and campus activity fund 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, truancy, and campus activity fund management.

5. Performed a risk-based analysis to select the campuses to audit. The analysis was performed based on (i) information gathered from key

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[1] Texas Association of School Boards School Legal Services, Activity Funds
[2] Board Policy CFD (Local) Accounting: Activity Funds Management

personnel, (ii) the external auditor's management letter, (iii) the number of unverified absences, (iv) attendance rates, (v) changes in attendance and financial clerks, and (vi) changes in campus activity balance totals.

6. Conducted a campus visit, inquired about the attendance, truancy, and campus activity fund 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.

Internal Audit
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